

Doing Buses Differently: Greater Manchester Consultation on a Proposed Franchising Scheme June 2020

Stakeholder Responses

Contents

STATUTORY

| | |
|---|-----|
| Arriva UK Bus | 6 |
| Belle Vue (Mcr) Ltd | 13 |
| First Manchester Ltd (Letter)..... | 20 |
| First Manchester Ltd (Consultation Response) | 23 |
| HCT Group | 38 |
| PDR Travel Ltd | 54 |
| Go North West Ltd | 55 |
| Stagecoach Manchester (Letter)..... | 107 |
| Stagecoach Manchester (Consultation Response) | 110 |
| Stagecoach Manchester (HSF Legal Paper) | 135 |
| Stagecoach Manchester (Partnership Proposal) | 152 |
| Transdev Blazefield Ltd (Consultation Response) | 212 |
| Warrington's Own Buses | 232 |
| Rotala PLC (Legal Letter) | 241 |
| Rotala PLC (Consultation Response) | 243 |
| Blackburn with Darwen Borough Council..... | 299 |
| Bolton Council (Letter) | 307 |
| Bolton Council (Consultation Response)..... | 310 |
| Bury Council..... | 322 |
| Cheshire East Council..... | 331 |
| Cheshire West and Chester Council | 336 |
| Chorley Council..... | 339 |
| Derbyshire Council | 347 |
| High Peak Borough Council | 354 |
| Lancashire County Council..... | 356 |
| Manchester City Council..... | 359 |
| Oldham Council..... | 365 |
| Liverpool City Region Combined Authority..... | 366 |
| Rochdale Borough Council (Letter)..... | 369 |
| Rochdale Borough Council (Consultation Response) | 372 |
| Rossendale Borough Council..... | 379 |
| Salford City Council | 387 |
| Stockport Metropolitan Borough Council | 398 |
| Tameside Metropolitan Borough Council (Letter)..... | 412 |
| Tameside Metropolitan Borough Council (Consultation Response) | 414 |
| Trafford Council | 426 |
| Warrington Borough Council | 440 |
| West Yorkshire Combined Authority..... | 448 |
| Wigan Council | 452 |

| | |
|---|-----|
| Bus Users UK | 461 |
| Peak District National Park Authority | 466 |
| Stockport UNISON..... | 474 |
| Transport Focus | 477 |
| Travelwatch NorthWest (Consultation Response) | 492 |
| Travelwatch NorthWest (Appendix) | 502 |
| TUC North West..... | 511 |
| UNISON Greater Manchester Transport Branch | 519 |
| UNISON North West..... | 520 |
| Unite the Union..... | 526 |
| Wigan Metro UNISON | 534 |

NON-STATUTORY

| | |
|--|-----|
| Burnage Academy for Boys | 539 |
| IPPR North | 547 |
| Manchester Medical School | 556 |
| Manchester Metropolitan University | 558 |
| Redwood School | 568 |
| Royal Northern College of Music | 576 |
| Students of Holy Cross..... | 585 |
| University of Manchester | 592 |
| University of Salford..... | 603 |
| Abellio..... | 608 |
| Keolis UK..... | 621 |
| RATP Dev..... | 624 |
| Tower Transit..... | 632 |
| Age Friendly Manchester Older People's Board | 640 |
| Bolton CVS..... | 642 |
| Breakthrough UK..... | 650 |
| Caribbean & African Health Network | 653 |
| Centre for Cities | 655 |
| Dunham Massey National Trust | 665 |
| Equality and Human Rights Commission | 674 |
| Greater Manchester Coalition of Disabled People | 686 |
| The Guide Dogs for the Blind Association..... | 689 |
| Learning, Training & Employment Group..... | 694 |
| The Proud Trust..... | 703 |
| Stockport Youth Partnership | 704 |
| Stroke Association | 706 |
| Whalley Range Community Forum..... | 708 |
| Whitemoss Youth/Community Centre and the North City Nomads | 716 |
| Afzal Khan, MP for Manchester, Gorton | 724 |

| | |
|--|-----|
| Barbara Keeley, MP for Worsley and Eccles South | 725 |
| Chorlton Park councillors (Councillors Mandie Shilton Godwin/ Joanna Midgley/ Dave Rawson) ... | 727 |
| City Mayor of Salford..... | 729 |
| Councillor Adrian Pearce, North Ward of Stalybridge | 731 |
| Councillor Charlotte Morris, Elton Ward | 734 |
| Councillor Chris Wills, Withington Ward | 737 |
| Councillor Eddy Newman, Woodhouse Park Ward | 738 |
| Councillor Emily Rowles and Councillor Sharif Mahamed, Moss Side Ward..... | 739 |
| Councillor Gina Reynolds, Langworthy Ward, Salford..... | 741 |
| Councillor Marcus Johns, Deansgate Ward | 742 |
| Councillor Neil Reynolds, Claremont Ward | 745 |
| Councillor Tina Hewitson, Ardwick Ward..... | 746 |
| Debbie Abrahams, MP for Oldham East and Saddleworth..... | 747 |
| Elected Representatives for Mossley..... | 749 |
| Sir Graham Brady, MP for Altrincham and Sale West | 761 |
| Graham Stringer, MP for Blackley and Broughton..... | 762 |
| Jeff Smith, MP for Manchester Withington | 763 |
| Jim McMahon, MP for Oldham West and Royton | 765 |
| Jonathan Reynolds, MP for Stalybridge and Hyde..... | 766 |
| Kate Green, MP for Stretford and Urmston | 769 |
| Whalley Range Councillors (Cllr Angeliki Stogia/ Cllr Mary Watson / Cllr Aftab Razaq) | 771 |
| Altrincham Business Improvement District..... | 773 |
| Barlow Hall Neighbourhood Group..... | 783 |
| Chorlton Voice | 784 |
| Community Transport Association..... | 792 |
| Esoterix | 813 |
| Friends of Patricroft Station | 814 |
| Friends of Walkden Station | 821 |
| Greater Manchester Centre for Voluntary Organisation (GMCVO) | 828 |
| Heald Green Ratepayers Association | 836 |
| Living Streets | 843 |
| Manchester Friends of the Earth | 844 |
| Manchester Local Care Organisation | 850 |
| Northern Neighbourhood Forum M22..... | 862 |
| Oxford Road Corridor | 869 |
| Sale Moor Community | 878 |
| The Church of England – Diocese of Manchester..... | 886 |
| Tottington District Civic Society | 888 |
| Transition Buxton..... | 890 |
| Walk Ride Heatons | 898 |
| Walk Ride Greater Manchester | 907 |
| Whalley Range Climate Action Group..... | 916 |

| | |
|---|------|
| Withington Civic Society | 917 |
| Manchester University NHS Foundation Trust | 924 |
| The Christie NHS Foundation Trust | 936 |
| The Northern Care Alliance NHS Trust | 944 |
| Northern Powerhouse Partnership | 957 |
| Saddleworth Parish Council | 959 |
| Stockport Metropolitan Borough Council, Liberal Democrat Group | 966 |
| Tameside Council, Place and External Relations Scrutiny Panel..... | 968 |
| 607 Rebels of St James's Church..... | 970 |
| Better Buses for Greater Manchester | 978 |
| BUS4US..... | 1017 |
| Derbyshire and Peak District Campaign for Better Transport | 1024 |
| Steady State Manchester Collective..... | 1026 |
| Bruntwood | 1034 |
| Intu Trafford Centre | 1042 |
| J Murphy and Son..... | 1050 |
| Morrison Property Services..... | 1058 |
| Nycomm Ltd | 1066 |
| Ryse Hydrogen Ltd | 1074 |
| Schroders | 1076 |
| Scott-Grant Ltd..... | 1080 |
| Chartered Institute of Logistics and Transport – North West Policy Group..... | 1087 |
| Confederation of Passenger Transport UK (CPT) | 1094 |
| Greater Manchester Chamber of Commerce..... | 1099 |
| OneBus (Consultation Response) | 1102 |
| OneBus (Partnership 4PP)..... | 1120 |
| OneBus (Partnership Plus – Additional Document) | 1124 |
| One Bus – Jacobs Economic Review V3..... | 1126 |
| University of Manchester Students' Union | 1180 |
| University of Salford Students' Union..... | 1191 |
| Manchester Airports Group (MAG) | 1193 |
| Passenger User Group..... | 1200 |
| South East Manchester Community Rail Partnership | 1208 |
| Bryn and Makerfield RUG | 1216 |
| Mobilities Justice CIC (Pending Registration) | 1223 |

LATE RESPONSES

| | |
|---|------|
| Competition and Markets Authority (CMA) | 1236 |
| Councillor Charlotte Martin, Audenshaw Ward | 1254 |
| Association of British Commuters..... | 1255 |
| Venture Arts | 1258 |
| Age UK Bolton | 1259 |

GMCA Franchising Proposal

Questionnaire (Long-Form)

Questions about the Proposed Franchising Scheme

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

No.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

We remain of the view that a partnership proposal would address the majority of the issues identified by GMCA, however, if a franchising scheme is the preferred option of GMCA we feel that it could be restricted to those parts of Greater Manchester in which there is clear evidence of market failure and therefore a case for such a significant local authority intervention.

Q3. Do you have any comments on the local services that are proposed to be franchised?

Please refer to our response to question 2 above. We have no objections to the proposals regarding local services set out in the assessment, if a franchising scheme was to be implemented.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

No.

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?

No.

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

We do feel that the proposed timescales are very ambitious and would question whether it allows sufficient time for consultation responses and proposals to be incorporated and consulted upon in the final franchise scheme proposed by GMCA.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

We would suggest that a more prudent approach would be to allow a longer period of time (2-3 years for example) to assess the mobilisation and performance of operations under the Sub-Area A contracts before GMCA commits to further Sub-Area deployments. This would ensure that lessons can be learnt and further extension of the franchising scheme is undertaken as efficiently and effectively as possible.

Q8. Do you have any comments on the nine-month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

A nine-month period to undertake mobilisation will only be feasible if the requirements of the relevant franchise contract are such that ULEV or hybrid vehicles and infrastructure is not required. It would also require a depot to be available for use by an operator (large contracts). If this is not the case, a longer mobilisation period would be necessary.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

We would suggest that a consultation is undertaken during the life of the first franchise contracts to ensure any adjustments or improvements are implemented as part of Sub-Area B and C deployment.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

We have no comments with regard to this proposal.

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

We believe such a proposal would remove a significant barrier to entry for some operators and therefore enhance the tender process and outcome. However, we would suggest that such depots would need to be "future-proofed" to ensure that the requirements of the franchise contracts can be fulfilled, such as the provision of appropriate charging or other infrastructure. If this is not done, the barrier to entry (significant investment in charging infrastructure as an example) would remain and not be removed simply by providing a generic bus depot.

Questions about the GMCA Assessment

***Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?**

We would agree that the bus market is not, in some areas and on some services, operating as well as it could be, this is why Arriva and other operators have been championing a partnership proposal which can improve the bus network in the most effective way possible, delivering value for money and significant benefits for the travelling public. We would like to state that the development and expansion of the tram network also, if not done in a co-ordinated manner, risks abstraction from bus services.

***Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?**

We acknowledge that there is a case for reforming the bus market in Greater Manchester, however, for the reasons we given in our responses elsewhere in this consultation response, we feel that a franchising scheme is not the best means of implementing such reform.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

We agree that a key objective for GMCA should be ensuring value for money. We would question how, given the significant demands which the franchising scheme proposal would place on local authorities and taxpayers in the current economic environment would deliver best value.

We are surprised that it is not an objective of GMCA to try and arrest the decline of, or increase, bus patronage given the unprecedented amount of investment required to deliver a franchising scheme in Greater Manchester. There is clear evidence from the Liverpool City Region Bus Alliance that a well-structured and managed partnership can deliver significant patronage growth (18%) at a fraction of the cost.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

We feel that each of the objectives set out in the Strategic Case could be delivered via a partnership proposal. This has been proven in existing partnerships such as the Liverpool City Region Bus Alliance which has delivered against an even wider list of objectives at a significantly lower cost to the taxpayer and local authorities.

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

Whether a voluntary partnership or a statutory partnership scheme, we feel that partnerships can deliver all of the GMCA objectives. Partnerships are proven to work and deliver substantial benefits if structured, supported and managed correctly. The Liverpool City Region Alliance is a prime example of the great benefits which can be delivered through partnership working between operators, local authorities and other stakeholders.

***Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the**

best value for money compared to the partnership options because it would:

- offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options,
- provide the most economic value (Net Present Value), and
- create the best platform from which further economic value could be delivered.

Do you have any comments on this?

We note that a significant element of the benefits to be derived from the proposed franchise scheme are purported to be a consequence of reduced congestion. On the basis that the forecast patronage under such scheme is expected to fall, would it not be the case that more individuals would be travelling by car (or at least a significant percentage of them) such that congestion may in fact increase?

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

We believe that the small franchise contracts should have a minimum PVR of at least 10 in order to ensure that every operator has sufficient resource to deliver and manage the demands of a franchise contract (e.g. customer complaints, reporting and delivery of agreed franchise contract standards).

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

No

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?

We agree that a performance regime should apply to franchise contracts, however, we would ask that the regime is reflective of the interventions and action of GMCA to address issues which are outside the control of operators and such impact our ability to deliver to the performance standards (e.g. congestion hot-spots, poor roadside infrastructure or lack of bus priority measures).

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?

There is a significant risk that the proposed franchising scheme will leave bus operators that are not successful in being awarded similar levels of franchised services as they currently operate being in a position whereby they have a depot, vehicles and employees (those that do not TUPE out) but no services to operate (or fewer services to operate). Whilst “strategic” depots may be acquired and some vehicles may be placed in the proposed RV mechanism, employees “left behind” post-franchise scheme commencement may have to be made redundant. This would be through no fault of the employee or operator. These costs may be significant. What is GMCA’s proposals with regard to such risks and costs? We are of the view it is not reasonable for operators to bear the costs associated with a scenario whereby a decision of the authority has caused significant losses.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?

We note not all depots would be acquired by GMCA. This may result in significant numbers of “stranded assets” which operators will continue to lease or own with no means of operating bus services. We would ask GMCA how it intends to compensate operators in such circumstances? Furthermore, for the strategic depots, it should be a pre-condition of the franchise contract that such depots are available in good time to assist with mobilisation and commencement of services. What are GMCA’s plans regarding any necessary infrastructure at such depots to meet their franchise contract standards? e.g. electric vehicles, requiring potentially new sub-stations, electricity supplies, depot re-development, charging batteries and dispensers etc.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?

We support the establishment of vehicle and cleanliness standards, but they should be robust and enforced if the RV mechanism is to work as envisaged.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?

No.

Q25. Do you have any comments on GMCA’s approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

No.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?

No.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

No.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

We feel the assessment of the partnership options is overly pessimistic. It does not reflect the actual (rather than hypothetical) real-world benefits which other partnerships (e.g. the Liverpool City Region partnership) can and do deliver.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

No

***Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?**

No comment, but we would highlight the current annual deficit and debt burden which can result from introducing and operating a franchised bus market, as can be seen in the only existing franchised bus market in the UK at present.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

No comment.

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

No comment.

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?

No comment other than we feel the timescales are highly ambitious and to ensure that franchising is deployed successfully and effectively we would suggest more time is allowed, not least to acquire properties etc. before contract award and commencement. We would also suggest allowing time to review the success and lessons learnt of Sub-Area A before embarking on further franchising.

Q34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

No comment.

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

Most, if not all, of the benefits under a proposed franchising scheme can be delivered via partnership proposals without the associated significant cost that franchising would require to establish and maintain/manage. We are surprised that the scheme is not expected to deliver any arrest in the trend in recent years of bus patronage decline or improvement in patronage, especially given the significant increase in bus patronage which the Liverpool City Alliance has delivered since its creation.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

No comment

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

Notwithstanding the RV mechanism and acquisition of strategic depots, an operator may still be left with stranded assets, a depot for which it has no use and employees for whom there is no work. The current proposals offer no form of compensation or mitigation for this loss and risk placed on operators. This could result in significant redundancies or the closure of bus operators' businesses.

Q38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

No Comment

Q39. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business?

Yes

If so, please explain what you think those positive or negative impacts would be.

Please see our response to question 37 above.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

The proposed franchising scheme (unlike the other models considered) exposes GMCA and operators to significant financial risk and costs. It has yet to be proven in the UK that a franchised bus network can deliver consistent surpluses or is sustainable in the long-term. This would be a leap of faith by GMCA, potentially at the expense of local businesses and individuals through increased rates and council tax. We feel that a partnership will deliver (as has been proven elsewhere) significant benefits for GMCA and the people of Greater Manchester without the significant risks posed by the establishment and maintenance of a franchised bus network.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

All options would be to the benefit of wider society. The partnership models have the benefit of delivering such benefits without the exponential growth in risk for GMCA, tax and business rate payers.

***Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?**

We do not agree for the reasons given above. Partnerships, voluntary or statutory, have been proven to deliver significant investment and improvements in city-wide bus networks, driving-up standards and patronage, whilst reducing fleet age and emissions. We feel this has been overlooked throughout the assessment. The costs and risks to GMCA of a franchising scheme, we feel, far outweigh any incremental benefits it may offer over a partnership model.

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

No.

Question on the Equality Impact Assessment

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

No.

Final questions

***Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?**

We believe a partnership option is the best outcome for the people of Greater Manchester and for GMCA. However, if the Mayor resolves to proceed with franchising, we will of course accept that decision and do our best to assist GMCA in delivering its bus improvement objectives.

Why do you say this?

Our view on partnerships and franchising is based upon our experience in the UK's most successful partnership, the Liverpool City Region Bus Alliance (in which we are the largest bus operator) and our successful operations in the TfL, London bus market.

***Q46. Are there any changes that you think would improve the Proposed Franchising Scheme?**

Yes

Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

Please refer to our comments above but, in essence, we feel more should be done to ensure operators do not suffer significant financial harm as a result of the introduction of franchising (which in turn may result in the closure of businesses/depots and redundancy) and that the timescales proposed should be re-considered as they seem somewhat unrealistic given the unprecedented change a scheme would require, if it is to be successful.

***Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?**

N/A

***Q48. Finally, do you have any other comments you want to make?**

No.

| | |
|--|---|
| Organisation Name | Belle Vue (Mcr) Ltd |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | The Strategic Case sets out the challenges facing the local bus market and why it is not performing well but fails to mention that the market has been manipulated by the withdrawal of Local Government backed funding which subsidised the tendered services during the quiet periods (which were not commercially viable) such as evening and weekend services. Passengers who used and relied on these services were forced to seek other methods of travel such as the car purely due to these withdrawals. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly disagree |
| Q13b Why do you say this? | The reforming will create a market place which only contains the larger bus operators such as in London, and the small to medium sized operators will not be able to compete within the franchising process with these larger conglomerates as they do not have either the resources or financial backing. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | The Proposed Franchising Scheme removes competition from the market place and will only result in the richer becoming richer and the poorer poorer. The bus network has shrunk to its current levels by local government austerity, what reassurances would be in place to prevent this reoccurring? as far as we can see no such reassurances have been made withing the consulatation documentation. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|--|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | As per my previous comments, this Proposed Franchising Scheme will result in Stage Coach, The Diamond Group First, Go Ahead and Arriva being the only operators competing for these schemes due to the requirement for both financial and capability requirements which the smaller or medium sized operators struggle to acquire. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | A Cheaper option to GMCA would be the reintroduction of subsidised services and funding options made available to the smaller operators which would result in improved bus services rather than that of Franchising. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly oppose |
| Q45b Why do you say this? | Its unfair on the smaller sized Bus operators |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | The provision of Business Grants/Subsidy for smaller and medium sized operators. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely unlikely |
| Q48 Finally, do you have any other comments you want to make? | |

Our Ref: IH/NWP

7 January 2020

Mr Eamonn Boylan
Chief Executive
GMCA
Churchgate House
56 Oxford Street
Manchester
M1 6EU

First Manchester Ltd
Wallshaw Street
Oldham
OL1 3TR
Tel: 0161 627 2929
www.firstgroup.com

Dear Mr Boylan

First would like to take the opportunity of the open consultation on "Doing buses differently" to offer further comments and suggestions on a constructive way forward. It should be noted that the views contained in this document are those of First and First only, and do not form part of the wider Partnership offer or associated process as led by OneBus.

First understands the ambitions of the Mayor, of local policy makers and the wider customer base to reform the way bus services are provided. We have seen at first hand the frustration expressed by Members in various consultative environments at the (differing) behaviours of individual operators and their approach to making service changes, including in the extreme, the short notice removal of entire services. In the formal consultation questionnaire, we have strongly agreed that some form of change is desirable as we ultimately share common objectives. Our concern is that the debate is focussed on two extreme solutions – a deregulated free market or a rigid gross cost franchising system. In any form of review, there is always a significant risk of missing the best solution if only two absolutes are considered – without consideration of options which derive the best from both worlds and without the opportunity to learn from practical experience.

The key risks of the proposed franchise model are:

- The first £100m (excluding depot purchase costs) spent on the franchising proposal will all go on administration and deliver nothing to the public. No perceived benefit for bus customers or potential bus customers for several years after taking the decision to progress
- The franchising proposal will deliver an ongoing decline in bus patronage
- The franchising proposal will result in guaranteed fares increases for bus passengers
- The franchising proposal will deliver no material improvement in the age or quality of the bus fleet
- There is no guarantee that the franchising proposal will provide any extensions to current bus routes or times of operation, or increased frequencies and it does not provide any additional socially desirable network enhancements. It is unlikely to meet political and customer expectations
- The franchising proposal will impose a cost on every home in Greater Manchester, irrespective of whether they use bus services.
- These costs will fall as a burden on the Council Tax or as foregone expenditure on other areas of public spending, whether on transport or elsewhere, or both.

- The franchising proposal will need to absorb any cost risk associated with maintaining the network status quo, mitigate against above inflation cost increases and address quality and increasing cost of service provision if no anti-congestion measures are funded
- Franchising requires management of the interim (4 year) period of transition which includes the very real risks of unexpected procurement and mobilisation bumps along the road. It also requires additional contract management costs for both authority and franchised operators, generating additional work streams and costs
- The franchising proposal is a distraction from, and will delay, addressing the basic problem preventing efficient and attractive bus service provision – resolving congestion

In line with comments made in our questionnaire response, we propose that a local partnership (LP) is run as a trial in one area in parallel to any new franchising or similar scheme being piloted in another. We consider that the local circumstances are particularly amenable to the LP approach in Oldham.

Local Partnership Overview

- Mayor achieves “control” of the Network – preferred approach would be to commence a joint network review upon launch of the partnership, with option to continue current network for an initial period of 3 years, with continuous open book monitoring of patronage and viability. This would be an enhanced version of the approach to that currently adopted by TfGM on tendered services. Any changes proposed by the operator to reduce routes/frequencies to be approved through TfGM/GMCA. Operator remains free to enhance and experiment with growth initiatives where it is believed that an opportunity exists. Unmet demand identified by TfGM or market research can be “quick start” funded through agreed arrangements
- Pricing – operator to continue process of fares simplification – from 2nd Jan 2020, there are only 4 standard single fares. Previously stated commitments to the two-year price freeze on multi operator products would still apply subject to GMTL approval
- Livery/branding – a localised livery would be applied following local agreement. A similar concept to Vantage would be applied which is sympathetic to the GM corporate transport design
- Fleet investment of a minimum 22 new vehicles pa for 3 years
- Examination of fleet electrification opportunities
- Ticketing Technology – in addition to the OneBus partnership, commitments to be enhanced by early adoption of tap and cap
- Tendered services – greater integration with commercial services and opportunity to provide links at lower or no cost using de-minimis provision where required
- Profit growth generated by Partnership Interventions would be reinvested into services
- Where more than one operator is involved in overlapping provision, a commitment to examine best value through TfGM support for a Qualifying Agreement
- A ring-fenced time limited “emergency” tender fund to provide cover in circumstances of disagreement about existing service viability pending identification of a permanent solution
- Integration between commercial and tendered services and other modes to deliver a best value approach to demand responsive and local link services delivering a complete network
- Underpinned by a simple legal framework agreement
- Immediate start and rapid progress


This Local Partnership approach would draw on our shared experiences of Vantage where a contractual/commercial arrangement has proved successful and grown the market to the extent that further opportunities now exist to utilise some of the additional capacity to provide socially desirable links at relatively low incremental cost.

To briefly consider the funding model in the context of the proposed Franchising approach, given an assumed minimum £100m (plus depot purchase) cost of franchising, divided equally across Greater Manchester, this would equate to £10m for the Oldham district. Even if only 25% (£2.5m) was to be deployed on the Local Partnership by TfGM, this alone would be enough to add a further 20 pvr to the local network. This would have an immediate and significant positive impact for local people and the wider integrated transport network.

Based on the principles of Mayoral control of the network, best value, relative simplicity and low cost to introduce and rapid realisation of public benefits, we believe the Local Partnership is the best option going forward and that it certainly warrants a trial.

We would welcome the opportunity to explore this concept further in discussion.

Yours sincerely

A handwritten signature in black ink, appearing to read 'I. Humphreys', with a stylized flourish at the end.

Ian Humphreys
Managing Director - First Manchester

| | |
|---|--|
| Organisation Name | First Manchester Ltd |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | No |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | <p>First considers that Franchising is a highly risky and expensive approach to the delivery of local bus services and the intended outcomes could be delivered much more quickly and cheaply through partnership. For that reason First considers that there would be considerable merit in adopting a pilot led approach, where Franchising (if it is considered that this will be pursued despite the alternatives available) is tested in a ring-fenced location within Greater Manchester, alongside a partnership led approach (which may be based on the partnership options assessed by TfGM and its consultants, or an entirely new and different partnership offer) in another pilot area, with the intent of maximising benefits and minimising risks in the identification of the appropriate method to realise the improvements sought to local bus services.</p> |

| | |
|---|---|
| <p>Q3 Do you have any comments on the local services that are proposed to be franchised?</p> | <p>First does not consider Franchising to be the appropriate means of realising the improvements being sought. First agrees that if Franchising was to be pursued, all local services will need to fall within its remit but – as set out in response to Q2, this would need to be tested in a geographically localised pilot in the first instance.</p> <p>Considering the proposals set out in Para 3.8 and Annex 1 of the consultation document it is clear that franchising will deliver no material change to the network as operated today, therefore it is difficult to see the justification for such action when cheaper and quicker partnership-based alternatives are available to effect improvements to services for passengers.</p> <p>Franchising will deliver no material improvement in the age or quality of the bus fleet, as stated in para 8.4.10 of the Assessment document.</p> <p>There is no guarantee that franchising will provide any extensions to current bus routes or times of operation, or increased frequencies and does not provide any additional socially desirable network enhancements. This is referenced at para 4.179 which states that “The key impacts of the Proposed Franchising Scheme . . . includes the benefits to passengers from improvements to the network, reduced fares, simplified and interoperable tickets, and also improved customer service” It is worth noting the commitment made by CPT members in “Moving Forward Together” strategy for England that capped contactless ticketing will be rolled out across major urban areas by 2022.</p> <p>Para 4.219 – “The scale of the changes that could be made to the current bus network are greater under the Proposed Franchising Scheme than under either of the partnership options.” But there is no proposal for change and no reason or evidence to suggest that the opportunity to change would be greater under Franchising.</p> <p>We also note from page 112 (The Grant Thornton Observations Report) that “the ability to adjust network size in response to any shocks and the expected long-term decline in demand is one of the responses that could be adopted under the Franchising option. It is noted that many of the economic case sensitivity tests do not reflect the network size adjustment in either the reference or option cases”</p> |
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> | <p>For geographic rollout, see comments at response to Q2 above. In terms of transition, First understands the proposals set out in paras 3.9 to 3.14 of the Consultation document but this takes no account of the requirement for transition between the current deregulated network and the future franchised one, the very threat of Franchising having a potentially destabilising effect on the provision of bus services in Greater Manchester in the interim, potentially seriously disadvantaging passengers</p> |
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | <p>The purpose of the exclusion of schools services is unclear. If these services are available for public use, then their exclusion is illogical. If they are not available for public use, then they are not relevant to the Franchising proposals.</p> |

| | |
|--|--|
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | <p>The proposed date for making the Franchising scheme is noted as 6 March 2020. That is very soon after the conclusion of the consultation exercise – only two months – which indicated a presupposition that Franchising will remain the intent irrespective of the outcome of the consultation. That is not considered reasonable.</p> <p>Furthermore, the impact of franchising will not be fully felt until 2024 according to the Consultation document (para 3.21 for instance, taking account of mobilisation period for contracts – see para 3.22) which gives a period of instability, but without improvement to services, of almost four years. By contrast a partnership led approach – of any description - could begin to deliver benefits almost instantly.</p> |
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | <p>The comments made at response to Q6 apply here too.</p> |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | <p>All other things being equal this is a reasonable time period but will require a degree of flexibility on a case by case basis, given the relatively small capacity of the vehicle manufacturing industry and the disruption to delivery schedules that a major disruptive event, such as the recent failure of Wrightbus, can cause.</p> |
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>Once there is a commitment to Franchising the effect on the provision of local bus services is immediate and significant as it changes operators’ future plans irrevocably.</p> <p>The proposals to only begin a review of the effectiveness of Franchising after the expiry of the initial operational contracts – which could last for up to 8 years – does not offer a credible opportunity to learn, reflect and amend. and will result in the region being irrevocably committed to Franchising, without opportunity to reassess this decision if it proves not to be in the interests of passengers and the wider community. This reinforces the case for our proposed pilot approach set out in response to Q2 above.</p> |

| | |
|--|---|
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>First acknowledges that changing the structure of the local bus market ought not to adversely impact on either large or small operators, or indeed on any other arbitrary criterion. The means by which TfGM elects to seek to ensure this does not happen is a matter for TfGM as long as the objective is met. Only time will tell whether or not this is achieved. However, there are some rules which need to be observed. The award of contracts must be on the basis of best value taking account of financial cost and quality related issues. It also must accord with the requirements of UK and EU contracting rules in particular EU Regulation 1370 and of competition law – simply stating that a certain number of contracts will be the maximum awarded to a particular bidder is a potential market distortion and would be challengeable by an unsuccessful bidder. A specific point of detail – the meaning of the comment in para 3.25, "This would roughly reflect the current subsidised bus market..." is not clear.</p> |
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>First believes that the Franchising model is not appropriate for the delivery of local bus services and this is one of the ways in which it fails to meet "value for money" objectives. By providing facilities to house and maintain fleets of vehicles that would otherwise be provided by the free market, TfGM inevitably increasing the costs of local bus service provision. As there are already suitable premises available to meet this objective, this is expenditure which could be better focused on improved service/network coverage or avoided altogether.</p> |
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>See attachment - BI</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|---|--|
| Q13b Why do you say this? | Reforming the bus market covers a wide range of strategies. Franchising is an extreme approach – it takes away everything that has been achieved to date and what could be achieved further by operators and authorities working in any form of partnership, through the establishment of shared objectives. First accepts that the overall provision of local bus services in Greater Manchester could be much better but contends that there are cheaper, quicker and more efficient means of achieving this, using partnership based on shared objectives. |
| Q14 Do you have any comments on GMCA’s objectives for the future provision of bus services as set out in the Strategic Case? | First agrees with all the objectives set out in the Strategic Case. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA’s objectives for bus services as set out in the Strategic Case? | <p>Considering para 4.30 of the consultation document, stating that the network will be planned as a single network meeting the various objectives is at odds with the earlier assertion that the contracts to be awarded under Franchising will replicate the current provision.</p> <p>The provision only of an “all operator” ticket theoretically makes the user of a single bus route pay more than under the current regime – this applies to the vast majority of passengers but setting these at the price of the “lowest incumbent large operator fare (paraphrased)” will require effective subsidy to that ticket price, paid for by council tax and commercial rate payers within Greater Manchester.</p> <p>There is nothing under customer experience (other than perhaps the extent of any common branding) that operators are not already providing to passengers.</p> <p>Finally, under value for money, assuming the underlying calculations are correct, there is an implicit assumption that either the cost of capital and other finance costs to TfGM is lower than it would otherwise be to bus operators, or that the additional costs of Franchising will also be picked up in council tax and commercial rates increases. Franchising, on a like for like basis, will always cost more than deregulated operation as there are additional contract management costs associated with both the franchising authority and the franchised operators. Therefore, there needs to be additional public funding to provide the same level of service, rather than leaving these costs with the private sector – at their risk.</p> |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA’s objectives for bus services as set out in the Strategic Case? | See attachment - BI |

| | |
|--|--|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>The economic analysis set out in the table at para 4.60 does not represent a situation that First recognises. It is acknowledged by TfGM that the network which Franchising will deliver is essentially the same as that which pertains today. And that bus patronage will continue to fall under Franchising. Furthermore, as recorded above, the implementation of Franchising will not include any infrastructure or other strategic measures to facilitate more efficient bus operation by addressing congestion problems.</p> <p>How therefore can there be the forecast additional decongestion benefits from Franchising that are recorded in the table (£61m vs £16-19m under partnership)? And what are the large non-monetary benefits accruing to bus passengers under this option - £299m compared with £68-85m under partnership? Examination of paras 15.3 et seq of the Assessment reveal some details of the derivation of these figures, which describes these as “time savings”. This is called into further question given the observations above.</p> <p>Considering costs, the cost to reach the position of having a Franchised operation is noted at over £100m which would not need to be spent under a partnership approach – as well as an additional incremental £90m investment in depot – i.e. a total cost of £190m.</p> <p>This cost will fall to the local taxpayer or in the opportunity costs of foregoing other, higher value spend, on the wider Greater Manchester transport system.</p> <p>In light of the above First simply does not believe that Franchising offers “the best value for money” as the benefits are overstated, and the costs need not be incurred.</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>First acknowledges that changing the structure of the local bus market ought not to adversely impact on either large or small operators, or indeed on any other arbitrary criterion. The means by which TfGM elects to seek to ensure this does not happen is a matter for TfGM as long as the objective is met. Only time will tell whether or not this is achieved. Other relevant observations are set out above in response to Q10.</p> |

| | |
|--|---|
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Notwithstanding any other comments within this response, the most advantageous contract value will generally be realised when contracts are awarded for the maximum permitted term under the prevailing procurement rules. This allows bidders both the greatest long term security to reduce the risk of business change at contract end, and more cost effective means of procuring vehicles and other capital assets as outright purchase or longer (fixed) term leasing deals are available at more advantageous terms than over shorter periods. First notes that the proposed period of 5 years plus two-year extension is slightly shorter than the maximum legally permitted 8-year contract duration currently in force.</p> |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>The proposed allocation of risk set out in para 4.77 is, all other things being equal, considered appropriate. However First contends that the current deregulated regime, with an appropriate partnership based on shared objectives, allocates risk in a far more efficient and incentivised manner without imposing additional risks on the public sector or the tax and ratepayers of Greater Manchester.</p> |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | <p>The proposals set out in paras 4.78 to 4.83 reflect our expectations of how employees would be treated in a transition to and under the operation of a Franchised regime. However, we note that the very threat of Franchising has a serious effect on operator employees as it places the entire future of their employer under considerable threat and that in itself leads to instability in the labour market and discomfiture for individuals.</p> |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Para 4.85 states that “...GMCA would seek to take control of strategic depots...” – would this be through compulsory purchase of operator premises or other means? When would this be decided, given the potentially significant knock-on implications for a smooth and cost-effective transfer to Franchised operations. And, if through compulsory purchase, how would departing operators continue service operation until such time as Franchising took effect? The mechanism set out at paras 26.1.19 et seq of the Assessment represents an over-simplified approach to achieving this and is likely to result in considerable cost increases to provide facilities owned by GMCA. This further militates against the costs and risk profile of the Franchising approach, whereas under a deregulated scenario, operators retain full responsibility for the provision and maintenance of these facilities at no cost to the public purse.</p> |

| | |
|--|--|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | First has similar concerns as those set out in response to Q22 above – taking the risk on vehicles – both potentially current fleet and those procured for Franchised operations – into the public sector is considered to be unnecessary and a burden on the public sector that is avoidable. Big issues remain to be resolved on handling of the existing fleet in Greater Manchester, in particular in respect of take up of the “residual value” mechanism and magnified by the current emphasis on decarbonisation and electrification which could render the existing Greater Manchester bus fleets obsolete within 15-20 years. This exposes the Franchising system and the Greater Manchester authorities to significant cost risks. Better to let the risk remain with the operators. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Even under a Franchised regime there is an increasingly viable option to integrate such (legacy) systems to use common standards and protocols rather than replace with common systems – this opportunity should be explored. |
| Q25 Do you have any comments on GMCA’s approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | Our comments are set out in response to Q10 and Q18 above. Additionally, First does not consider that the “competitive dialogue” approach to tendering is one which facilitates fair and equitable contract award as much of the process is undertaken “behind closed doors”, preventing bidders who do not get to the “dialogue” stage from making their best offer which could ultimately deliver better value for money and a higher standard of operation. |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | No comments – this is understood to be the only mechanism available to accommodate cross-boundary services under a Franchised regime. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | Other than the continuity of services during the transition period (i.e. meaning before a given contract commenced operation, rather than the phasing of contracts) First considers that the conclusions set out in para 4.102 are valid. First considers that this exception presents a significant risk to bus users. |

| | |
|--|--|
| <p>Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?</p> | <p>Operators were not aware of the detail of the partnership option assessed under this exercise, but it does not represent the offer that operators have made at the time of this consultation response. First notes the reference to an Enhanced Partnership Scheme in the document under TfGM’s “Ambitious Partnership” approach, and remains of the view that this is not the most effective mechanism for securing the best outcome for bus passengers in Greater Manchester, with a voluntary partnership providing a platform that allows operators to bring forward their best offers. Furthermore, the voluntary partnership affords the opportunity to make rapid improvements to services without the long time and considerable administrative effort required to set up and subsequently modify an Enhanced Partnership. First considers the wording in para 4.106 of the consultation document to be somewhat disingenuous as it suggests that there is no inter-available ticketing, whereas the contrary is true, operators’ own tickets instead offering the passenger regularly making the same simple journeys a discount compared with the price of the multi operator ticket.</p> |
| <p>Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?</p> | <p>First considers that a partnership-based approach led by shared objectives will better guarantee the long-term future of operator employees as it helps reduce the potential “shocks” to the system that Franchising would deliver. Contracts would have a fixed life and despite the protection afforded by provisions such a TUPE, there is a significant risk to employees given the inevitability of disruptive change in such an environment. First considers that there will be negligible impact (other than training) on staff from a partnership approach but does not support the statement at para 4.110 of the consultation document that services would not be expected to change under a partnership.</p> |
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>See Attachment - BI</p> |

| | |
|--|---|
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | <p>Para 4.138 assumes that the two-year freeze on the cost of all-operator tickets would result in no patronage growth.</p> <p>First considers that the transition costs to a partnership scenario in 4.141 are not realistic and that there would be minimal financial impact in moving to a partnership scenario.</p> <p>The analysis takes no account of the partnership proposals for operator reinvestment of profits as a result of benefits arising from infrastructure improvements enabling greater operational efficiency and growth.</p> |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | <p>Franchised operations will incur additional “bureaucratic” costs not only for TfGM but also for operators providing these services. Contract management costs will accrue to both the public and private sectors. These costs could be avoided for both parties under a partnership approach and instead their value could be invested in providing better services. Under the present-day regime there are more limited costs associated with the management of those services procured by TfGM which are not commercial, but the partnership approach from operators includes a commitment to reducing the services requiring financial support during the life of the partnership so these costs should in fact decline.</p> <p>First is disappointed to learn that in addition to the cost of £122m required to change the regime but deliver no material change to local bus services, this would also require an additional 57 TfGM employees to manage, as stated in para 4.157. This does not look like the best value use of public resources and could be avoided under partnership.</p> |
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | <p>The “complexity and confusion” (para 4.163) that bus users would experience in moving to a Franchised regime should not be underestimated. Operators may well choose to cease service operation requiring service replacement by TfGM. The threat of Franchising may lead to operators seeking to maximise short term profit on a temporary basis and the lack of ongoing incentive for collaborative working may undermine much that is currently done by agreement and goodwill between operators and TfGM. Again, all these costs to the public purse could be avoided by adopting a partnership led approach based on shared objectives.</p> |

| | |
|--|---|
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | <p>First is surprised at the forecast level of additional resource required to implement partnership-based proposals and considers that the management of a partnership by TfGM might be expected (other than perhaps some additional administrative tasks) to be a “business as usual” scenario.</p> |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | <p>A forecast increase in patronage is projected compared with the do-minimum situation, a forecast which we question given the lack of substantive measures underpinning the increase. Despite this the Franchised regime is still forecast to deliver a decline in bus use (see for instance graph at para 4.61). This is largely because of the prioritisation of actions – to deliver regime change as Phase 1 and only then seek to address the problems underlying the delivery of bus services in Greater Manchester under any regime - no relief from congestion and addressing car demand – under Phase 2. To First this prioritisation is inappropriate and bus services should be provided firstly with an environment in which they can be operated more efficiently and therefore be quicker and more punctual, leading to higher frequencies and cheaper pricing.</p> |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | <p>Operators do not have details of what partnership assumptions TfGM has made in its assessment therefore cannot comment further on this.</p> |

| | |
|--|--|
| <p>Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?</p> | <p>Franchising has the effect of closing the market and can result in business confiscation. An operator with a current operation in Greater Manchester might find that under a Franchised regime, not only is it prevented from maintaining its current operations as the deregulated market is suspended, it is undercut in its bid to provide the same (or indeed another network of) services by a newcomer to the market or another incumbent. That operator then faces the issues of what to do with redundant assets such as staff – whilst drivers and maintenance staff may have the opportunity to transfer to the new operator under the TUPE provisions, the same is far less likely to apply to its management and support staff, and stranded assets including vehicles (which may still be within a fixed term lease, or be owned and retain considerable residual value which may or not be realised dependent on the prevailing state of the second-hand bus market) and depots, not to mention the essential element of any commercial business, “goodwill”. The mitigation measures proposed – for instance at para 4.195 of the consultation – do not offer a robust “safety net” for such operators and depend upon the offer that TfGM might – or might not – be prepared to make in respect of any given asset at any given time, and furthermore there remains no opportunity for such a business to retain its operational cash flow and future business prospects. The pensions implications would vary considerably dependent upon the circumstances at the time of any market closure – including wider economic considerations.</p> |
| <p>Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?</p> | <p>Greater Manchester operators have indicated their willingness to voluntarily reduce their ability to take unilateral decisions, on the basis of the new Partnership offer with genuinely shared objectives which the operator (and TfGM) can continue to work towards these without the looming threat of Franchising. This will ensure an appropriate balance can be struck to ensure that the risk is balanced by reward for operators, taxpayers and passengers. As stated above in many instances the re-prioritisation of action to put Phase 2 – improving the operating environment – before Phase 1 – change of control – will create a set of circumstances under which operators will have the opportunity to maximise what they can bring to any partnership.</p> |
| <p>Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business?</p> | <p>Don't know</p> |

| | |
|--|--|
| <p>Q39b If so, please explain what you think those positive or negative impacts would be.</p> | <p>That would depend entirely on what the outcome of the consultation and decision-making process is – whether partnership of Franchising, and if the latter, what contracts were successfully won and the scale and nature of these compared with the existing business.</p> |
| <p>Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?</p> | <p>The impacts of Franchising can be categorised as cost and risk – but it is noted that in both cases these are effectively passed on through, for instance, increased council tax levies and/or foregone spends in other areas so the net impact can be categorised as nil to GMCA, but substantial to those who live and work in Greater Manchester. The impacts of partnership are negligible in terms of both cost and risk with the latter continuing to be borne by the commercial operators.</p> |
| <p>Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?</p> | <p>Economic growth and environmental impacts are mentioned in paras 4.206 to 4.208 but these are only part of the wider implications. In particular there are impacts on health and community whereby both individuals and local areas rely on local bus services to maintain or improve their quality of life. In all cases First believes that there are greater advantages to be gained, more quickly and at lower cost and risk, through a partnership-based approach.</p> |

| | |
|---|--|
| <p>Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?</p> | <p>As set out throughout this response, First believes that a partnership, based on shared objectives, would secure the best outcomes. If there is considered by TfGM to be no alternative to Franchising on the basis of all work undertaken to date, then as set out in response to Q2 First considers that this should first be implemented on a pilot basis, and in parallel with a pilot partnership, to minimise costs and risks and seek to ensure that the best value and lowest cost was achieved in the delivery of the desired objectives. First recognises that there are issues of control which the Franchising agenda is seeking to address, but control is not an either/or choice. The maximisation of benefits relies on the skills and abilities of those operators to grow their businesses in an environment of shared objectives and not where one party seeks to wrest control from the other in its entirety. That is why First favours the partnership approach and seeks to persuade TfGM and GMCA that this deserves to be fully explored in order to prevent the adoption of a sub-optimal approach to local bus service delivery across Greater Manchester.</p> <p>Commenting on the specific points made in the consultation document, at para 4.29 the assertion that more change could be made to the network under Franchising than a partnership is speculative. There are no restrictions on what could be agreed under a partnership. Furthermore, the franchising proposals are simply to replicate the current network. Secondly there is no reason why improved environmental standards for the Greater Manchester bus fleet would be introduced more rapidly under Franchising. Under 4.220 whilst the restrictions on what operators can do with fares were set out in our answer to Q16 above, there are very few other restrictions on what operators could do to rationalise fares, and fares competition will continue to provide best value to passengers under a partnership approach. Customer experience is likely to be similar across the two options, and value for money far better under partnership as the initial cost, operating cost and risks to the public associated with Franchising are obviated. Cross boundary issues can be managed under either approach.</p> |
| <p>Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme?</p> | <p>First considers that this consultation risks a premature decision in support of Franchising on the basis of a contrived evidence base, with the likelihood of ordinary members of the public having the time or expertise to digest and comment upon such volume and range of consultation material being negligible,</p> |

| | |
|--|--|
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | First does not believe that there are any material differences between the Franchising proposals and a partnership led approach in respect of their impact on persons with protected characteristics. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly oppose |
| Q45b Why do you say this? | See answers to the previous questions above |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | See response to Q2 above and the additional information supplied by First as referred to under the response to Q48. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Neither likely nor unlikely |
| Q48 Finally, do you have any other comments you want to make? | First has appended a proposal to this consultation response which seeks to maximise the benefits that could be realised by adopting a pilot- based approach to future local bus service reform. First proposes trialling a partnership led regime in a discrete region of Greater Manchester to enable the potential of this to be assessed against an equally controlled Franchise pilot. This would enable a better-informed decision to be taken for the Greater Manchester region as a whole rather than risking delay and expense through the immediate adoption of Franchising. This proposal from First is separate from the OneBus partnership proposal and concentrates on ensuring there are shared objectives between operators and authorities, and delivery by all parties in the most rapid and financially expeditious manner, minimising the public sector risk whilst ensuring that the commitment by the private sector is guaranteed, and ensuring an appropriate level of joint responsibility and control to guarantee the optimum outcome for both existing and potential bus passengers. The considerable expense associated with the Franchised regime would be rechannelled into delivery of the Phase 2 measures thereby facilitating a more efficient operational environment for local bus and thereby releasing user benefits more quickly and at less cost and risk to the public purse. |

| | |
|---|---|
| Organisation Name | HCT Group |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | No, the changes make sense and do not lessen the impact |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | There is no benefit in half measures and a franchising scheme that does not cover the entire region would be counter-productive. By its very nature, a franchise MUST cover the entire area – otherwise the creation of a comprehensive and integrated network is impossible. In addition, not covering the entire area would create a two-tier bus market, with the advantages of simpler ticketing and fares, and more frequent services, limited to a specific corridors and those who use them. Residents who lived outside these corridors or areas would be relegated to whatever was left. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | The proposals include those services that will provide a robust network for GM residents; however, GMCA should have been more ambitious, and considered if and how Community Transport (CT) could be involved in the solution. CT operators provide vital socially necessary routes which are not met by the current network, and so might be able to support the franchise network in some way. |

| | |
|---|--|
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> | <p>Dividing the authority into 3 sub-regions will make it more manageable for all stakeholders, including TfGM, operators and most importantly, passengers. The phased approach will give everyone time to learn the new system, including routes, fares and ticketing.</p> <p>Franchising the entire market at once would simply be too much. It would risk plunging GM into chaos similar to that of summer 2018 when rail operators simultaneously changed their entire timetable, and rendered services inoperable, and passengers confused.</p> <p>The arrangements for transition need further detail. This period is going to be confusing and must be well managed and well communicated. Residents, whether they are current bus users or not, will need frequent updates, and in the weeks leading up to the franchise date, TfGM should ensure customer services staff are visible and available at key stops, interchanges and even on routes, to advise passengers of the changes.</p> <p>The biggest cause for confusion will be for those residents travelling between two sub-areas, where one has been franchised (or is transitioning) and the other has not. Passengers are likely to need help understanding what ticket / fare / route they need, and drivers will need additional training to help answer these questions.</p> |
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | |
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | <p>GMCA is the first authority to propose franchising and the consultation will garner many responses. GMCA must determine a timeframe that balances the time needed to properly listen to stakeholders with ensuring that the process is not delayed whilst testing every permutation, or obstructed by opposition. A recent DfT S19/22 consultation was delayed due to a high number of (disagreeing) inputs.</p> <p>Given this delicate challenge, a decision within 3 months of the consultation deadline closing, may be considered ambitious.</p> |

| | |
|---|--|
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | 12 months between decision and award gives ample time for existing and new operators to develop tenders and redesign their business model. Our only caveat is that if the decision date of March 2020 is delayed, contract award dates will need to be revisited. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | Nine months is a sensible extension to the legally required limit. It will give operators not only the time to order new vehicles, but also recruit. |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | <p>Yes, ensure the documentation is simple, and accessible. The total number of pages associated with this consultation exceeds that of War & Peace. This does not make submission easy, and acts as a barrier to many. Any future consultation(s) must be briefer.</p> <p>Content wise, the criteria which GMCA propose to consult upon seem entirely sensible save one key area – social impact. Throughout this consultation, social impact has been too narrowly defined, covering only economic and environmental impact. There is no proposal to examine how well the Proposed Franchising Scheme (PFS) is working on improving people’s lives through increased access to essential services or improved physical mobility or wellbeing. A broader definition of social value / social impact – including and expanding upon the Wider Economic Impacts (WEI) - should be embedded in any consultation on how the PFS is working.</p> |

| | |
|---|--|
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>GMCA appears to have thought deeply about how SMEs can be part of transport solution, and the recognition that a simpler single-stage ITN might be more appropriate shows that GMCA truly want to build a diverse market. This is absolutely the right approach as only when you introduce and facilitate competition, will passengers finally get the high-quality service they deserve.</p> <p>Sadly the GMCA have imposed two limitations on SMEs which risk undermining the above: duration and number of franchises held.</p> <p>Currently, the contract duration proposed for smaller franchises is 3-5 years. It must be extended to a minimum of five years, as per the larger franchises. This provides stability for the operator to recruit and procure a depot, and this in turn ensures stability of service for passengers.</p> <p>The second limitation - which restricts the number of franchises a smaller operator can hold - is discriminatory and paternalistic. There is no such restriction on the larger operators, so why the assumption that SMEs can't manage their business themselves? It is also unnecessary as SMEs will be limited by the size of their O Licence. This already acts as an effective restraint on operators taking on 'too much' - without GMCA seeking to introduce an additional arbitrary limit.</p> <p>If GMCA want to ensure that no single operator can put the entire network at risk, then volume limitations should apply to all franchises, regardless of size. Perhaps a market share restriction e.g. no operator should have more than 25% of the large or small franchise markets could be considered?</p> |
|---|--|

| | |
|--|--|
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>The provision of depots is essential if GMCA want to foster competition. Without it, franchise contracts will be restricted to incumbents who already have depot space. Whilst it might be true that new entrants could buy or lease land and build a depot, this is high-risk and likely to be a deterrent.</p> <p>HCT Group has experience of operating in two franchising markets: London and Jersey.</p> <p>In London, depot space is not provided and this can be a barrier. Land is expensive and difficult to find, and new entrants can be priced out or prevented from even getting a 'foot in the door.'</p> <p>Conversely, in Jersey, a depot was provided - owned by the commissioner and leased back to the operator. Without this, very few operators would have been able to bid as alternative depot space would have been difficult to source. As it was, the Jersey contract was highly competitive with over 30 international operators submitting stage one bids.</p> <p>GMCA, if they want to avoid simply replacing private monopolies with publicly commissioned ones, must create a level playing field and provide depot space. Only then will the market be competitive and only then will residents get a service that meets their needs, not those of private shareholders.</p> |
|--|--|

| | |
|---|---|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>The UK bus market overall is not performing well. Ridership is declining in most major metropolitan areas – not just GM. In addition, fares are increasing and thousands of routes are being cut, with deprivation and social isolation as collateral.</p> <p>Incumbent private operators have sliced the city into regional monopolies, over-bussing on commercial routes, and neglecting passengers on socially necessary ones. The GM market fails its residents by putting the needs of private shareholders first. And that same market is now also failing operators. First Group’s exit shows that the current model is no longer sustainable.</p> <p>The few operators who remain opposed to franchising will reluctantly concede that the GM bus market is not performing well but they then usually lay blame at the feet of their new god, Congestion. Additional traffic on the road is undoubtedly a genuine challenge to operators, but the premise that franchising will exacerbate this is misdirection. Franchising will create a better, more reliable, affordable network. As this happens, ridership will increase and this modal shift will reduce congestion.</p> <p>HCT Group has seen this in Jersey. Ridership has increased by 38% and alongside, a decrease in cars during the morning commute. Based on this we would encourage GMCA to be more ambitious than the data in figure 4.61 suggests. A well-managed franchise is a positive intervention and can create a positive spiral of demand - increasing commercial performance, increasing supply, and increasing demand.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|--|---|
| <p>Q13b Why do you say this?</p> | <p>The current market fails everyone. Partnership approaches, particularly those proposed by the operators, merely tinker at the peripheries, and this will not deliver the shift required to meet GMCA's 2040 vision or objectives. Whole system reform – through franchising - is the only approach which will deliver a high-quality, comprehensive network for GM.</p> <p>In addition, franchising should be considered as part of a wider range of interventions such as bus priority measures or parking restrictions, and these interventions brought forward. Reforms will be most successful if they tackle the challenges from both sides – improving the service, and making the alternatives less attractive.</p> |
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>The list of objectives is bold, forward thinking and places bus front and centre of the future of GM transport. There is however a key objective missing – social impact. It is important that any future provision does more than improve the reach of the network and reduce emissions. It must make a positive impact on resident's lives by increasing their access to opportunities and facilities and where relevant, improving physical and mental health and wellbeing. Half a million older people go at least five or six days a week without seeing or speaking to anyone at all (Age UK 2016, No-one should have no one). Bus travel can mitigate this, reducing social isolation and loneliness.</p> |
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>Franchising is the only option that will not only deliver GMCA's objectives, but also provide the foundation for any phase 2 interventions.</p> <p>Franchising covers the entire network and only this will provide wholesale change, delivering value for money, clearer and simpler fares and ticketing and services that are integrated.</p> |

| | |
|--|--|
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>The incumbent operators have agreed little, and committed to even less. They are 'Mafia dons' defending their turf, and the Voluntary Partnership option offers little more than they would do in the course of their normal business. It does not introduce any measures that improve the network, simplify fares and ticketing or facilitate integration with other services. In fact, the proposal actually perpetuates the current failings, condemning residents to anti-competitive regional monopolies that do not serve the passenger. It does not contribute to the GMCA's objectives.</p> <p>The Ambitious Partnership goes further, but without operator buy-in – which it does not have - it is unachievable.</p> |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>The Economic case is clear – you get the quality of service that you pay for. GM residents deserve a bus service that meets their needs. It does cost more, but the benefits accrued and the NPV show that franchising warrants the investment.</p> <p>By contrast, the Operator Proposed Partnership offers significantly less, and as no firm commitments have been made, cannot be considered value for money.</p> <p>It is important however that the value for money assessment be expanded to fully account for broader social value (e.g. health & wellbeing), not just NPV.</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Dividing the network by into small and large franchises should facilitate competition by encouraging new entrants. It also allows smaller operators to bid.</p> <p>The restriction on the number of franchises won however either needs to be extended to both small and large franchises, or removed from just curtailing the ambitions for SMEs.</p> <p>See also the answer to the earlier question: Do you have any comments on the GMCA's plans for allowing SMEs the opportunity to be involved in the PFS?</p> |

| | |
|---|---|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>The contract duration for all franchises, regardless of size, must be a minimum of five years.</p> <p>See also the answer to the earlier question: Do you have any comments on the GMCA's plans for allowing SMEs the opportunity to be involved in the PFS?</p> |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>For the first franchise, the proposed risk allocation makes sense. In subsequent tranches, GMCA should consider reallocating the revenue risk to operators. This increases the incentive of providers to deliver and invest.</p> <p>In Jersey, HCT Group retains the farebox but also give a profit share back to the commissioner. We are incentivized to increase ridership by improving the network and the commissioner is incentivized to support that through improved bus measures.</p> |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | <p>The Bus Services Act makes good provision for the protection of employees. Our only additional comment is that GMCA must ensure adequate time for the TUPE negotiations and information sharing. Too often this is rushed, and employees are penalised.</p> |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>See answer to previous question: Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts?</p> |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>Introducing Residual Value is essential. It will protect operators from high losses if they exit the market, and ensures a fair price for those entering it.</p> <p>There is, however, concern that CAZ investment costs have not be included in any of the reform options. GMCA need to provide clarity on who would bear these, if the business case were to be approved.</p> |

| | |
|--|---|
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Having a common ITS is essential to an integrated smooth-running network. GMCA's approach to undertake the procurement is the only way to ensure this, however they must include operators (and of all sizes) in the decision making process, as they are the ones who will use it. Otherwise there is a risk that the system may miss vital functionalities or not be fit for purpose. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | Creating 3 sub-regions makes franchising practical and manageable. That the contracts will also initially be negotiated is important as it acknowledges the need for both bidder and commissioner to be flexible as both sides endeavour to build a new world. |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | The proposals state that two statutory tests will need to be passed for a service permit to be granted to operate in a franchised area. The first is that the services would benefit those making local journeys. The second that there would be no adverse effect on franchised services. The Commercial Case frames 'adverse effect' as how the service would impact routes, fares and stopping points. This is unhelpfully narrow. Any assessment should not be limited simply to the financial impacts, but should also include a broad definition of the social value of a service (i.e. more than just economic and environmental) and how this might support the franchise network and passengers. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | We agree with the conclusion and it is supported by our own experience of operating in franchise markets. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | Whilst a Voluntary Partnership Agreement might be quicker to implement, the proposals are so 'light' on committed actions, that it can't really be considered a viable solution to achieving the 2040 strategy objectives. |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|---|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | GMCA intend to fund franchising from several sources. This ensures the security of the market and avoids over-reliance on a single source e.g. central government. They have also identified mitigation responses if a funding source dissipates. Sadly this mitigation relies on fare increases or network reductions. More preferable would be identifying ways in which to lock-in long term funding, or additional revenue streams. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | No, the proposals seem logical and sensible. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | The transition proposals should minimize the disruption for all e.g. involving operators in the mobilization plans, and establishing back-up plans for operator exits and service cessations. In addition, further interventions should be considered around passenger communication, particularly on ticketing and fares in the transition period as even the idea of low-cost add on tickets could be confusing, especially alongside new tickets and existing SystemOne tickets. |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | <p>Franchising will give passengers an extended network and service improvements. Impact will be positive, even for the few who will experience a fare increase.</p> <p>HCT Group's experience in Jersey also shows that passengers will experience positive social impact through increased access to essential services, and improved health and wellbeing such as improved confidence and decreased loneliness. These outcomes should be included in the GMCA assessment.</p> <p>For more information, please see our latest social impact report here: http://hctgroup.org/uploaded/libertybus-impact-report-2019.pdf</p> |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | <p>The key impact on passengers is that there will be no additional cost - theoretically. This cannot be discounted, however it can also not be guaranteed as nothing has been confirmed. The partnership option is voluntary and may not remain long term.</p> |
| <p>Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?</p> | <p>The key impact of these proposals is that it opens up the GM market to new operators. Existing operators will be able to bid, but so will others. This does mean that incumbent operators may lose business but if this happens as a result of increased competition bringing fairer fares and better services, this can only be seen as a positive. In addition GMCA have sought to mitigate any stranded assets, reducing any negative impact of exiting operators.</p> |
| <p>Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?</p> | <p>The operator partnership proposal requires little of operators and as a result the impacts - beyond what they would be expected to action in the normal course of their businesses - are likely to be minimal. They will retain all profits and will invest only what they want.</p> |
| <p>Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business?</p> | <p>Yes</p> |

| | |
|---|--|
| <p>Q39b If so, please explain what you think those positive or negative impacts would be.</p> | <p>We believe the impact of franchising will be positive. We are confident of winning more work as the network is redesigned to serve passengers.</p> <p>We have a proven history of operating within franchise markets, and crucially, setting up a new franchise in Jersey. This has given rare experience of the challenges and how to address them.</p> <p>As a social enterprise, we invest all our profits in improving our services to increase social impact. This vision is aligned with GMCA's own, and in winning more work, we will be able to deliver increased social value.</p> <p>The impact of a partnership is more muted. The voluntary partnership does not currently include us and delivers minimal social impact.</p> <p>The impact of an Ambitious Partnership is less clear due to our size and the exact nature of the standards. That said, we do not anticipate longer terms commitments being a problem. Our Jersey contract is currently 10+3.</p> |
| <p>Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?</p> | <p>For franchising, GMCA have identified that the key impact lies with the revenue risk. This overlooks several important considerations. In successfully introducing franchising GMCA will become the first combined authority to put the needs of their residents ahead of the private shareholder. The positive impact this will have on congestion, the economy, and wellbeing should not be underestimated.</p> <p>Conversely, if the GMCA choose to take the easy route and succumb to operator pressure, the impact will be 'limited' to failing an electorate, condemning them to a broken transport model.</p> |

| | |
|---|--|
| <p>Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?</p> | <p>The impacts on the wider society have been identified as economic (labour supply, agglomeration etc.) and environmental (sustainable models, emissions etc). These are key but omit other important aspects of impact, such as the effect of transport on physical and mental health and other outcomes such as how a well-designed and affordable network can improve passenger independence and confidence.</p> <p>HCT Group has assessed the social impact of our bus franchise on Jersey. The detailed results can be found here http://hctgroup.org/uploaded/libertybus-impact-report-2019.pdf, but examples include:</p> <p>72% of users said the service saved them money 25% of concession pass holders felt healthier 40% of disabled people said their independence increased 33% of young people said their confidence increased</p> |
| <p>Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?</p> | <p>The PFS is not the best way to achieve the objectives - it is the ONLY way to achieve them. The operator proposed partnership is a temporary salve to a dying network.</p> |
| <p>Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme?</p> | |
| <p>Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?</p> | <p>The impact assessment explores the impact on people with protected characteristics, but does so a little narrowly. It misses, for example, the fact that women use buses more than men, and so will be disproportionately affected by the changes to the bus market.</p> <p>Similarly, GMCA does not appear to consider the impact on essential life skills that bus reform could have e.g. increased independence, confidence, particularly on younger and older people and those with a disability. Compared to the depth of the rest of the assessment, the Equality Impact assessment is lacking.</p> |

| | |
|--|---|
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | Franchising is the only way to ensure a comprehensive, affordable and integrated network which serves local residents. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | <p>There are a few changes we would recommend:</p> <ul style="list-style-type: none"> a) Embed social value throughout, from the design and implementation, through to commissioning, bid evaluation and quality measurement. b) Consider the role of Community Transport can have either as part of PFS, or in supporting it |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |

| | |
|---|--|
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>The answer to the previous question [If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?] is actually N/A but this option was not available.</p> <p>In addition, we have two comments about fares.</p> <p>Firstly, GMCA have said they would simplify fares and that period products would be valid throughout the scheme – excluding discount products. Does this mean they would only be valid on a single operator, or face some other limitation? We would oppose this as it discriminates, typically against younger or older people, or those with a disability. These groups already face barriers to travel, without having the benefits offered by a franchise withheld as well.</p> <p>Secondly, GMCA has assumed in the Operator Proposed Partnership that the costs of fare freezes will be absorbed by the operators and not passed on to passengers through other fare increases or service reductions. Private operators are accountable to shareholders, and are rarely permitted to be so magnanimous.</p> |
|---|--|

Hi I run a small travel company called PDR TRAVEL LTD I have a O licence with up to 6 vehicles on it. I Work for Manchester council doing school runs. I would like to know a few things firstly how it is going to affect my business if at all. Also are any bus companies going to be able to tender for bus routes or is it just going to be the big boys like stagecoach, go north, etc. also I have heard that everyone who lives in the Manchester area is going to be paying for this to happen ie in the rates we pay. As someone who doesn't use buses at all I think this if correct is not the best way to do it.

Thanks PDR TRAVEL LTD
Paul Ratcliffe

Go North West**Boyle Street****Manchester****M8 8UT****gonorthwest.co.uk**

Response of Go North West Limited to the consultation of Greater Manchester Combined Authority ('GMCA') on Greater Manchester's bus market and the proposal to introduce bus franchising, 8th January 2020

Executive Summary

This is the response of Go North West Limited ('GNW'), a subsidiary of Go-Ahead Group plc ('Go-Ahead'). Go-Ahead is one of the UK's leading public transport companies and operates bus and rail services across the country and internationally in a range of regulatory contexts including franchised and non-franchised environments.¹

GNW welcomes the opportunity to respond to GMCA's consultation on the Proposed Franchising Scheme for Greater Manchester ('the Scheme'). The consultation period is however very short given the complexity of the Scheme and this has limited the opportunity to review GMCA's proposal; in addition the economic model used by GMCA to construct the case for the Scheme would benefit from being shared for scrutiny by consultees. The answers below constitute GNW's response to the statutory consultation and this summary provides an overview of GNW's assessment of the Scheme.

GNW is not opposed in principle to regulatory interventions in bus networks where the framework and environment deliver the right outcomes. However the Scheme in its current format will not deliver GMCA's ambition for buses in Manchester, and GNW questions whether franchising is the best option for Greater Manchester (in its current form). The Scheme is operationally unworkable in the timescales proposed. It has structural flaws and delivers less benefit and more risk to GMCA and Greater Manchester bus passengers than is set out in GMCA's Assessment. In addition, it does not meet the statutory tests of being affordable or providing value for money. GNW is therefore not able to support the Scheme as proposed.

GNW supports GMCA's ambition of improving bus services in Greater Manchester. Three out of four public transport journeys are by bus, and the services provided enable access to employment, vital services and

¹GNW is a statutory consultee, by virtue of section 123(B)(4)(a) of the Transport Act 2000 ('the 2000 Act'). It began operating bus services in Greater Manchester on 2 June 2019. The services listed in Appendix 1 are operated by GNW out of its Queens Road depot, which was acquired by GNW in February 2019 from FirstGroup.

social contact. These services need to work well for customers and communities, and only through a collaborative approach between public authorities and service providers can this be achieved. The single biggest issue which should be addressed by the Scheme, but for which there is no mention, is traffic congestion. Congestion is the largest contributor to the fall in bus patronage in cities and is 14% worse than five years ago in the UK's largest cities.² Manchester is the second most congested city in the UK, and congestion costs Greater Manchester's economy £1.3bn a year.³ A 10% reduction in bus speeds can reduce patronage by 10% with longer journey times deterring customers,⁴ and congestion leads to more vehicles being needed to run the same frequency, increasing costs and putting inflationary pressure on fares regardless of how or who provides the buses.

GNW fully endorses GMCA's vision of 50% of journeys being on sustainable modes by 2040 and believes that addressing the issue of congestion is fundamental to delivering that vision. Congestion can only be addressed by introducing measures that genuinely deter car use, like congestion charging and parking levies, and by giving priority on roads to buses, and cycling and walking. Doing so would help tackle air pollution and improve public health, as well as promoting social inclusion and sustainable economic growth. The absence of such measures represent a genuine flaw in the Scheme.

GNW is part of Go-Ahead which has experience of franchised markets and, drawing on that experience, we have identified a number of serious concerns with the Scheme:

- the current proposal would instigate a long period of uncertainty for operators who may as a result, for commercial considerations, freeze investments and upgrades, which would in turn detrimentally impact on passengers' experience. It may also lead to significant turmoil in the labour market, which may also lead to difficulties in delivering the Scheme.
- Without robust commitments to quality, operator financial stability and sustainability as part of GMCA's procurement processes there is a risk that:
 - new entrants to the market lead a 'race to the bottom' on price to win franchise contracts and, as TUPE may not apply to bus drivers (see Q21) in order to maintain low costs, offer employees terms and conditions of employment (such as wages and scheduling conditions) that are less favourable than those provided by existing operators;
 - as the history of franchising in London shows (see Q10), SME operators who lack financial backing and the necessary skills and expertise to assess and correctly price the complexities of franchise service delivery may fail, leading to poor outcomes for customers, employees and GMCA; and
 - the stability enjoyed by the existing market will be disrupted and may be subject to significant turmoil during transition. The effects on the labour market alone (see Q21), where actual and possible redundancies (and potential changes to terms and conditions

² : <https://greenerjourneys.com/publication/impact-congestion-bus-passengers-new-extended-version/>

³ <https://tfqm.com/news/congestion-conversation-closes>

⁴ <https://greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf>

of employment which would result) could lead to uncertainty and increased employee turnover which in turn would threaten the operators' ability to deliver the Scheme successfully.

- for franchising to deliver the outcomes that GMCA has stated, it needs to be part of a holistic transport policy, as demonstrated in London, which has congestion charging and other policies to deter car use, investment in infrastructure and measures that promote public transport and not the car. Congestion, created by uninhibited car use, is the biggest obstacle in achieving the economic, social and health benefits that effective public transport can deliver, and nothing in this Scheme addresses this issue. The Scheme does not incorporate such proposals for Greater Manchester and accordingly its objectives cannot be achieved; and
- GMCA's approach to assets (including its intention to acquire depots and its proposed Residual Value ('RV') mechanism for fleet) does not take into account commercial incentives of operators and practical realities and will not generate the outcomes that it anticipates.

The Scheme overstates the importance to the network of the small number of buses that GMCA considers can be redeployed (30 out of nearly 2,000 buses in total i.e. about 1.5% of the total fleet). In previous analysis GMCA identified that around 114 buses could be freed up (around 5.5%) but the scope for redeployment has shrunk substantially. It is unclear how the £304m of Wider Economic Benefits ('WEBs') can realistically arise from the redeployment of only 30 buses (equating to over £10m of benefit per redeployed bus). However, to the extent that they can, GNW's revised proposals for a VPA, the Partnership Plus, submitted today, will achieve the same or better WEBs as the Scheme because it proposes the deployment of 30 **additional** buses. GNW would be pleased to discuss this proposal further with GMCA.

GNW has only been running services since June 2019, some time after the Scheme was first being developed by the GMCA. From the knowledge GNW has acquired of the Greater Manchester bus market, the VPA provides the best and most deliverable means of achieving the GMCA's vision for bus. The VPA would enable a dynamic market in which operators respond and cater to passenger needs at a lower cost and risk to the public purse and GMCA. Even if the serious problems with the Scheme were overcome, it could only offer marginal benefits to the market and passengers, but at significant risk.

GNW wishes to emphasise its support for continued collaboration and dialogue, including on how the Scheme could be altered to make it more deliverable, reduce the risks involved and deliver the outcomes that the GMCA wants and which the communities and passengers of Manchester deserve.

Summary of GNW's concerns

GMCA has based the Scheme on timescales for implementation and transition that are unrealistic. GNW believes the Scheme in its current format would cause significant disruption to bus passengers, lead to increases in bus ticket prices, a fall in patronage and potentially risk redundancy for bus company employees. The cost and risk of the Scheme would be borne by the public purse rather than bus operators, which is concerning because the Scheme is much less likely to be able to withstand shocks to the market such as reductions to the Bus Service Operator's Grant ('BSOG'), increased congestion, an unexpected downturn in patronage or sudden surges in fuel price.

GNW's particular concerns with the Scheme can be summarised as follows:

- **The Economic Case does not meet the statutory criteria** – To proceed with a franchising scheme, GMCA is required to demonstrate that it has met the statutory criteria. On analysis of the information available, it appears that the Scheme does not meet the statutory criteria set out in section 123B(3)(d) and (e) of the 2000 Act. It is neither affordable nor represents value for money and it would not therefore be lawful for such a scheme to be made. This is for the following reasons:
 - The Scheme is a much riskier proposition than the partnership models. Whilst the Net Present Value ('NPV') of the Scheme is higher than it is for the partnership models, the benefit-cost ratio is lowest under the Scheme (at 3.11 on the recommended approach compared to 3.45 or 3.66 under the partnership models). This is because the costs of the Scheme are much higher than for the partnership models, which in turn places a considerable burden on the estimate of benefits. The Scheme appears even riskier once account is taken of the revised proposals in the Partnership Plus model which would provide more enhanced benefits through the deployment of an additional 30 buses. This proposal had not been made at the time that GMCA conducted its assessment of the Scheme.
 - The economic model inflates benefits arising from the Scheme, including (i) the value of a common brand across the franchised network, which is based on a stated preference survey that is almost 25 years old and does not read across to the situation in Manchester - if the brand value were excluded, the NPV of the Scheme would fall to a level similar to the partnership models while the costs would remain much higher. GNW is of the view that the benefits associated with a common brand are being considerably overstated, however to the extent that they are capable of being realised this can be achieved via the VPA, without the move to a franchised environment; (ii) an optimistic view (i.e. an overestimate) of the additional journeys that are expected to arise under the Scheme; (iii) the network adjustments that would be implemented through reducing the number of buses on overlapping corridors may not be significant given there are only 30 redeployed buses available for supplementing the current network; and (iv) there is no account taken of the losses to passengers arising (in terms of reduced frequency and increased congestion) from redeploying buses on popular corridors into areas that are currently uncommercial.
 - The Economic Case does not appear to demonstrate adequate sensitivity testing on key inputs that generate the benefits case such as brand, network, price elasticity and wider economic benefits. The Economic Case should be subjected to robust and appropriate sensitivity analysis in order to stress test the benefit-cost conclusions. It appears that if less optimistic assumptions were used for some key inputs, the benefits would be lower and hence the benefit-cost ratio would also be lower.
 - GMCA appears to have modelled its analysis on the approach of Transport for London ('TfL'). However, there are material differences between Manchester and London that indicate it is risky to import a framework that is heavily based on the approach in London. For example, multi-modal and multi-vehicle trips are substantially greater in London than

any other urban centre. Also, London is not a drivable city because of congestion charges and parking restrictions, which have been implemented in order to make the value of integrated public transport greater. By contrast, GMCA has not proposed interventions to enable congestion reduction to encourage bus patronage. GNW refers in particular to its answer to Q17.

- **The Clean Air Zone requirements require urgently addressing** – The Clean Air Zone ('CAZ') is being introduced across Greater Manchester in two phases from 2021 to 2023. Given the legal deadlines and public concern around improving air quality, action to address these issues must necessarily take primacy over the next few years. GNW refers in particular to its answers to Q6, Q15, Q23 and Q41. Easing congestion would lead to dramatic reductions in noxious emissions from all vehicles. Emissions from Euro VI diesel buses, can be halved by increasing speeds from just 3.7mph to 5mph.⁵
- **The transition and absence of genuine trial removes the ability to learn from early experiences and perpetuates those mistakes in all tranches of franchising for the duration** – The Scheme would, if implemented, be rolled out in three tranches (by sub-area) and large franchise contracts would be organised around depots. The timetable for the roll-out of franchising in three tranches does not allow sufficient time for evaluation of the first tranche of franchising (in sub-area A) and consideration of whether franchising should be implemented, and if so with what amendments, to sub-areas B and C. If a franchising scheme were to be implemented in sub-area tranches, it must be introduced initially as a genuine trial followed by an adequate period of consultation. GMCA's proposal to roll out franchising to the whole area by 2023 is not workable. GNW refers in particular to its answers to Q2, Q9 and Q33.
- **The approach to depots is unlikely to work** – GMCA's proposal to provide depots to operators that are awarded the large franchise contracts is not only unnecessary (since there are unused and underutilised depots in Greater Manchester and land is also available) but is also unworkable. It will not be in the interests of the operators to sell their depots, and it is highly likely therefore that this would not be achieved as a voluntary sale. GMCA would be required to exercise its compulsory purchase order ('CPO') powers. Given that operators would be very likely to object and pursue avenues of legal challenge, it is probable that it would take GMCA between two and a half and three years to obtain a depot through exercise of a CPO, if indeed it could be achieved at all. It is possible, in light of the risk that GMCA has not met the statutory test for the proposal, that the Secretary of State would refuse the CPO. GNW refers in particular to its answer to Q11, as well as Q4 and Q7.
- **The timeframe for the procurement is insufficient** – In light of the point above regarding depots, GNW considers that GMCA would, if it intended to pursue franchising on an area-by-area approach, need to rethink the entire procurement timetable and enable sufficient opportunity for bidders to acquire depots in order to bid for the large franchise contracts. A significantly longer time period must be built in to undertake the procurement. GNW refers in particular to its answers to Q6, Q7, Q8 and Q25.

⁵ Begg, David and Haigh, Claire 'Tackling Pollution and Congestion: Why congestion must be reduced if air quality is to improve' Greener Journeys <https://greenerjourneys.com/wp-content/uploads/2017/06/TACKLING-POLLUTION-AND-CONGESTION-15-JUNE-2017-FINAL.pdf> Accessed: 28/08/18.

- **Route-by-route franchising as an alternative approach may mitigate risks** – In light of the issues identified above including the need for a genuine trial, the approach to depots and the consequences these problems would have for GMCA's timetable, GMCA should consider whether franchising on a route-by-route basis could ameliorate these issues. It is not clear whether GMCA has considered this option and if so, why this has not been pursued. We would encourage GMCA to consider and re-consult on this approach. GNW refers in particular to its answers to Q2, Q3, Q4, Q9, Q10, Q13, Q18, Q22, Q25, Q33, Q39, Q42, Q45 and Q46.
- **Inadequate recognition of the benefits of a partnership model** – The improved Partnership Plus model proposed by operators today would offer very much better benefits than those the GMCA hopes for from the Scheme but at a much lower cost to GMCA and at far reduced risk. Most of the WEBs said to derive from the Scheme arise from the different deployment of 30 buses. Operators have today proposed the additional deployment of 30 buses under the revised Partnership Plus proposal, giving rise to additional benefits above and beyond the Scheme but at much lower cost and without transferring risk to GMCA. Under the Partnership Plus model, operators would agree to a bond payable in the event that they fail to deliver on partnership promises, which would ameliorate any risk for GMCA by providing assurance of delivery. GNW refers in particular to its answers to Q12, Q13, Q16, Q17, Q28, Q29, Q31, Q36, Q38, Q39, Q41 and Q42.
- **Insufficient consideration of risk leaves GMCA, bus passengers and operators facing risk** – All stakeholders have a shared interest in minimising these risks. The Scheme represents a significant risk to:
 - bus passengers who would experience disruption to their services;
 - operators who would have to terminate services with minimal notice;
 - employees with uncertainty over employment tenure and terms and conditions; and
 - residents who could face an increased burden on the local public purse if risks materialise.
- **Out of date analysis** – Finally, GNW is concerned that GMCA's assessment is based on an outdated view of the future prospects for the bus market in Manchester, based on the experience of First Group's struggling operations. However, since GNW has taken over these operations, it has invested significantly, moderated fare increases, improved service delivery, and started to stabilise the declines in passenger volumes experienced in recent years and even begun to see some increases in volumes on certain routes. This provides a further reason why the Economic Case is out of date and overestimates the potential benefits of the Scheme.

Conclusion

GNW considers the statutory test for the making of the Scheme is not met and puts it at significant risk of legal challenge. It also puts GMCA (and the local public purse) at significant financial risk while leading to disruption to approximately 190 million bus journeys that take place every year in Greater Manchester and the jobs of about 5,000 bus drivers plus other staff employed by the operators.

The heightened risks of the transition to franchising will inevitably lead to delays and increased costs, at a time when Greater Manchester needs to focus on the transition to a CAZ, and to tackling the congestion that has led to the fall in bus patronage.

The VPA represents a real opportunity to deliver, at much lower risks, GMCA's ambition of improving bus services for customers and communities. GNW wants to work collaboratively with GMCA and other stakeholders to develop a partnership approach which will deliver this in a way that works for all parties.

If GMCA continues to be set on a franchising approach, then steps should be taken to reduce the significant risks involved, and our response sets out various ways in which this could be addressed. In particular we suggest that the Scheme needs amending to ensure that the introduction of franchising in one sub-area (which could be more of a route-by-route approach) is done on a genuine trial basis, with time for analysis and consultation prior to further roll out.

Answers to the Questionnaire

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

GMCA has noted in the Consultation Document that the Scheme if made will include changes such as the correction of typographical errors and inserting a clearer map. It is noted that these '*have no practical effect on the Proposed Franchising Scheme*'. The map delineating the boundaries of the sub-areas A, B and C is unclear and these boundaries are significant for operators. It would be preferable if in the further consultation which GNW proposes, GMCA were to list services by service number and note in which sub-area(s) the services operate as well as providing a clearer map.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

Implementation should be trialed

GNW has significant concerns about GMCA's proposed approach to and timetable for introducing the Scheme across the entirety of Greater Manchester. GMCA has itself identified a very significant number of risks arising from the Scheme including serious risks during transition such as the possibility that operators are left financially unable to continue services or that depots cannot be purchased and alternative arrangements need to be pursued.⁶ GMCA does not appear to have considered in any detail what action it would take if an operator became insolvent (other than the award of emergency contracts) or any mitigating steps to prevent this occurring. The risk of an operator becoming insolvent is particularly pertinent in light of the early experience of implementing a bus franchising scheme in London. This operational disruption could lead to significant cost and uncertainty for GMCA.

In light of the number of and seriousness of the risks associated with the Scheme, it would be unreasonable to roll it out to the whole area without a genuine trial followed by a staggered and gradual implementation.

GMCA appears to recognise in principle the value of a staged approach to introducing franchising, with the proposal that it would:

- enter into franchise contracts for sub-area A on 2 April 2021 (with launch of franchised services between August and November 2021);
- enter into franchise contracts for sub-area B on 25 March 2022 (with launch of franchised services between July and October 2022); and
- enter into franchise contracts for sub-area C on 10 March 2023 (with launch of franchised services between July and September 2023).

However, the proposed timetable does not facilitate a trial since it allows, at the least, just four months in between launch of franchised services and entering into further franchise contracts for the next sub-area. In

⁶ Appendix A to GMCA Bus Franchising in Greater Manchester Assessment September 2010 ('Assessment Document').

order to enable a meaningful evaluation of the implementation of franchising in sub-area A, the franchising of sub-area A should be treated as a genuine trial with a duration of at least one year (to allow a full cycle of seasonality) followed by a period of approximately one year in which GMCA can meaningfully assess the performance of the franchising scheme to date and consult on it. Such an approach would enable GMCA to consider whether changes are required in order to successfully implement franchising in sub-areas B or C, or indeed whether franchising ought not to be introduced. It would also be reasonable for the size and scale of the area (of sub-area A) in which the initial trial is implemented to be reduced so that any risk may be mitigated and contained.

Franchising on a route-by-route basis

As noted elsewhere, a less risky approach would be for GMCA to implement franchising on a route-by-route basis which would allow franchising to be implemented gradually and with minimal disruption to passengers.

Q3. Do you have any comments on the local services that are proposed to be franchised?

Exclusion of services operating from Queens Road depot from franchising in sub-area A

GNW's Queens Road depot is situated in sub-area B according to the map published with the consultation. Accordingly GNW understands that none of the services operating from Queens Road would be included in the franchising of sub-area A but that GNW would be required to obtain a service permit in respect of services which travel into or through sub-area A.⁷ Services operating from Queens Road would only fall to be franchised if and when franchising was implemented in sub-area B. Any other approach would be wholly unworkable because an operator cannot run a depot where it is prohibited from running some services because they have been excluded by franchising; having some routes removed would make it unprofitable to run the remaining commercial services, no doubt leading to their being withdrawn by operators with resulting detriment to passengers. GNW (and other operators) will need clarity on how the transition will work because if there is any lack of clarity, the efficiency and viability of services will be put at risk.

If GNW's understanding is not correct and GMCA proposes that services operating from GNW's Queens Road depot were to be within the scope of franchising in sub-area A, GNW would have no option but to consider all legal avenues to challenge the proposal. For the purpose of this response, GNW has assumed that GMCA does not intend that services operating from its depot in sub-area B would be within the scope of the franchising in sub-area A.

Cross-boundary services

Cross-boundary services should be included in any proposed franchising scheme. Some of the services proposed by GMCA to be franchised⁸ appear to be part or short working of services that are currently operated. For example, Manchester-Trafford Centre-Cadishead appears to be a short working of the Manchester-Trafford Centre-Cadishead-Warrington service. Commercial operators do not tend to work to authority boundaries and many commercial services cross such boundaries, in the interests of passengers

⁷ GNW's services 33 and 63 operate in what would be sub-area A but since they run from the depot in sub-area B would need to be excluded from the franchising in sub-area A.

⁸ Annex 1 and 2 to GMCA Have Your Say on How Your Buses Are Run Consultation Document ('Consultation Document').

who frequently make cross-boundary journeys. If cross-boundary services are not within the scope of franchising, there is a risk that frequency and coordination of services on such routes will be lost because it would be difficult for the out of boundary elements to be designed and operated in a consistent manner. Services would be likely to end at the boundary of the franchised area and there may not be adequate service provision for passengers to continue their journeys. Moreover, the exclusion of cross-boundary services deprives GMCA of the revenue that could be generated from such services which are profitable. The common branding, vehicle specification standard and fares systems sought by GMCA would also be undermined if cross boundary services are not included.

The selection of services to be franchised should be driven by passenger demand rather than arbitrary administrative boundaries, which are irrelevant for passengers. A preferable approach would be for GMCA to consider travel to work and other travel patterns and design the franchising scheme according to passenger behaviour. It would be open to GMCA to engage with other transport authorities to cooperate regarding the continuation of cross boundary routes.

Franchising on a route-by-route basis

The problems in delineating the sub-areas and the complexity of cross-boundary services could be avoided if GMCA re-considered its proposal for franchising on the basis of route-by-route franchising.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

Franchising on a route-by-route basis

In order to manage risk and minimise disruption it is paramount that any franchising scheme is implemented in a staged manner. However, the timeframe for the implementation of the Scheme in sub-areas A, B and C does not represent a genuine trial. Route-by-route franchising would mitigate risk and minimise disruption far more effectively than sub-area by sub-area franchising. If nevertheless, GMCA pursues a franchising scheme on the basis of a sub-area by sub-area implementation, it would need to be amended so that the introduction of franchising in sub-area A constituted a genuine trial, followed by a period of consultation and reflection prior to roll-out to sub-areas B or C.

Three sub-areas

As noted above, through excluding cross-boundary services from the scope of the Scheme, GMCA has given insufficient consideration to the impact of the Scheme on passengers who are reliant on cross-boundary services for travel to work or for other purposes.

Other transition arrangements

During the period of transition and whilst a new operator mobilises, there is a risk that a lack of knowledge and experience of the area or routes could detrimentally impact on the reliability and punctuality of services and therefore on passenger confidence in the service.

The proposed transition arrangements are likely to lead to customer confusion, particularly when travelling between the franchised network and the non-franchised network. Passengers will experience a change in

the appearance and livery of buses and will also be affected by new fare structures that will be inconsistent across the three sub-areas during transition. GMCA does not appear to have given any or any adequate consideration to passenger communications.

Depots

One of the key elements to GMCA delivering the transition to the Scheme is its acquisition of depots, since it has committed to providing depots to operators awarded large franchise contracts. For the reasons set out in detail to its answer to Q11, GNW does not consider this to be necessary but in any event, it could take between two and a half and three years for GMCA to obtain a depot or depots through CPO. It is not realistic for GMCA to obtain depots within the timescale it has anticipated for the transition to a franchising scheme even if it pays significantly above the market rate, which would in turn further undermine the Economic Case for the Scheme.

Risks

Transition to the Scheme will be disruptive, costly and unpredictable. Given that the Scheme will not benefit passengers more than the VPA, the likely negative consequences associated with transition render implementation of the Scheme disproportionately risky.

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?

Exclusion of services operating from Queens Road depot from franchising in sub-area A

We refer to our answer to Q3 and in particular our assumption that none of the services operating from Queens Road (located in sub-area B) would be included in the franchising of sub-area A and that GNW would be required to obtain a service permit in respect of services which travel into or through sub-area A. If this were not the case, and it was proposed that such services would not be permitted to operate, the depot would be partially utilised and this could lead to withdrawal of non-franchised services, with serious detrimental consequences for passengers during the transitional phase. In such circumstances GNW would be required to consider options for legal challenge.

Cross-boundary services

As noted above in the response to Q3, services operating from outside Greater Manchester or to outside Greater Manchester (cross-boundary services) should not be outside the scope of franchising. It would be preferable (for the reasons explained above) for such services to be included within the scope of franchising.

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

GNW has two major concerns about GMCA's proposed timetable for making the Scheme.

Insufficient time for evaluation of consultation responses and re-consultation

Firstly, the deadline for consultation responses is 8 January 2020 and GMCA proposes making a decision as to whether to implement the franchising scheme on 6 March 2020. GMCA cannot meaningfully take into account responses to this consultation and make any changes as necessary to the Scheme in less than two months. As noted in the answer to Q17, GMCA needs to re-examine its Economic Case which is a significant undertaking. It will be necessary for GMCA to re-consult on new proposals before deciding whether to proceed.

Failure to take into account CAZ obligations

Secondly, GMCA does not appear to have taken into account the obligations and associated timescales for Greater Manchester bus operators to comply with CAZ. The CAZ is being introduced across Greater Manchester in two phases from 2021 to 2023. As buses that have a Euro 5 engine or earlier would be subject to a daily penalty, but those with a Euro 6 engine or ultra-low emission buses would not, bus operators are in the process of upgrading their fleets to Euro 6 standard in order to meet this deadline. This requires operators not only to make investment (very little of which is underwritten by the Government) but to manage complex and significant upgrading projects. In such circumstances, it is not reasonable to propose making a decision regarding the Scheme in March 2020. A better proposal would be for GMCA and bus operators to focus on achieving the CAZ obligations, and only once that is done, turn to considering the implementation of franchising or any other scheme.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

GMCA has stated that it could enter into franchise contracts for sub-area A on 2 April 2021; sub-area B on 25 March 2022 and sub-area C on 10 March 2023. These dates are not achievable for a number of reasons.

Evaluation of tenders

GMCA has allowed a 13 week period for evaluating bids in relation to each tranche of the Scheme. This is short period of time given that there are likely to be protracted negotiations with a preferred bidder.

Depots

GMCA intends to provide depots to operators awarded large franchise contracts. We refer to our response to Q11 which explains that GMCA will not be able to obtain depots voluntarily and that in order to obtain them through CPO this could take from two and a half to three years from preparation to obtaining the depot or depots. Accordingly, GMCA should:

- (a) either amend the Scheme such that GMCA will not provide depots to facilitate the letting of large franchise contracts (and instead the control of depots will remain with operators, with timescales for the procurement amended accordingly to allow operators sufficient time to acquire or build depots in order to bid for franchise contracts); or
- (b) amend the proposed timeframe for procurement and transition significantly (to begin no earlier than 2023) to take account of the likely period of time that will be required for GMCA to obtain depots by use of CPOs.

Fleet

GMCA has stated that franchise operators would be obliged to put new fleet into the RV mechanism so that they would be available for subsequent franchises. GNW has significant concerns about the assumptions that GMCA has made relating to the RV mechanism. Operators are unlikely to be willing to volunteer the best of their fleet into the RV. Furthermore, the process for agreeing the market price of assets is likely to be complex and time consuming as there would inevitably be arguments around whether to adopt a market value or a book value and whether the price takes into account fair wear and tear and dilapidation. The valuation of franchised assets has been a problematic issue for the government in rail franchising. Accordingly, it may not be possible for GMCA to quickly (or at all) reach agreement with operators on the price of fleet. This process will take time and impact on GMCA's proposed timetable. It is also unclear how GMCA would provide assurance to operators that they would each be awarded equivalent values for their fleet.

Legal challenge

In preparing its timetable it does not appear that GMCA has taken into account the possibility of legal challenge(s) from operators in respect of the decision to implement the Scheme. In GNW's view, in light of the multitude of serious issues with the Scheme, there is a serious risk to GMCA of legal challenge. A judicial review of the decision would undoubtedly increase the risk of delay to GMCA's timetable.

Q8. Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

GMCA has proposed that the period of time between it entering into a franchise contract and the beginning of services provided under that contract will be nine months. GNW does not consider this estimate to be based on any meaningful estimates. It makes assumptions about timescales for mobilisation which are untested and does not allow any contingency for unforeseen delays. GNW notes that the transition in London from minimum subsidy to full gross cost contracting was undertaken on a graduated, route by route basis over a period of years. This included an initial stage of gross cost contracting, followed by a minimum subsidy and then a full regime of quality incentive contracts.

GNW has identified below a number of aspects of mobilisation that will need to be carried out by GMCA and/or operators which will take significantly longer than nine months to complete. The unrealistic timetable exposes GMCA and the passengers of Greater Manchester to significant risk of services not running or running at a poor standard.

Depots

We refer again to our answer to Q11 which sets out the serious difficulties which GMCA is likely to face in obtaining depots voluntarily or through CPO and that this renders GMCA's proposed timescale unworkable.

Fleet

It would be extremely difficult for operators to be ready with a full fleet of buses to GMCA's specification within a nine month lead time. It is unreasonable to expect operators to procure new vehicles or assemble sizable fleets of second hand buses within nine months of the award of a franchise contract in readiness for

delivering a contract. GNW's experience is that between six and nine months can be required for the manufacture of a batch of new buses on a much smaller scale than is proposed by GMCA for this franchising scheme. The second hand bus market is challenging and is unlikely to be able to fulfil the proposed demand for vehicles with up to date specification quickly.

It is also not possible to expect operators to refurbish existing fleet within nine months. Many bus operators do not have in-house refurbishment facilities. The external suppliers whose services would be required have limited capacity and the average timescale for the repaint of one bus is around two weeks and for a refurbishment is four weeks. This solution would also require operators to release 'spare' buses to be refurbished and meanwhile continue to deliver existing services but in reality most bus operators are unlikely to have sufficient spare fleet. This is likely to lead to reduced services for customer during the transition as a significant number of buses are off the road for refurbishment.

Staff

Nine months is not a sufficient period for GMCA and/or operators to recruit and train the extra staff that will be required to deliver an effective franchising scheme, which will include backroom and support staff. Recruitment processes can take months, and some individuals will be subject to three months' notice periods. In order to ensure effective performance on day one, staff should be able to benefit from training and experience in their role prior to the commencement of the franchising services.

Operator licences

Any new entrants to the market will be required to obtain a PSV operator licence, which would take a minimum of eight weeks from the point of application.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

Paragraph 46.8.3 of the Assessment provides that:

'It is proposed that the timing of this consultation would take place after all the first franchised contracts have expired... TfGM believes it would be reasonable for the GMCA to begin consulting such organisations after all the franchise contracts that where [sic] entered into by the GMCA during transition had expired, as opposed to during that transition process, because the Franchising Scheme will effectively only be working as a steady state model when all of these contracts have expired. The current proposals assume that few changes will be made to the network upon any implementation of the proposed scheme so the views of the public would be unlikely to assist the GMCA in helping it to transition from a deregulated market to the proposed Franchising Scheme.'

This proposal for consultation cannot enable GMCA to meaningfully review the efficacy of the Scheme during transition and make any necessary changes prior to full implementation. This is because GMCA's indicative timetable states that 'Once franchising becomes operational in sub-area C, there would no longer be three sub-areas and instead there would be just one area which would cover the entirety of Greater

Manchester.⁹ The proposal for consultation at the end of the franchising contracts of sub-area C, i.e. after transition, exposes GMCA and passengers in Greater Manchester to an unacceptable level of risk, since it has not allowed any time between transition and the 'steady state model' for views to be heard and changes to be made. Under this proposal, there is a risk that major operational, technical, commercial and other issues that arise during the first tranche of franchising, which could cause serious passenger detriment or risk to GMCA, will simply be replicated and exacerbated in the second and third tranches of franchising.

To ameliorate this risk, see response to Q2 above, GNW considers that franchising must either be implemented as a genuine trial in sub-area A, or implemented on a route-by-route basis.

For the transition period to constitute a genuine trial, it would be necessary for GMCA to have sufficient opportunity following the roll-out of franchising to sub-area A to learn from its experience and adapt the Scheme as necessary for the next tranche to be franchised. As noted above, to ensure that the first tranche constitutes a trial, it would be advisable for the size of sub-area A to be reduced. The second and third tranches of franchising would follow the same model of reflection after implementation. Evaluation would be undertaken, lessons learned from the trial and any changes made to the proposed scheme before the next tranche of franchising is undertaken.

Alternatively franchising should instead be implemented on a route-by-route basis which will reduce the risk of disruption to passengers and enable GMCA to evaluate the franchising system on an incremental basis.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

GNW supports initiatives to promote competition in the market at all levels.

GMCA has proposed that there would be a restriction on how many small franchises could be awarded to a single operator to reduce the risk of a single operator being able to dominate the market. GMCA has not confirmed what the restriction would be. To preserve competition but still enable value for money for GMCA, the restriction must be made by reference to the global market share of an operator across Greater Manchester.

GNW is concerned about the poor record of SMEs that have been awarded franchising contracts in other contexts. For example in the early days of bus franchising in London, TfL sought to improve competition in the market by awarding contracts to SMEs which had inadequate experience and comprehension of the complexity of the operations required. This led to a number of companies failing to perform their obligations and/or becoming insolvent. Examples include Harris Bus and Boro'line Maidstone.

GNW considers that a better and less risky approach to ensure competition in the market and enable SME operators the opportunity to bid for franchise contracts is to structure the procurement on a route-by-route basis. This would give operators of all sizes the option to choose how many contracts to bid for and minimise the risk of operators failing to deliver.

⁹ p.19, Consultation Document.

In order to manage the risks during transition and avoid operator failure, it is crucial that GMCA implements a fair process for all operators and one which ensures that operators awarded franchise contracts are financially stable and are committed to behaviours that will not disrupt the stability and quality of the driver labour market in Manchester.

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

GMCA has proposed that under the Scheme, it would seek to take control of strategic depots and provide these to operators of large franchises for the delivery of franchise operations.

GNW does not consider that it is necessary for GMCA to provide depots to facilitate the letting of large franchise contracts. It does not agree that without this, an operator owning a depot would have a significant competitive advantage compared to other operators and that this would constitute a barrier to entry and accordingly reduce competition. Moreover, and crucially, GNW also does not consider that it is possible for GMCA to obtain depots within a timescale that would enable delivery of its proposed timescale for procurement and transition to the Scheme.

Firstly, it is not necessary for GMCA to provide depots to facilitate the letting of large franchise contracts because there is not a shortage of depot capacity which could constitute a barrier to entry for operators bidding for large franchise contracts. In the franchised bus market in London, TfL does not provide depots to operators, who are responsible for acquiring and operating depots. GNW cannot identify any reason why this model could not work in Greater Manchester since there are a number of unused and under-used depots. These facilities offer significant capacity that operators may utilise in order to ensure they are in a position to bid for large franchises. Alternatively, operators (whether existing operators in Greater Manchester or new entrants to the market) could build new depots; GNW notes that in North Manchester there are brownfield sites where this could be done. Operators have a number of viable options by which they can obtain depot capacity. Accordingly, there is not a risk that competition would be hindered if GMCA does not provide depots to operators.

Secondly, it is not a realistic proposition that operators would agree to sell their depots to GMCA voluntarily. It is highly unlikely for there to be any commercial or other incentive for GNW to sell its Queens Road depot to GMCA. If GNW did not win any franchises the depot could be sold to another operator for a market value or for non-transport development. Accordingly, if GMCA wished to acquire this depot it would be required to exercise its CPO powers. GNW would object in the strongest terms to such exercise. GNW also anticipates, based on its understanding of the market, that other operators in Greater Manchester are likely to take the same approach and not be amenable to voluntarily sale of depots.

Thirdly, if GMCA has to rely on the CPO process to obtain depots (which GNW considers will be the case since operators would not agree to sell), GMCA's whole timetable for the procurement of franchise contracts, transition and roll-out will be pushed back for a period of up to three years because of the likely time periods associated with CPO. The CPO process is comprised of the following elements for which the timescales set out below are likely to apply:

- **Preliminary Phase** – GMCA must demonstrate that real efforts have been made to negotiate a voluntary acquisition with the owners of bus depots which it requires for the Scheme. A reasonable

period of time needs to be allowed to allow for negotiations to take place. This could easily take **at least 3 months**.

- **Preparation of CPO documents** – GMCA would be required to prepare a range of CPO documents before it can resolve to make the CPO. These include a Statement of Reasons (which must make clear that the only impediment to the Scheme is acquiring the depot(s) so it **cannot be made until all planning permission etc has been obtained**); a Resolution of the Executive to make the CPO (which must carefully test what is in the Statement of Reasons and therefore can result in the Statement being revised **over a period of weeks**); the CPO itself; and Statutory Notices. **It would be unusual for this preliminary phase to be completed in less than 3 months, and could easily be at least 6 months or more.**
- **Making the CPO** – If GMCA has resolved to make the CPO, it must then put the draft order and map on deposit in the locality of the land (often a local library) for **at least 21 days**. Notice of the making of the CPO also has to be advertised for 2 consecutive weeks in a local newspaper and put on display on the land – **a minimum of 21 days** must be allowed for objections to be made.
- **Objections** – Objections regarding GMCA's CPO would be made to the Secretary of State who will appoint a planning inspector to consider the objections. For most contentious matters, this will be at a public inquiry. The length of the inquiry will depend on how many objections need to be considered – inquiries of more than a few days may be harder to timetable, depending on availability of an inspector. Statements of Case have to be produced (usually **6 weeks** after the date the Secretary of State decides to hold an inquiry, and detailed statements of evidence have to be produced, typically 3 weeks before an inquiry commences. Although, the planning inspectorate has targets periods within which an inquiry should commence, **in practice it could be several months before an inquiry takes place**. The inquiry itself could range from a small number of days to a period of weeks depending on the level of objection, and evidence that is required to be produced. **This phase is unlikely to be less than 6 months, and could be nearer to a year.**
- **Post public inquiry** – After the inquiry had been completed, the inspector would prepare a report and recommendation for the Secretary of State, who would then consider that report (with civil servants reviewing it). If the inspector had recommended that the CPO be confirmed, and the Secretary of State agreed, the CPO would be confirmed. GNW understands that the Secretary of State will take into account all of the circumstances including the purpose of the CPO and whether the Scheme is deliverable from a financial perspective. In light of the concern articulated in the answer to Q17 that the Scheme does not meet the statutory test for providing value for money, there appears to be a risk that the Secretary of State would refuse the CPO on that (or another) basis. **This period can take between 3 to 6 months depending on the complexity of the matter. It is not unknown for the consideration by the Secretary of State to take longer, and there is no specific deadline by which the Secretary of State has to make a decision.**
- **Post confirmation of CPO** – if GMCA has obtained a CPO, notice of the confirmation of the order would have to be advertised in a local newspaper and affixed to the land. Objectors have **6 weeks** from the date of that notice to challenge that Confirmed Order in the High Court on legal grounds (very similar to judicial review). Where this happens, it may be a matter of weeks before the High

Court decides whether there should be a full hearing, or whether it is not persuaded that there is a valid claim. The timing of a full hearing will depend on how busy the High Court is, but **several months could pass before a hearing and a further period of weeks (or months) before a decision is handed down.**

- **Giving effect to a Confirmed CPO** – if no challenges were made or the challenges were unsuccessful, GMCA would be able to take possession of the land either by General Vesting Declaration (which usually takes **at least 3 months**) or by serving a Notice to Treat (negotiate) and Notice of Entry (which allows the Acquiring Authority to take possession more swiftly than by GVD, but before title in the land transfers to it).

On the basis of the timescales set out above, it is quite possible that it would take GMCA from **two and a half to three years** to acquire a depot or depots. This is a realistic estimate since GNW considers it to be highly unlikely that any operators would voluntarily sell their depots to GMCA and that operators would object at all stages and pursue all available avenues of legal challenge. For this reason GMCA's intention to provide depots to facilitate the letting of large franchise contracts is wholly unworkable within the timescale for procurement and implementation that GMCA has proposed. GMCA has noted that *'The procurement approach described on page 61 of this document would be adapted where required in the event that an alternative approach for initial depot provision was pursued for one or more of the franchises. However, at this stage it is not anticipated that the procurement approach would be materially affected in this event.'*¹⁰ For the reasons set out above, this is not a reasonable assumption. Accordingly, GMCA should reconsider its proposal and either:

- amend the proposal such that GMCA will not provide depots to facilitate the letting of large franchise contracts (and instead the control of depots will remain a matter for operators, with timescales for the procurement amended accordingly to allow operators sufficient time to acquire or build depots in order to bid for franchise contracts, which will prevent barriers to entry and facilitate competition in the procurement process); or
- amend the proposed timeframe for procurement and transition significantly (to begin no earlier than 2023) to take account of likely period of time that will be required for GMCA to obtain depots by use of CPOs.

***Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?**

The Strategic Case describes a *'spiral' of decline* in the Greater Manchester bus market which GNW does not agree to be the case.¹¹ GNW sets out below its view that there is not limited competition to the extent that GMCA believes, or a failure to innovate or adapt to new technology in the deregulated market. For these reasons it does not consider the decline in patronage to be inevitable in a deregulated market.

Competition in the Greater Manchester bus market

¹⁰ Para 4.87, Consultation Document.

¹¹ Para 4.15, Consultation Document.

The Strategic Case asserts that limited competition is a feature of Greater Manchester's bus market and that this is a challenge facing the market because *'the limited nature of the competition means that assumed benefits of full "on-road" competition – typically a high degree of value for money and innovation – are not experienced.'*¹² It also states that the *'limited competition'* leads to undesirable effects for passengers including fare increases, lack of co-ordination of networks, services for social and economic need are not provided where they are not profitable and there are complex fares and ticketing arrangements.

In fact, GNW competes with other operators on similar or identical flows, as set out in the table below. GNW has increased competition recently with other operators by offering an enhanced peak express service between Bury, Heywood and Manchester. Passengers therefore have choice on these routes and operators must compete in relation to price.

| Route | Go North West's service flow | Competitive Service Flow | Competitive Operator |
|-------|----------------------------------|---------------------------------|----------------------|
| 17 | Manchester Shudehill - Middleton | 162 163 | Diamond Bus |
| 17 | Manchester - Queens Park | 81, 112, 113, 116, 118, 119 | First/ Stagecoach |
| 18 | Manchester Shudehill - Middleton | 162 163 | Diamond Bus |
| 18 | City Centre - MRI | V1 V2 | First |
| 18 | Manchester - Queens Park | 81, 112, 113, 116, 118, 119 | First/ Stagecoach |
| 41 | Victoria Avenue - Middleton | 162 163 | Diamond Bus |
| 41 | Piccadilly - Withington | 42, 42A, 42B, 43, 142, 143, 147 | Stagecoach |
| 41 | Piccadilly - West Didsbury | 43, 143, 147 | Stagecoach |
| 41 | Piccadilly - Northenden | 43 | Stagecoach |
| 41 | Sale - Sale Moor | 19 | Arriva |
| 52 | Cromwell Bridge - Eccles | 10 | Arriva |
| 53 | Trafford Bar - Oxford Road | 250, 263 | Stagecoach /Arriva |

¹² Para 4.18, Consultation Document.

| Route | Go North West's service flow | Competitive Service Flow | Competitive Operator |
|-------|--|--------------------------|----------------------|
| 67 | Manchester - Salford Royal | 34 | Stagecoach |
| 67 | Eccles - Peel Green | 10 | Arriva |
| 93 | Manchester Shudehill - Cromwell Bridge | 10 | Arriva |
| 100 | Manchester - Salford Royal | 34 | Stagecoach |
| 100 | Eccles - Trafford Centre | 2 68 | Diamond Bus |
| X63 | Manchester Shudehill - Middleton | 162 163 | Diamond Bus |
| X63 | Heywood - Bury | 163 | Diamond Bus |

Moreover, there is already an established tendered service network in TfGM area that covers some of the links that are no longer/ have never been commercially viable for operators.

Innovation and adaptation to new technology

GNW does not agree that the current bus market in Greater Manchester is characterised by a failure to adapt to new technology. Deregulated bus markets have a strong record for innovation because operators are incentivised to make investments in technology and other initiatives that attract customers in order to maximise profits. Details of such innovations are described in the answer to Q13 below.

Network coordination

In the current bus market, bus stations are used as hubs to enable seamless passenger interchange between bus, tram and train services. Passengers are able to capitalise on this arrangement because of Greater Manchester Travelcards Limited's product range of travel cards. The coordination is publicised to customers by TfGM through information on interchanges.

Ticketing arrangements

GNW does not consider the current ticketing arrangements to be complex or detrimental to passengers. Passengers have the option of purchasing single operator tickets or multi operator tickets. Although there is some scope for simplification, GMCA appears to have overstated the significance of the issue which is common to all transport systems. Ticketing is also of declining importance for passengers who are increasingly switching to a contactless form of payment.

Patronage

The Strategic Case asserts that *'the number of trips taken on the bus network in Greater Manchester has been in long-term decline. More recently this trend has continued, From a more recent peak of 233m trips per year in 2008-9, there were 194m trips in 2017-18, a reduction of 17%.'* As a relatively new operator in Greater Manchester, GNW has not had the opportunity to collate its own data regarding the performance of the local bus market. However, it understands that any decline in bus patronage is likely to have been caused by increasing patronage of the city's Metrolink tram networks and it does not therefore represent a customer shift away from public transport and increasing congestion leading to slower and less reliable bus services and increased costs leading to higher fares.

In any event it is clear that operator initiatives can have a positive effect on patronage. Passenger growth has been demonstrated in Nottingham, Liverpool and Brighton. Most operators regularly review demographic data to compare how their service provision matches population density and operators develop relationships with local authorities in order to be aware of housing developments or other significant local changes so that services can be adapted. For example, early data collected in respect of GNW's Rochdale Road service indicates that investment in improving frequency and vehicle standards has led to an increase in patronage.

Operators have demonstrated that they can generate passenger growth by focussing on quality in terms of timetable reliability, strong marketing and enhanced vehicle quality. Passenger growth can also be stimulated by improvements in vehicle standards and offerings such as power sockets, Wi-Fi, high quality interiors and in some cases increased capacity, can be seen to stimulate growth. For example Go-Ahead companies have successfully innovated with items such as USB charging sockets, WiFi, next stop announcements, interior design changes such as tables and social seating with considerable success on services such as the 'Coaster' 12 service between Brighton and Eastbourne operated by Brighton & Hove buses, the 'Fastway' group of routes which are run between Crawley, Gatwick Airport and Horley by Metrobus and the highly successful 'more' branded routes in the Bournemouth/Poole area run by Go South Coast. All of these have demonstrated significant patronage growth to justify the investment made.

For these reasons GNW does not agree with GMCA's characterisation of the current bus market in Greater Manchester. It also does not agree that services and patronage will best be addressed by this franchising proposal, for the reasons set out in the answer to Q13 below.

***Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?**

For the reasons explained in the answer to Q12 above, the challenges facing the local bus market in Greater Manchester are not as severe as has been articulated by GMCA. GNW considers that the factors inhibiting patronage in the bus market in Greater Manchester are not addressed by the Scheme.

Congestion

One of the biggest challenges facing the bus market in Greater Manchester is traffic congestion which detrimentally affects the punctuality of bus services and therefore their appeal to customers. The Scheme does not address this issue at all. This challenge to the bus market would be best addressed by demand management measures including raising car parking charges or reducing the availability of car parking

spaces. Such initiatives can also be revenue raising. The following initiatives have led to an increase in patronage:

- Workplace User Charging was implemented in Nottingham, which has the second highest level of bus use in England outside London with 75% of public transport trips into the city centre made by bus.
- Road User Charging was implemented in London which led to bus ridership growing by 70% between 2000/2001 and 2014/2015.
- The Balanced Transport Strategy was introduced in Oxford as an attempt to limit car trips into central Oxford by reducing the availability of parking and increasing the price of parking. Today there are six park and rides and Oxford is a bus city with over 50% of all trips into the city centre made by bus - unprecedented outside London.

The Scheme does not contain any proposals to address congestion. Any proposal to improve the bus market in Greater Manchester should take into account the issue of congestion and measures to address it.

In London, despite the positive impact of congestion charging in the central area, recent city wide demand pressures have increased congestion resulting in a negative impact on passenger numbers and operating costs. Our sister company in London (Go-Ahead London) has calculated that increased congestion in the capital means that, to maintain the same level of service frequency as two years ago, would involve an additional £200,000 of cost per vehicle and duties.

Fares

As discussed further in our answer to Q17, the Scheme assumes that fares will rise by RPI plus 1.4% on average every year. Passengers' fares would therefore be higher under the Scheme than under a partnership model since in the latter case there would be no price rises for two years.

Innovation to increase patronage

The Scheme is less likely to deliver innovation to the bus market than a partnership model. Under the Scheme, standards would be prescribed at the point of entering into franchise contracts and set for the five years (and potentially an additional two years) thereafter. Innovation would be unlikely because GMCA has less experience than bus operators of innovation and development in the market, and there would also be a cost associated with GMCA seeking to introduce innovations within a franchise contract period as a change of terms would be likely to constitute a contract variation. This contrasts with the position in London where the rolling programme of route-by-route franchising enables innovation to be introduced incrementally.

By contrast, in a partnership model there would be no rigid contractual structure, enabling operators to make investments in innovation in the hope of increasing patronage and revenue. By way of illustration, in a deregulated market operators have made the following investments to innovate the Greater Manchester bus market:

- operators have worked together with TfGM as part of the Greater Manchester Travelcard scheme to introduce innovative ticketing solutions to provide all operator ticketing for bus services including Smartcards;
- payment solutions such as contactless Apple Pay, Google Pay are available on GNW, Arriva, First, Diamond, Stagecoach, Transdev and Vision buses in Greater Manchester;
- mobile ticketing apps have been developed by GNW, Stagecoach, First Manchester, Diamond Bus, Arriva, Transdev and Vision;
- carnet tickets for irregular travellers are offered by GNW, First Manchester and Diamond in the Greater Manchester area;
- QR code ticketing scans for paper tickets and mobile apps are provided by GNW, First Manchester, Diamond Bus and Arriva;
- USB charging is offered on Diamond Bus's new double decker buses, Transdev single decker buses in the Bury area; and wireless charging which is available on Transdev single decker buses in the Rochdale area;
- Wi-Fi is offered on all GNW and First Manchester buses;
- Customer journey planning apps showing real time tracking data and positioning are offered by GNW, Arriva and Stagecoach;
- Twitter is used by GNW and Transdev to publicise traffic disruption which is affecting services as well as diversions, news and special offers; and
- high quality interiors with leather seats are offered by GNW (as part of a route branding programme) as well as by Arriva on its Sapphire 263 and 575 buses.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

GNW considers GMCA's objectives for the bus network in Greater Manchester (relating to network, fares, customer experience and value for money) to be ambitious and admirable. However as explained further in the answer to Q15 below, the Assessment document in which these are set out lacks detail as to how these objectives can be delivered through the Scheme.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

The Scheme in its current form looks to GNW to be unworkable whereas the Partnership Plus VPA would enable GMCA to achieve its objectives, more quickly and at much lower risk.

Patronage

The Scheme would not achieve GMCA's objective relating to patronage. GMCA itself has acknowledged in the Consultation Document that *'Given the forecast decline and the challenges facing the bus market in Greater Manchester, none of the options for reform, including the Proposed Franchising Scheme, would on their own be likely to achieve the full improvement in performance or patronage necessary. Some of the challenges facing the bus market, such as journey speed, are not capable of being directly addressed by introducing either a partnership or the Proposed Franchising Scheme'.*

As noted above, the main challenge to patronage in the Greater Manchester bus market is traffic congestion. Accordingly, GNW does not consider that the stated objectives could be achieved through the Scheme in the absence of complementary measures such as congestion charging, red routes investment in infrastructure and policies that promote public transport as a realistic alternative to the car (all of which would achieve significant benefits without transferring significant cost and risk to GMCA through franchising). Some initiatives of this type are referred to as 'Phase 2' interventions but are outside the scope of the Scheme. It is notable that these sorts of interventions are key factors that enable congestion reduction in London and without which GNW believes franchising could not be successful in Manchester.

Moreover, the Scheme is likely to reduce overall patronage because it is premised on increasing accessibility which will be achieved by re-allocating buses from busy routes to routes on which patronage is lower or by forcing some bus flows to break their journey and travel by Metrolink instead.

Reducing harmful emissions

One of GMCA's objectives is to *'ensure harmful emissions of buses are reduced and CO2 emissions from buses are reduced.'* However, the objectives (and the detail of the Scheme) do not set out any methodology for addressing the CAZ requirements. The CAZ obligations will apply whether or not the Scheme is implemented.

Sustainable public investment

In relation to GMCA's objectives around value for money and in particular its objectives to *'ensure economic value for money for public investment'* and *'make sure any market intervention is sustainable in the long term'*, GNW notes that it is unclear how the Scheme would be able to absorb shocks such as major reductions in the BSOG, reduction in patronage and fuel price spikes. GNW understands that BSOG will be under review for the next Government Spending round in 2020 that there is risk of reduction in support. BSOG was reduced by 25% in 2012 during the austerity years and it is not unlikely that a similar cut might be implemented.

An assumption has also been made regarding funding for English National Concessionary Travel Scheme ('ENCTS'). GMCA has indicated that Central government *'could provide additional funding for the Proposed Franchising Scheme'*. As there is no entry in the risk register relating to ENCTS, GMCA does not appear to have considered the possibility that additional funding is not provided, or ENCTS funding is decreased.

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

Lack of clarity as to best and final partnership model

As a preliminary point, it is not clear to GNW that the enhanced partnership referred to by GMCA is the best and final offer available from bus operators as correspondence from GMCA states that they are open to a revised offer as part of the consultation. As noted above, the operators are today submitting revised proposals for a VPA: the Partnership Plus model. This proposal should be properly considered in accordance with a clear process to establish what the best possible partnership model is.

The partnership model will offer the same or better benefits, meeting GMCA's objectives

It is clear that a partnership model could deliver the same or even better benefits than the Scheme and could therefore enable GMCA to achieve its objectives, because:

- most of the WEBs that GMCA state would be generated from the Scheme arise from the re-deployment of 30 buses. Operators have made a revised VPA offer which includes deployment of an additional 30 buses. If GMCA's assumption about those WEBs is correct, the VPA will now give rise to exactly the same supposed benefits;
- whereas under the Scheme, fares would be set to increase, under the partnership model, there would be a two-year freeze on the price of an all bus operator ticket;
- under the partnership model there would be a mechanism for information about sales to be available in one place for customers;
- in a partnership model the operators have made commitments around CCTV, Wi-Fi, cleanliness and comprehensive branding;
- the VPA would permit GMCA to agree a whole host of measures with the operators to seek to achieve the same outcomes that are sought under the Scheme, but at significantly less cost and risk;
- GMCA has underestimated the ways in which a partnership model could enable GMCA to deliver its objectives around 'Network'. It is stated that *'while reliability would be monitored and targets could be agreed, there remains uncertainty over any potential enforcement mechanism.'*¹³ It is not the case that a partnership model could not provide certainty of delivery because partnership would take the form of a binding contract with strict obligations on bus operators to perform, with financial penalties imposed for non-performance. This can offer GMCA and passengers confidence in delivery of services;
- a partnership model is more likely to enable GMCA to deliver its objective to improve the customer experience of passengers (including *'improve ease of understanding of the bus service'*, *'improve safety of travel'* and *'enhance the on-bus experience'*) because bus operators would be incentivised to innovate in a way that they would not under the Scheme;

¹³ Consultation Document, para 4.32.

- a partnership model is more likely to enable GMCA to deliver its objective to achieve value for money because the arrangement would be more resistant to shocks such as a reduction in BSOG as discussed in the answer to Q15 above; and
- GMCA would have assurance from operators that they would deliver as per the terms of the partnership agreement. For example the Partnership Plus proposal that has been offered today includes a proposed bond to be given by operators to GMCA, ameliorating any concern on the part of GMCA about operators failing to deliver on the commitments. The Nexus/NEBOA VPA is an example of how much a mechanism works in practice.

Overall, a partnership model enables GMCA to take on less risk than it is required to do under the Scheme but for similar benefits to the bus users of Greater Manchester.

Examples of partnerships which have delivered similar objectives

We note the following examples of partnerships between bus operators that have been implemented with success:

- Bus operators implemented a partnership in Bristol called Metrobus. The service is not subsidised but is funded by central and local government grants and overseen by Bristol, South Gloucestershire and North Somerset councils. Under the scheme a new network of bus routes was created across the city including sections of bespoke bus infrastructure such as bus only roads, bridges and guideways. As these are in effect private roads the transport authority can specify contractual requirements for operators to run over them. These can relate to vehicle age, quality, frequency and may even include some performance penalties.
- Similar arrangements to those described above relating to Metrobus apply for the guided bus schemes in Cambridge, Manchester (Vantage), Eclipse (Gosport - Fareham) and Luton - Dunstable.
- Sheffield is a partnership that involves co-ordination of services and frequencies rather than infrastructure but is underpinned by a contractual agreement between the transport authority and the operators involved in the co-ordination agreement.
- The Fastway Bus Rapid Transit project running between Crawley, Gatwick Airport and Horley increased patronage by 160% between 2003 and 2013.
- Partnership working has led to a boom in bus travel in Birmingham.¹⁴

***Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:**

- offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options,

¹⁴ <https://www.birminghammail.co.uk/news/midlands-news/bus-travel-birmingham-booming-how-17440887>

- **provide the most economic value (Net Present Value), and**
- **create the best platform from which further economic value could be delivered.**

Do you have any comments on this?

It is not possible to replicate the economic model because much of the necessary detail has not been provided. However, it is clear from what has been provided that there are material concerns with the approach. Moreover, it is not clear what partnership model GMCA has assessed the Scheme against. It has not taken into account the Partnership Plus proposal that has now been made by the operators.

Set out below is a summary of the concerns that GNW has identified with the Economic Case.

(a) The partnership models give rise to the highest ratio of benefits to costs, indicating that the Scheme is a riskier proposition

It is obvious from the numbers reported in the Economic Case that the Scheme is a riskier proposition than either of the partnership models. While the NPV of the Scheme is higher than for the partnership models, the benefit-cost ratio is lower.

In fact, the ratio of benefits to costs is lowest under the Scheme (at 3.11 on the recommended approach compared to 3.45 or 3.66 under the partnership models).¹⁵ The economic appraisal at Table 7 of the Economic Case Supporting Paper reports other approaches to calculating the NPV and benefit cost ratio. In each case, the Franchising model has the highest NPV, but the lowest benefit-cost ratio.

This indicates that the Scheme is the riskiest of the options. It contains the highest benefits, but also the highest costs. The costs are fairly predictable as they are largely within GMCA's control, indicating that the results are sensitive to the assumptions that give rise to the benefits. This suggests that it is critical that the benefits are appropriately measured. However, as set out below, there are several reasons to think that the benefits (particularly the soft benefits and wider economic benefits) are over-estimated.

(b) Several assumptions of the model (in particular relating to the benefits generated by the Scheme) appear to be over-optimistic

Although it is not possible to replicate the economic model on the basis of the information provided in the Economic Case, it is possible to identify the key assumptions that feed into the model and to assess whether these are evidence-based and hence likely to provide robust modelling results. The benefits from the models primarily arise from the increased number of journeys made by consumers and the time savings resulting from those journeys being made more efficiently. There are several ways in which the model's assumptions appear to be over-optimistic, in that they appear to inflate the benefits arising from the Scheme in the following ways:

¹⁵ As noted above, this also does not take into account the Partnership Plus proposal of the operators which would provide more enhanced benefits.

- **Price elasticity.** The economic model uses long run price elasticities of -0.65 for commuters to -2.08 for leisure passengers (in the long run – the impact is lagged over 3 years). If the price elasticity is too high, this will give rise to an excessive quantity response (in the form of additional journeys) given the price reduction, and hence benefits that are over-estimated.

Mark Wardman (2014) assessed bus elasticities by reviewing hundreds of separate studies and carrying out a meta-analysis.¹⁶ Wardman states that '*Given the absence of any bus industry-wide document such as PDFH, the current view of bus elasticities can be taken to be -0.4 in the SR, rising to -1.0 in the LR (TRL et al., 2004). The Department for Transport (2011) expects transport appraisal to conform to an LR bus fare elasticity for full-fare-paying passengers in the range -0.7 to -0.9, while Transport for London (2008) recommend conditional elasticities by time period that vary little around -0.3*' (p382).¹⁷

This suggests that while the price elasticities for commuting and school trips appear to be in the relevant ranges, the value used for the leisure elasticity appears substantially higher than the relevant range. The results are shown in **Figure 1**, compared to the values used in the Economic Case.¹⁸

Figure 1: Comparison of elasticities

| Type of travel | Wardman (2014) | Economic Case |
|---------------------------|----------------|---------------|
| Commute | -0.68 | -0.65 |
| Child school | N/A | -0.85 |
| Leisure single | N/A | -2.08 |
| Leisure period | -0.89 | -0.98 |
| Leisure senior full | -1.51 | N/A |
| Leisure senior concession | -0.53 | N/A |

Source: *Economic Case, Appendix 1, p44; Wardman 2014, Table 5, LR values reported; not all measures have direct overlaps.*

As a result, there must be some doubt about the leisure elasticity employed.

¹⁶ Wardman (2014), Price Elasticities of Surface Travel Demand, A Meta-Analysis of UK Evidence, Journal of Transport Economics and Policy, Volume 48 Part 3 pp. 367-384.

¹⁷ Annex 7.3 of the Competition Commission Local Bus Services investigation in 2010, which reviewed existing evidence on price elasticities to that point, suggested (in Table 1) that price elasticities were often less than -1 in absolute magnitude and at a maximum -1.7 (for generalised cost elasticities).

¹⁸ There is not always a direct overlap.

- **Higher prices under the Scheme.** While the Economic Case includes the benefits to passengers of lower fares for customers who currently purchase interoperable tickets, it also assumes that prices will rise by RPI plus 1.4% on average every year. This is a higher rate than has been observed in the market in the past (and under the partnership model there will be no price rises for two years). These higher prices in the Scheme should be incorporated in the model as direct losses to customers and as a source of reductions in patronage.
- **Stated preference services.** Many of the inputs appear to be based on Stated Preference (i.e. willingness to pay) surveys which have not been publicly reported.¹⁹ There may be no alternative to willingness to pay surveys. However, any predictions based solely on Stated Preference should be treated with caution. In the context of stated preference approaches used to measure price elasticities, Wardman (2014) states that:

*'Given that it is hardly credible to claim that SP [i.e. stated preference approaches] provides a full LR behavioural response, that SP and RP choice models are supposed to be measuring basically the same behavioural response but apparently are not, and that we might expect price variations in SP exercises to invite strategic bias, our conclusion is that it is unwise to use elasticities obtained from unadjusted SP models.'*²⁰

It would make sense to apply a similar level of caution to other parameters calculated using stated preference approaches.

- **No losses resulting from network changes.** GMCA does not apply any loss of hard benefits, soft benefits, or wider economic benefits from its proposed removal of buses from popular corridors. This is extremely unrealistic. Many passengers are currently using interoperable tickets to travel on these buses and so will see a reduction in their service and an increase in waiting times. It is also likely that passengers will suffer from an increase in congestion on these corridors, particularly at peak times. Our recent experience is that bus operators are typically trying to increase the number of buses they operate on these busy routes, so the idea that it is costless to reduce capacity on these routes is not credible.
- **No losses resulting from potential ossification of the network.** The Economic Case assumes that GMCA will be able to replicate (or indeed improve) the network planning that would occur under commercial operation where operators have incentives to seek out profitable routes and to adjust frequencies regularly in response to customer demand, and that this situation would persist over the next 30 years. In reality it is likely to be challenging for GMCA to be closely in touch with these 'on the ground' factors given that they will only be renewing each franchise every 5 or 7 years, and the nature of the franchising process will mean that within any franchise period there is no scope for adjustment. No losses for the danger of ossification have been included in the analysis.

¹⁹ Section 5.5, Economic Case Supporting Paper (TfGM, 2019a).

²⁰ Wardman, 2014, pp 377.

- **The soft benefits of the Scheme appear to be overstated.** 'Soft factors' account for a significant proportion of the overall benefits. The main difference between the soft benefits under the three options relates to branding. The Economic Case assumes that customers place a value on using a 'Transport for Greater Manchester' branded service (a 'single unified identity') over and above any specific benefits in terms of improved service, interoperability or lower prices, and over and above the brands of existing providers that operate in the Do Minimum or partnership models.²¹

Soft factor benefits are described in other research, such as *'The Role of Soft Measures in Influencing Patronage Growth and Modal Split in the Bus Market in England'* (DfT, 2009), as less important than 'hard' factors such as frequency and reliability unless the latter have reached acceptable thresholds. It is not clear the extent to which such thresholds would be met under any of the 'do something' options, and how those options vary.

Branding is the largest source of soft factor benefit specifically for the Franchising Model rather than other models.²² It is assumed to arise at a flat rate of 4.1p per trip (2017 prices). The underlying research on which this is based is from TRL's 2004 report number 593 into *'The demand for passenger transport: a practical guide'* ('TRL593'). This report quotes a previous study by Steer Davies Gleave from 1996. There are various issues with using this study:

- * First, the underlying research is 23 years old, and relates to London, and hence its reliability and relevance is questionable.
- * Second, the analysis is based on stated preference surveys. These are less robust than revealed preference analyses as discussed above.
- * Third, it is unclear whether the Steer Davies Gleave study uses the correct counterfactual for the current situation. The context of the Steer Davies Gleave study was that it took place in the early years of deregulation, where there may well have been many unbranded small operators not necessarily operating to a fixed timetable or predictable route. As a result, there may well have been a benefit for a passenger to seeing a branded bus relative to an unbranded bus. However, the relevant comparison here is not between branded and unbranded buses, but between a common Manchester brand and the brand of a well-known national bus operator (e.g. Stagecoach, FirstGroup, or GNW). It is not clear exactly what the 'brand benefit' is that is measured by Steer Davies Gleave, but it cannot be taken for granted that the benefit reads across from a different situation into the present one. Given its importance the benefit/cost case of franchising in the present situation it would seem necessary to estimate the brand benefit anew to reflect the specific circumstances being considered.
- * Fourth, even if there were a common brand benefit (over and above other brand benefits), it is not clear that this this would persist on a permanent basis. It seems at least reasonable to

²¹ Table 5, Economic Case Supporting Paper.

²² In what follows we assume that the brand benefit has been appropriately identified separately from benefits arising other sources (e.g. interoperability). Where multiple changes are being proposed there is a danger of wrongly assigning benefits to one source rather than another.

assume that this would not last forever. Indeed, factors such as safety and security are described as the most important of the soft factors, and potentially more important than hard factors (*ibid*). However, the Economic Case Supporting Paper states that these benefits are assumed to be fully realised only after year 3 of the franchise and are scaled back after year 7. We note that scaling back is also assumed for Wi-Fi benefits relative to the counterfactual – but no scaling back is assumed to apply for branding.

- * Fifth, the brand benefits will be overstated in early years (and potentially throughout the period) because of the existence of routes that cross the boundaries of the franchising area. Presumably such cross-boundary routes will have different branding. The brand benefits apparently arise because '*a simplified bus product under the control of the GMCA and which offers a single unified identity will emerge under the franchising option*'. So if there is no single unified identity, then any brand benefits will be diluted, to a great extent when only areas A or A and B are franchised, and then on an ongoing basis to the extent that cross-boundary routes are allowed to continue to operate. As a result, this would suggest that any brand benefits are diluted (if they are present at all) particularly in early years, contrary to the assumption in Table 5 of the economic case where the benefits are assumed to arise at 100% for all years.

Concerns around the scale of the brand benefits were also raised by the auditors, who raised many of the points above.²³ TfGM has stated that it will carry out a new study to refine this estimate but that the NPV of the Franchising model still exceeds that of the other options even if the brand benefits are removed.

However, while strictly speaking true, this appears to be an optimistic interpretation of the attractiveness of the Scheme absent the brand benefits. The difference between the soft benefits in the Scheme (£193.9m) and the Operator and Ambitious partnerships (£68.3m/£68.5m) is £125m, of which 90% (or £112.5m) appears to be from branding.²⁴ Removing this benefit entirely from the calculation would remove almost all the benefit of the Scheme in NPV terms, and would substantially lower the benefit-cost ratio for the Franchising model. This is shown in Figure 2.

Figure 2 Comparison with and without brand benefits

| | Franchising Case | Operator Partnership | Ambitious Partnership |
|-------------------------|------------------|----------------------|-----------------------|
| Total customer benefits | £344.7m | £113.3m | £141.8m |
| Of which brand | £112.5 | 0 | 0 |
| Net customer benefits | £232.2 | £113.3 | £141.8 |
| Total costs | £110.8 | £32.7 | £38.7 |

²³ p114, Appendix 3 to Consultation Document (Auditor's Report).

²⁴ Economic Case, Table 6, "soft factors". The brand benefit is 4.1p compared to the benefit from ticket inspectors of 0.4p.

| | Franchising Case | Operator Partnership | Ambitious Partnership |
|--|------------------|----------------------|-----------------------|
| NPV | £121.4 | £80.6 | £103.1 |
| Benefit-cost ratio (recommended approach) | 2.10 | 3.46 | 3.66 |

Source: Economic Case, Table 6 and Table 7, plus adjustments for brand benefits

Note: There are various formulations of benefits and costs in Table 6 and Table 7 of the Economic Case and this Table only reports the key outputs.

Figure 2 shows that the NPV of each option, excluding the brand benefits, is similar, at between £80.6m and £121.4m. While the NPV is highest for the Scheme, the costs are also much higher than for the other options. As a result, the benefit-cost ratio is significantly lower for the Scheme once the brand benefits are excluded. Also, given the much higher level of costs incurred, the Scheme presents much greater risk that cost overruns would significantly reduce or even cancel out the estimated benefits.

Given the doubts over this source of benefits and the relevance of the supporting material, it would seem prudent to exclude any brand benefits until these can be accurately measured against an appropriate counterfactual in the analysis the TfGM proposes to carry out.

Finally, if the branding benefits were as substantial as TfGM expects, it would seem to be more cost effective to require all private operators to rebrand under a common 'TfGM' brand in a partnership model, perhaps with a 'operated by X' addition, rather than reorganise the entire approach to bus provision in Manchester.²⁵

- **The wider economic benefits (WEBs) are overstated and could be achieved more cheaply.** The WEBs appear to be unrealistically large in several respects. The most important source of WEBs is in labour supply improvements, which arise from bringing more individuals into the labour force by reducing time and/or cost of getting to a place of work. In turn, these arise from changes in the bus network. GMCA argues that under the Scheme there will be substantial benefits from network adjustments, through reducing the number of buses in overlapping corridors (which are viewed as being unnecessarily duplicative) and redeploying these to develop new routes elsewhere.
- However, the number of buses that GMCA considers can be redeployed is only 30 out of nearly 2,000 buses in total (i.e. about 1.5%).²⁶ This is a small number, either absolutely or as a proportion of the total fleet. In previous analysis GMCA identified that around 114 buses could be freed up (around 5.5%) but that the scope for redeployment has shrunk substantially as there are now fewer competed corridors.²⁷ It is unclear that £304m of WEBs can realistically arise from the

²⁵ This would potentially lead to concerns that customers may not be able to use certain buses if they have bought single operator tickets. However, if that is the concern, this suggests that the benefits to customers are arising from interoperability – captured elsewhere – rather than brand.

²⁶ Network Supporting Paper, paragraph 10.1.9.

²⁷ Network Supporting Paper, paragraph 10.1.4 et seq.

redeployment of only 30 buses (equating to over £10m of benefit per redeployed bus).²⁸ However, if they can, then the revised VPA will produce this benefit too.

- Moreover, the scale of labour supply effects is typically relatively small as it is typically agglomeration effect that is the relatively larger in scale: *'Agglomeration is generally the most substantial impact of transport interventions currently missing from appraisals. In assessing this effect, wide geographical area must be considered because a shift in activity may have disagglomeration effects that should be netted off'* (Eddington Study, Volume 3, para 4.92). This further casts doubt on the scale of the WEBs arising from labour supply improvements. However, even the agglomeration benefits must be questionable given that they arise from network changes (*'better linking people with opportunity is a significant reason for reforming the bus market'*), and the scope for network adjustment appears small.²⁹

Moreover, if there were substantial labour supply or agglomeration benefits that would arise from alternative routes, where these routes were currently non-commercial, it would seem to be more cost-effective for TfGM to tender out these specific routes, rather than to reorganise the entire approach to bus provision in Manchester.

- **The optimism and risk analysis does not cover the key points of optimism.** GMCA has published a 'Risk and Optimism Bias' supporting paper.³⁰ This paper is limited in scope, and covers only two points:
 - * Revenue risk that would be faced by GMCA in the event of adverse macroeconomic shocks.
 - * Optimism on costs that GMCA would incur (following best practice in assessing large infrastructure investments such as Crossrail and High Speed 2).

This paper does not carry out sensitivity analysis on the key inputs that generate the benefits case such as brand, network, price elasticity, WEBs etc. So, on its own basis this paper may make a robust assessment of the risks and optimism bias concerns that it explores, but it does not present a complete picture and cannot be used to demonstrate that the benefit-cost case is sufficiently robust to appropriate sensitivity analysis.

- **London is not a direct comparator for Manchester.** GMCA appears to have modelled its analysis on Transport for London's approach. However, Manchester is not London, and there are material differences between the two cities which suggest that a straight read-across from the experience in London would not be appropriate. In particular:
 - * Trip density and complexity (i.e. multi-modal, multi-vehicle) is substantially greater in London compared to other urban centres, including Manchester. As a result, the benefits

²⁸ Economic Case, Table 8.

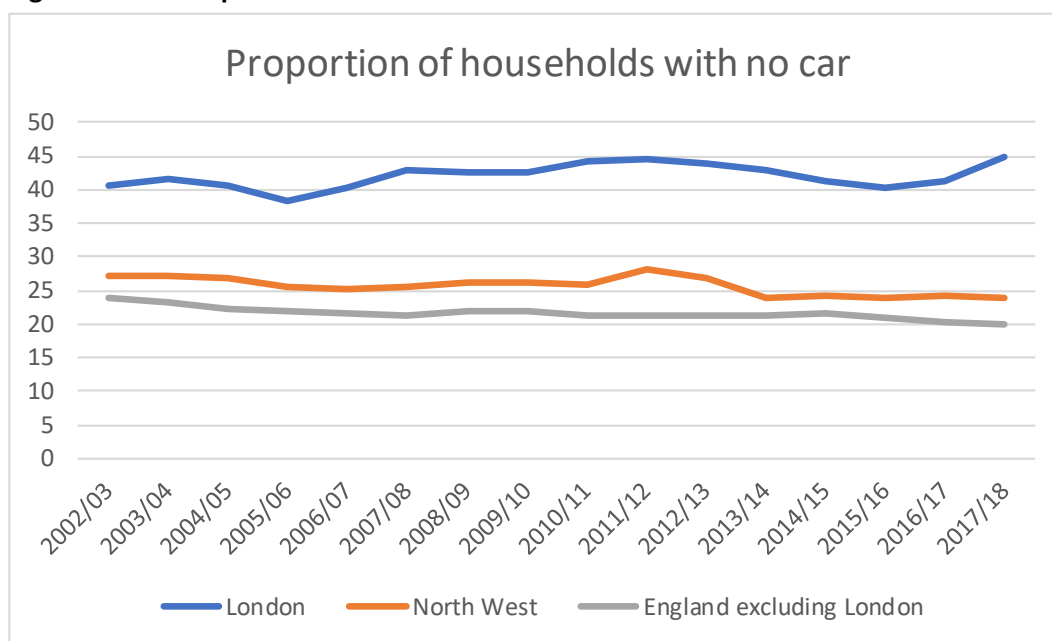
²⁹ Economic Case, paragraph 7.3.3.

³⁰ Similar comments apply to the Assessment, paragraphs 64.1.5-64.1.7.

of integration between modes are likely to be much greater in London. For example, 48% of trips involving London buses on average use an additional mode of transport, compared to 34% elsewhere, while 80% of trips involving the Underground use an additional mode of transport.³¹

- * Also, due to congestion, congestion charges and the high cost of parking, London is not a particularly drivable city. Again, this makes the value of better more integrated public transport much greater because the alternative is not travelling (or a very unattractive driving option). Manchester is not the same. Cars are a much more viable alternative with much greater flexibility. This is supported by evidence from the National Travel Survey that the proportion of households with no car is substantially higher in London than in the North West or the rest of England more generally, as shown in Figure 3. This suggests that measures to reduce the attractiveness of making a journey by car will be of critical importance in the development of the bus market in Manchester. Such measures could be undertaken under either a franchising model (albeit that such measures do not seem to be anticipated in this consultation) or a partnership model.

Figure 3 Proportion of households with no car



Source: National Travel Survey

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

³¹ National Travel Survey, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/484929/nts-multistage.pdf, p3.

Under the Scheme, GMCA would award one large franchise per strategic depot (five to 10 large franchises) and 25 smaller franchises. For the reasons set out in the answer to Q11, it is not viable to organise the large franchise contracts round depots which GMCA may not be able to obtain. The approach to small franchise contracts is also flawed since it may not provide GMCA with the best value for money and may not enable SMEs to optimise their procurement strategy.

A better approach to franchising would be route-by-route franchising. As well as offering the benefit of enabling a staggered implementation of franchising (as discussed elsewhere), this would enable better competition in the market since operators could choose which routes to bid for.

If however GMCA proceeded with the packaging approach set out in the Scheme, GNW would agree that this should be done in tranches as GMCA has proposed. This is on the assumption (as stated above) that all services operating from GNW's Queens Road depot in sub-area B will be excluded from the first round of franchising in sub-area A.

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

GNW is in principle supportive of GMCA's proposal that the large franchise contracts would be let for five years with an optional two year extension at GMCA's discretion, subject to the following points:

- It is important that buses (which have an average approximate life span of 14 years) which are used in a five-plus-two year contract can be used on a further five-plus-two year contract. This will avoid wastage (that would occur if buses are re-specified from one contract to another), and prices being driven up.
- It is also important that GMCA is transparent with operators regarding the optional two year extension and the circumstances in which it will be exercised or not exercised. This is important so that operators are aware of the impact on their asset values. GNW's position is that the award of the two year extension should be the expected default position so long as an operator has delivered to reasonable performance criteria.

GMCA has proposed that small franchise contracts will be let for shorter terms of three to five years. GNW notes that the difference in duration between large franchise contracts and small franchise contracts may present difficulties for an operator considering whether or not to rebid for contracts with a lack of certainty as to its contractual position.

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?

As noted above in the answer to Q17, the Scheme represents a far riskier proposition for GMCA than either of the partnership models and is much riskier the Partnership Plus model.

Under the Scheme, GMCA would:

- define and specify the bus network. GNW notes that this is an exercise which involves a significant skill base which under a deregulated market GMCA has not had the opportunity to develop; and

be responsible for a performance regime used to incentivise operational performance and service quality. Any performance system should be kept simple with clear and workable rules, for example focussed on operated mileage, punctuality, vehicle standards and safety. Surveys have indicated that reliability and punctuality are the most important factors for passengers. However, the performance regime should also only measure aspects of service delivery that are within the bus operators' sole control. It is important that funding arrangements are set up in such a way that GMCA is not reliant on penalties for non-compliance to fund payments for good performance; GMCA's budget should be based on paying 100% of incentives. The cost of revenue collection inspectors should also be factored in.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?

GNW's employees

GNW employs drivers, engineers, management, directorate, cleaners, front line supervisors (inspectors, controllers), commercial function, HR, IT, finance department, CCTV and risk manager and driver trainers. All of these employees may be affected by the Scheme.

Application of TUPE

Under the Franchising Schemes and Enhanced Partnership Schemes (Application of TUPE) (England) Regulations 2017 as read with the Transport Act 2000, where an authority makes a franchising scheme it must issue a consultation notice to the operators of the affected local services; and appropriate representatives of the employees employed in the provision of those services in order to attempt to seek agreement on how to determine whether a person's employment is '*principally connected*' to the affected services. If agreement cannot be reached, the default position in the 2017 Regulations is that a person's employment is treated as '*principally connected*' to the affected services if that person spends on average at least half of their working time assigned to the provision of the services; or assigned to activities connected wholly or mainly to provision of the services.

GNW supports the intention behind the legislation to bring interested parties together and minimise the uncertainty over which employees are in scope to transfer from the provider of the current services to the provider of the new services under the franchise.

GNW is very concerned about the potential for redundancies as a result of the Scheme. We understand that a redundancy occurs where the requirements of an employer for employees to carry out certain work, ceases or diminishes. A person who is working in the provision of the services being transferred but who is not 'principally connected' (or 'assigned') to those services because they are also working on other services which are not the subject of the relevant transfer, will: (a) not be in scope to transfer to the new service provider and will therefore remain with the original employer; but (b) will have lost part of their role as a result of the transfer of the services and may find that they are redundant because the requirements of the employer for employees to carry out work in connection with the lost services has now ceased or diminished.

██

████████

A significant number of GNW drivers could on the basis of the above not be transferred by virtue of TUPE and could therefore be subject to redundancies. GNW employs ■■■ drivers who drive bus routes in Greater Manchester. Of these, only ■■■ drivers drive Free City Bus routes and ■■■ drivers drive on school contracts. In addition, due to some historic legacy route knowledge issues, ■■■ drivers drive on services ■■■ and ■■■ only and ■■■ drivers drive on services ■■■■■■■■■■ and ■■■ only (albeit they are in the process of becoming familiar with all routes). The remaining ■■■ drivers are familiar with all GNW routes and drive all routes. The position of these employees clearly depends on how these routes would be franchised but it appears likely that the ■■■ drivers (and potentially the ■■■ route-specific drivers who are in the process of becoming familiar with all routes) would be unlikely to be deemed to be 'principally connected' to the routes being lost to the franchised area because the drivers operate more than half of their time on different routes in other areas.

Head office staff

Similar issues would arise with head office staff who are not likely to be 'principally connected' to the services to be transferred. GNW employs ■■■ head office staff to cover the Greater Manchester region as well as ■■■ apprentices. The phased approach may result in very few head office staff being assigned to activities connected wholly or mainly to provision of the sub-area A services but a progressively higher proportion being assigned to activities connected wholly or mainly to provision of the sub-area B and C activities when those transfers come round. This is because the loss of work in the first phase will likely result in a higher concentration of work on the services being transferred at phases B and then C. It is possible that such staff would be made redundant and GNW would be required to pay the redundancy costs.

Engineers and operators

GNW employs ■■■ engineers to cover services in Greater Manchester. An operator may also be still operating commercial services outside the franchise area in respect of which it is required to maintain skilled engineers, operational controllers and inspectors (who tend to be required to cover shifts, rather than assigned to particular routes), head office functions, managers, engineering supervision, support and admin staff. As a result of its commercial activities outside of the franchise area, these staff may never be 'principally connected' to the services being transferred whilst being directly affected by the loss of work connected to the Manchester routes.

Impact of the Scheme on employee terms

Moreover a further issue is that under the Scheme, operators would be mindful of the need to compete on cost during the procurement process. It seems inevitable that competition between operators for franchising will result in pressure on employee terms and conditions as lower cost tenders are more likely to be

successful. Lower cost tenders could be driven by lower wages and tighter scheduling conditions, which would detrimentally affect operators' employees.

Impact of the Scheme on Greater Manchester workforce

It is possible that skilled and experienced employees of operators who are made redundant as a result of the Scheme will not re-enter the job market. This could lead to a shortage in the supply of suitable workforce in the area.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?

With respect to large franchise contracts, see answer to Q11 for the reasons why we do not agree with the approach to depots and believe that this is a major flaw in the Scheme. A preferable approach would be for GMCA to revise its proposal and prepare a proposal for route-by-route franchising.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?

Approach to fleet likely to cause delay

GNW considers that the approach to fleet appears to be reasonable (subject to the points below) once a franchising scheme is operational. However, during the transition period we anticipate that the approach is likely to be fraught with difficulties including disputes as to what assets should be included in the RV mechanism and whether assets are valued according to book price or market price. As discussed above, agreeing a price under RV mechanisms can be very difficult and the process of negotiation could lead to delay to GMCA's proposed timetable.

RV mechanism should be expanded beyond fleet

The RV approach will work best if GMCA provides precise vehicle specifications, recommended vehicle purchase prices and agrees future values at the outset. GMCA should underwrite the risk of all stranded assets for incumbent operators which means there should be no minimum standards for participation in the RV scheme. To prevent operators from incurring significant losses in the event that their franchise ends and they do not win a subsequent franchise, the RV scheme should also include ticket machines, CCTV, plant and machinery in depots and software and other assets lost on not winning a franchise.

CAZ requirements and impact on fleet mean the Scheme should be delayed

Bus operators in Manchester are currently upgrading their fleets to meet the 2021/2023 deadline for implementation of the CAZ. [REDACTED]

[REDACTED]

[REDACTED] It does not make sense for GMCA to seek to make a decision as to the Scheme by March 2020, enter into the first franchise contracts by April 2021, and seek to agree an approach

to fleet under the RV mechanism, in circumstances where operators are mid-way through this project. GMCA should delay consideration of any franchising scheme until after the CAZ has come into effect.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?

GMCA's proposal to conduct one or more procurements to select a single preferred supplier for the majority of Intelligent Transport Systems equipment which would be made available to franchise operators appears sensible. GNW agrees however that CCTV should be excluded from such a procurement since operators run CCTV in-house.

Q25. Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

As noted above, we consider that a better approach to procuring franchise contracts is for this to be done on a route-by-route basis rather than according to sub-areas.

Assuming that a competitive procedure is appropriate in a given case, GNW agrees in principle with the use of the negotiated procedure under the Utilities Contracts Regulations 2016 for the award of franchising contracts until such time as both GMCA and operators have sufficient experience of bus franchising in Manchester to be able to award effectively using an open or restricted procedure. GNW also welcomes the commitment of GMCA (a) to consult in due course on draft procurement documents and a draft franchise agreement and (b) to build lessons learned from earlier tranches into procurements of subsequent tranches. It will be crucial to the success of bus franchising in Greater Manchester that franchise contract procurements are designed and run in a way that properly reflects the specific features and costs of bus operations in Manchester to ensure that a quality service is delivered on all franchise routes, avoiding a 'race to the bottom' on price. GNW would be supportive of a procurement in which sufficient weight is placed on quality assessment rather than simply price. GMCA should not determine the award of contracts according to cost alone and should ensure that quality has a significant weighting in the assessment during any procurement process, if quality and sustainability are not to be compromised.

It is important that GMCA enables a level playing field during the procurement process and does not facilitate a situation where newcomers to the market are able to make unrealistic assumptions about price because of their lack of experience in the market. To ameliorate this risk, GMCA should identify costs and provide explanation for costs and make these available to bidders via a data room (which can be an extremely time consuming and resource-intensive exercise).

GNW is concerned that, for the procurement of the larger franchises, the timescales and approach set out in the consultation documents rest on the highly unrealistic assumption that GMCA will be able to acquire ownership of strategic depots in sub-areas A, B and C either by voluntary agreement with the current owners or by CPO within those timescales. As discussed in the answer to Q11, owners of the depots are very unlikely to be willing to agree to transfer them voluntarily without payment of a substantial premium, leading in all likelihood to a protracted CPO process. If GMCA intends to pursue the proposal to acquire ownership of strategic depots, this will inevitably delay the commencement of the tranche 1 procurement by a significant period (in light of the estimate that obtaining a depot by CPO could take between two and a half and three

years if operators exercised all available legal challenges) with subsequent tranches being pushed back accordingly.

Finally, the process by which the market value of assets is to be agreed is likely to be a fractured and complex process which has not been taken into account by GMCA.

If GMCA invokes the CPO process for acquiring strategic depots, in order to ensure continuity of service and an effective transition to franchising, it would be necessary to award interim contracts to the incumbent operators running routes out of those depots until such time as the CPO process is complete and the franchise awards can be made. Given that, prior to successful conclusion of the CPO process, the owner of each strategic depot will be the sole possible provider of bus transport services from that depot, we consider that interim contracts in respect of services from those depots can lawfully be awarded to the owner of the depot on the basis of the single supplier exception in regulation 50 of the Utilities Contracts Regulations 2016.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?

As noted elsewhere (such as the answer to Q3), it would be preferable for cross-boundary routes to be included within the Scheme with the co-operation of transport authorities outside of Greater Manchester. If such services are not included in the Scheme, there is a risk that routes into and out of the franchised zone will not be designed into the network. This could lead to a reduction in frequency of services, a loss of coordination and higher costs for passengers. The overall impact could be very detrimental to passengers.

If the Scheme is implemented as proposed (without the inclusion of cross-boundary services), GNW considers it is likely that there will be reduced competition at the boundary of the Greater Manchester franchised zone because it is likely that operators will focus on delivering franchised services.

GNW notes that GMCA has stated that *'Under the Proposed Franchising Scheme, GMCA would also work with neighbouring authorities and cross-boundary operators to put in place new ticketing arrangements to encourage cross-boundary travel.'* This is an important consideration because there is a potential adverse impact on passengers who commonly travel on routes that would after implementation of the Scheme cross the franchising zone. The Scheme would lead to passengers who are travelling outside of the franchised zone losing ticketing benefits that currently exist, for example operator ticket offerings which currently allow travel within and outside what would become the franchised zone.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

GNW is not confident that GMCA could secure the operation of services under franchise contracts in the manner proposed by the Scheme, for the following reasons:

- for the reasons set out in the answer to Q4, the proposed arrangements for transition would expose bus passengers and GMCA to an unacceptable level of risk that services will not be operated;
- GMCA's assumption that it will be able to obtain depots is not realistic, for the reasons set out in the answer to Q11 above;

- the tendering process is likely to take longer than the timescale that GMCA has allowed;
- it is not clear that GMCA has considered what contingency it would put in place beyond the award of emergency contracts in the event that an operator which has been awarded a franchise contract (in particular a large franchise contract) becomes insolvent. Difficulties similar to those that the Government faces in managing the situation with Northern Rail could arise following implementation of the Scheme. GMCA seems to have underestimated the financial impact that such an event would have as well as the disruptive consequences for passengers.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

Please see response to Q16. A partnership model could deliver the same or even better benefits than the Scheme (since it would enable innovation) but at much lower risk to GMCA and bus passengers in Manchester. This is especially so in light of the Partnership Plus proposal.

With respect to the commercial implications of the partnership models, there may be an advantage for services to be branded on a route by route basis (as they would be under a partnership model) rather than a unified brand being implemented through the Scheme. Branding on a route by route basis can be a successful tool for increasing patronage if used alongside other measures to attract and retain passengers such as improved fleet, better retailing, ticketing and bus priority. This can distinguish between routes, which makes the route legible and easily understood by passengers. Such branded route service can generate 4% to 8% growth and it is a widely used tool across the industry.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

The partnership model is likely to have a more positive impact on employees of bus operators as compared to the impact under the Scheme. This is because the status quo would be largely preserved and employees would not be exposed to disruption such as changes to the location of their workplaces and their working patterns.

On the other hand, under the Scheme, GNW anticipates significant effects on employees, as detailed in the answer to Q21.

***Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?**

Farebox revenue

GMCA has noted that its primary source of income for the Scheme will be farebox revenues because it would assume revenue risk. In relation to GMCA's estimation that a number of interventions will lead to changes in demand and revenues that would '*increase farebox revenue by approximately 3% compared to the Do Minimum forecasts*', see answer to Q17. In particular in relation to GMCA noting that '*service*

quality/soft factor benefits' could contribute to an increase in farebox revenue as compared to the Do Minimum Forecast, GMCA has overestimated the benefit that could accrue from *'soft factor benefits.'*

Bus Services Operator Grant

In relation to the income received from the Bus Services Operator Grant, GMCA has stated that *'Under all options the value of this funding is assumed to be maintained at current levels'*. As noted in the answer to Q15, GNW does not believe this to be a realistic assumption and considers it likely that the BSOG may be reduced. Any reduction would have a significant impact because BSOG represents about 6% of the total costs of a typical bus operation.

Additional funding

In relation to GMCA's assumption that additional funding could be secured from the Local Authorities of Greater Manchester and GM Mayor, GNW questions whether it is realistic to assume that such funding could be generated through council tax on residents of Greater Manchester when residents may perceive that bus services are currently adequately provided at lower risk.

No contingency

GMCA places great reliance on additional funding being received from the Local Authorities of Greater Manchester, GM Mayor and Central government to fund the net transitional funding requirement. It has not however set out what the fall-back position is if such funding is not available or not provided in the amounts anticipated. In the absence of any protection or guarantees, GNW is concerned about the impact this could have on bus passengers in Greater Manchester.

Sensitivity testing

In relation to GMCA's comments about the sensitivity testing that has been performed to test the financial impact of potential changes to assumptions behind the financial model, GNW refers to its answer to Q17 above and in particular its view that the sensitivity analysis undertaken is inadequate.

Impact of legal challenge

Finally, as noted above, GMCA would be at significant risk of legal challenge if it were to implement the Scheme because it does not appear to meet the statutory test for value for money. It is also possible that GMCA would face legal challenge if it sought to exercise CPO powers. It is not clear that GMCA has accounted for the cost associated with such legal challenges or the inflationary affect that any delay arising from legal proceedings could have on the cost base which further undermines the affordability of the Scheme.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

A partnership model is by its nature more agile and flexible and can therefore deliver better affordability since it can react to change quickly and flex to what participants in the partnership can afford to invest. The bus operators who have participated in the OneBus proposals are prepared to fund the partnership options

and this can be done with minimal risk to the public purse. This guarantee may be offered by way of a bond for which GNW is supportive and would be willing to give. Such a bond is one of the terms of the Partnership Plus model that has been proposed to GMCA today. Under the terms of this bond, any operator that sought to exit the partnership would be contractually obliged to make a payment that would be financially very significant. The onerous commitment that operators would be required to make provides assurance of delivery to GMCA.

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

GMCA has estimated that to manage the franchised operations under the Scheme it would require an additional headcount of 57 full time equivalent employees.

The management of the franchised operations includes planning, designing and specifying the bus network; managing the customer interface; overseeing the commercial performance of the network; managing the contractual relationship with the franchisees and support activities such as customer and stakeholder engagement; finance, sales and marketing. The extended responsibilities that GMCA would be taking on are significant and the volume of the work is far more extensive than that which is required for example for the operation of a light rail network. These are incredibly specialist areas of expertise that exist only in the UK within TfL at present because of the de-regulated nature of bus services outside of London. It is not clear from section 46 of the Assessment that GMCA has undertaken any benchmarking against the employees of TfL to check whether its assumptions are realistic. In this respect, GNW notes that according to 2018 data, TfL employ a total of 11,152 non-operational staff,³² of which 868 employees worked on the London Buses.³³ Although the scale of operations in Manchester would be different to London, it appears to have been an oversight in preparing the Scheme not to consider the number of employees who manage the franchised bus network in London.

GMCA may have underestimated the number of employees required to undertake direct monitoring of performance data and on street monitors. In addition, GNW considers it likely that during franchise renewals, GMCA would require significantly more employees.

Although GNW does not know the methodology by which the employee costs associated with managing franchised operations have been calculated, it notes that given the specialist nature of the skills, there should be sufficient cost factored in to GMCA's estimates for attracting high quality candidates. GNW is concerned that GMCA has underestimated its exposure to risk resulting from not being able to secure enough employees to manage the operations or employees of sufficient experience and expertise.

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?

³² <https://tfl.gov.uk/corporate/publications-and-reports/safety-sustainability-hr>

³³ Page 19 of TFL's Diversity and Inclusion Impact Report 2017/2018.

GNW refers to its comments regarding transition and implementation set out above and in particular its concern that the staged approach does not enable an adequate evaluation period; its belief that the approach to acquiring depots is unworkable and the consequence that the timetable for procurement is not realistic. Under the Scheme, transition would be a very difficult and complex phase and that the time period over which transition is implemented will be significantly longer than anticipated by GMCA. It will not be possible for GMCA to implement a transition to the Scheme in full by July to September 2023.

GMCA has noted that *'the planned phased transition to the Proposed Franchising Scheme could potentially introduce some short-term complexity and confusion for some customers in terms of fares and ticketing, especially when travelling between franchised and non-franchised areas within Greater Manchester where different ticketing arrangements are in operation.'*³⁴ GMCA has underestimated the level of customer confusion and disruptive impact on the market, particularly for passengers who regularly travel on services that will become 'cross-boundary' services.

As noted above, we believe that GMCA should reconsider the premise of the Scheme as an area-by-area franchising scheme and instead make a revised proposal for a route-by-route franchising scheme. This would enable implementation of franchising on a staggered basis which will limit the disruption to passengers, enable assessment and evaluation of franchising in a controlled manner and accordingly, would minimise the risks to GMCA.

Q34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

GMCA has noted that the TfGM partnership operating model would require additional headcount of six full time employees for the Operator Proposed Partnership and eight full time employees for the Ambitious Partnership. Little additional resource in head office roles would be required for delivery of the partnership options. Instead, TfGM may wish to train employees to build awareness of the partnership and coordination.

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

GMCA has concluded that under the Scheme, passengers would benefit from *'improvements to the network, reduced fares, simplified and interoperable tickets, and also improved customer service'* and that *'passengers would benefit more from any additional interventions under the Proposed Franchising Scheme than they would under any of the other options.'*³⁵ GNW does not agree with this conclusion, for the following reasons:

- GMCA's assumptions that the Scheme will benefit the customer experience may not be reasonable. Franchised systems tend to be rigid and slow to introduce new technology, which could adversely impact passengers who are as a result denied access to the latest market developments until a franchise contract has come to an end. In this regard, GNW notes that

³⁴ Consultation Document para 4.163.

³⁵ para 4.183, Consultation Document.

Metrolink has not delivered a passenger experience of punctuality of service and integrated ticketing. By contrast, a partnership model can offer more extensive opportunities for innovation and improvements to the passenger experience; and examples of this are set out in the answer to Q16.

- With respect to the network, large networks' routes can become hard to navigate when they are subject to one brand/colour scheme as they would under the Scheme. Network legibility can in fact be improved by separately branding town services, express services and high frequency services as they could be under a partnership model. For example, in the existing Greater Manchester market, Vantage and City Free Bus are branded differently. Elsewhere, Go North East has introduced X-lines; rapid bus links that have a distinct branding and style to set them apart from the regular local services. Go South Coast also has a number of sub-brands including morebus which is a distinctly branded, high frequency service between Bournemouth and Poole that has experienced an increase in patronage.
- With respect to fares, under the Scheme, passengers will see higher than inflation fares increase, on average. As there is mixed data regarding fare levels over the last year (with some fares increasing and some remaining static), it is not clear that passengers' fares would be lower under the Scheme will compare to a deregulated market or partnership model.
- Under the Scheme, accessibility is due to increase but mileage is proposed to remain constant. Consequently it would seem likely that frequencies will be reduced on busy corridors to provide buses on currently unserved or underserved areas. This could detrimentally impact on passengers' experience when using the busy routes; particularly commuters and low paid workers travelling on currently high frequency networks towards the main urban hubs, where we imagine resources may be removed to fund increases in other areas.
- GMCA acknowledges that the Scheme will impact passengers in neighbouring authorities because of changes to cross-boundary services and changes to fare arrangements. As set out in response to Q3, GNW considers that the impact of the Scheme to passengers making cross-boundary services could be very significant. Customers seek to avoid breaking journeys and being required to do so will be disruptive and detrimental to the customer experience. Moreover, there is a risk that with GMCA controlling the operation of Metrolink as well as the bus network that the latter would become a feeder network for the tram. This consequence has been underestimated when GMCA reached a conclusion that the Scheme is the model which is of most benefit to passengers.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

We refer to our answers to Q16 and Q35. A partnership model could offer similar benefits to those said to flow from the Scheme but at a much lower cost to GMCA and at far reduced risk. A partnership model is far a preferable option for passengers as compared to the Scheme for the following reasons:

- In relation to network, GMCA has concluded that the scale of changes that could be made to the current bus network are greater under the Scheme than under a partnership model and that the Scheme offers the long-term potential to develop the network. Franchising will not automatically

deliver more comprehensive networks that benefit the entire area (including areas that suffer from social exclusion). It is possible and likely that under a partnership model, operators would agree to provide just as comprehensive networks.

- As noted above, most of the WEBs are said to arise in the Scheme from the different deployment of 30 buses. Operators have made a revised VPA proposal for deployment of the same number of additional buses, giving rise to exactly the same supposed benefits but at much lower cost and without transferring risk to GMCA.
- GMCA has itself acknowledged that *'There are assumed to be no additional costs to passengers from either partnership option'* because additional costs for operators will not be passed on to passengers in the form of fare rises or reductions in the service they receive.³⁶ Under a partnership model the operators would potentially place a two year freeze on an all bus operator ticket. The benefit to passengers of protection from fare increases and certainty over their service level should not be underplayed.
- Although GMCA notes that the partnership measures would cause minimum disruption, this does not appear to have been given sufficient weight in balancing the relative impacts. The overall risk to passengers of the partnership model is much lower than the risk associated with the Scheme.
- GMCA does not appear to have sufficiently taken into account the possibility that the partnership model could deliver a 'common brand for Greater Manchester'. As discussed in the answer to Q17, this is in stark contrast to the importance that GMCA places upon the 'soft benefits' of the Scheme including in particular the common brand across Greater Manchester.
- In relation to fares, a partnership model would avoid the disruption to passengers travelling on cross-boundary services that would arise if the Scheme were implemented.
- A partnership model could deliver better value for money than the Scheme.

It does not appear that GMCA taken into account the benefits which a partnership model could offer to passengers.

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

GNW agrees with the articulation of the impact on operators as set out in the Consultation Document from paragraph 4.193 onwards and that of all the options, the Scheme would have the most significant impact on operators. The risks for operators under the Scheme are very grave, for the following reasons:

- Operators which have made significant capital investments in the anticipation of long-term returns are likely to incur significant losses through the 'cliff edge' loss of business that might occur if they do not secure a franchise contract.

³⁶ para 4.186, Consultation Document.

- In the event that an existing operator in Greater Manchester is not awarded a franchise contract, there will also be substantial redundant assets which are not part of the RV scheme, such as IT, plant and machinery, investment in people development and redundancy costs of employees not required in a franchised environment e.g. commercial and marketing staff. These factors could lead to further commercial losses.
- In the event that an existing operator in Greater Manchester is awarded a franchise contract but this constitutes a reduction in its services compared to the status quo, the operator could also have substantial redundant assets. There are significant overheads costs associated with depots including land cost and management of staff. Operators seek to minimise space in depots because the more space in a depot, the less economical it becomes. If an operator's depot is partially utilised, the burden of costs may become too great to be sustainable.
- There is therefore a risk of an operator which has been awarded a franchise contract becoming insolvent, and as noted elsewhere, this would disrupt the implementation of the Scheme and may lead to GMCA incurring significant cost in making alternative arrangements.
- Under the Scheme there is likely to be a significant impact on employees of operators. We refer to the answer to Q21 which sets out the potential impact on employees of GNW in the event that GNW is not awarded franchise contracts for the services it currently provides.

Q38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

Under a partnership model, the major costs and risks are borne by bus operators and GMCA is sheltered from major cost and risk. Operators would be subject to obligations and would face financial penalties if these were not met. Operators would commit considerable resource and investment (including capital expenditure) to delivering GMCA's obligations and would face increasing public scrutiny of their performance.

Q39. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? If so, please explain what you think those positive or negative impacts would be.

We refer to the assumption stated in the answer to Q3 that none of the services operating from Queens Road would be included in the franchising of sub-area A because it is not viable for an operator to run a part-utilised depot. Subject to this assumption, we have set out the impact that the Scheme would have on GNW's business in detail in answers to other questions. In summary, we consider that the Scheme would have a detrimental impact on GNW's business in the following ways:

- The Scheme introduces the possibility that GNW may lose all of its services in Greater Manchester and may be left with stranded assets.
- If implemented, the Scheme could lead to the redundancy of a significant number of GNW employees.

- Whilst GMCA considers the Scheme and its decision, uncertainty may lead GNW to deprioritise investment.
- The rigid terms of franchise contracts would dampen and discourage innovation and market responsiveness.
- The control of the bus network by GMCA which is implicit in the Scheme is likely to lead to less focussed scrutiny and improvement in the market since GMCA's time and resource is subject to other demands. This is by comparison to the scrutiny which is undertaken by operators because of commercial incentives.
- There is no assurance that under the Scheme GMCA will prioritise growth in the bus network and there is a risk that it could instead prioritise the tram network, or prioritise funding to other aspects of its social duties, such as social care, healthcare and education. Currently funding of the bus network is not at risk from competing local authority demands, but it would be under the Scheme.

GNW considers that a number of the potential negative impacts of the Scheme could be mitigated if GMCA reconsidered its proposal for franchising on a route-by-route basis.

A partnership model would have the following positive impact on GNW's business:

- It would give certainty in respect of GNW's operations which would enable GNW to plan ahead and invest in innovative measures to improve the passenger experience (at much less risk to GMCA).
- It would offer more stability and security to GNW's employees.
- It would provide GNW and other operators in the partnership the flexibility to agree changes to the network to respond to customer demand.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

Please see:

- the answer to Q17 and in particular the assessment that the Scheme presents the riskiest economic model which is neither affordable, nor represents value for money. This exposes GMCA to financial risk and the risk of legal challenge; and
- the answer to Q32 which highlights the additional expertise that GMCA will require in order to oversee the Scheme and the potential risks if such employees cannot be found.

If the implementation of the Scheme does not go to plan (as GNW considers likely), or is affected by an unforeseen shock, there would be a very significant financial impact on GMCA.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

The impacts of the Scheme on wider society cannot be said to be more beneficial than a partnership model. GNW notes that GMCA has divided the impacts on wider society into two main categories: economic and environmental impacts, which we address as follows:

- In relation to the former and GMCA's statement that *'The... Scheme would have a greater impact on bus patronage than the partnership and Do Minimum options and therefore would better support the forecasted economic growth'*³⁷, see the detail contained in its answer to Q17 which summarises GNW's concerns with the Economic Case and in particular the way in which the benefits of the Scheme have been measured.
- In relation to environmental impacts, GMCA notes that *'the... Scheme is forecast to increase patronage and reduce the use of car, and therefore would be expected to contribute most strongly to the use of sustainable transport.'*³⁸ It also states that it could accelerate the replacement of fleet. On the contrary, the Scheme does not offer any advantage in this respect as compared to a partnership model. As discussed in the answer to Q23, operators in Greater Manchester will, regardless of which option is pursued, be making significant investment in new or upgraded fleet in order to meet the requirements of the CAZ. As a result, even in a deregulated market, by 2021/2023 (depending on the phase of roll-out) all buses in Greater Manchester will be fitted with a Euro 6 engine.

***Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?**

GNW does not agree that the Scheme is the best way for GMCA to achieve its objectives. For the reasons set out throughout this document, we believe that GMCA should reconsider a proposal for franchising on a route-by-route basis and should give further consideration to a partnership model.

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

As noted above, GNW has had a limited opportunity to review the Assessment given the short time period for the consultation and GMCA has not made the economic model available. The main concerns of GNW are set out in the Executive Summary.

Question on the Equality Impact Assessment

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

GNW notes that the focus of the Equality Impact Assessment is on bus users rather than employees. We have no other comments.

³⁷ para 4.206, Consultation Document.

³⁸ para 4.211, Consultation Document.

***Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?**

GNW considers that the Scheme is an inappropriate, unworkable scheme for implementation in Greater Manchester. The reasons for this are summarised in the Executive Summary. In light of the serious flaws that have been identified with the Scheme, including that it does not meet the applicable statutory test, GNW considers it would be unreasonable for GMCA to proceed with the Scheme and that to do so would put GMCA at significant risk of legal challenge. GMCA should instead consider a proposal for a route-by-route franchising scheme.

The benefits that GMCA hopes could be achieved through the Scheme can be delivered the revised VPA but at a lower cost and with much lower risk to GMCA.

***Q46. Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.**

As noted elsewhere in this response, the following changes could improve the viability of the Scheme:

- GMCA should not undertake to provide depots to operators who are awarded franchise contracts.
- Any franchising scheme should be undertaken on a route-by-route basis rather than according to sub-areas.
- The timetable for the procurement should be altered to allow operators the opportunity to acquire depots in advance of bidding for franchise contracts.
- A franchising scheme could instead be limited to the franchising of routes which in GMCA's view are in need of the additional 30 bus resource.
- If the Scheme were to be implemented on the basis of sub-areas, it should be implemented on a staged basis starting with a trial in sub-area A which is followed by a meaningful period of consultation, after which the Scheme may be adapted and improved for roll-out to sub-area B or C.
- Any franchising scheme should include cross-boundary services.

***Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?**

GNW opposes the Scheme for the reasons set out above. If the improvements suggested in the answer to Q46 above were made, GNW would consider the further proposal of GMCA carefully to ascertain whether changes had adequately addressed the serious issues.

***Q48. Finally, do you have any other comments you want to make?**

We have set out in this document the serious flaws we have identified with the Scheme. We reiterate our suggestion that GMCA now considers whether franchising on a route-by-route basis could ameliorate these issues and carries out a further consultation on this approach. In any event, the only bus network in the UK that has been franchised is London, where franchising was implemented on a staggered basis. As was done in London, in order to ensure an effective transition to franchising, it may be necessary for GMCA to award interim contracts on a direct basis. GNW would be willing to assist GMCA and deliver services under a direct contract.

GNW hopes to work with GMCA to find a way of achieving its objective - a better bus network for Greater Manchester - but through more sustainable and cost-effective means.

Appendix 1

The routes which are operated by GNW are set out in the table below along with an estimate of the sub-area(s) each route operates in according to the map provided in the Consultation Document.

| From/to | Service | Sub-area |
|-------------------------------|---------|--------------------------|
| Manchester to Rochdale | 17 | B (plus city centre) |
| Manchester to Rochdale | 17A | B (plus city centre) |
| MRI to Langley | 18 | B + C (plus city centre) |
| Manchester to Worsley | 33 | A (plus city centre) |
| Sale to Middleton | 41 | B + C (plus city centre) |
| Trafford Centre to Failsworth | 52 | A + B (plus city centre) |
| Salford to Cheetham Hill | 53 | A + B + C |
| Manchester to Brookhouse | 63 | A (plus city centre) |
| Manchester to Cadishead | 67 | A + C (plus city centre) |
| Manchester to Bury | 92 | A + B (plus city centre) |
| Manchester to Bury | 93 | A + B (plus city centre) |
| Salford to Bury | 95 | A + B (plus city centre) |
| Manchester to Bury | 97 | A + B (plus city centre) |
| Manchester to Bury | 98 | A + B (plus city centre) |
| Manchester to Warrington | 100 | A + C (plus city centre) |
| Manchester to Bury | 135 | A + B (plus city centre) |
| Manchester to Bury | X63 | A + B (plus city centre) |



One Stockport Exchange
20 Railway Road
Stockport
SK1 3SW

T 0161 880 5660

stagecoachbus.com



Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M1 6EU

8 January 2020

By email to gmbusconsultation@ipsos-mori.com

Dear Sir or Madam

I write on behalf of Greater Manchester Buses South Limited ("**Stagecoach Manchester**"), and refer to the Greater Manchester Combined Authority's ("**GMCA**") "Doing Buses Differently" consultation launched on 14 October 2019 (the "**Consultation**"). The Consultation proposes a bus franchising scheme for Greater Manchester, and seeks responses to its proposals by 8 January 2020.

Stagecoach Manchester's response to the Consultation comprises of three documents which set out our concerns (and those of our advisers) in relation to a number of fundamental aspects of the Consultation process. These documents, read together, constitute Stagecoach Manchester's statutory response to the Consultation:

- 1) A confidential paper prepared by our legal advisers, Herbert Smith Freehills LLP, which sets out their concerns with a number of aspects of the consultation process, and why it would be unlawful for GMCA to seek to introduce franchising based on the current proposals ("**HSF legal paper**");
- 2) A paper prepared by Stagecoach responding to the questions set out in the Consultation document, and highlighting the flaws in the GMCA's assessment. This paper considers the five business cases – Strategic, Financial, Economic, Management and Commercial – in detail ("**Stagecoach business response**"); and
- 3) A separate report dated 20 December 2019 produced by Jacobs Limited on GMCA's Economic case ("**Jacobs paper**"). This report was commissioned by OneBus, which is an industry group responsible for representing bus operators in Greater Manchester.

Stagecoach Manchester's position is that the proposed scheme as set out in the Consultation document and the accompanying assessment is materially and substantially flawed, and it should not be pursued in its present form by GMCA. Our overarching concern is that the assessment appears to be overly favourable in attributing benefits towards franchising as against those which can be delivered by current operators working within a partnership with GMCA. Further, the assessment envisages an extremely optimistic timeline for the introduction of the scheme.

The three documents forming part of Stagecoach Manchester's response provide more detailed analysis of the consultation process (including GMCA's assessment and the underlying audit), but the key points from the documents are summarised below:

1) There are flaws in the assessment and audit

The process followed by GMCA has not complied with the requirements set out in the Transport Act 2000 and in relevant Department for Transport (DfT) Guidance. Primarily, the assessment itself is flawed and is based on a particularly optimistic (and unrealistic) view of how franchising works. Further, the business cases (particularly the Financial and Economic cases) contain fundamental errors and incorrect assumptions. Each of those flaws are independently enough to undermine GMCA's case (and in the assessment), but taken cumulatively, they cast serious doubt over GMCA's conclusion that the proposal is affordable and/or represents Value for Money.

2) The consultation process has been unfair

GMCA has run the consultation in a deficient manner. Stagecoach Manchester's key concern in this regard is that GMCA have not yet disclosed the models used to underpin the analysis in the assessment. These are fundamental documents central to the assessment and audit process. Consultees have been hamstrung as a result of not having access to these models, and Stagecoach Manchester have been unable to respond with more detailed comments on the Economic and Financial cases. We note that GMCA has refused to release the models despite a Freedom of Information request being made by OneBus for the documents.

3) Franchising is a disproportionate measure in the circumstances, and GMCA has failed to adequately consider the alternative options available to it.

Stagecoach Manchester's business response and the Jacobs paper provide numerous examples of how GMCA's assessment overstates benefits and underestimates the adverse impacts of franchising. In general, we are concerned that franchising is highly likely to have a disproportionate impact on bus operators.

The proposal put forward by Stagecoach Manchester in parallel to this consultation response is an example of a partnership model that could help GMCA achieve the objectives in its transport strategy without disproportionately impacting relevant bus operators in the area of the partnership.

4) Franchising throws up a number of other legal issues

The HSF legal paper highlights a number of other legal issues that suggest that GMCA's proposals may be unlawful, including concerns that franchising would breach Stagecoach Manchester's (and other operators') right to enjoyment of property under human rights legislation and may lead to significant damages claims not only from operators, but also employees of operators. Further, there also appears to be insufficient analysis on potential employment/TUPE issues and pensions, as well as concerns over whether GMCA have fully considered the timings and costs associated with the exercise of its compulsory purchase powers.

Overall, Stagecoach Manchester firmly considers that the franchising scheme will absorb a considerable amount of public money (approximately £134m according to its own analysis) for no clear improvement in the experience of bus users. This money could be put towards other projects, whether in relation to the bus system or other vital public services. Stagecoach Manchester firmly believes that a partnership solution is instead what can truly deliver a world-class bus service for users and value for money for the wider taxpayer in Greater Manchester.

Please note that, as stated above, the HSF legal paper is a confidential paper produced as part of Stagecoach Manchester's consultation response. As such, it is to be circulated only to GMCA members and staff to consider as part of Stagecoach Manchester's consultation response. In the event that GMCA receives a request for disclosure of the HSF legal paper or any part thereof, I should be grateful if you would notify me in order to give Stagecoach Manchester an opportunity to make representations, most notably given the confidential nature of the document, before any decision on disclosure is taken.

The contents of this letter and the enclosures to this letter have the full support and endorsement of Stagecoach Group plc.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Elisabeth Tasker'.

Elisabeth Tasker
Managing Director
Stagecoach Manchester



Doing Buses Differently for Greater Manchester Consultation

Statutory consultation response from Greater Manchester Buses South Ltd (Stagecoach Manchester)

8th January 2020

1. Introduction and Background

- 1.1 This is the formal response of Stagecoach Manchester to the Greater Manchester Combined Authority ("GMCA") 'Doing Buses Differently' consultation as issued on 14 October 2019, which proposes the introduction of franchising in Greater Manchester (the "**Consultation**").
- 1.2 Our legal advisers, Herbert Smith Freehills LLP, have produced a separate paper setting out the legal concerns with the Consultation process and the proposal more generally ("**HSF legal paper**"). In addition, Stagecoach Manchester is a member of OneBus¹ which commissioned Jacobs Consultancy² ("**Jacobs**") to review the economic case that underpins the GMCA assessment (the "**Assessment**"). The report produced by Jacobs ("**Jacobs paper**") is included referenced in our review of the economic case. This response, along with the HSF legal paper and the Jacobs paper, together constitute Stagecoach Manchester's response to the consultation.
- 1.3 The Assessment has been reviewed by a number of subject matter experts within Stagecoach. The documentation has also been reviewed by an external advisor who has relevant experience of creating Outline and Full Business cases within the Department for Transport ("**DfT**"). We have sought to respond sequentially to the sections of the assessment, with our responses answering many, but not all, of the 48 questions detailed within the Assessment. It should be noted that GMCA's refusal to provide the models used to prepare the GMCA Assessment has meant that we have been restricted in some aspects of our analysis. We believe these models should be provided to consultees to allow them to provide more detailed comments on the Economic and Financial cases in the Assessment.
- 1.4 As GMCA is aware, Transport for Greater Manchester ("**TfGM**") has engaged with operators, through OneBus, in developing a Voluntary Partnership Agreement ("**VPA**") as an alternative to franchising. Stagecoach Manchester is firmly of the view that the partnership offers a more economic, efficient and effective alternative to franchising at a significantly lower risk to local and national taxpayers. To that end, in addition to our support of the OneBus all-operator partnership, we have spent a number of months creating an alternative partnership proposal which we have submitted to TfGM on 8th January 2020, which focuses on services within the south of the city region, which builds on the all-operator partnership offer, creating a compelling proposition.

2. Executive Summary of our response

- 2.1 As a successful major operator in the Greater Manchester market, we do not agree that the introduction of the proposed franchising scheme is the best way to enhance the customer experience for bus users in the region. We believe it is still possible that partnership can still

¹ The Greater Manchester Bus Operators' Association - <https://www.one-bus.co.uk/>

² <https://www.jacobs.com/what-we-do/services/consulting>

offer a more economical, efficient and effective alternative to franchising at a significantly lower risk and cost to local and national taxpayers.

2.2 We have made a number of observations and seek further clarity on a number of the assumptions made by GMCA, which appear to underpin the recommendation from the assessment that the proposed franchising scheme is the most appropriate business model for the future of the bus market in Greater Manchester.

2.3 We have three major concerns which are set out throughout this response, these are:

- i. The Assessment appears to be overly favourable in attributing benefits towards franchising, against those which can be delivered by the current market working within a partnership. This appears particularly pertinent where all the real benefits of the franchising scheme, noted in the Assessment are detailed as 'Phase 2' activities, which are as yet, unplanned and unfunded from 2025, and therefore, are not guaranteed.
- ii. The timescales for the creation of a franchising scheme, which is proposed to be delivered within less than four years is extremely optimistic. As proposed, this would involve the procurement of 10 strategic depots, the introduction of a Residual Value Mechanism for vehicles, the recruitment of a brand-new team within TfGM, as well as the specification and contracting of 10 large and 25 small to medium franchises. Our wider experience of participating in mature public-transport franchising markets shows that this is unrealistic.
- iii. The Assessment appears to accept that the procurement of the 10 strategic depots is not likely to be achieved fully through negotiation, and therefore, is likely to adversely impact the critical path for franchising. Yet even with this acknowledgement, it is still suggested that the proposed franchising scheme can be delivered by December 2023. This appears to be an ambitious timeline, and inevitably places at risk the whole business case for franchising if there are any delays or cost-overruns.

2.4 Our overarching view remains that delivering the proposed franchising scheme will absorb £134 million of public money, for no ascertainable improvement in journey times and service quality or provision, and will limit new vehicle investment and innovation. It seems evident that investing over £134 million of public money into infrastructure projects alongside private investment and innovation through a partnership with bus operators (which encourages bus use) would be a more optimal investment for the local and national taxpayers, and would not compromise investment in other vital, publicly funded services.

3. Background: Stagecoach in Greater Manchester

3.1 Stagecoach's approach to putting the customer first

3.1.1 Stagecoach Manchester is part of the Stagecoach Group, which is the largest bus and coach operator in Britain, with a fleet of around 8,300 buses and coaches. Stagecoach Group has a near forty-year history in providing public transport services across the globe. Our services play an important role in helping people in rural and urban areas access work, education, health, shopping and leisure, with 3 million passengers travelling on our bus services daily. We are a major employer in the UK, providing direct employment for over 24,000 people.

3.1.2 Stagecoach's priority is to deliver safe, high quality and good value services to our customers. In our forty-year history, we have made significant investment in services and operations, and that commitment continues. In the last four years alone, significant investment has been made in new, environmentally friendly vehicles in Manchester, all of

which are designed to be fully accessible to the vulnerable, the elderly, people with disabilities, families with young children, and to meet the latest strict emissions standards. Stagecoach continues to invest heavily in recruitment and training for our people, as well as the provision of improved passenger information and the overall customer experience.

- 3.1.3** Stagecoach Manchester is a major public transport operator in this region, with local operations from our Stockport, Ashton-under-Lyne, Sharston, Hyde Road, Wigan and Middleton depots. Around 90% of our services are provided commercially (with Stagecoach as operator, taking fare box risk), which compares favourably to the rest of the region, where around 80% of bus services are provided commercially by the area's other bus operators.
- 3.1.4** Stagecoach is proud of our level of investment in Greater Manchester which includes over £53 million in new buses in the five-year period to 2018, replacing around 40% of our fleet of 298 buses, a figure which is well above routine fleet replacement. These new vehicles have increased accessibility of the network, reduced emissions to provide cleaner air and enhanced customer experience for our 108 million customers each year. This represents an average investment of £10.6 million per annum. Unlike capital expenditure on the TfGM Metrolink, and in the proposed franchise scheme, this investment is made without recourse to the public purse. Stagecoach's investment extends beyond our fleet to, for example, our people, our property, plant and equipment contributing towards driving high levels of customer satisfaction.
- 3.1.5** Whilst the Assessment makes a number of assertions that franchising will enhance value for money and reduce the cost of bus travel in Greater Manchester, franchising would provide limited, if any, benefits to customers and communities where Stagecoach operates, especially in the south of Manchester.
- 3.1.6** Stagecoach has some of the lowest fares nationally and our fares are generally regarded as the lowest of operator fares in Greater Manchester, with the majority of our customers only travelling on Stagecoach services, meaning no requirement for multi-operator tickets. In addition, contactless payment is available to all customers on Stagecoach buses in Manchester, with 37% of customers choosing this payment method. With all 7,000 of the Stagecoach fleet in England, Scotland and Wales fitted with contactless technology, and a third of all revenue outside of London now using this payment method, Stagecoach is the single largest contactless merchant in Europe, after Transport for London. Customers can now also benefit from a new improved app, which is the only travel app that combines a live map of all buses, an interactive journey planner and the ability to buy and use mobile tickets all in one place.
- 3.1.7** Along with the simplicity of our fare offerings, Stagecoach also offers customers in Greater Manchester a simple and easy to understand timetable, with a high frequency service on core corridors.
- 3.1.8** In addition, Stagecoach is part of the long-established and popular 'System One' range of multi-operator, multi-modal tickets in Greater Manchester. These tickets, which, are governed by Greater Manchester Travelcards Ltd ("**GMTL**") and have been in existence for over 25 years. TfGM is also a GMTL Board member.

3.2 Customer satisfaction with bus services in Greater Manchester is improving

- 3.2.1** The industry Transport Focus Bus Passenger Survey shows a steadily improving picture emerges for bus services in Greater Manchester since 2015, with the satisfaction levels in 2018 for Stagecoach at 89% and TfGM as a whole at 87%. The impact of congestion and roadworks on the results of these surveys is important, and does show the criticality of tackling congestion in the minds of bus users. This is a theme we explore further

throughout our consultation response and which we believe has not been properly addressed in the franchising proposal.

4. Our thoughts on the Strategic case

4.1 The strategic case sets out key objectives for reform, which fall into four main areas:

- i. **Network** – The bus network should be as accessible as possible for customers wishing to travel to a variety of destinations, and it should function as an integrated network and be integrated with other modes. It should be as reliable as possible with the lowest possible journey times. Harmful emissions from the fleet should be reduced.
- ii. **Simple and integrated fares** – An integrated fares system should be introduced allowing passengers to travel on all buses. Fares should offer value for money and account-based smart ticketing should be introduced as quickly as possible.
- iii. **Customer experience** – The bus service should be easy to understand, and information comprehensive and accurate. Safety of travel should be improved and there should be improvement in the on-board experience overall.
- iv. **Value for money** – There should be value for money for public investment in the bus service. Intervention should be feasible and sustainable in the long-term and any intervention should be affordable.

4.2 Stagecoach agrees that these outcomes are important to a successful bus market. We believe that a properly constituted partnership approach between public and private sectors is the more appropriate way to deliver these to the GMCA. We believe our alternative South Manchester Partnership Proposal, as submitted to TfGM on 8th January 2020, delivers benefits for bus customers and communities, as well as securing the objectives of politicians. The Partnership provides a more targeted approach to addressing any perceived current weaknesses in the bus network, minimising the cost and financial risk to local taxpayers, and delivering a more sustainable and joined up bus network for the long term. We also note that many of the real step change initiatives within the franchise proposal are not only unfunded, but unplanned and can only be delivered with 'Phase 2' funding from 2025 onwards. This means that the real benefits for customers are not actually guaranteed under franchising, and therefore, caution should be taken when considering the suggestion that franchising could significantly outperform what a partnership model could deliver – when franchising funding developments have not been agreed.

4.3 Our review of the Assessment produced by GMCA has drawn out a number of questions, these are detailed below.

4.4 Performance of the current market

- 4.4.1 As a successful operator in Greater Manchester since 1996, Stagecoach does not share the view that the market in Greater Manchester is performing at a sub-optimal level, and would question the completeness of the analysis which has been used to make these assertions.
- 4.4.2 Our experience in Greater Manchester demonstrates that a combination of low fares, high operational performance and consistent investment has generated more use of buses and in turn benefitted financial performance. On a like for like basis, to exclude the impact of acquisition, our business in Manchester has seen a 5% increase in passenger journeys from 2008 to 2017/2018 (which equates to approximately 4.5 million additional trips made by customers). Journeys have reduced since their peak in 2013/14, directly attributable to the significant passenger growth on new Metrolink lines. Compared to GMCA analysis, within

the same time period, where passenger journeys declined by 17% (which equates to approximately 39 million less trips made by customers). This shows to us that where there is a combination of low fares, high operational performance and consistent investment, customers will use the service.

- 4.4.3** The strategic case appears to be selective in the way it presents the current market, making limited reference to the true significant negative impacts on the current bus market such as worsening congestion, the challenging economic environment, or competition from other modes, specifically the expansion of the Metrolink network.
- 4.4.4** We note with interest that despite a major market intervention, which sees a completely new model introduced at a cost of £134 million, the net impact on demand for bus travel in the Assessment is generally negligible, with demand still forecast to be in decline. This is counter-intuitive for such a huge investment in what is badged by GMCA as intervention meant to be reforming the market. In addition, we note references to buses needing to move more people into the regional centre and overcrowding on public transport. It is far from clear how, or if, the franchise proposal will seek to address this.
- 4.4.5** One of the major impacts on bus demand has been the impact of the huge expansion of Metrolink. Your statements in section 2.1.8 of the strategic case make reference of a decline from 233 million bus trips in 2007/08, to 194 million bus trips in 2017/18. Ashton, Rochdale, East Didsbury, Airport & Media City lines have all opened and abstracted bus patronage in this period. Only one further line is due to open in the future - Trafford Park. This abstraction from bus to tram accounts for the majority of the decline and when this is adjusted for correctly, the actual decline is at its lowest level since the 1950's. We support, and acknowledge the importance of the Metrolink network, and the significant contribution it is making to the public transport landscape in Greater Manchester. The Assessment's analysis on the decline in use of buses makes multiple references to Metrolink which shows the impact it has on the market, with 17 million bus trip reductions attributable to it (two-thirds of the decline in bus use). A high-level assertion that the bus network is in decline without recognising the transfer of passenger journeys from bus to tram is, in our opinion, a disingenuous and misleading portrayal of the performance of the bus market.

4.5 Network

- 4.5.1** The strategic case set out for franchising, builds a narrative that the current market is set up in a way that commercial operators only operate services which are profitable, leaving GMCA to step in and provide services of an unprofitable nature. This is absolutely not the case; analysis of Stagecoach Manchester's current successful commercial network shows that there are a number of services operating where the operating costs of providing those services are not fully covered. However, we continue to operate them as we recognise the positive beneficial customer, community and financial effect of providing these within the overall commercial network, and not transferring these into the publically funded part of the network.
- 4.5.2** The presentation of the existing market, as one where incumbent operators are only interested in profit-making service is contradicted by the actual commercial performance of many of these local bus businesses within it. Similarly, there is a presentation of fare increases in the commercial market above inflation being for profit motivation, without recognising the real detrimental impact of declining bus journey speeds as a significant contributory factor to bus industry costs increasing above the general measures of inflation (CPI and RPI). Professor David Begg's report³ on the impact of congestion on bus services

³ https://greenerjourneys.com/wp-content/uploads/2016/09/TTBusReport_Digital-FINAL-With-Changes-1.pdf

identifies that for every 1% reduction in average bus speed, the cost to bus operators of providing those services increase by 1%. The average speed of Stagecoach's south Manchester services has worsened from 10.17 mph in 2007/8 to 9.21 mph in 2018/19 – a 9% reduction.

4.5.3 If the GMCA were to invest a proportion of the £134 million they are proposing to spend implementing franchising, into bus improvement measures to prioritise bus services and mitigate the impact of this average speed decline, would in our opinion, be a much more efficient and effective use of public resources. It would help to drive bus passenger journey growth by making bus journeys more attractive in terms of speed and variability, reducing private car journeys by encouraging modal shift from private to public transport, and finally, helping to achieve the GMCA's economic, social, and air quality objectives.

4.5.4 The Assessment (at paragraph 2.1.29) details that the franchising scheme would ensure that the network is as efficient as possible, not competing with other parts of the bus network or other public transport modes. As an experienced and successful operator, our four decades of experience show that offering customer choice and high bus service frequencies, drive increased passenger demand in the medium to long term – and removing this choice and frequency of service would see bus patronage and public transport use across all modes decline on these corridors.

4.6 Customer

4.6.1 Bus passengers have relatively straightforward priorities. The independent customer watchdog, Transport Focus⁴, state that of the 31 priorities bus users are asked to rank, the below are the top five:

- i. Better value for money from bus journeys;
- ii. More buses arriving on time at your bus stop;
- iii. More journeys on buses running to time;
- iv. Buses running more often than they do now; and
- v. More effort made to tackle any anti-social behaviour.

4.6.2 From the franchise assessment it is not easy to see how and where many of these issues will be addressed. As already mentioned above, the Assessment seemingly ignores the impacts of congestion, which is objectively recognised as a significant contributory factor in reducing bus passenger journeys, and by addressing this, could therefore have the biggest single direct effect on achieving four of the top five customer priorities. We also contend that this could be delivered equally effectively through partnership as it could through franchising. Greater Manchester has seen an improvement in its satisfaction levels compared to other local authority areas, in the Transport Focus annual bus survey, since 2015, so passenger sentiment is already strong in relation to service. Stagecoach Manchester already achieves high customer satisfaction at 89% in the most recent Transport Focus annual survey, which is slightly higher than Metrolink at 87%, showing that there is no additional customer benefit provided by franchised services over the current commercial proposition, and there is little in the franchise proposal that is promising a revolution to drive a step change in customer satisfaction.

4.6.3 Better integration and a single brand, which appear to underpin the argument for franchising, are also key deliverables in the all-operator partnership proposal and are further enhanced in Stagecoach's South Manchester Partnership Proposition. We see little justification for the additional benefit to users ascribed within the franchising assessment.

⁴ Bus passengers' trust and priorities for improvement. Populus for Transport Focus, March 2016

in its assessment of the Economic Case, paragraph 3.7.1 of the Jacobs paper makes reference to Grant Thornton's audit report comments on the Assessment, where branding is given a 4.1p per trip benefit to users in the franchise case – valued at £102 million over the life of the appraisal. This comes from a 1996 study by Steer Davies Gleave (in London) and in that report it is a value applied to trips from hail and ride services only.

- 4.6.4** We would again argue that the money proposed for introducing a new brand would be better used in investment to reduce congestion or to prioritise bus services, which would deliver a real step change in customer experience for passengers in the areas they need.
- 4.6.5** There is limited reference outside of continuing the Travelsafe scheme in operation today and ensuring all vehicles have CCTV (all of Stagecoach buses in Manchester already have this) to address the customer need for improved safety and security. Even the initiative to employ more Revenue Protection Officers tails off in year 6 of the franchise scheme.
- 4.6.6** On the UK rail network, we operated train services for more than two decades with Virgin, one of the most trusted global brands. We therefore, understand the importance of brand in bringing customers to public transport. However, a brand is not simply a repaint of a vehicle, it is about improving the complete customer journey experience.
- 4.6.7** It is difficult to see that the single brand proposal within the franchise Assessment without enhancements to the end-to-end customer experience will deliver the financial benefit attributed to it in the TfGM assessment. Much of the on-board experience will remain as now, with measures only really delivering hygiene factors for customers. The average vehicle age is proposed to stay broadly the same, the network will not be radically altered to enhance service provision, and fares will increase above the rate of inflation. It appears from papers issued to support the endorsement of the franchising scheme to GMCA, that Grant Thornton in their role as auditor, shared concerns about the true impact that brand and other soft benefits in themselves could in reality deliver, which appears to have been disregarded by TfGM in this Assessment.

4.7 Simple and integrated fares

- 4.7.1** The assessment of a complex fares and ticketing market fails to recognise that Greater Manchester operators have had an integrated ticketing scheme in operation for over 25 years, and even the content which introduces the System One ticket, has pre-cursor text which references the lack of integrated ticketing. Where sub-Greater Manchester (single operator) tickets are offered, customers are given cheaper products for a more limited range of services. We would assert that these meet a demand and give rise to passenger benefits through customer choice and improved value.
- 4.7.2** The integrated System One range of products has been restricted in the past due to TfGM's reluctance to include the full Metrolink service and offering within the scheme (other than off-peak day tickets), making the price of such integrated multi-modal service use high due to the requirement to additionally purchase the Metrolink element at peak times. We would assert that this integration has not been pursued and resolved by TfGM - it has been operator-led and bus operators have given, and still do give, far bigger discounts to be able to offer the combined bus metro and rail ticket prices at more competitive prices in the current marketplace.
- 4.7.3** We are interested in your assessment at paragraph 9.3.16 where you prescribe £56 million of benefits to a fare reduction. It is difficult to see how this can be achieved when you have stated at several instances throughout the Assessment that passenger trips will continue to decline. The lack of visibility of your Demand and Revenue Model (and your refusal to provide it to OneBus under the auspices of the Freedom of Information Act) means that we are unable to interrogate this modelling, but have to assume it to be overly optimistic.

4.7.4 It is also of interest that whilst above inflation increases are presented as a failing of the current commercial market, your franchising proposition where fare box risk passes to TfGM, sees fares proposed to increase by RPI +1.4%, which would suggest that the above inflationary pressures are not a result of commercial operator behaviours as implied throughout the whole Assessment.

4.8 Value for Money

4.8.1 Paragraph 8.4.20 of the Assessment references moving from the limited competition 'on road' to competition 'for the market', as operators competing for franchise contracts will lead to increased levels of competition. We struggle to see how removing the dynamic of competition will do anything to enhance it. Commercial operators regularly tweak and adapt services to maximise their potential. In addition, multiple studies have shown that the largest competitor to bus use is the ownership of private car. There has been significant growth in the number of licenced cars in greater Manchester and associated road congestion in recent years. In addition, like many cities across the UK, Manchester has seen an increase in taxi usage through the simplicity of propositions provided by companies such as Uber. Nothing in the franchising proposition will address these factors.

4.8.2 Experience of franchising elsewhere shows how a prescribed specification which cannot be altered leads to an inappropriate network which becomes stagnant, not thriving due to the additional complications of reacting to the changing demands of the network under a contractual specification system. Passengers of Northern Rail who have suffered due to the inflexibility of a franchise arrangement would argue that this type of system provides them with very poor customer experience and value for money.

5. Our thoughts on the Economic case

5.1 As referenced in the Introduction, as part of our association with OneBus we have contracted Jacobs to undertake a technical analysis of the Economic Assessment. A high level summary of their review follows.

5.2 Assessing the demand forecasting and appraisal methodology

- i. The 30-year appraisal period has the potential to favour franchising as this option has the longest operational timeframe in the Assessment, compared to the partnership options.
- ii. The Do Minimum scenario excludes proposed future transport schemes that do not have confirmed funding. Only two Metrolink schemes are assumed over the 30-year appraisal period. It may be unrealistic to assume that no further public transport interventions are made by TfGM over this long timeframe.
- iii. There is a significant risk that the modelling approach double counts benefits from the introduction of interoperable tickets and a more frequent service level. Both facets of franchising may have similar impacts, and therefore, modelling the impact of both policies separately has the potential to overestimate the impact of franchising on demand.
- iv. The demand and revenue model employ an elasticity-based approach. This may not be appropriate given the scale of proposed changes to the bus network, as elasticity-based modelling is normally used for smaller-scale interventions, such as revisions to existing timetables. This has the potential to either underestimate or overestimate future demand levels compared to a real-world scenario.

- v. Service quality improvements are assumed to have a significant impact on levels of demand. However, this is only backed up by limited evidence from other studies. Therefore, there is a risk that the scale of these benefits has been overestimated. Also, soft initiatives can be implemented in the TfGM proposed Ambitious Partnership scenario, which would increase benefits and increase Value for Money (“VfM”).
- vi. The assumptions that have been used in sensitivity testing have not been fully “stress-tested”. Sensitivity tests included in the analysis vary input assumptions by a small proportion than would be expected in an economic case such as this. Additionally, the results from several sensitivity tests were counterintuitive (for example had the opposite impact on demand than would have been expected). This undermines the credibility of the analysis. For example, the lower population growth scenario was found to improve the business case compared to the central scenario. It would be more reasonable to expect this scenario to worsen the business case, as demand would be lower in a scenario with a smaller population.
- vii. It is not clear how reliability and frequency were considered in the model. These two variables are highly correlated with demand, meaning that demand could potentially be overestimated within the model.
- viii. Further clarifications are needed on how TfGM has built the baseline for demand, and how it has abstracted the effect of demand growing in Metrolink and reduction on supported services.

5.3 Review of Consultation Economic Case

5.3.1 Revenue Forecasting

- i. Fares were expected to increase by RPI + 1.4% in each option for all ticket types. This assumption is particularly high, given that the average fare yield growth across English metropolitan areas since 2004/05 has been at a rate below RPI. Therefore, modelled revenue levels are likely to be over-estimated as a result of this assumption.
- ii. With the introduction of bus franchising, TfGM is likely to be subject to political pressure to limit the increase of fares in real terms - as has been the case in Greater London recently. This would impose future limits on fare rises, particularly single fares which have seen the largest increases price in recent years, and any revenue shortfall will have to be covered by the local or national taxpayer.
- iii. The modelling of revenue for English National Concessionary (“ENCTS”) is inconsistent with recent evidence which shows falling trips made under ENCTS. The assumption is also counter-intuitive as it might be reasonable to assume bus use by pensioners will fall in the future as car use becomes a more affordable alternative to travel for this group, due to rising incomes amongst this cohort. Additionally, the ENCTS eligibility criteria will change in the near future, leading to a further reduction in bus use by this cohort.

5.3.2 Impact on Operators & TfGM Finances

- i. TfGM assumes a blanket 7.5% operator margin across all future franchise contracts. This ignores operational risks, likely bidder interest and the number of routes. Taking these factors into consideration suggests that under the franchising model, operator margins will vary across different parts of Manchester depending on local factors, and that the average 7.5% margin assumed may not be reflective of real- world commercial factors. In spite of the statements in the Assessment, Stagecoach’s

experience is that the average margin of franchised services in London is significantly lower than the 7.5% referenced. We would also query whether a mature franchising market such as London, where hundreds of contracts are let on a different model to that proposed for Manchester is even the correct one.

- ii. There is a risk that the involvement of public authorities in the award of future franchise contracts could lead to higher costs than assumed in the economic case (which are assumed to be similar to the current arrangements), as political pressure leads to a higher-than-expected increase in service levels.
- iii. There is a risk that the rate of bus replacement will slow down in the years preceding the implementation of bus franchising, which could lead to higher bus replacement costs in the initial few years of implementing franchising. The economic case also assumes that the cost of replacing buses will increase in line with RPI over the appraisal timeframe, but this may be unrealistic as it is inconsistent with anecdotal evidence received from the industry on vehicle costs. It also does not take into consideration the fact that the higher level of specification of buses under franchising may result in higher vehicle costs. The cost of acquiring bus depots currently owned by existing operators could be higher than currently assumed in the business case. Existing operators are unlikely to put depots up for sale in order to facilitate a franchising competition, which they have a chance of losing. TfGM assumes that the configuration of bus depots across Greater Manchester will remain the same. However, the bus network under franchising will have a different service pattern which may require the purchase of new depots, which would increase costs higher than is assumed in the business case. Similarly, spending by existing operators on plant equipment maintenance may fall in the years preceding franchising which may lead to higher-than-expected bus depot refurbishment costs during the implementation period of franchising.
- iv. There is not a risk mitigation plan, which could therefore lead to higher-than-expected costs. Finally, it is not clear in the economic case if TfGM has included costs related to new infrastructure (e.g. high-quality bus shelters) across Greater Manchester, which are needed to implement bus franchising.

5.3.3 Wider Economic Impacts

- i. The methodology used to calculate the wider economic benefits from introducing bus franchising raises significant concerns. These benefits usually accrue to businesses who benefit from an increase in productivity, as a result of improvements in transport journey times. As only a small proportion of journeys made during the day by passengers on work duties are made by bus, which is supported by recent National Travel Survey⁵ data which shows that only 4% of distance travelled by people in England was by bus compared to 77% by car, it is unlikely that these benefits will be realised.
- ii. There is a further concern around how wider economic benefits have been calculated, as no evidence has been provided on the assumptions used to calculate local (as opposed to national) wider economic benefits. Whereas, national values used to model these transport benefits are available on the Government website, TfGM has calculated its own values for local impacts. The methodology used to generate these local values is not transparent.

⁵ <https://www.gov.uk/government/statistics/national-travel-survey-2018>

5.3.4 Risk Assessment

- i. In general terms, TfGM has underestimated the risks related to the scheme, and there is no clear methodology as to how the criteria was established for assessing the impact and probability of each non-quantifiable risk. For example, it is appropriate to assume that the implementation risk of an incumbent operator not winning a contract as being 'high', but equally so the wider transitional risks. On the other hand, other cities, including London, have transitioned their bus business models through various stages, where both operators and the 'local authorities' have at times retained both risk and reward, to a position now where quality incentives can enable operators to both develop their business and offer passengers service improvements.
- ii. Several risks are interlinked with one another and should be explored further. In addition, it seems that there are some risks that would flow through each of the scenarios but are not captured in each. An approach which groups risks by broad category rather than perhaps by scenario may ensure that each risk is captured.

5.3.5 The economic case presents an overly optimistic view of franchising, whilst assuming partnership operators are not incentivised to grow the market

- i. Our high-level view of the Economic case is that it appears to present an overly optimistic view of franchising. An example of this is where the Assessment seems to imply that even after setting fares at the lowest standard fare price, the current market has almost £100 million worth of untapped upside, which the free-market forces of the current system have failed to identify. As a private operator with nearly 25 years' experience in the Greater Manchester market, one in which we have seen growth over a number of years, we struggle to calibrate this assessment.
- ii. Much of the Assessment, especially when considering the benefits offered in partnership, seems to place a view that private operators will simply deliver the legal minimum, and therefore any partnership initiative is credited with only a low level of benefit. Again, this is not reflective of how the real world operates. Customers have more channels to be vocal about their experience than ever before and can vote with their feet. Stagecoach has delivered consistently high levels of customer satisfaction in the Greater Manchester marketplace, regularly outperforming Metrolink (run as a concession by TfGM.) Assuming as a commercial operator, we will degrade the quality of our customer experience to operate at a level of minimum compliance when operating in partnership is simply not credible or feasible.
- iii. Very early in the Economic case we are presented with a future year forecast for patronage (chart 9), which says that franchising gives a kick start to the market and then decline continues as normal, but at a higher initial base level. This leads us to wonder whether the franchising costs (£134 million) could not be used to provide a kick start in other ways. It is our view that a major intervention such as the one proposed, should make the bus market perform dramatically better over a longer period and be much more attractive to customers, otherwise why intervene?
- iv. We note that at paragraph 13.1.15 it is expressed that the franchising scheme option is expected to be durable and yield better performance over time, that the partnership options are anticipated to be less durable, with benefits eroding over time, perhaps entirely within a ten-year timeframe. This assessment of the marketplace appears far too simplistic.

- v. Evidence of franchising within the UK market suggests that it is not without its own faults and requires government intervention. Private bus operators continually need to invest to keep their product compelling and relevant. To assume that this wouldn't happen in a world of partnership, or that a 10-year limitation can be applied to frame operator's ambitions, is unrealistic.

5.3.6 Fares benefits appear overly optimistic, whilst impact of congestion appears to be underplayed

- i. We are confused somewhat by the methodologies which appear to underpin the outputs in Chart 14 of the Assessment, suggesting that a 9% increase in revenue and a 16% passenger reduction leads to a 25% increase in fares. This would imply a 25% increase in fares would shed 16% of passengers which is very high. It also assumes a direct relationship between revenue and mileage reduction, when service reductions are made it is reasonable to assume you would remove the least used mileage. The congestion effect of 0.2% feels completely inappropriate when journey speeds are slowing by 1% a year.
- ii. As referenced above in our assessment of the Strategic case, we believe too much emphasis is being placed on above RPI fare increases being a driver of dissatisfaction with the bus service, when in reality the greatest issue impacting passengers is slowing journey times and an increased level of journey time variability – particularly when in the franchising proposal, TfGM is proposing above RPI fare increase in any event. Our 2018 study into drivers of demand⁶ in Greater Manchester, undertaken by KPMG, showed that alongside car ownership and the service offered by Metrolink, bus journey times were one of the greatest influencing factors impacting bus demand in Greater Manchester. If this element was resolved, the requirement for additional Peak Vehicle Requirement ("PVR") would reduce, removing one of the major reasons for the above RPI fares and you would therefore retain patronage. In our opinion these basic principles appear to be missing from the Assessment.
- iii. Claims in the Economic case that franchising will have a significant impact on reducing congestion feel far too optimistic and disproportionately beneficial to the case for franchising and fly in the face of the current reality of congestion in Greater Manchester. We would be interested to understand the interoperability and network improvements which underpin this assumption. However, unfortunately this has not been possible due to the failure to make available the full models which underpin the assessment, despite our requests. Time Savings (with their benefit of £299.1 million) are ultimately the driver of franchising having a greater Present Value of Benefits ("PVB") than either of the partnership options.
- iv. We also note with interest from Table 9 that Metrolink appears to benefit from the removal of parallel services. We would question how forcing bus passengers onto tram services benefits the bus market or the consumer, who will be forced to pay higher ticket costs and above inflation fare increases on tram services.
- v. The claim at paragraph 15.4.9 that only TfL Buses have achieved a major improvement in the provision of local bus services in recent history across a large city region, seems to ignore passenger growth and trips/population levels achieved in areas of the country (such as Merseyside), where support for bus has been forthcoming from the local authority, without franchising. Growth in TfL (which has

⁶ Refer to slide 19, <https://www.stagecoach.com/~media/Files/S/Stagecoach-Group/Attachments/media/publication-financial-reports/preliminary-results-presentation-28-06-2018.pdf>

been in decline for the last five years⁷) has been underpinned by substantial subsidy (currently £722m p.a.⁸) which is not proposed/available for GMCA. Chart 19 suggests you need an additional £10 million in subsidy to generate 3 million to 3.5 million trips. We would be interested in understanding how this is considered to be value for money.

- vi. We question the optimism bias statements in paragraph 15.5.7, and sensitivities to assess it would not show significant results/variation in results of the business case for franchising, noting that optimism bias sensitivity had almost zero impact on the NPV. We would welcome clarification and justification on this.
- vii. As per our concerns about the benefits derived from time savings above, we also note from Chart 22 of the Assessment, which shows that of the £355 million in user benefits derived from franchising, £194 million is derived from 'service quality'. This again has been presented with no context to explain what underpins the assumptions which make up this major benefit. Noting of course that, this item alone is making the case for franchising over any partnership method.
- viii. If we recognise Transport Focus' five key priorities for bus passengers, detailed above in this response – resolving congestion and increasing average bus speeds would help deliver at least three of these priorities – not service quality – which customers are saying is not the problem.
- ix. Our final challenge with the Assessment is with the Wider Economic Impacts analysis in Section 19. We note in paragraph 19.3.3 that Agglomeration impacts are noted to provide 2.7 times the benefit of the Ambitious Partnership (£165.8m v £61.3m). However, no explanation or rationale is given for such a wide differential.

6. Our thoughts on the Commercial case

6.1 The commercial case presents an overly ambitious timeframe to introduce franchising

- 6.1.1 Whilst reaffirming our objection to franchising, having reviewed the commercial case, we would suggest that the plans to introduce the scheme are overly optimistic, with significant risks and challenges that have been ignored to present franchising as deliverable in a three-year timeframe.
- 6.1.2 GMCA seeks to introduce the new franchising scheme and complete the letting of all contracts within three years. This would be optimistic for a specifying authority with significant experience in a mature franchising market, but TfGM is looking to set up a number of concurrent complex procurement and mobilisation programmes, managed by a number of individuals who are yet to be recruited. The DfT, which is a mature franchise procuring body, takes over two years to procure just one rail franchise and we all see the current challenges these have. At the same time, TfGM is looking to negotiate the purchase of major depots from incumbent operators, who it is felt will not always be co-operative in the sale process. The assessment details the need to use Compulsory Purchase Orders (“CPO”) powers to acquire some depot facilities as not all are assumed to be procured via negotiation, at the same time, maintaining the timings for franchising to be completely delivered by December 2023. These two approaches do not feel aligned with one another.

⁷ <https://www.transporttimes.co.uk/news.php/TfL-is-planning-significant-cuts-in-bus-services-and-now-acknowledges-cycling-as-a-cause-of-London-ridership-decline-333/>

⁸ <https://www.standard.co.uk/news/transport/tfl-set-for-742m-loss-thanks-to-bus-subsidies-a4096581.html>

- 6.1.3** We have concerns about the confidence levels in the quality of data made available to bidders, especially around the risk of inaccurate TUPE assumptions at franchise bid stage. Experience of bidders in the UK rail market has seen significant variability of data room quality, with a good example being the Thameslink franchise, where not enough drivers were included in resourcing plans due to inaccurate full time equivalent (“FTE”) data within the data room for that bid – and this is in a well-established and mature franchising marketplace. The first wave of franchise contracts must be at significant risk of failure due to cost decisions based upon poor quality data from incumbent operators, meaning many operators would spend more time seeking contractual remedy from TfGM than they would improving services for passengers – at the same time as TfGM requiring more resources themselves to manage these contracts.
- 6.1.4** The concerns around GMCA's preferred plan for depots, namely that the strategic depots would be owned outright by the GMCA, are set out in the HSF legal response.
- 6.1.5** Whilst we have had some early engagement with regards to the proposed Residual Value (“RV”) mechanism which is proposed to be introduced for vehicles, a full market engagement and detailed consultation with all incumbent operators is clearly required. As such, to assume a market engagement can be conducted, completed and a RV process implemented in the short timeframes before the commencement of the sub-area A tranche of franchises in the second half of 2020 to inform bidders of the mechanism to allow them confidently bid a vehicle strategy seems wholly unrealistic.
- 6.1.6** Plans to introduce Intelligent Transport Systems under a centralised contract, specified, negotiated and managed by TfGM on behalf of GMCA, make sense under a franchise scenario. However, it places yet further pressures on finite TfGM resources (procurement and legal) to operate yet further procurement programmes in the same timeframe as franchising contests are planned. IT projects in the public sector have a history of being delivered late and over budget. We query whether a local authority would be able to commercially negotiate contracts to deliver any further value compared to the current market.

6.2 Plans for cross-boundary services will have a detrimental impact on customers and communities

- 6.2.1** Many of the Greater Manchester towns core radial routes are served by services predominantly operating outside of Greater Manchester so restrictions on these services would reduce choice for customers travelling wholly within Greater Manchester. There are several examples where cross boundary services and services operating wholly within Greater Manchester combine together to provide a much more attractive customer proposition with higher combined frequencies and service levels. If it was deemed that the cross-boundary service was competing and a permit was not granted, then the customer would be in a worse position with a reduction in service level, sometimes massively so. If cross boundary services were not allowed to use intermediate stops, cross boundary journeys from these intermediate stops would necessitate a two-part journey causing further inconvenience to the customer.
- 6.2.2** These potential restrictions will reduce the current viability of cross boundary services which may cause them to be seriously reduced or withdrawn completely. Indeed, many customers within Greater Manchester benefit from cross boundary services as the service level within Greater Manchester would be less without the cross-boundary usage. Under the proposals it is difficult to see how restricting cross boundary services will not be detrimental to customers within Greater Manchester and this will likely lead to passenger loss, reduced service levels, movement to other modes, and a higher franchising cost to

support Greater Manchester only services that operate to terminus's located at the county boundary where there is no demand for travel.

6.3 The ambitious partnership considered in the assessment appears not to have been tested with operators

6.3.1 We are intrigued by the consideration of an ambitious partnership and the consideration given to it by TfGM during the assessment. As a key operator in Greater Manchester, we had no discussions whatsoever with TfGM as to what an ambitious partnership could look like, and it has simply been created as a theoretical construct by officials and not operators, which allows one of the other contractual mechanisms under the Bus Services Act (an Enhanced Partnership) to be considered. It is therefore difficult to comment fully on the appropriateness of the commercial implications of the partnership options as set out in the Commercial case.

7. Our thoughts on the Financial case

7.1 Significant expenditure is required to set up the proposed Franchising scheme, which could surely benefit Greater Manchester if invested elsewhere

7.1.1 The financial case sets out how GMCA could afford to introduce and operate the proposed franchising scheme, we would note that there is a significant opportunity cost attached to the money which would be allocated towards the transition to franchising, and would again question the value for local and national taxpayers in funding this transition. The significant use of 'earn back' funds to cover £78 million of the transition costs mean other significant priorities in Greater Manchester, where this expenditure could be focused miss out.

7.1.2 Further to this, using historic and future council tax precept to cover £33.7 million of the scheme costs feels inappropriate, with a risk of greater local taxpayer investment required post 2025. Introducing this burden directly contradicts findings by independent market research agency, YouGov, which shows that over three quarters of the Greater Manchester population said that they did not want public transport improvements to result in higher taxes.

7.1.3 We have sought to assess the full impact the assessment by understanding the inputs and outputs of the Demand and Revenue Model. However, this was not provided, either as part of the consultation documentation or under the auspices of FOI, and therefore we have not been able to undertake a complete assessment of the Financial assumptions which underpin the recommendation for franchising in the assessment.

7.2 Specific challenges we have identified when assessing the financial case

7.2.1 We have a number of concerns in the financial case with regards to the treatment in the following areas:

- i. **Labour costs** – We note that the Assessment assumes no change to the labour models adopted in today's market and that these would be expected to continue throughout franchising. This feels at odds with the views of key stakeholders such as the Unite Trade Union who have backed franchising with one of the reasons stated for their endorsement being the ability to enhance pay and benefits for its members. Unite believe that its members will gain more advantageous terms and conditions with a greater influence provided by the public sector, due to the ability for the Mayor and politicians to intervene. This belief is underpinned by precedents from

various Mayors of London in that franchised bus market. Yet this does not appear to have been taken into account by the Assessment.

- ii. **Revenue Protection** – The Assessment proposes the recruitment of 30 Revenue Protection officers, primarily as a safety and security measure, despite their name. In addition, the number of FTEs reduces to 13 in 2026/27. We would like to understand the thinking and justification behind this further, as it has to be assumed that this would have a negative implication for the protection of the fare box revenue, which would be under TfGM’s control at this point, as well as reduce the presumed benefit on safety and security for staff and passengers.
- iii. **Network Review and Redeployment** – The Assessment assumes that 1.2 million passengers can be generated by the network change programme in franchising (Chart 17) This feels far too optimistic based on the previous assertions that operators only operate a network where routes are profitable and that the GMCA steps in with tendered services to fill gaps in the network that commercial operators do not operate. It feels hugely optimistic to assume the network has such a level of latent demand that can be achieved by the removal of some buses which overlap with Metrolink services, or where routes compete to be placed on routes designed to answer socio-economic needs.
- iv. **Local Concessionary schemes** - We are surprised that no impact has been modelled for the ‘Our Pass’ scheme which offers free travel to 16-18-year olds. Whilst we acknowledge that this is a trial, the political risk of withdrawing such a scheme once it has been introduced is high and therefore some consideration would have been expected and relevant. This feels like an oversight in the Assessment.
- v. **National Concessionary schemes** - Whilst the assumptions around future demand under the English National Concessionary Travel Scheme (“**ENCTS**”) scheme seem reasonable, we note with interest the statement at paragraph 42.1.10 which appears to provide £96 million of benefits to franchising through the reallocation of central government funding, via the removal of the requirement for TfGM to reimburse operators for journeys made under the ENCTS scheme. In reality, this would simply be monies which are diverted to cover the costs of this concessionary scheme, through variations to franchise payments to operators and therefore, cannot realistically be claimed as a benefit.

7.2.2 Whilst the assumptions and data sources within the Economic Case Supporting Paper, which appear to underpin the revenue forecasts summarised at paragraph 40.1.6 seem relevant, we are surprised to see the absence of any assumptions for the impact of remote working (home working), part-time workers, considering its impact on other forms of public transport. For example, in UK Rail, the DfT is specifying a requirement to include season ticket solutions responding to part-time season tickets within franchise specifications over the last three years. A failure to recognise this trend puts at risk the ability of the proposed franchise scheme to achieve its revenue targets, as well ignores the fundamental changes that are happening in society right now.

7.3 Assumed margins for franchising appear unrealistically high and may present challenges to TfGM

7.3.1 We are interested by the EBIT margin assumption of 7.5%, made in this assessment, which is above the [London/TfL] benchmark point estimate of 7.1%. This additional margin allowance of 0.4% is considered sufficient to account for any potential differences between the London market and Greater Manchester. As an operator in the London franchise

market, we struggle to recognise the assumed benchmarks stated for London and would expect operator margins in any franchising market to be lower.

7.3.2 Overall, these margin levels for Manchester feel over-optimistic considering the current commercial position of many operators within Greater Manchester, which is detailed throughout the Assessment. In order to achieve these margin levels, more profit will need to be generated than exists in the market today. Balancing this against the continued trip rate decline alongside the additional costs associated with franchising, this does appear counterintuitive.

7.3.3 The financial case appears to make a number of assumptions, which appear to have been generated to create an overly-beneficial picture for franchising. For example, there is no allowance for any operator staff redundancy costs (due to changes in the nature of the business requiring different skill sets). There is no allowance for operator equipment write-downs, where new equipment is required by GMCA, for example, for radio, automatic vehicle location (AVL) or Intelligent Transport Systems (ITS) equipment. Nor is there any provision for the increase in costs of operators to operate in a contracted franchising world, where the recruitment of contracting managers will be required for example. The Assessment provides significant focus on the number of FTEs required within TfGM but provides no assumptions for the recruitment of contract management and performance regime analysts within bus companies. Similar roles are prevalent in London bus operating companies and within train companies operating in a franchise market.

7.4 Concerns on impact of pension funding

7.4.1 We consider that the assessment of the treatment of defined benefit pension arrangements does not properly recognise the additional punitive costs that would be charged on existing operators from the imposition of franchising proposals.

7.4.2 With respect to the Greater Manchester Pension Fund (“**GMPF**”) alone, we would estimate that this could precipitate additional exit funding in the range of £30 million to £60 million for all current operators across Greater Manchester, which under the current arrangements or a partnership model would not be necessary. The pension exit funding serves to extract valuable capital from the operators which could otherwise be allocated for further investment in Greater Manchester. Once in the pension fund, the capital is invested overwhelmingly in assets out with the Greater Manchester area – as such the extraction of additional pension exit payments actually provides no real-economy benefit to the local community or tax-payers, and serves only to transfer even more value away from Manchester. Indeed, a key beneficiary would be the investment firms taking their share of fees, located largely in the City of London.

7.4.3 Under its most recent actuarial valuation to 31 March 2019, the funding bases used by the GMPF would suggest it is carrying a surplus in the range of 105% to 110% of its funding requirements. While the GMPF (and presumably the elected councillors) will have access to the latest 2019 numbers, they have not been made public yet. Nevertheless, based on information provided to Stagecoach, it is clear that across the whole fund, the excess level of funding can be estimated to be around [£1bn - £3bn] – the share allocated to Stagecoach using the lower more cautious end of the Fund’s investment assumptions is around £9 million. This is the surplus that arises on an ongoing basis for the Fund and under the current business model or a partnership arrangement.

7.4.4 The Pensions Impact Supporting Paper wrongly alludes [at paragraph 1.4.7] that because there are relatively few active members employed by operators “*there could be a cessation point in the near future*” [leading to additional pension funding] - this is seeking to infer that the crystallisation of these punitive pension exit costs will not be caused by the

franchising proposals. This is incorrect. Absent any franchising proposals, the Stagecoach Manchester business fully expects to have active members in the GMPF for at least another 20 to 25 years, noting that the age of the youngest Stagecoach member of staff in the Fund is only 45 years of age.

- 7.4.5** While the Pensions Impact Supporting Paper understands that the franchising proposals could have an impact where *“existing pension related liabilities could be measured on a different or more conservative basis”*, possibly through a lack of understanding on pension funding, it reaches the wrong conclusions on the impact of the franchising proposals and the responsibility of the franchising authorities. As noted above, applying the Fund’s own investment assumptions (and even if at the less optimistic, more cautious end) on an ongoing basis and under the current business model there is no deficit payment due to the Fund from Stagecoach under the 2019 valuation (and most likely the case from the other operators). However, the introduction of the franchising proposals weakens the business model for the Operator (as noted in the Bus Franchising Assessment Paper September 2019, the *“impact of the Franchising Scheme on the incumbent operators would be...the effective cessation of their current business.”* [61.2.8]. In turn, this may be expected to result in a more cautious more conservative funding basis, and also will increase the risk that a pension exit charge could arise as active members are forced to TUPE to other operators. As such, charges that would not normally be expected to arise using the Fund’s own investment and funding assumptions, would arise because of the franchising proposals. This serves to extract contributions from operators that would not otherwise be necessary, sucking investment unnecessarily out of local transport companies and out of the local economy, diverting it via the investment firms in the City of London.

7.5 The recommended approach of procuring strategic depots places a further debt burden on TfGM and GMCA

- 7.5.1** The HSF legal paper details our views on the approach proposed for the procurement of assets by GMCA. We question whether the £58 million provision for the purchase of the ten strategic depots across the whole of Greater Manchester is reasonable, and what assumptions have been made in terms of management resource and timescales for just undertaking this activity. With interest payments this investment is set to cost £85.7 million, with so many other challenges facing Greater Manchester, with existing liabilities in relation to the Metrolink infrastructure⁹, alongside the added challenge of Brexit, we do question the legitimacy and value of utilising local government resource in this way.

7.6 Quantification of revenue risk appears overly low throughout the Assessment

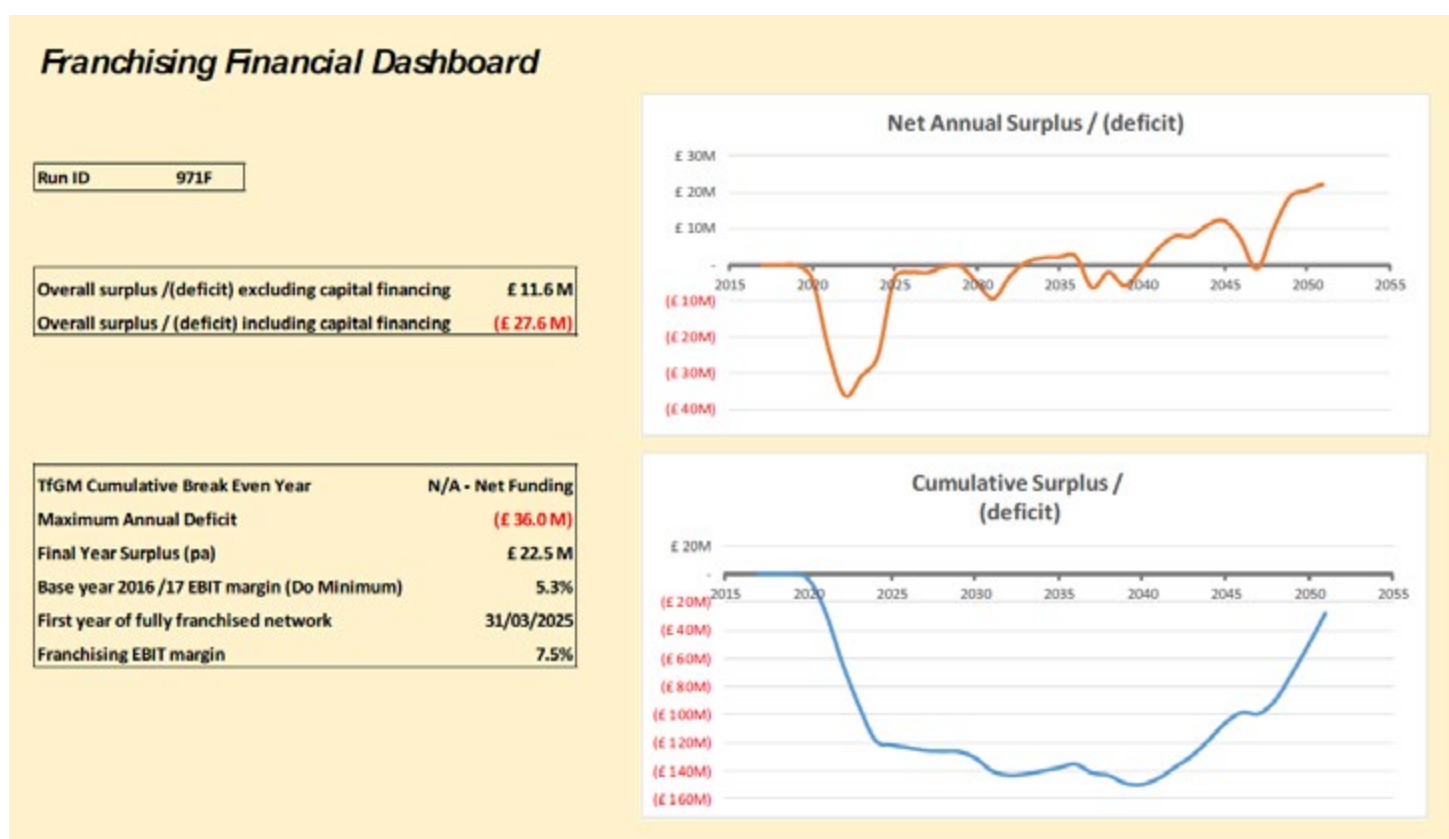
- 7.6.1** The review of the economic assessment undertaken by Jacobs details the assessment of quantified risk, but we would like to draw attention to the incredibly low level of risk/contingency values allocated to revenue in Table 49. Allocating only £24.5 million of risk to revenue over a 30-year assessment feels very optimistic, allowing only a 0.4% margin of error. No UK rail bid (typically modelled over a 7-10-year timeframe) since franchising commenced in 1996 has progressed with such a low margin of error, so we fail to see how a 30-year plan with so many unknowns can have allocated so little risk to revenue.

⁹ <https://www.placenorthwest.co.uk/news/but-economic-impact-of-1-5bn-metrolink-extension-is-unknown/>

7.7 The 30-year assessment presents some serious questions about the benefits of franchising

7.7.1 The presentation within the assessment of the 30-year position of franchising within the Franchising Financial dashboard leads us to ask a number of questions.

Fig 1. Franchising Financial Dashboard



7.7.2 We note with interest the analysis in Figure 1 which shows a 30-year deficit of £28 million cumulatively, with a peak annual deficit of £36 million and a peak surplus of £22 million by year 2050. The proposed franchising scheme is loss-making until 2040 and relies on “unproven” passenger/revenue growth to bring it into a positive position. By 2025, the deficit will be £125 million to give a potential 10m p.a. boost in patronage, which leads us to query the implications to GMCA and its budgets, if this is not delivered.

7.7.3 There are also significant risks to this figure demonstrated by the sensitivity analysis detailed in Table 50. Such numbers with the associated risks GMCA seem prepared to take on show a high-risk appetite to reform the bus market. We would challenge the wisdom in the GMCA taking on this risk when a much lower risk of partnership is available.

7.7.4 Finally, we would question the analysis within the Assessment, which recommends the recruitment of eight additional FTEs to manage the proposed operator partnership. Many of the tasks, processes and reporting proposed in this partnership are already provided in the current Do Minimum market, meaning the requirement for these to be incremental roles, at a cost of £97 million, is questionable.

8. Our thoughts on the Management case

8.1 Following a review of the Management Case, we are left with a series of questions which fall into two main categories:

- i. Has the GMCA been too optimistic in its capability to deliver this franchise transition? This is a monumental task which requires significant organisational change within TfGM. There is a risk that the best place to recruit is from the operators themselves – so ‘robbing Peter to pay Paul’ will not deliver franchising.
- ii. Are the risk mitigation plans really deliverable or have they been softened to increase the attractiveness of the Outline Business Case?

8.2 TfGM’s plans to manage multiple procurements required to deliver franchising by 2023 appear challenging

8.2.1 Whilst TfGM has experience of procuring contracts with the private sector through its letting of the Metrolink contract and tendered services, specifying and managing bus services for the whole of Greater Manchester is significantly greater. This is acknowledged within this management case.

8.2.2 Paragraph 46.4.4 references the recruitment of a core activities team headed by a Director of Bus services, with a series of Heads of Department and technical specialist roles. The creation of this team introduces a number of significant strategic level roles, which we assume cannot be filled by incumbent employees of TfGM. Therefore, the recruitment of individuals from outside of TfGM will mean those individuals having long notice periods. There are limited authorities with specification, design and contract management accountability with this experience and expertise (TfL and DfT) which means the talent pool for these roles is limited. We would argue that it is optimistic that this can be in place to manage a sensible implementation of franchising, and would argue bringing this team together half way through Tranche 1 of franchising, as proposed in Figure 18, is overly optimistic. As noted above, a significant risk is that TfGM recruits from the operators themselves, which will damage the delivery of the bus service – this is untenable. This will therefore lead to an over-reliance on contractors and consultants (who themselves may have limited experience) to fulfil critical roles. This is likely to drive further, unfunded cost pressures onto TfGM (funds which could be better used invested in bus services) and risks knowledge transfer.

8.2.3 We note the resourcing plan, summarised in Table 56, which states the need for a net incremental headcount of 57 FTEs. Notwithstanding the challenges with the recruitment of such a large number of individuals (and the risk this would impart on other parts of TfGM), we note with interest the 25 roles within bus operators are likely to TUPE into the new organisation. As these roles are funded by current operators in the ‘Do Minimum’ scenario, these additional 25 heads are truly incremental to the franchising scheme. We question

whether any provision has been made in the business case for the incremental costs of these individuals.

- 8.2.4** In relation to the requirement for a business change budget of £1.7 million, whilst this is a significant budget to cover what is proposed to be a huge change within TfGM, we do reflect that this money would be better spent enhancing bus services or some other part of the TfGM portfolio which makes a real difference to taxpayers in Greater Manchester – as opposed to shifting management around.

8.3 The risks of mobilisation and complexity of system enhancements early in the proposed franchising timeline appear to have been underestimated.

- 8.3.1** As per our comments regarding the commercial case above, we note the £14.3 million for systems enhancements, which excludes contingency. There is very limited information provided in the Assessment (an architecture graphic in Figure 16) to consider whether this is in an appropriate budget. The risk register suggests that interim solutions may be in place for several years which appears to be imparting significant risk to the programme, and we question whether a commercial impact for this risk is included in the Assessment – if one is not, then this challenges the credibility of the Assessment further.
- 8.3.2** When considering mobilisation, we note the requirement for operators to propose a mobilisation plan. We wonder, what experience TfGM have of managing mobilisations. Recent experience of mobilisations in UK rail, experienced by Stagecoach in recent years for example have seen operators undertake mobilisation in very different ways, which adds risk to the proposed delivery of the scheme. Mobilisation is a significant cost requirement for both client (TfGM) and operators – has this been fully factored in, in the Assessment. In any case – this cost would be much more limited in a partnership model
- 8.3.3** Whilst more pertinent to the strategic case than the management case, we note with interest the reference to ticketing throughout transition to franchising, whereby the introduction of franchising effectively adds a new operator into the current offerings for passengers. In particular, the statement at paragraph 48.3.6 that *"This complexity would not affect the majority of passengers at any one time – as they would be travelling wholly within the franchised network or the remaining deregulated network"*. This statement implies that passengers mainly travel on one operator's services and therefore the significant financial and commercial benefits of a single simplified ticketing scheme and interoperability are overstated in the assessment.

8.4 Risk assumptions appear overly simplistic and favourable to franchising

- 8.4.1** When assessing the risks detailed within Table 59, a number of areas prove interesting, two of which stand out:
- i. PR risks make no reference to the negative image already existing among passengers UK-wide regarding franchising, particularly passengers in the North e.g. Northern Rail passengers who also would be passengers/users of this franchised bus system following the issues on the railway which have hugely impacted customers in Greater Manchester. We note the Mayor has now questioned the Transpennine Express franchise too¹⁰.
 - ii. Access to depots is stated as being on the critical path alongside the fact that TfGM could use CPO powers under section 10 (3) of the Transport Act 1968 if it is unable to

¹⁰ <https://www.theguardian.com/uk-news/2019/dec/22/manchester-and-liverpool-mayors-ask-pm-for-action-on-railway-chaos>

negotiate depot sales. There is a question of whether the potential 2-4-year delay of not being able to negotiate depot sales has been costed into the Outline Business case in a meaningful way. Further, the cost of tendering, contracting and paying for the building of any new depots in the Outline Business Case has not been fully factored in. This is particularly important given the GMCA itself accepts that depots are "*large and specialist facilities which require significant land for parking, specific facilities for refuelling and maintenance, appropriate staff welfare and training facilities*" (paragraph 26.1.3). The alternative CPO route is time consuming and expensive for all parties. Not building this risk into the Assessment is a significant oversight.

9. Our thoughts on the Assessment conclusion

9.1 The assessment conclusion continues to offer an overly optimistic view of the benefits of franchising at every level

- 9.1.1** Having reviewed the full Assessment document, we have made a number of observations throughout this Consultation submission, and we will re-iterate these throughout our comments to the Assessment conclusion. Our key challenges can be summarised as follows:
- 9.1.2** Delivering the proposed franchising scheme will absorb £134 million of public money for no ascertainable improvement in journey times or numbers, and will limit new vehicle investment and innovation. It seems evident that investing over £134 million of public money into infrastructure projects along-side private investment and innovation which encourage bus use would be a more optimal investment for the tax-payers of Manchester and would not compromise investment in other vital publicly funded services.
- 9.1.3** We share the concerns raised at the very end of Authority's assessment that if patronage and fare box revenue were to reduce from the forecast, then this shortfall would need to be met from other sources, or the level of service reduced. We would be concerned that a reduction in the level of service would have a negative impact on the social benefits included in the Economic case, especially given how much of the Economic case is based on the wider social impacts of more services. We would note with concern that there is no indication of the potential sources of any additional funding provided in the Assessment under franchising – the only other source is the taxpayer – as fare box revenue has transferred to TfGM.

9.2 The case for change creates an overly pessimistic view of the future of bus travel in Greater Manchester

- 9.2.1** The case for change and action to improve the bus service in Greater Manchester is in our opinion too pessimistic about the future for bus travel in Greater Manchester (based on the experience of Stagecoach in the city since 1996). The interventions proposed appear expensive to alter the commercial model in the city, without any funding secured to truly revolutionise the experience for passengers. We again assert that investing over £134 million of public money into infrastructure projects which encourage bus use would be a more optimal investment.
- 9.2.2** The right mix pathway from the GMCA 2040 strategy states that bus needs to do more to achieve the number of trips made by non-car modes. We wholeheartedly agree, but struggle to see many initiatives in this GMCA proposal which provide confidence that this can happen. Major step change interventions are referenced throughout but they all

appear in 'Phase 2' from 2025, with these activities currently unfunded – investing the £134 million now in these interventions could change the shape of the city region now.

9.3 Network planning appears to oversimplify the process that the franchising scheme will need to undertake and undervalues the existing levers the current business model has at its disposal

9.3.1 In the assessment of how the network could be reviewed, planned and enhanced under the franchising process, the approach at paragraph 60.2.9 fails to recognise that a commercial operator is able to enact network changes in a way which makes it more responsive and efficient. The process proposed under franchising will be time consuming and expensive. There is a question of much time/cost has been included in the franchising scheme appraisal for such consultations.

9.3.2 The Assessment also states that franchising makes it "easier for the GMCA to establish new services to areas of new demand". We would challenge the reality of this statement as, under franchising GMCA would either have to:

- i. Tender a new franchise if the additional services are big enough, which would take time, money, involve consultations and bidding costs; or
- ii. Amend an existing franchise, which again would consume time and take resource away from other GMCA activities.

We question whether GMCA has factored this into its assessment.

9.3.3 Ultimately, GMCA already has current tendering powers to address this issue right now by procuring any new routes it deems necessary. We do not believe that £134 million needs to be spent changing the overall model to deliver services to areas of new demand.

9.3.4 We would also challenge the statement that *"If revenues fell, the GMCA would be in a similar position to operators in the current market in needing to adapt."* It is not a very similar position because in the current market or in a partnership, operators could adapt more quickly and easily to a change in the market and reallocate resources across their network faster, as appropriate to maintain the highest possible return. This would (in a partnership scheme where operators promised % of revenue to initiatives or reinvestment) benefit passengers from the reinvestment and have no impact on the passengers (that no longer exist) where revenue fell.

9.3.5 Contrasted to the franchising scheme where the reallocation of resources i.e. GMCA/TfGM's ability to adapt would be constrained by the need to:

- i. Run consultations before implementing significant changes e.g. route changes etc. (time and money implications);
- ii. Renegotiate franchise agreements and carry out deed of amendments to make changes; and
- iii. Potentially open several franchise agreements as part of just one change if they are reallocating fleet/resource from one franchise to others in the pursuit of higher returns.

We query whether GMCA has factored this into its assessment.

9.3.6 A perfect storm is impacting bus markets throughout the whole of the UK, with falling propensity to travel, changing socio-demographics and enhanced micro mobility. GMCA is proposing taking on risk of market at a point where risks are accelerating and yet it does not have the commercial expertise and is constrained by the processes to respond in an agile way.

9.4 Failure to tackle congestion limits the capability of the proposed franchising scheme to succeed

- 9.4.1** We are disappointed that after a major intervention costing £134 million, no assumed step-change in the speed of journeys in the three years following implementation is delivered, indeed the Assessment simply talks of stabilising of bus journey times. Having been promised so much by the franchising offer, surely passengers will be frustrated and disappointed at this outcome.
- 9.4.2** In addition, we note with interest your view that franchising will eliminate poor performance from operators with regards to punctuality. This is a bold claim, and we wonder if this is what has been assumed in the base case for franchising scheme appraisal. We question whether the risk that franchising does not eliminate poor performance (merely reducing it) has been priced into the scheme's appraisal i.e. lower customer satisfaction, lower patronage etc.?
- 9.4.3** Environmental issues are critical to the future of our society, so much so that the Greater Manchester Plan has proposed significant interventions with the introduction of the Clean Air Zone ("CAZ"). We were, therefore, surprised to see that the franchising scheme does little to reduce the environmental impacts of vehicles on the Greater Manchester network. We note the criticism of operators in partnership schemes for their reliance on external funding, yet the same external funding sources (DEFRA) are relied upon for franchising. A key principle of any clean air strategy must be to reduce car usage, and the franchising scheme is modelled to have the greatest effect on reducing car km, of 13.4m trips per year. With no journey time reductions and so many of the initiatives in franchising unfunded, this assumption does not feel credible.

9.5 Revenue assumptions from fares changes and plans to simplify fares appear overly optimistic

- 9.5.1** The intervention to reduce the multi-operator ticket to the levels of the lowest of the largest incumbent operators (aligning it with Stagecoach fares), with a significant revenue upside of £56 million feels optimistic. Our inability to analyse the Greater Manchester Demand and Revenue model due to TfGM's refusal to release it to OneBus means we have not been able to assess the credibility of this assertion and understand which sensitivities have been applied to the analysis.
- 9.5.2** We are interested to see that throughout the 30-year assessment, fares are proposed to increase by RPI +1.4% to replicate the 'Do Minimum' market. Again, this does not align with 'Doing Buses Differently.' We also query the claim that fares will be simplified within one year of franchising being introduced. The UK rail industry has yet to simplify fares structures in spite of the system being specified by one party since 1996.
- 9.5.3** As referenced in the financial case, we are quite surprised that the recruitment of 30 additional revenue protection officers, which in itself feels quite low, reduces to 13 after 6 years. This does not send a message of how important protecting revenue leakage is to the GMCA. From a safety and security perspective the introduction of CCTV on vehicles is welcome but not particularly ambitious, but the failure to invest in any CCTV at bus stops (when Transport Focus state this as its number 5 priority feels like another opportunity missed).

9.6 Plans for cross boundary services have a disproportionate impact on customers and communities which surround Greater Manchester

- 9.6.1** Our comments above detail the impact of the proposed permit scheme for cross-boundary operators, but in addition we note that at paragraph 60.5.28 of the Assessment that of the

116 services that cross the boundary, 24 might be adversely affected by the permit scheme. In most cases, these services reflect the Journey-to-Work area covered by the towns and cities of Greater Manchester. If these services are not guaranteed this would likely have an immediate impact on Greater Manchester businesses and it being to the detriment of their access to skilled workers, as well as undermining access to employment for people individually. We cannot see how this would be beneficial to the overall objectives of the GMCA.

- 9.6.2** We also note references to this approach negatively affecting the achievement of neighbouring authorities' policies and objectives, yet the solution proposed of working with operators and these authorities appears non-committal and no-real solutions appear have been agreed or costed.

9.7 The impacts on operators of Franchising are underplayed

- 9.7.1** Throughout this response we have expressed a number of concerns with the assumptions made in the Assessment of franchising and these are pertinent to our review of paragraph 61.2 which details the impact on operators. As a large incumbent operator in the city we are clearly significantly impacted by any reforms to the bus market in Greater Manchester. The HSF legal paper sets out further views on this, especially on the concerns around the proposals to acquire depots, whether through negotiations or an exercise of CPO powers. Our response to the Economic case references our queries over the validity of the Earnings Before Interest and Taxation ("EBIT") margin assumptions bidders can expect to achieve as these do not reflect our experiences operating in the London franchised market. We also believe, as set out in our response to the Financial case, that the assumptions in the Assessment regarding pensions are also not reflective of the current market and cause us considerable cause for concern. As a result, we are less inclined to agree with your assessment of the impact on operators as referenced at paragraph 61.2.8.

10. Conclusion: Stagecoach Manchester firmly believes that a partnership solution can truly deliver value for money to taxpayers in Greater Manchester

- 10.1** When considering value for money we note the view that franchising provides the best chance of achieving a sustained improvement in the Greater Manchester bus market. Stagecoach Manchester is firmly of the view that partnership can still offer a more economic, efficient and effective alternative to franchising at a significantly lower risk to local and national and local taxpayers. We therefore believe that GMCA can achieve its objectives through the adoption of our alternative partnership proposal with bus operators submitted to TfGM on 8 January 2020, which encourages bus use and focuses on services within the South of the City, building further on the benefits offered by the all-operator partnership offer.
- 10.2** This proposed twin-track approach would also address the concerns of local taxpayers about the major cost and risk of franchising the entire Greater Manchester bus network. This includes the taxpayer risk of making bus services economically successful in a rapidly changing environment. It would allow for 'real world' testing of the two different approaches over an extended period to provide definitive evidence about what each approach delivers.

The Greater Manchester Combined Authority: Proposal to introduce bus franchising in Greater Manchester

Paper prepared by Herbert Smith Freehills LLP ("HSF") to accompany the consultation response of Stagecoach Manchester

1. INTRODUCTION AND BACKGROUND

- 1.1 This paper forms part of a suite of responses on behalf of Greater Manchester Buses South Limited (referred to as "**Stagecoach Manchester**" or "**Stagecoach**") to the "Doing Buses Differently" consultation launched by the Greater Manchester Combined Authority ("**GMCA**"). This paper sets out HSF's legal analysis on behalf of Stagecoach of a number of significant legal issues that are likely to arise if the proposed franchising scheme is introduced in its present form. This paper should be read alongside, and supplements, the Stagecoach business response ("**Stagecoach business response**") and the Jacobs paper commissioned by OneBus ("**Jacobs paper**"). The documents, read cumulatively, constitute Stagecoach's statutory response to the public consultation.
- 1.2 To set the context, Stagecoach's understanding is that on 30 June 2017, GMCA agreed to use the powers given to it under the amended Transport Act 2000 ("**TA2000**") to "*prepare an assessment of a proposed franchising scheme*" and also agreed to delegate authority to the Chief Executive of Transport for Greater Manchester ("**TfGM**") to prepare such an assessment. In May 2018, the Mayor of Greater Manchester and the Chief Executive of TfGM jointly updated members of GMCA on the long-term objectives for the bus network. Following this, on 28 June 2019, TfGM confirmed that it had carried out the assessment of the proposed franchising scheme, and was minded to recommend proceeding with the proposed scheme.
- 1.3 On 27 September 2019, TfGM confirmed that an independent auditor (Grant Thornton) had reviewed the assessment as required under section 123E of the TA2000 and had provided a report to TfGM on 26 September 2019. As a result, it was announced that the proposal would be put forward before GMCA at a meeting scheduled for 7 October 2019 (the "**7 October meeting**") to approve a major public consultation.
- 1.4 At the 7 October meeting, GMCA agreed to proceed to public consultation. The consultation window is to run from 14 October 2019 to 8 January 2020. As part of this consultation process, GMCA produced the following documents:
 - 1.4.1 The Consultation Document which describes the proposed franchising scheme and sets out the list of questions for consultees to consider in their responses. This paper refers to this document as the "Consultation Document" hereon, and specific references to the document use the paragraph or page numbers within the document.
 - 1.4.2 The assessment which underpinned the decision of TfGM to recommend that GMCA proceed with the franchising scheme. This paper refers to this

documents as the "the Assessment" and specific references to the document use the paragraph or page numbers within the document.

- 1.4.3 A small number of supporting documents were also produced alongside these two documents. We note however that the models which formed the basis of GMCA's analysis in the Assessment were not provided - either as part of the consultation process or in a subsequent Freedom of Information request that has been made by OneBus.

2. SUMMARY / OVERVIEW

- 2.1 It would be unlawful for GMCA to seek to introduce franchising based on the current proposals, and there are a number of aspects of the consultation process that give rise to serious concerns:

- 2.1.1 The process which GMCA has followed has not complied with the requirements set out in the statute and the guidance. There are flaws in both the assessment and the audit process. In addition, there are serious flaws with the way the consultation process itself has been run, and GMCA has acted in a procedurally unfair manner ([section 4](#)).
- 2.1.2 The flaws in the franchising proposal mean that it would be irrational to proceed. In particular, the franchising proposal is neither value for money (within the meaning of s123B(3)(e)) or affordable (within the meaning of s123B(3)(d)). There are also fundamental errors and incorrect assumptions in the strategic, commercial, and management cases ([section 5](#)).
- 2.1.3 Franchising would be a disproportionate measure – GMCA has failed to adequately consider the alternatives available to it, including a partnership model ([section 6](#)).
- 2.1.4 There are serious concerns that GMCA has not fully considered issues relating to pensions and TUPE ([section 7](#)).
- 2.1.5 Stagecoach's right to the enjoyment of its property as set out in the European Convention on Human Rights could be breached ([section 8](#)). This right is not overridden by the Bus Services Act and breach could give rise to substantial damages. It is also possible that pensions issues may give rise to employees claiming damages separately.
- 2.1.6 There are also legal issues over GMCA's potential use of compulsory purchasing powers ([section 9](#)).

This paper addresses each of these issues in turn after outlining the applicable legal framework.

3. LEGAL FRAMEWORK

- 3.1 In this section we outline the legal framework applicable to the exercise by GMCA of its powers to introduce bus franchising in Greater Manchester.

- 3.2 The statutory requirements are set out in Part II of the TA2000 (as amended). The Secretary of State has also issued guidance under the Act (the "**DfT Guidance**").¹ GMCA is under a statutory duty to have regard to that Guidance.
- 3.3 Key elements of the applicable legal framework are as follows:
- 3.3.1 **GMCA must produce an assessment of its proposed franchising scheme** (s123B(1)). With its Consultation Document, GMCA published an assessment which is dated "September 2019" (the "**Assessment**"). The Consultation Document however indicates that the Assessment was originally completed in June 2019.² We understand the version of the Assessment which has been published to be identical to the June 2019 version to which the Consultation Document refers.
- 3.3.2 The Assessment must (a) describe the effects that the proposed scheme is likely to produce; and (b) compare making the proposed scheme to one or more other courses of action (s123B(2)). The Assessment opts to compare the proposed franchising option with "Do Minimum" and partnership options. Within the partnership option, the Assessment compares franchising to both an "Operator Proposed Partnership" and an "Ambitious Partnership".³
- 3.3.3 The Assessment must also include consideration of the factors listed in s123B(3). These are:
- (A) Whether the scheme would contribute to the implementation of GMCA's policies.
 - (B) Whether the scheme would contribute to the implementation of neighbouring authorities' policies.
 - (C) How GMCA would make and operate the scheme.
 - (D) Whether GMCA would be able to afford to make and operate the scheme. The DfT Guidance requires a detailed costs analysis and budget to be included in the Assessment (paragraph 1.62). The Assessment must also consider the effects of the proposal on the balance sheet, income and expenditure of GMCA (paragraph 1.59). The DfT Guidance emphasises that consideration must be given to "*demonstrating the longer-term financial sustainability*" of the proposal (paragraph 1.61).
 - (E) Whether the scheme would represent value for money. The DfT Guidance states (at paragraph 1.53) that the Assessment "*should include sufficient detail so that the scale of the benefits and impacts on different groups can be understood*". It also states (at paragraph 1.55) that GMCA should "*consider how best they can demonstrate the ongoing sustainability of the different options, bearing in mind*

¹ The Bus Services Act 2017: Franchising Scheme Guidance (2017). Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831690/bus-services-act-2017-franchising-scheme-guidance.pdf.

² See paragraph 1.2 above.

³ As set out below, however, Stagecoach has since put forward a further partnership option which would deliver greater benefits than those contemplated in either partnership option considered in the Assessment or Consultation Document.



the long-term implications of a decision to change the model of bus service delivery in an area". There is an express requirement in the DfT Guidance (at paragraph 1.56) for GMCA to "*present the net present value*" of each option.

- (F) The likelihood of GMCA being able to secure the provision of local services under the scheme.

3.3.4 GMCA must obtain a report from an auditor on the Assessment (s123D(1)). GMCA appointed Grant Thornton as auditor in June 2019 and Grant Thornton issued its "Independent Reasonable Assurance Report" in September 2019 (the "**Audit Report**"). The Audit Report was accompanied by a letter from Grant Thornton providing observations on the Assessment (the "**Observations Report**"). Both the Audit Report and the Observations Report were published by GMCA with the Consultation Document.

3.3.5 The Audit Report must state whether, in the opinion of the auditor:

- (A) The information relied on by GMCA in the Assessment in relation to (a) affordability; and (b) value for money is of sufficient quality (s123D(2)(a)).
- (B) The analysis of the information in relation to affordability and value for money is of sufficient quality (s123D(2)(b)).
- (C) GMCA had due regard to the Guidance in preparing the Assessment (s123D(2)(c)).

3.3.6 Paragraph 1.85 of the DfT Guidance requires the auditor to consider the following criteria when assessing whether the information and analysis is of "*sufficient quality*":

- (A) whether the information used comes from recognised sources;
- (B) whether the information used is comprehensive or selectively supports the arguments in favour, or against, any particular option;
- (C) whether the information used is relevant and up to date;
- (D) whether the assumptions recorded as part of the assessment are supported by recognised sources; and
- (E) the mathematical and modelling accuracy of the analytical methods used to calculate the impacts of the options.

3.3.7 Before proceeding to franchising, GMCA must consult publicly on the proposals (s123E). Sections 123E and 123F set out a number of requirements in relation to the content of such consultation. As set out above, GMCA published the Consultation Document in October 2019. The DfT Guidance (at paragraph 1.88) requires that GMCA's consultation process ensures that "*local passengers, businesses, and transport providers are able to comment on the proposals before [GMCA] takes the decision as to whether to implement the franchising scheme*".

- 3.4** In addition, as a public authority, GMCA must comply with public law principles. These include the common law requirements to act rationally and in a procedurally fair manner.

4. GMCA HAS NOT FOLLOWED A LAWFUL PROCESS

4.1 We are concerned that GMCA has not complied with all of the statutory requirements outlined above. In particular:

4.1.1 **There are flaws in the Assessment.** Taken together these flaws mean that the Assessment does not appear to comply with the legal requirements. This paper elaborates on this non-compliance in section [5](#) below. However, the key points are:

- (A) At the outset, the Assessment and proposal appear to be driven by GMCA's views on the state of the current market (as set out in the strategic case section of the Assessment). As the Stagecoach business response explains (on pages 4 and 5), they do not agree with the characterisation and consider it to be founded on incomplete analysis on GMCA's part. By way of example, the Assessment draws a direct link between performance of bus operators and declining bus patronage without factoring in the impact of other modes of transport such as the huge expansion of Metrolink. Another example is the narrative built by GMCA that the commercial operators only operate services which are profitable, and leave the GMCA to step in and provide the unprofitable services. This is simply not the case, and we are concerned that the strategic case is selective in the way it presents the current market.
- (B) As the Jacobs paper demonstrates, the economic case is flawed (see paragraphs 4.6.3 and 4.8.2-4.8.3) – it vastly overestimates the benefits of franchising, makes what appear to be very significant accounting errors (for example, it double counts the benefits of franchising at certain points), and also uses assumptions that have not been rigorously stress-tested. In terms of the wider economic impacts, the methodology used to calculate this raises significant concerns, and there is a general lack of transparency around how these benefits have been calculated.
- (C) Overall, there appears to be no accurate and comprehensive description of the effects of the scheme on bus users and operators. This contravenes s123B(2)(a) TA2000.
- (D) Finally, neither the Consultation Document nor the Assessment provide a rigorous and detailed breakdown of whether the proposal is affordable or value for money. While there are numerous references to the proposal being affordable, that in itself does not satisfy the statutory requirement to consider affordability. As we note above at 3.3.3 (D), GMCA has to demonstrate how it can afford to make and operate the scheme, as well as demonstrate that it is financially sustainable in the long term. This, combined with the flawed assumptions in the financial analysis that feature in the Consultation Document and Assessment, suggests that the proposal is fundamentally flawed.

4.1.2 Each of the points individually and collectively indicate that GMCA has failed to comply with the requirements of the TA2000. Consequently, any attempt to implement the franchising scheme is open to legal challenge.



- 4.1.3 **There are flaws in the audit.** Taken together, the below issues suggest that the audit process has not been sufficiently rigorous and thorough enough to satisfy the provisions of the TA2000 and the DfT Guidance. This would mean that it is unlawful for GMCA to proceed without commissioning a further audit. In particular:
- (A) A major gap in the Audit Report is the failure to analyse the assumptions made by GMCA in terms of the transition costs. These are clearly key to affordability. It is unclear how Grant Thornton could have reached its conclusion on affordability without having considered those costs and the funding proposed for them. It is evident that the Act and DfT Guidance require such costs to be audited. This gap in the Audit Report is all the more pertinent given the observations in the Jacobs paper (see page 22) on potential underestimation of transition costs in the Assessment.
 - (B) The Audit Report's approach to materiality is incomplete. In summary, Grant Thornton appears to have set the level of materiality for each issue and has considered whether those individual issues would affect its conclusion on the affordability and value for money analysis. While that may well be a reasonable approach, it is incomplete as Grant Thornton do not also carry out an analysis of how all these issues (which may conceivably be just under their materiality threshold) cumulatively impact their overall analysis on affordability and value for money. It is an example of statistical cherry-picking.
 - (C) The Audit Report omits key issues with the economic and financial cases. Stagecoach's business response and, in particular, the Jacobs paper provide numerous examples of fundamental flaws in the economic and financial cases. The Audit Report does not appear to reflect these, and that undermines the auditor's conclusions on both affordability and Value for Money.
 - (D) The Audit Report could not have legitimately reached the view that the information on which the proposal is based is of sufficient quality. It makes a legitimate observation that the data set used by GMCA is from 2016-17, but it appears to provide no reasons to justify its conclusion that GMCA has been reasonable in doing so (see page 113 of the Consultation Document). The Audit Report acknowledges that more recent information is available. It therefore appears that GMCA has acted unreasonably in relying on data that is nearly four years old. If the fundamental premise of the proposal is that bus patronage is declining, it is essential that GMCA relies on wholly up-to-date data. The DfT Guidance also considers this to be an important factor to be taken into account by the auditor when considering the quality of the data. As it currently stands, the Consultation Document paints an out-of-date picture that should not - and cannot - be the basis for such a major decision with wide-ranging impacts on bus users and operators. It is not relevant whether GMCA has acted 'reasonably' – s123D(2)(a) requires the auditor to confirm whether information is of sufficient quality. It



cannot be right that an out-of-date data set is considered of sufficient quality in a dynamic market.

4.1.4 There were flaws in the consultation process. In addition to breaching the statutory requirements, GMCA has not acted in a procedurally fair manner which is compliant with public law principles. In particular:

- (A) GMCA did not publish all of the required documents with its consultation. For instance, the models referred to in the Audit Report (see page 107 of the Consultation Document) have not been published. As the Audit Report notes, Grant Thornton carried out the following analysis:

"In relation to the Financial Model, Demand and Revenue Models, Cost-Benefit, Analysis Models and Wider Economic Benefits Analysis Models (together "the Models") we have undertaken:

Calculation reviews of the Models – this element of the work evaluated the quality of the analysis undertaken and the arithmetical accuracy of the analytical methods used

Technical/Methodological/Analytical reviews of the Models – in line with the Guidance, this element of the work evaluated the quality of the analysis undertaken and the quality of the information used"

These models appear to be fundamental to the audit process and the Assessment itself. We understand that these models are in the form of spreadsheets and other electronic files. There is therefore no practical reason why these could not have been provided as part of the consultation process (with safeguards to protect commercially sensitive information, if any). We understand that OneBus requested these models through a Freedom of Information Request ("FOI"), which was refused in the first instance after nearly three weeks (which seems excessive given the initial response, particularly given the narrow window available for a consultation response). This is now subject to an internal review. Overall, this has had the effect that consultees have been unable to respond to the Consultation Document with more detailed comments on the and financial cases contained in the Assessment. This contravenes DfT Guidance and is also procedurally unfair in public law terms.

Should these models be released as a result of an FOI request, or indeed, any court order requiring the same, we consider that GMCA will have to either extend the consultation period or commence a new consultation process with the full data set available.

- (B) GMCA did not allow sufficient time for the consultation. GMCA allowed less than three months for this consultation, which was inadequate in any event (but even more so given the intervening Christmas holiday period). It should be noted that GMCA itself took two years to prepare the Assessment (from June 2017 to June 2019). It then gave the auditor (who had the benefit of all of the underlying documents which Stagecoach and other consultees do not) several months to conduct an audit. That audit was limited to

considering only two of the business cases. Consultees have been given less time to analyse nearly a thousand pages of documents without seeing the underlying models, to discuss as appropriate with various internal stakeholders, seek any external advice, and to prepare a detailed response. Consultees have been restricted in the analysis that they have been able to do in this short time period. By way of comparison, it is also significantly less time than was permitted for the only other consultation exercise that has occurred in relation to the franchising powers in the Act. In the Quality Contracts Scheme consultation run by the Tyne and Wear Integrated Transport Authority in 2013, the Authority's passenger transport executive gave four months to respond to the statutory consultation. Even then, the time period was only four months because the authority had already conducted an informal consultation before that stage (which GMCA did not do). We note that GMCA then envisages a decision being taken shortly before "purdah" begins for the local/mayoral elections in May. In the circumstances, we are concerned at the speed at which such a significant decision is due to be taken.

- (C) Finally, GMCA seems to have an over optimistic view of how franchising would operate which is not supported by facts. In summary, the benefits have been overstated, the adverse impacts understated, and the issues with the status quo appear to have been exaggerated on occasion (with no credit being given to areas of Greater Manchester where the status quo works well). Further, as we have noted above, the assumptions underpinning a lot of GMCA's commercial case appear flawed. When considered with what we note in 4.1.4 (A) and (B) above, it could be concluded that GMCA has closed its mind to all other alternatives other than franchising, or that there is a real risk that GMCA has refused to meaningfully consider viable alternatives such as a partnership model. Should GMCA proceed with the franchising proposal, it could be considered procedurally unfair on the basis of bias/pre-determination.

- 4.1.5 Overall, the consultation exercise has not given consultees adequate information and time to allow a fully informed response, and we are concerned that it may not have been approached with an open mind. In these circumstances, it may be considered unlawful for GMCA to proceed with its proposals without at the very least a) providing more information and a complete data set including the models; and b) providing a longer time period for responses.

5. THE FRANCHISING PROPOSAL IS FUNDAMENTALLY FLAWED

- 5.1 As noted above, in circumstances where all of the required information was not made available (including certain key documents such as the models), Stagecoach has not been able to fully consider the proposal. It has done what it can in the limited time available but in the circumstances reserves its rights to highlight further issues.

5.2 Nevertheless the enclosed response from Stagecoach and the Jacobs paper point out a number of significant issues. These include:

5.2.1 Errors and other flaws (for instance, optimistic modelling) in the economic case:

- (A) The Jacobs paper highlights that GMCA's analysis has the "*significant*" potential to "*overstate benefits*" during the first 3 to 5 years (paragraph 3.4.1).
- (B) It further notes a number of points in the Assessment when insufficient evidence or detail has been provided (see, for example, paragraph 3.4.2 which suggests that there is "*insufficient evidence that interoperability acts as a demand driver above and beyond the journey time and fare improvements*" and paragraph 3.8.1 which highlights "*Insufficient information has been made available regarding future operating cost and capital investment.*"
- (C) The analysis in the Stagecoach business response provides numerous examples of how the economic case presents an "*overly optimistic view of franchising*" (page 11).

5.2.2 Errors and other flaws in the financial case:

- (A) The Stagecoach business response demonstrates how the financial case appears to make a number of assumptions, which appear to have been generated to create an overly beneficial picture for franchising. By way of example, it makes a far too optimistic assumption on the number of passengers who would be generated by the network change programme in franchising (page 16).
- (B) According to the Stagecoach business response, the quantification of revenue risk appears overly low throughout the Assessment (page 19).
- (C) On the other hand, the assumed margins for franchising appear unrealistically high (page 17).

5.3 GMCA's own appointed auditor, Grant Thornton, makes observations around the quality of the dataset (as we set out above) as well as on GMCA's quantification of soft benefits – particularly the benefits that it says arises from the unified branding of bus services. The Audit Report (on page 111 of the Consultation Document) also suggests that TfGM intends to commission a new study to further examine the economic and financial benefits of the franchising proposition. We have not seen anything to suggest that this has now been done, or to explain why these studies were not carried out before the Assessment was prepared.

5.4 On their own, the above errors/flaws are sufficient to undermine GMCA's case, and to undermine confidence in GMCA's analysis. However, the cumulative effect of these flaws on the financial and economic cases is fundamental (as we note above, the cumulative impact is something the Audit Report does not consider). When considered together, a) the issues flagged in the Stagecoach business response in

relation to the financial case; and b) the numerous 'red' issues⁴ highlighted by Jacobs in relation to the economic case cast doubt on the GMCA's conclusion that the proposal is affordable and represents value for money.

- 5.5 There are other issues with the franchising proposal. Again these are set out more fully in the Stagecoach business response, however to illustrate the scale of the issues:

5.5.1 Errors/misconceptions in the **strategic case**: There are a number of flawed assumptions including in relation to the performance of the current market and the motivations and objectives for commercial operators in Manchester. Further, neither the Assessment nor the Consultation Document is able to demonstrate a clear rationale for why franchising is the preferred way of meeting the priorities of bus users rather than the partnership model. This suggests that GMCA has failed to appropriately consider whether the proposed scheme would contribute to the implementation of its transport policies (as it is required to do under s123B(3)(a) of the TA2000).

5.5.2 Errors/misconceptions in the **commercial case**: As the Stagecoach business response details, the commercial case ignores significant risks and challenges to the proposals. In particular, the three-year timeframe set by GMCA to deliver on franchising appears unrealistic at this stage, especially as there is the possibility that GMCA will have to exercise some form of compulsory purchasing powers to acquire depots through compulsory purchase orders ("**CPOs**") (paragraph 4.86 of the Consultation Document).⁵ In fact, the Assessment acknowledges that acquiring depots will not be straightforward (see paragraph 26.1.17 of the Assessment) and makes some high-level comments about how such an acquisition process would take place. However, it does not fully factor the time required to acquire such depots in its analysis. As an alternative, the Assessment also suggests that GMCA will provide "*short-term temporary depot facilities*" (paragraph 26.1.20) – while simultaneously also warning that depots are "*large and specialist facilities which require significant land for parking, specific facilities for refuelling and maintenance, appropriate staff welfare and training facilities*" (paragraph 26.1.3). All these factors suggest that GMCA has not thoroughly and comprehensively assessed the practicalities of introducing franchising. In the circumstances, it is highly unlikely to be able to implement the proposals without significant disruption to bus users and operators alike.

5.5.3 Errors/misconceptions in the **management case**: Further, there are considerable hurdles for GMCA to overcome in terms of resourcing and recruitment of staff to carry out the large number of new roles that the proposal envisages. There is a lack of clarity over how these roles will be

⁴ According to Jacobs' RAG Rating System, the Red rating represents "*Potentially a significant area of concern in the assessment. For these areas we have significant concerns regarding the methodology, evidence base used, or analysis conducted, and would need further information in order to verify that there are no fundamental issues with the economic case. Our concerns would likely have a material impact on the conclusions and results presented in the economic case.*"

⁵ We further consider the lawfulness of any move from GMCA to "*take control of strategic depots*" in section 8 and 9 below.

filled in the short term. There may be further hurdles in relation to employment/TUPE issues as well as pensions issues. From a financial perspective, Stagecoach's business response suggests that there may be an over-reliance on contractors and consultants, which may further create cost pressures on GMCA. All of these factors indicate that GMCA has failed in its statutory duty under s123B(3)(c) to fully consider how it intends to make and operate the scheme.

6. FRANCHISING WOULD BE DISPROPORTIONATE GIVEN THE ALTERNATIVES AVAILABLE

- 6.1 The Stagecoach business response and the Jacobs paper demonstrate that the economic basis on which GMCA has developed the proposal is flawed. Not only are the benefits of franchising overstated (see 6.2 below) but the adverse effects of franchising are considerably understated (see 6.3 below).
- 6.2 To outline some key examples identified by Jacobs of how the Assessment overstates benefits:
 - 6.2.1 The Jacobs paper notes that there is a "*significant risk*" that the modelling approach double counts different benefits (see comments on page 44 in the section summarising the paper's key findings).
 - 6.2.2 There is a risk that the scale of benefits attributed to a rise in demand due to service quality improvements has been overestimated (paragraph 3.7.1).
 - 6.2.3 There are concerns over the methodology used to calculate wider economic benefits, and as such, Jacobs' paper consider that it is unlikely that these benefits will be realised (paragraph 3.10.2).
 - 6.2.4 The use of a 30-year appraisal period has the potential to prejudice the results of the analysis, as it will potentially favour options with a longer timeframe (e.g. franchising) (paragraph 3.5.3).
- 6.3 In addition, the adverse impacts of franchising may have been underestimated:
 - 6.3.1 Jacobs' analysis is that GMCA have underestimated the risks related to the scheme, and that there is no clear methodology on how the criteria were established to assess the impact and probability of each risk (paragraph 3.11.3).
 - 6.3.2 The transition costs relating to the bus fleet and depots are potentially being underestimated (paragraph 3.8.4).
 - 6.3.3 The scale of impact on operators is likely to be very high. While not like for like, it is noteworthy that the Quality Contract Scheme Board assessed the franchising proposals in the North East in 2013, and found that Parliament (when it amended the TA2000) could not have had in mind a situation where "*incumbent bus operators would be subject to losses of [this] scale without compensation*" and that in the circumstances, "*the negative impacts on the operators are wholly disproportionate to the benefits accruing both to the travelling public in Tyne & Wear and the well-being of the wider citizens*". It is unclear how severely operators will be impacted under GMCA's proposals as GMCA has not fully set out that impact assessment,

but it is likely that the impact will be disproportionate to the policy objective sought to be achieved through the proposal (paragraph 3.8.1).

- 6.4 **In these circumstances it would be disproportionate to introduce franchising, particularly when viable alternative options exist.** As Stagecoach set out in their business paper, the outcomes that GMCA seeks to achieve from the franchising proposal could easily and more quickly be achieved through a partnership model. A true partnership model would help deliver the key objectives in GMCA's 2040 Transport Strategy including by providing:

- 6.4.1 A simpler and more integrated public transport network;
- 6.4.2 Providing cheaper fares (including price-capped fares) for customers;
- 6.4.3 Savings for the local taxpayer; and
- 6.4.4 A funding mechanism by which profits could be reinvested into improvements across the region.

In circumstances where one option (franchising) is highly likely to have a disproportionate impact on bus operators, GMCA is required to consider whether its objectives can be met through an alternative route. As the DfT Guidance makes clear, this *"should not be a desk exercise however, and authorities should engage with bus operators in the area and explore whether, for example, there is a realistic partnership proposition or ticketing solution that should be considered and assessed alongside the franchising proposition"* (paragraph 1.37) and that authorities *"should also give a clear explanation of why these outcomes would not be achieved in any other way"*.

- 6.5 The proposal put forward by Stagecoach in parallel to this consultation response is an example of a partnership model that could help GMCA achieve the objectives in its transport strategy without disproportionately impacting relevant bus operators in the area of the partnership. To the extent that the Consultation Document and Assessment do not test this option against franchising, GMCA is required to now fully engage with this alternative proposal as part of its statutory and common law duties.

7. LEGAL ISSUES IN TERMS OF PENSIONS AND EMPLOYMENT

- 7.1 There also appear to be significant issues with the franchising proposal in relation to employment/TUPE issues and pensions, which have not been taken into account by GMCA in the Assessment or by Grant Thornton in the Audit Report. These are analysed in greater detail in the Stagecoach business response, but in summary:

- 7.1.1 **Employment:** The Assessment has little or no analysis on how GMCA's recruitment strategy fits within the timeline it has set itself for implementing franchising. It does not fully analyse how it intends to fill the various roles requiring specialist expertise or how the notice periods for hiring individuals with specialist expertise from outside TfGM will affect the timeline. Further, the proposal has not analysed sufficiently the TUPE implications of franchising for operators. In particular, GMCA has not fully identified the costs and disbenefits arising from the effects of TUPE if the proposed franchising scheme were to be implemented. The Assessment suggests that GMCA does not appear to appreciate how complex an area this is.



- 7.1.2 **Pensions:** The assessment of the treatment of defined benefit pension arrangements does not properly recognise the additional punitive costs that would be charged on existing operators from the imposition of franchising proposals. With respect to the Greater Manchester Pension Fund (GMPF) alone, Stagecoach consider that this could precipitate additional exit funding in the range of £30-£60m, which under the current arrangements or a partnership model would not be necessary.

8. INTRODUCING FRANCHISING WOULD BREACH THE RIGHT TO ENJOYMENT OF PROPERTY UNDER HUMAN RIGHTS LEGISLATION

- 8.1 As public authorities, GMCA/TfGM must comply with the Human Rights Act 1998 ("HRA"). The HRA effectively incorporated the European Convention on Human Rights ("ECHR") into domestic law. Section 6 HRA provides: *"It is unlawful for a public authority to act in a way which is incompatible with a Convention right"*.
- 8.2 Under section 7 of the HRA, 'victims' are able to bring legal proceedings alleging a breach of the rights under the ECHR or rely on such breaches in other legal proceedings. A 'victim' includes a corporate body, and the general rule is that where damage is suffered by a particular company the 'victim' is that company (*Agrotexim v Greece* (1995) 21 EHRR 250). In the case of Stagecoach, the most direct victim would be Greater Manchester Buses South Limited, the legal entity for Stagecoach Manchester which has operated bus services in Greater Manchester since early 1996.
- 8.3 Article 1, Protocol 1 ("A1P1") of the ECHR guarantees the right to peaceful enjoyment of possessions. It provides:
- "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided or by law and by the general principles of international law."*
- The preceding provisions shall not, however, in any way impair the right of a state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties."*
- 8.4 The courts have repeatedly recognised that the goodwill in a business is a possession for the purposes of A1P1 (see, for example, *Tre Traktörer v Sweden* (1991) 13 EHRR 209 at 54 to 55).
- 8.5 In order to comply with A1P1, any interference with a person's possessions must be justified. This requires that the measure:
- 8.5.1 is lawful under domestic law;
 - 8.5.2 pursues a legitimate aim in the general or public interest; and
 - 8.5.3 bears a reasonable relationship of proportionality between the means employed and that aim.
- 8.6 Proportionality requires that a fair balance is struck between the demands of the general interest of the community and the protection of individual rights; an individual



should not have to bear a "*disproportionate and excessive burden*" (*Broniowski v Poland* (2005) 40 EHRR 21 at 150). These requirements must be met in all cases involving an interference with possessions, and do not depend on whether the interference is classified as a "*deprivation*", a "*control of use*" or another type of interference (*Sporrong and Lönnroth v Sweden* (1983) 5 EHRR at paragraph 69).

- 8.7 In the context of GMCA's proposals, we consider that franchising is unlawful given the public law breaches that we have outlined above, and in any case, is a disproportionate measure.

8.8 **Franchising would interfere with the property of Stagecoach**

8.8.1 GMCA appears to accept that the introducing of franchising will materially interfere with the peaceful enjoyment by operators of their business and possessions in Greater Manchester. For instance, GMCA accepts that it will "*seek to take control*" of strategic depots (para 4.85, Consultation), and that market change could potentially "*expose operators to a risk of stranded assets*" in terms of fleets and depots. Consequently, we consider that A1P1 will be engaged.

8.9 **Franchising would be unlawful given the public law breaches outlined elsewhere**

8.9.1 We have set out above the various public law breaches that will occur as a result of the Government's proposals. We consider that its imposition will necessarily lead to a breach of A1P1 (which, as we set out below, would also entitle Stagecoach to seek damages).

8.10 **The lack of compensation means that franchising would be disproportionate.**

8.10.1 In considering the proportionality of the proposal it is necessary to consider the drastic nature of the interference it involves and the consequences that it would have on the existing operators' businesses.

8.10.2 As a starting point, the effect of the proposal would be wipe out the goodwill built up by operators in the existing businesses. For Stagecoach, this goodwill has been generated by the operation of a successful business for over 20 years, and is clearly a result of a successful branding strategy and customer loyalty on the routes it currently operates on with customer satisfaction levels of 89% for Stagecoach services in 2018. The proposal effectively introduces a "blank slate" across the region, and means that Stagecoach stands to suffer a considerable loss in value. While the physical assets deployed on these routes may well be redeployed elsewhere and/or sold, the value attributable to goodwill in the business will be destroyed.

8.10.1 The proposal will effectively lead to the 'deprivation' of the goodwill in the business without any compensation mechanism. The failure to offer compensation where there is deprivation would render the proposal disproportionate and unlawful as a consequence. In *James v United Kingdom* (2006) 42 EHRR 49, the European Court of Human Rights ("**ECtHR**") said that:

'... under the legal systems of the contracting states, the taking of property in the public interest without the payment of compensation is treated as



justifiable only in exceptional circumstances... [T]he protection of the right of property [A1P1] affords would be largely illusory and ineffective in the absence of any equivalent principle. Clearly, compensation terms are material to the assessment of whether the contested legislation represents a fair balance between the interests at stake and, notably, whether it does not impose a disproportionate burden on the applicants..."

This principle has been widely adopted by the English Courts (see, for instance, *R (Kelsall & Ors) v Secretary of State for Environment, Food and Rural Affairs* [2003] EWHC 459 (Admin)).

8.11 Franchising is otherwise disproportionate in any event

8.11.1 In any event, for the reasons stated in this paper at paragraphs 6.1 to 6.5 it is clear that the proposal is disproportionate. This is borne out by the analysis in the Stagecoach business response and the Jacobs paper. Fundamentally, the issues can be summarised as follows:

- (A) The benefits of the proposal have been considerably overstated. The actual benefits are not sufficient to justify adverse effects on operators. These adverse effects have been underestimated by GMCA, and are based on a series of incorrect or unreasonable assumptions. Specifically in the context of A1P1 and Stagecoach's possessions, it is clear that the proposal will lead to Stagecoach losing all its goodwill in the market. This, of course, may incur significant pensions liabilities. It will also lead to Stagecoach being deprived of the right to use its possessions and run its business, and will lead to it bearing "*a disproportionate and excessive burden*" in breach of A1P1.
- (B) Further, the availability of an alternative, less intrusive, means of achieving the same aim is highly relevant to the consideration of whether a particular measure is proportionate for the purposes of complying with A1P1. In the circumstances, GMCA's assessment does not provide sufficient reasons or analysis as to why franchising is better than the other alternatives that it considers, namely the "do minimum" and "partnership" alternatives. These options, particularly the partnership model, have the potential to provide superior or equivalent benefits to the franchising scheme with a much smaller impact on the existing operators' rights. Neither of those alternatives are tested as rigorously as the franchising proposal. In that context, we note the specific observation in the Jacobs analysis (on page 40) that the Assessment "*did not explore the full extent of options that could be feasible*" in relation to the two partnership options.

8.12 Stagecoach would be entitled to damages

8.12.1 For the reasons outlined above, the proposal would breach A1P1 if implemented. This breach would entitle Stagecoach and other operators to seek damages, as was confirmed by the Court of Appeal in *R (on the application of Infinis plc and Infinis Re-Gen Limited) v the Gas and Electricity Markets Authority* [2013] EWCA Civ 70). In that case, the Court of Appeal confirmed that substantial damages were payable for a breach of



A1P1 even in circumstances where the relevant public authority had been acting in good faith. The basic principle upon which damages were payable and assessed was *restitution in integrum*, that is, to put the claimant in the position he would have been in had the breach not occurred. The Court of Appeal cited with approval one of its earlier decisions, which held that "[w]here the breach of a Convention right has clearly caused significant pecuniary loss, this will usually be assessed and awarded."

- 8.12.2 In the case of the proposal, the existing operators would therefore be able to seek damages from GMCA for a breach of A1P1 equivalent to the destruction of goodwill in their existing businesses and any other losses flowing from its imposition, such as additional pensions liabilities. It would therefore also be entitled to substantial damages.
- 8.12.3 If there are any additional pensions issues, Stagecoach's employees may also be entitled to damages, particularly if there is an adverse effect on the value of their pension benefits.

9. ISSUES WITH COMPULSORY PURCHASE POWERS

- 9.1 Any proposal to acquire land compulsorily is subject to a formal procedure in which landowners have the right to object to the proposed acquisition of their property. Landowners' objections must be properly considered by the acquiring authority before the powers are confirmed. This will usually be done at a local inquiry presided over by an experienced planning inspector. Objectors may be legally represented by a solicitor or barrister and will have the opportunity to cross-examine the acquiring authority's witnesses to ensure that the acquisition is properly scrutinised.
- 9.2 The Assessment assumes that the "GMCA would achieve control of strategic depots through a combination of negotiated depot transfer and CPO with the alternative arrangements...being pursued in the event that this cannot be achieved" (paragraph 26.1.21). Given that large operators (who own the large 'strategic' depots in Greater Manchester) are not likely to enter into agreements that do not give them adequate compensation for their assets, there is a likelihood that GMCA will have to exercise its powers of compulsory purchase. According to the Assessment, this is likely to be an exercise of its powers under section 10(3) of the Transport Act 1968. Under this provision, GMCA will first have to make a request in writing to the Transport Minister to authorise TfGM to purchase compulsorily any land which TfGM (or any wholly-owned subsidiary of theirs) requires, and then follow the process set out in 9.1 above. The Assessment does not account for the time this will take, and does not consider how this will impact on the transition period to implement the proposed scheme. We note in this context that the strategic depots in the Greater Manchester region are spread across at least four operators with the risk of further fragmentation if First sells any further assets, and this is likely to increase the time taken to negotiate the transfer of depots and/or any compulsory purchase process.
- 9.3 In the circumstances, either the three-year transition period set out in the Assessment is unrealistic or the GMCA will need to find a way to fast track the transfer of depots from operators in order to meet its transition targets. It should be noted that to the extent that GMCA attempts to purchase compulsorily any operator's land without following the correct procedure or without having the statutory power to do so, this is likely to be unlawful and will give rise to grounds for challenge.

- 9.4 In terms of any costs associated with CPOs, we note that compensation payable as a result of compulsory acquisition is based on the principle that the owner should be paid neither less nor more than their loss. This is known as the "equivalence principle" and it disregards any effects on value as a result of the acquiring authority's scheme for the land (known as the "no scheme" principle). It is unclear to us whether GMCA have appropriately calculated the costs involved for compulsorily purchasing any operator's land. If GMCA's economic analysis has not factored in compensation based on the "equivalence principle", that would be another significant gap.

10. CONCLUSION

- 10.1 For the reasons set out in sections 4 to 9 above, the GMCA's proposals give rise to significant legal concerns. In light of this, it would be unlawful for GMCA to introduce franchising in Greater Manchester following the current consultation process.

Herbert Smith Freehills LLP

8 January 2020

Stagecoach South Manchester Partnership Proposition



Commercial in Confidence
Not for Distribution and Subject to Agreement

**Transforming Greater Manchester's bus network
to deliver our region's aspirations**

Purpose of the Document

This document has been produced by Stagecoach Manchester, with the intended audience of Transport for Greater Manchester ("TfGM") and the Mayor of Greater Manchester ("Mayor"). This document aims to provide, at an executive level, the key components of an exciting new partnership proposal, that Stagecoach Manchester believe is appropriate for TfGM and the Mayor to consider, and to encourage further discussion on the proposals made within.

The proposals within have been formed to provide an alternative view to that proposed within the "Doing Buses Differently" Consultation.

We expect, should the proposal progress, a number of clarification discussions and commercial negotiations to be required and concluded, which will require engagement with a number of relevant stakeholders. This proposal is also subject to the negotiation of a Voluntary Partnership Agreement ("VPA").

We are submitting this proposal to TfGM, as a confidential communication, not as a consultation submission and on the basis that it is Private and Confidential, under the terms of the agreed NDA and, therefore, not subject to a Freedom of Information ("FOI") request. Stagecoach Manchester have developed this proposal in discussion with TfGM and have aligned the circulation of the proposal to the timings of "Doing Buses Differently" Consultation, which concludes on 8th January 2020.



1. Executive Summary

| | | |
|-------|--|----|
| 1.1 | Executive Highlights..... | 5 |
| 1.2 | Stagecoach - Successfully Serving Greater Manchester Since 1996..... | 7 |
| 1.3 | The Case for Change..... | 8 |
| 1.3.1 | The Stagecoach Proposal Focuses on Achieving Benefits Across Five Key Areas..... | 9 |
| 1.3.2 | Principles of the South Manchester Partnership..... | 10 |
| 1.3.3 | Deliverables of the South Partnership and Franchise..... | 11 |
| 1.4 | Financial Transparency – Aligning Incentives..... | 12 |
| 1.4.1 | Profit Share..... | 12 |
| 1.4.2 | South Manchester Partnership Fund..... | 13 |
| 1.4.3 | Performance Accountability..... | 13 |

2. The South Manchester Partnership Proposition

| | | |
|-------|---|----|
| 2.1 | Proposal Themes..... | 14 |
| 2.1.1 | Initiative Summary..... | 15 |
| 2.2 | Priority Initiatives..... | 16 |
| 2.2.1 | Comparison of the Partnership to the proposed Franchise Scheme..... | 25 |
| 2.3 | Benefits..... | 28 |
| 2.3.1 | Key Benefit Themes..... | 28 |
| 2.4 | The Expedited Timeline for Change..... | 29 |
| 2.4.1 | 10-year Roadmap..... | 29 |

3. Governance Framework & Reporting

| | | |
|-------|---------------------------|----|
| 3.1 | Governance..... | 30 |
| 3.1.1 | Governance Structure..... | 30 |
| 3.1.2 | Engagement..... | 31 |
| 3.2 | Reporting..... | 31 |
| 3.2.1 | Reporting Schedule..... | 31 |
| 3.2.2 | Specific Reports..... | 32 |

4. The Legal Framework

33

5. Dependencies & Assumptions

33

6. Appendix

35

| | | |
|-----|--|----|
| 6.1 | South Manchester Partnership – Detailed Proposition..... | 36 |
| 6.2 | Profit Share..... | 58 |
| 6.3 | South Manchester Partnership Fund..... | 59 |
| 6.4 | Bibliography..... | 60 |

1. Executive Summary



Delivering a better, more sustainable bus network for Greater Manchester

Overview

Greater Manchester Combined Authority ("GMCA") is seeking to deliver a better bus provision in the region as part of its 2040 transport vision and wider aspirations for the region. The Bus Services Act 2017 gives regions with metropolitan mayors a range of tools to deliver improvements, including partnerships and franchising. GMCA is currently consulting on its recommendation to proceed with a franchising scheme for the whole of Greater Manchester.

Stagecoach believes there is a powerful case for an alternative approach to franchising in the manner proposed by GMCA, and will respond in due course to the consultation. This submission proposes an alternative third way, which, if the GMCA were to decide to pursue franchising in the North of the region, would deliver a complementary offering in the South.

This alternative would deliver the objectives of politicians and secure benefits for bus customers and communities. It would provide a more targeted approach to addressing any perceived current weaknesses in the bus network, minimise the cost and financial risk to local taxpayers, and deliver a more sustainable and joined up bus network for the long term.

What is Stagecoach Proposing?

We are committing to an ambitious plan which would deliver a £142m package of investment for Greater Manchester, and see London-style improvements introduced in a way that is suited to the region. This could be achieved through the seamless integration of a partnership model in the South of Greater Manchester and a franchise system in the North¹.

Our proposition offers an opportunity for the Mayor and district council leaders on GMCA to focus on the key historic challenges they have identified for the city, that are not specifically focused in South Manchester. This would sit alongside the introduction of a 10-year partnership agreement in the South of Manchester, between GMCA and small and large bus operators, where there has been greater investment, more punctual and reliable services, lower fares and higher customer satisfaction.

The delivery of this partnership proposal will start in June 2020 and will be expedited to secure customer benefits and outcomes faster than the proposed franchise plan; benefits such as, a simple, unified bus network, which in the longer term would be fully integrated with tram and rail services and have a consistent, high quality experience wherever customers travel across the region.

What are the benefits of this approach for Greater Manchester and its authorities?

- It will provide politicians with improved transparency and greater control over the bus network, through a new performance regime and involvement in network development.
- It will provide a targeted approach to addressing any specific challenges in the bus network which are not uniform across the region.
- The mixed model approach will unlock significant investment to deliver cleaner air and reduced road congestion in the region, through a greener bus fleet and more attractive services which will help generate modal shift from the car.
- It will assist politicians in making good on their promise to the electorate to deliver a step-change in transport connectivity to underpin the region's economy and make it the best place to grow up, get on and grow old.
- Improvements to the bus network and the wider public transport offer will be delivered more quickly and at lower cost than a franchise model.
- The proposals will deliver a key political objective of delivering better value for the taxpayer, by the participating Partnership Operators providing the majority of investment to deliver the benefits.
- It will reduce the significant risk to the taxpayer from a full franchising of the region's entire bus network, which is known to be a concern of local taxpayers.

¹If the decision made by the Mayor is to franchise the North

1.1 Executive Highlights (continued)

How will customers, communities and employees benefit?

Our research has found that Greater Manchester residents are very clear on their priorities: cleaner air; higher quality bus services; less congestion; faster journey times; cheaper and simpler fares, and; clearer travel information. Both users and non-users also want improvements without higher tax bills.

Our plan will deliver:

- **Investment:** £142m Stagecoach investment over the period of the Partnership.
- **Cleaner air:** Investment in new greener buses and associated infrastructure, this will build on the £16.5m investment already made on the purchase of 32 electric-buses (and infrastructure) being introduced by Stagecoach on two key high-frequency services connecting Manchester city centre, Manchester Airport, five hospitals and two universities from March 2020.
- **Simpler, better value fares:** London-style price-capped tickets.
- **Seamless, easy-to-use services:** One unified brand and customer contact point for all bus services in Greater Manchester.
- **More influence over the network:** Enhanced consultation and a new performance regime to drive consistent high standards.
- **Efficient integrated journeys:** A better integrated bus, tram and rail network and congestion-busting measures to deliver more reliable journeys.
- **Improved accessibility:** "Talking bus" audio-visual systems fitted to all vehicles to improve accessibility.
- **Improved information and transparency:** Clear journey planning and bus tracking information for customers, plus open data on operational and financial performance and customer complaints.
- **Better skilled and rewarded employees:** Investment in employee training and new apprenticeships, with a commitment to pay staff the Real Living Wage.
- **More inclusive and sustainable communities:** Recycling and other environmental commitments, as well as community benefit initiatives, such as breakfast clubs for children.

Next steps

Stagecoach's proposal for a South Manchester Partnership has been generated on the basis that TfGM and other bus operators in South Manchester can also participate within it, and we have received initial support from Arriva, who we will work with to bring the Partnership to life over the coming weeks.

We have engaged extensively with TfGM in formulating our proposals, to ensure they address the political priorities and aspirations of constituent authorities, the requirements of bus customers and communities, and the interests of local taxpayers.

Our draft proposal was initially submitted to TfGM in December 2019 to allow review time of the draft within TfGM and to also commence engagement with political leaders on it. This proposal is now in final format; however, we expect to undertake clarification discussions with TfGM over the coming weeks and therefore, acceptance of the proposal is subject to agreement. We are sharing our South Manchester Partnership Proposal with TfGM aligned to the GMCA consultation on franchising closure date of 8 January 2020. We are also submitting a formal response to the GMCA consultation on franchising. Consultation responses are then due to be assessed and the decision is currently expected to be March 2020, subject to change, dependent on progress and outcome of consultation.

We acknowledge that during the period of assessment, there may be clarifications required of our proposal and we are prepared to engage with TfGM as required to ensure clarifications are concluded and effective assessment are achieved.

We are keen to engage with both the Mayor, GMCA, constituent authorities and other key stakeholders to explain our proposed approach in detail, and demonstrate how we believe it offers a balanced and workable solution for everyone in the region.

We are aware that as part of GMCA requirements of re-consultation, we may need to consider other options that could include an offer under Partnership for an interim period of time e.g. 18 months.

1.2 Stagecoach - Successfully Serving Greater Manchester Since 1996

As Britain's biggest bus and coach operator, we have made substantial improvements to Manchester's bus network for more than two decades. We have consistently been top ranked in the 'General Contract Operator Ranking', GMTC Bus Annual Performance Report. Our impact continues to be recognised through National Industry Awards, winning thirteen separate awards at this year's UK Bus Awards (more than any other operator), with three of those coming from Manchester specifically.¹ We have won 16 other industry awards over the past 5 years.

Our approach has helped to deliver high-quality connectivity across Greater Manchester, that supports the economy and underpins efforts to protect the environment. We've increased the number of route miles offered, significantly improved service quality, and simplified ticketing and retailing – offering one of the most affordable price ranges in the UK (for any comparable urban network). Mancunians are at the heart of our operations as both customers and employees, and we are one of the larger employers across Greater Manchester with 2,350 staff.

As a result, we've seen high levels of customer satisfaction, continued passenger growth (see Fig 1.1), and strong levels of employee engagement (with an engagement score of 75%, from an 83% response rate) – benefiting our customers and the communities of Greater Manchester. This has been acknowledged by politicians and the local authority, noting that we have not exhibited some of the issues that are said to have prompted the consideration of a franchising scheme.

The below graph shows Stagecoach Manchester passenger journeys since 1996, which have grown year on year. This makes an interesting comparison to Greater Manchester Combined Authority's ("GMCA") Passenger journey report for Greater Manchester², which reports a significant and long-term decline in passenger journeys. The figure for passenger journeys of Stagecoach has bucked the trend, in contrast to the decline experienced in passenger journeys overall in Greater Manchester.

Stagecoach Passenger Journeys (in millions by year)

Figure 1.1



The key indicators of the GMCA Greater Manchester and Stagecoach Manchester Passenger Journey comparison are:

- Stagecoach passenger journeys have grown year on year, with the exceptions of 1998 to 1999 and 2016, where a small decline was observed;
- Stagecoach reports a 21% increase in passenger journeys from 2008 to 2017/2018 (which equates to approximately 19m additional trips made by customers). Compared to GMCA analysis, within the same time period, where passenger journeys declined 17% (which equates to approximately 39m less trips made by customers);
- Stagecoach and Metrolink bus and tram passenger journeys have continued to grow, demonstrating the power of a high-quality, multi-modal offering.

1.3 The Case for Change

The “Doing Buses Differently” consultation document², makes a case for change in Greater Manchester, making clear that the GMCA does not believe ‘do minimum’ will deliver its aspirations. Stagecoach does not agree that franchising is necessarily the way forward and will be providing a formal response to the consultation. However if the GMCA wishes to change the status quo, Stagecoach believes there is a better, alternative approach to franchising bus services in Greater Manchester. We therefore welcome the statement that the GMCA is open to considering other options.

We have considered the “Doing Buses Differently” consultation document and reflected upon the recommended option of franchising across Greater Manchester, and we present this proposal as a new and credible alternative partnership offering (should the GMCA conclude that change is necessary). Our proposal of a Partnership in the South would complement any decision to franchise the North, and would maximise the benefits for the customers and communities of Greater Manchester and deliver a truly integrated transport system. This proposal makes the case for a South Manchester Partnership, where we believe we can build on our award-winning and strong track record, delivering an ambitious package of investment that would see a number improvements introduced within 3 years, starting in June 2020 and sustained over a 10-year period, in a way that truly suits the region.

In this proposal ‘South Manchester’ refers to the defined geography of the ‘South Manchester’ sub-area C outlined in the “Doing Buses Differently” consultation. It therefore does not include services operating from the Wigan and Middleton depots.

We believe our proposed set of initiatives will help to deliver on key political objectives – offering a step change in transport connectivity to underpin the region’s economy, improving safety, and reducing the environmental impact of transport. It would do so in a manner that delivers better value to the people of both South and the remainder of Greater Manchester, in a faster and more sustainable way than franchising the whole of Greater Manchester, avoiding what could be significant financial risk to the GMCA, the communities of Greater Manchester and national taxpayers. The financial risk of Partnership is borne by the participating operators and for this Proposal equates to a £142m investment package provided by Stagecoach.

For customers of South Manchester, and those in the North that travel into the South, it will mean greater benefits for an area that already enjoys a more positive customer satisfaction score than the North (■■■■■³). This package would make bus a platform for everyone, with initiatives to improve value for money, reliability, accessibility and integration – presenting bus as a truly attractive alternative for the people of Greater Manchester. It is understood that our Proposal is one for South Manchester and as such, potentially introduces two structures within Greater Manchester; however, it has been built to complement Greater Manchester.

Our Partnership proposal achieves the GMCA Vision for Bus (see Fig. 1.3) and can be delivered via a Voluntary Partnership Agreement (“VPA”), which should be supported by a series of Advanced Quality Partnership Schemes (“AQPS”) as introduced by the Bus Services Act 2017, such schemes to be agreed on a corridor or route basis. By adopting this approach, we can all be confident that all commitments are delivered and standards are maintained for the bus services provided in South Manchester.

A robust governance framework (see section 3.1.1) is also proposed that will ensure compliance with principles set out (see section 1.3.2) and will create a foundation of control for how the South Manchester Partnership is run throughout its term. It will also provide the correct level of accountability and responsibility for the continuous review, check, test and improvement of the services the Partnership provides to customers. At the same time, our proposed partnership approach allows the GMCA to address the key areas where it can best support better bus use.

We are confident that with the right incentives and using our expertise, innovation and resources, we together with TfGM can deliver the improvements that customers, communities and taxpayers in Greater Manchester need and deserve.

1.3.1 The Stagecoach Proposal Focuses on Achieving Benefits Across Five Key Areas

Our proposal for South Manchester will start in June 2020 and will deliver benefits throughout a 10-year period, significantly exceeding those proposed by both the All Operator Partnership and the Ambitious Partnership schemes, assessed as comparators to franchising. This Proposal equates to a £142m investment package, provided by Stagecoach.

Stagecoach are currently the largest operator of services in the proposed Partnership area. However, the Partnership framework has been generated on the basis that TfGM and other bus operators in South Manchester can also participate within it. We have received initial support from Arriva, with whom we will work to bring the Partnership to life over the coming weeks.

It is acknowledged that developing a partnership in the South of Manchester could possibly necessitate the need for the GMCA to carry out further assessment and consultation, which may impact the published timescales for interventions outside of the partnership area.

[REDACTED]

Our proposed Partnership, with the customer at its heart, focuses on delivering seamless travel across Greater Manchester and reducing the barriers that exist today. We have identified the following benefit categories in the South Manchester Partnership (see Fig 1.2) to achieve the GMCA's Vision for Bus:

Figure 1.2



1.3.2 Principles of the South Manchester Partnership

For the Partnership to be successful, it must be underpinned by a set of guiding principles. A partnership by definition, is the joining together of two or more parties, to jointly work on an agreed goal and to have joint responsibility for its success.

The parties to the South Manchester Partnership would commit to the following principles:



Safety First: The Partnership will ensure that passenger safety is at the forefront, and operators continue to tackle crime and anti-social behaviour in line with the Greater Manchester Transport Strategy 2040.



Protect a High-Quality Customer Experience: The Partnership will always be accountable for a measured high-quality service for our customers.



Inclusivity of Other Operators: The Partnership will be open for new operators to join, with all participating operators working in an appropriately collaborative way.



Pace of Delivery: The Partnership will expedite delivery of its initiatives, ensuring customer outcomes and therefore, benefits are delivered faster than the proposed franchise plan.



Transparency: Transparency of plans, performance and fares and ticketing initiatives essential to achieving the objectives of the Partnership, will be adhered to throughout the Partnership. The Partnership will provide TfGM, GMCA, customers and communities with clear line of sight to forthcoming changes and the reasons behind those changes.



Unifying Greater Manchester: Whilst the Partnership is for services provided in South Manchester, we recognise that many customers travel across North and South Manchester and, therefore, the Partnership will create as seamless an experience as possible for those customers and will actively seek opportunities to bring continuity across Greater Manchester.



Innovative Investment: The Partnership will collaboratively re-invest in initiatives or solutions that drive better customer value and contribute to wider TfGM and GMCA policy initiatives. This will be achieved without the requirement of additional financial contribution from the public purse.



Sharing of Best Practice: The Partnership will create a culture of sharing best practice amongst members to ensure an extended level of quality across multiple operators, driven from lessons learned and demonstration of higher level of practice. This will be used to fill gaps where there are improvements required, and ultimately deliver a better all-round multi-operator customer experience.



Proactive Use of Data: The Partnership will use various types of operator data related to network performance, quality and customer service to conduct trend analysis and continually inform improvements and the performance of services.



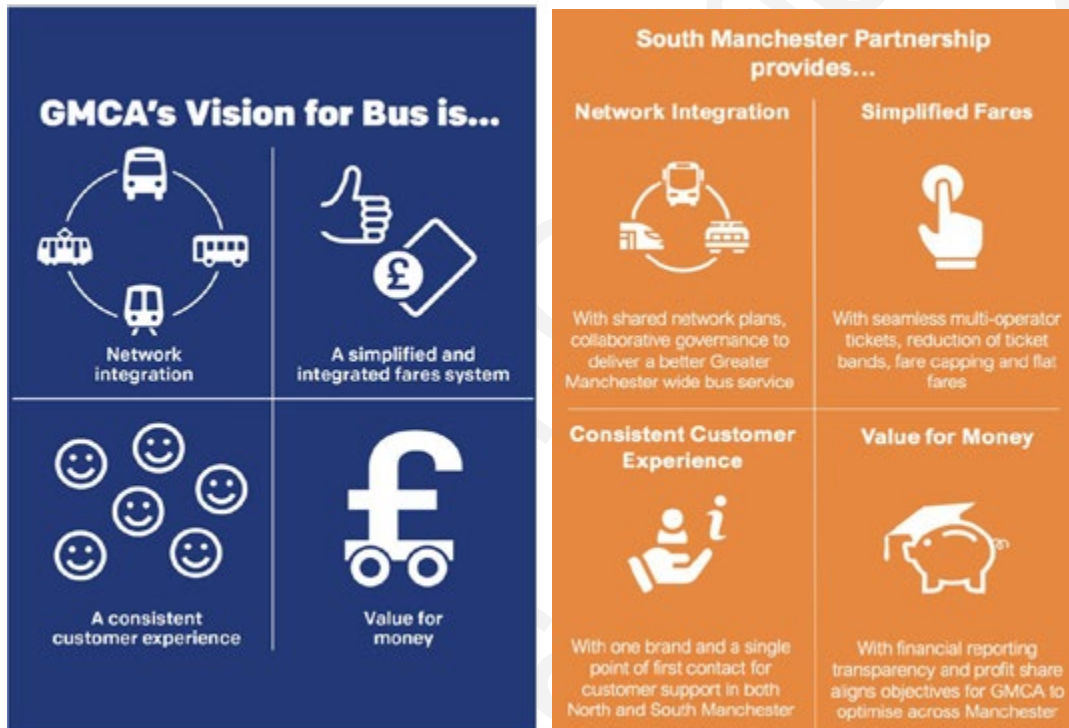
Governance & Control: The Partnership will be governed by a diverse and representative Partnership Board which working together would be responsible for decision making, implementation and monitoring the success of the Partnership.

1.3.3 Deliverables of the South Manchester Partnership and proposed Franchise scheme

The GMCA's Vision for Bus has identified the outcomes it is seeking through Bus Reform⁴. Stagecoach is confident this partnership offering supports the GMCA in achieving that vision, and that in adopting a complementary franchising and partnership model, the GMCA will not only achieve its Vision for Bus but will secure this vision in an ambitious and enduring way into 2030 and beyond.

The South Manchester Partnership will expedite delivery of its initiatives, ensuring customer outcomes are achieved much faster than the proposed franchising plan, to such an extent that we would have set up and delivered the majority of initiatives in 2022, and all by December 2023; before the currently planned franchising of South Manchester (by 2023/24).

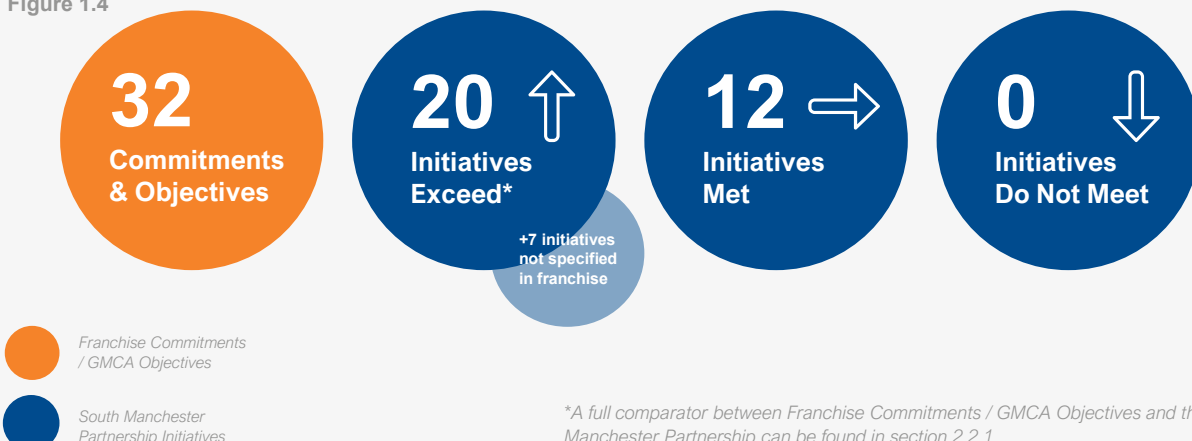
Figure 1.3



We have extensively reviewed the committed outputs set out by GMCA and identified within the proposed Franchise Scheme. We have assessed and tested our Partnership Proposition against this and believe we are offering a stronger, customer, community and taxpayer alternative.

Our Partnership Proposal, as a minimum, equals the objectives of franchising in 12 areas and exceeds them in 20, the assessment of 'exceeds' is primarily due to the expediency of delivery. However, there are an additional 7 initiatives that we believe represent a substantially larger material commitment, as they are not specified within the GMCA / proposed Franchise scheme within the consultation documentation. In summary:

Figure 1.4



1.4 Financial Transparency – Aligning Incentives

1.4.1 South Manchester Profit Share

We acknowledge the aspirations of the GMCA, through TfGM, to take much greater control over the planning and delivery of bus services in the city. This Partnership Proposal has been designed to create a framework which provides much greater transparency between Operators and TfGM (on a bilateral basis). A fundamental principle of this proposal is that; operators in the South remain in a commercial market and compete with one another, but we recognise the necessity of a 'joined up network' approach, especially with regards to network planning and customer experience (including fares and ticketing), to deliver the desired passenger benefits.

As such, we are proposing a robust joint Governance Framework (see section 3.1.1) for the South Manchester Partnership, which would offer a significant level of involvement and a greater level of influence afforded to GMCA than ever before, whilst incentivising all parties to focus on key interventions that improve the attractiveness of bus as a mode of travel in South Manchester (such as congestion reduction schemes).

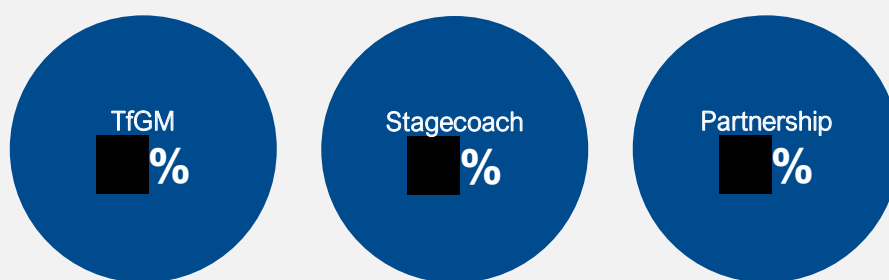
To show our commitment to this transparency, we are proposing a profit share mechanism, to start in year 2, that would provide incentives to the GMCA and Stagecoach. These incentives would focus on enhancing services for bus passengers in South Manchester through the allocation of part of this profit share to the South Manchester Partnership Fund. Other operators in the Partnership are free to agree their own profit share arrangement, if any, with the GMCA (but this is not necessary for participation in the South Manchester Partnership).

This profit share arrangement allows GMCA to ensure that the bus network and Greater Manchester as a whole benefit further from commercial operations in the South of the City via Partnership. If operators grow the market and exceed current assumptions, GMCA (via TfGM) will share in that success, to the benefit of bus users and taxpayers in Greater Manchester.

Our suggested approach to profit share in relation to services operated by Stagecoach in the South Manchester Partnership is detailed in Appendix 6.2, where outperformance of an agreed Target Profit would result in a three- way distribution, shown in Figure 1.5.

Figure 1.5

Profit Above Target Profit:



1.4.2. South Manchester Partnership Fund

In addition to any Profit Share arrangements agreed, any initiatives proposed by participating operators which provide savings to TfGM such as 'Commercialising a proportion of [REDACTED] tendered services' (see Appendix 6.1 initiative D.4) would see those savings entered into this South Manchester Partnership Fund.

It is intended that the majority of this Partnership Fund be re-invested into agreed schemes in South Manchester which focus on bus prioritisation to, in turn, reduce congestion and journey time variability. Decisions on how this South Manchester Partnership Fund will be spent would be agreed in the Partnership Governance Framework, via the Tier 1 South Manchester Partnership Strategy & Delivery Board (see section 3.1.1 for full details).

We propose that each £1 added to the fund, as a result of savings from these initiatives (but with the exception of the profit share funds) is split as follows:

- 33.3% to TfGM, acting on behalf of GMCA to invest in initiatives which benefit the bus user experience and encourage modal shift to bus, as it sees appropriate across any of the Greater Manchester geography.
- 66.6% to initiatives which benefit the bus user experience and encourage modal shift to bus in South Manchester (such as bus priority schemes or kick-starter programme). These would be proposed and agreed collectively between Operators and TfGM under the Tier 1 and Tier 2 governance proposed in section 3.1.1.

Appendix 6.3 suggests an appropriate process for the management of the South Manchester Partnership fund based on non-discriminatory and objective criteria.

Such investments present an opportunity for incremental bus journeys through modal shift to allow TfGM to deliver their 2040 target of 50% of journeys by bus, cycle or walking (currently at 39%).

For the avoidance of doubt, the money contributed to the Partnership Fund as a result of the profit share arrangements is not subject to the split above, but is subject to the Tier 1 and Tier 2 governance proposed in Section 3.1.1 to be invested to benefit the bus user experience and encourage modal shift to bus in South Manchester.

1.4.3 Performance Accountability

Providing a service to customers comes with standards and quality expectations. Stagecoach pride ourselves on the quality we currently provide and would welcome a Partnership Performance Regime, that would ensure a consistent level of quality across the South Manchester Partnership.

The Performance Accountability Regime is central to our Proposition and expected to include key quality metrics, such as reliability, journey times and vehicle requirements with stated measures and tolerances. Underperformance against these measures would incur a penalty. We expect to be held accountable for our performance and, as such, would expect the performance indicators on which we would be measured to be within our / the operator's control. Events such as late planned roadworks and music / sports events should not be measured and penalised in the same way. In line with the 'Transparency' Principle of Partnership (see section 1.3.2), we will publish our Performance Accountability reports and would implement and adhere to the Performance Accountability framework within the first 6 months of partnership.

We expect this to deliver clear accountability of operators. Not only would it be a key way of holding Stagecoach to account, but we also expect it to raise industry standards and promote common service quality standards. It is recognised that with the support of TfGM and interventions of the Partnership, we could align such a Performance Accountability regime to a franchise scheme, as challenges are addressed over time in Greater Manchester.

2. The South Manchester Partnership Proposition

2.1 Proposal Themes

We have considered how best to deliver a partnership that supports the GMCA Vision for Bus. This has driven our thinking to develop a South Manchester Partnership Proposal which incorporates a number of initiatives for South Manchester, underpinned by the principles of partnership.

Operations & Fleet Investment



Cleaner air for Greater Manchester through continued commitment to invest.

Customer



Create an offering that is high-quality, simple, trustworthy and easy to use.

Fares, Ticketing & Retail



Make the complex simple and integrate and standardise where possible.

Network Planning & Performance



Be reliable, punctual and regular. Also be transparent with performance.

Community and Employee

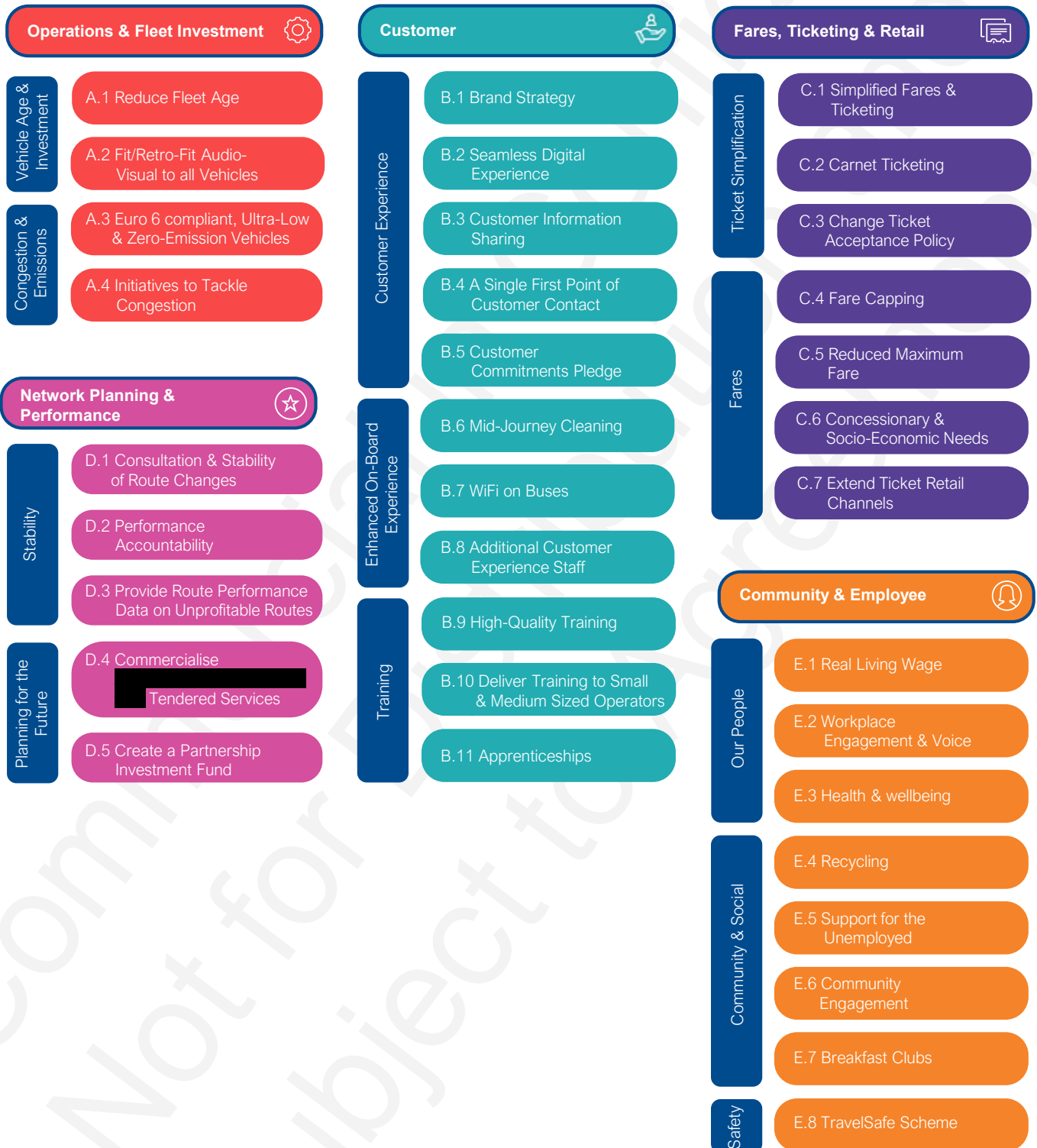


Do what's right by our people, customers and community.



2.1.1 Initiative Summary

In total we put forward 35 primary initiatives for further consideration in our proposed South Manchester Partnership, summarised below:



2.2 Priority Initiatives

The proposed initiatives comprise new projects and investment opportunities that we believe will strengthen the Partnership offering to the ultimate benefit of the customer, communities and the taxpayer. We are also proposing to expedite and enhance a number of other initiatives, which were under consideration in our future business plan, as part of our desire to deliver continual improvement. Additionally, we are absolutely committed to maintain the existing initiatives we already have in place.

Below is a presentation of a selection of the priority initiatives. The detail of the full Proposition which describes the problem statements, opportunities, description of initiatives, benefits and delivery target dates for every proposed initiative offered can be found in Appendix 6.1.



Operations & Fleet Investment

Emissions & Vehicle Age

Euro 6 Compliant, Ultra-Low, Zero-Emission Vehicles & Reduce Fleet Age

What is it?

Stagecoach will work to improve air quality in Greater Manchester by increasing the number of Euro 6, ultra-low / zero-emission buses on the road ahead of the current Confederation of Passenger Transport ambition of 2025. In line with commitments to the U.K. Government emissions reduction pledge, we will purchase Euro 6, ultra-low or zero-emission vehicles for every new vehicle we purchase for operation within the South Manchester Partnership from the start of the Partnership.

Euro 6 Compliance

Compliance will be executed through a combination of new vehicle purchases and retro-fitting older vehicle engines. We will retro-fit [REDACTED] buses by September 2021, subject to Defra funding and agreed terms for retro-fit.

Ultra-Low or Zero-Emission Vehicles

Stagecoach will utilise a balance of new vehicles (which are Euro 6, ultra-low or zero-emissions) and Euro 6 retro-fits. By September 2021, 45% of our South Manchester fleet will be better than Euro 6 compliant, as they will be ultra-low or zero-emission vehicles. In addition, Stagecoach will support and accelerate the GMCA's Clean Air Plan through the following initiative:

Average Vehicle Age

Stagecoach will reduce the average age of our fleet in South Manchester from [REDACTED] years (the average age of Stagecoach vehicles currently operating in South Manchester today) to 7.0 years by replacing older buses with new, more environmentally friendly vehicles. We will ensure this age is maintained over the duration of this partnership. To achieve this fleet profile, Stagecoach will acquire [REDACTED] buses in the first three years. This is in addition to the 32 electric vehicles that will be purchased shortly before the Partnership starts. Stagecoach recognises that not all operators will be in a position to achieve these standards but would expect a reasonable timetable be established for this.

When will this be Delivered?

Stagecoach will deliver a Euro 6 compliant fleet in South Manchester by September 2021 (based on a current fleet size of [REDACTED]) and will continue to upgrade our fleet based on the profile outlined.

We will reduce the average age of our South Manchester fleet to 7.0 years by December 2023.

Vehicle Age & Investment

Fit/Retro-Fit Audio-Visual to all Vehicles

What is it?

Stagecoach will improve accessibility across our entire fleet by extending the introduction of audible and visible information systems.

Audio-visual information systems will be retro-fitted on all Stagecoach buses that do not currently have them, and all new buses will be fitted with the systems at purchase. These systems use GPS technology to share real-time next stop information, allowing all passengers to be aware of their location on the route. They announce and show to customers what the final destination on the route is, reassuring them that they are on the correct bus.

When will this be Delivered?

When the Partnership starts, Stagecoach will have 52 buses fitted with audio-visual information systems. Stagecoach will fit audio-visual information systems on the remaining buses in the fleet by December 2023.

Customer Experience

Brand Strategy

What is it?

Due to multiple bus brands operating in the Greater Manchester region, it has been stated that customers feel that today's offering could be confusing and have reported varying experiences across bus services. A more unified brand across customer touchpoints will create a seamless experience for customers and ensure a more intelligible, usable and trusted service.

Stagecoach will adopt the appropriate TfGM led (franchise proposed) branding for Stagecoach vehicles and work to achieve a near identical brand across Greater Manchester to alleviate customer confusion. This is proposed in the following ways:

Bus Livery

All Stagecoach buses will be completely re-branded (painted) using TfGM branding guidelines. We will retain a small identifier to ensure a customer can identify that they can use a Stagecoach ticket on that bus, which is likely to be on the front and at the door to the vehicle. This process of rebranding of the fleet will complete within three years of the South Manchester Partnership. For the branding of buses in the short term (three months into the South Manchester Partnership), we will implement a transitional brand by applying a clearly identifiable partnership branding to our buses. It is important to reduce customer confusion, and we must ensure the brand identifies where a customer can use single operator tickets. Below is a concept that shows the Stagecoach brand on any chosen unified Partnership brand, this is to show our intent to keep any Stagecoach branding to a minimal, and therefore, enable GMCA to achieve their proposed branding benefits.

The brand changes do not impact Stagecoach's current advertising on buses strategy, and the plan will be for Stagecoach to continue to retail that advertising space.

When will this be Delivered?

Interim branding will happen within three months of the South Manchester Partnership.

Complete re-branding will happen within three years of the Partnership.

**Ticket Marketing**

For marketing messages displayed on buses, Stagecoach would give significant prominence to promotion of multi-operator tickets from year one of the South Manchester Partnership.

Digital Communications Channels

Stagecoach propose to offer our established digital infrastructure, both app and website, as a managed service (subject to a negotiation to agree terms) to the area, enabling the acceleration of customer improvements across the Franchised area too. In the short term, Stagecoach would apply an interim co-branding to our digital channels. We will work with TfGM to agree a future development schedule and outline timeframes in which the unified app and website can be put in place and introduced on a phased basis throughout the early years of the Partnership.

Uniforms & Badges

In line with the Franchise consultation, Stagecoach will retain our independent staff uniform design. However, we will incorporate joint-branded items such as badges or lanyards to act as a signifier of a unified bus service for customers and to build their confidence and trust in the Partnership bus service for customers.

Customer Experience

Seamless Digital Experience

What is it?

Stagecoach is willing to provide the digital and back-office infrastructure for a shared Greater Manchester Bus application and website. This will enable a single source of travel information for across Greater Manchester, accessible via one platform. The shared app and website will be accessible by all operators in the South. We see this arrangement working as a technology managed service with TfGM for both future Franchised and the proposed South Manchester Partnership areas. A development schedule will be agreed in line with the specifications set by TfGM. Consistent with the brand strategy, the app and website will significantly utilise the appropriate branding used for franchised services.

An additional benefit of this arrangement is that, aligned with the joint network planning approaches suggested in the Partnership, Greater Manchester will be able to leverage technology to deliver an optimal Mobility as a Service ("MaaS") solution to the benefit of the public transport system.

When will this be Delivered?

Stagecoach will work with TfGM to agree a schedule for development of the managed service based on outlined goals and discovery outputs. Assuming a phased approach will be required for TfGM, an interim position will be agreed with TfGM for delivery early in the South Manchester Partnership with the associated commercial details. We will provide the commercial costs at a later date once the schedule has been agreed.

Customer Experience

Single First Point of Customer Contact

What is it?

Stagecoach propose that the TfGM digital app and website should provide customers with a single point of contact, on first contact, for each customer service channel. This point of contact will be TfGM owned and will provide simplicity and clarity for customers, aligning with the wider strategy to create one unified experience.

Stagecoach will partner with TfGM to explore a range of feasible options and agree the best way forward at the start of the South Manchester Partnership, this will include identifying the most effective business processes e.g. triage, issue resolution for various scenarios, service quality and hand-off, to support this change. We will work to ensure current customer service resources and systems are made available and accessible in order to achieve these commitments, for example for inquiries related to lost items. It is understood that each party are responsible and accountable for their own services and therefore, are also responsible for any complaints received related to their services. Illustrative example options below:

Unified Social Media Services

Stagecoach see social media services transitioning into a centralised function operated by the TfGM Franchise team. The TfGM led Twitter feed will provide network-wide updates on service performance and delays. Any contact from customers through social channels will be dealt with initially by TfGM and triaged out to other operators, if necessary. Any contact received to the Stagecoach social media accounts would be dealt with the same way as today, whereby, we provide a recognition of the contact and offer a contact to the correct department to deal with the topic raised.

A Single Route for Customer Support

Stagecoach will work with TfGM to provide a single point, on first contact, for customer service queries via phone. This simplified system will mean the customer will only have to dial one number to get access to support. As with social channels, calls will be dealt with initially by TfGM and then triaged out to other operators if necessary. This phone number will be clearly displayed on the shared app, on the website, at bus stops and on buses.

Common 'Best Practice' Standards

Physical customer service will continue to be offered on board and at bus stations (by Stagecoach and TfGM). Through Stagecoach's training proposition (see Appendix 6.1 initiative B.9 and B.10 for more details), we will seek to raise the standards of customer service for those small and medium sized bus operators requiring it.

When will this be Delivered?

Stagecoach will deliver this at the point that TfGM are onboarding the successful operators of franchises in sub-area A Franchise (From April 2021 as per consultation document mapping).

Customer Experience

Additional Customer Experience Staff

What is it?

Stagecoach will continue to provide a high ratio of inspectors to protect and maintain a high-quality of service. [REDACTED]

[REDACTED] Stagecoach will deploy additional Customer Service Staff in the South Manchester Partnership area enabling every bus station in the area to have an inspectorate presence during peak periods to assist and support customers and maximise service performance.

Additionally, Stagecoach will increase other resources in the following ways:

- Funding an additional senior signal engineer to sit within the TfGM central Urban Traffic Control ("UTC") room.
- Increasing current resources to widen coverage in UTC when it is needed most: weekends and evenings, providing additional and therefore total coverage of 18 hours on weekdays and 12 hours on the weekend.

When will this be Delivered?

For the additional resources, working with TfGM, we will initiate recruitment for all roles in the lead up to the South Manchester Partnership, with the aim of having those resources in place for the start of the Partnership.



Ticket Simplification

Simplified Fares & Ticketing

What is it?

Stagecoach has consistently made efforts to simplify our product range but recognises that there is more it can do in reducing complexity and simplifying the fares experience for customers. As such, Stagecoach will commit to:

A Reduction of Fare Bands

There are currently five fare bands offered by Stagecoach depending on the route, corridor and time a bus is taken. Stagecoach is proposing [REDACTED], reducing the total number of fare bands to four.

A Single Suite of Period Tickets

There are currently multiple period tickets offered by Stagecoach depending on the ticket zone in which a customer uses a service, we will simplify this down to a set of three options (daily, weekly and monthly) across all South Manchester corridors and geographies, to ultimately make it easier for a customer to make value-based decisions.

Carnet Tickets

Stagecoach will permanently introduce carnet tickets that deliver flexibility and value for money to customers. Carnet tickets will consist of x5 unlimited daily tickets which can be purchased in advance and used within a 3-month time period. These tickets will provide better value for customers over the purchase of a single ticket on the day of travel.

When will this be Delivered?

Stagecoach will reduce the number of fare bands we have and offer a single suite of period tickets by January 2021.

Carnet Tickets will be permanently offered from January 2020.

Fares

Fare Capping

What is it?

Stagecoach proposes to implement fare capping across our bus services with the following commitments:

Fare Capping on all Stagecoach Buses

Stagecoach will implement a fare capping system on all of our buses across South Manchester allowing our customers to take unlimited journeys across Stagecoach bus services to an agreed daily and weekly limit. Customers will be able to tap with their contactless payment method and will be appropriately charged to a maximum daily price or a maximum weekly price.

Commitment to a Future Multi-Operator Fare Capping System

Stagecoach will also participate in a multi-operator fare capping system, working with TfGM to agree the rules that will include future Franchised areas. This will require TfGM to provide Stagecoach with a representative seat within subsequent governance and decision-making to ensure that the system is fair and equitable for both Franchised and South Manchester Partnership areas. As part of this commitment, we will support the technology scoping and discovery efforts that will permit systems to interact and expedite capping across Greater Manchester. The proposed Governance Framework (see section 3.1.1) makes recommendation for replicating current GMTL Board – System One to accommodate this initiative.

Extending Fare Capping

In addition to multi-operator capping systems, we will work closely with TfGM to ensure that the introduction of capped systems co-operating with the Metrolink tram can be expedited, with a Stagecoach / Metrolink capped product introduced shortly after the introduction of our scheme.

When will this be Delivered?

Stagecoach will deliver fare capping across Stagecoach South Manchester buses by the Summer of 2021.

Stagecoach will work with TfGM on an ongoing basis to deliver fare capping that works for both Franchised and South Manchester Partnership areas in line with TfGM plans.



Fares

Reduced Maximum Fare

What is it?

To offer better value and simplicity for customers, Stagecoach will continue to offer both the reduced maximum fare and flat fare for adults travelling on buses between 19:00 - 24:00 (current rate of £1.50 for shorter trips and £2.00 for longer) and 24:00 - 04:00 (current rate of £2.50) every day. The fare will allow customers to make unlimited journeys within the allotted times on the specified day.

When will this be Delivered?

Stagecoach will continue our offer of reduced maximum fares in the evenings throughout the course of the Partnership.

Fares

Extend Ticket Retail Channels

What is it?

Stagecoach has participated in a multi-operator scheme for many years and will continue to participate and promote the delivery of schemes that support a more efficient and integrated customer experience, in line with the 'Seamless Digital Experience' (see Appendix 6.1 section B.2). We propose the following initiatives to improve ticket purchasing:

Utilising TfGM Digital Channels

Stagecoach propose that TfGM sell Stagecoach single operator bus tickets through its digital channels (web and app) in addition to its current Travelshop retail channel. It is acknowledged that this would be subject to agreeing the commercials on any commission rates. Stagecoach will, however, make the multi-operator ticket the main retail focus.

Promoting Multi-Operator / Multi-Modal tickets

In line with TfGM's aspirations to enhance the use of multi-operator / modal tickets, Stagecoach will work to raise the multi-operator scheme's profile by promoting multi-operator tickets. Following this, we will promote multi-modal tickets that include the tram, and once in place, multi-modal tickets that include trains.

The proposed Governance Framework (see section 3.1.1) makes recommendation for replicating current GMTL Board – System One to accommodate these initiatives.

When will this be Delivered?

Stagecoach will promote the sale of multi-operator and multi-modal tickets including tram within year one of the South Manchester Partnership. Stagecoach requests that TfGM endeavours to sell Stagecoach single operator bus tickets through its digital channels within year one of the Partnership.



Stability

Consultation & Stability of Route Changes

What is it?

Stagecoach will promote transparency over South Manchester route changes, delivering and acting upon best practice when engaging key stakeholders. To do this, we propose the following initiatives:

Increasing the Minimum Notice Period for Route Change Consultations

Stagecoach propose that the current minimum of 10 weeks' notice to TfGM be increased by an additional 28 days. This will provide additional time to consult on any route changes across the South Manchester network that Stagecoach currently operates, before registering a change with the Traffic Commissioner.

Sharing the Schedule of Change and Adhering to Dates

Stagecoach will share the schedule for route changes with TfGM so that they have a clear view of upcoming impacts to Stagecoach operated routes. We will continue to adhere to the recognised change dates to allow for forward-planning and to publish changes earlier to limit the disruption to customer journeys.

Consultation Good Practice Guide

The partnership in conjunction with TfGM will develop and adopt a good practice guide on how customer and political stakeholder management consultations should be conducted. The objective of this is to influence the behaviours of other operators.

When will this be Delivered?

Stagecoach propose to enact the commitment to increase the current minimum notice by 28 days at the start of the Partnership. The schedule of change will be shared annually in February following Stagecoach financial planning with an interim update meeting in August.

The best practice guide will be in place for day one of the Partnership.

Stability

Provide Route Performance Data for Unprofitable Routes

What is it?

Stagecoach will provide quarterly performance data for any routes that are not covering marginal costs and are at risk of revision.

Any route that is not recovering its costs will be reported using the following report parameters: Service number; total revenue; running costs; operating costs; % margin for each of those services. The information and reporting format will be discussed as part of the agreed governance structure.

The goal of reporting on this data is to enable TfGM to proactively address financial concerns and plan for potential route changes to ensure minimal to no disruption of customer journeys.

When will this be Delivered?

Stagecoach will deliver this information by day one of the South Manchester Partnership.



Stability

Performance Accountability

What is it?

Performance Accountability is central to our proposition and is an equivalent offer to the Performance Regime in Franchise. It is expected to include key quality metrics, such as reliability, journey times and vehicle requirements with stated measures and tolerances. Underperformance against the measures would incur a penalty. Stagecoach expect to be held accountable for our performance and as such would expect the performance indicators on which we will be measured by to be within our / the operator's control. Events such as late planned roadworks and music / sports events should not be measured and penalised in the same way.

When will this be Delivered?

Stagecoach will provide and adhere to performance measures within the first six months of the South Manchester Partnership.

Stability

Commercialise [REDACTED] Tendered Services

What is it?

Stagecoach will commercialise a proportion of any current tendered route [REDACTED]. Accordingly, Stagecoach will operate these services which are not currently economic, foregoing the subsidy which Stagecoach had tendered for previously. [REDACTED]

Stagecoach's aspiration via the South Manchester Partnership Fund (see section 1.4.2) is that these savings are reinvested in schemes within South Manchester, such as kick-starter services (see Appendix 6.1 initiative D.5 for more examples).

When will this be Delivered?

[REDACTED]



Community & Social

Support for the Unemployed

What is it?

Stagecoach will continue to support and promote jobseekers in Greater Manchester by continuing to offer a scheme that allows customers who present their Jobcentre Plus card to receive half-priced single fare tickets.

Additionally, Stagecoach will continue working with TfGM and their offer of providing free journeys to unemployed people or the recently employed. This is offered in partnership with TfGM, System One and Jobcentre Plus to ensure unemployed people do not struggle with travel costs whilst searching for employment. This scheme offers a range of travel tickets from a single day pass to a 28-day period pass. This pass can be obtained through an individual's Jobcentre Plus advisor or their Work Programme by a customer who has gained employment and is signing off the out of work benefit they are currently receiving.

When will this be Delivered?

Stagecoach will continue our scheme that offers unemployed half price tickets, and our partnership with TfGM and the Job Centre to provide free travel for unemployed people for the duration of the Partnership.

The detail of the full Proposition which describes the problem statements, opportunities, description of initiatives, benefits and delivery target dates for every proposed initiative offered can be found in Appendix 6.1.





2.2.1 Comparison of the Partnership to the Franchise Scheme









We believe that our proposed South Manchester Partnership is an appropriate alternative which, working together with a franchise system in the North, would deliver all of the objectives identified for the area more quickly and at lower cost and risk, whilst reducing reliance on the national and local public purse. This Partnership approach will allow us to demonstrate that we are truly “doing buses differently”.

We believe that our Partnership proposal at least equals the objectives of franchising in 12 areas and exceeds them in 20, the assessment of ‘exceeds’ has primarily been made by the expediency of delivery. Additionally, there are 7 initiatives that we believe represents a substantially bigger material commitment, as they are not specified within the GMCA/consultation documentation.

The below table shows how the proposed South Manchester Partnership either meets or exceeds the objectives set out in the GMCA/TfGM Transport Strategy and commitments made in the proposed Franchise scheme:

| | GMCA Objectives/Franchise Scheme will... | Comparison | South Manchester Partnership Offer will... |
|----------------------------------|---|---|--|
| A. Operations & Fleet Investment | <ul style="list-style-type: none"> Take guidance from GMCA on which vehicles to be used (Franchise) Propose a 7 year average vehicle age (Franchise) |  Quicker Delivery | <ul style="list-style-type: none"> Ensure an average vehicle age of 7 years by the end of 2023 Ensure a maximum vehicle age of 15 years |
| | <ul style="list-style-type: none"> Ensure all buses fitted with audio and visual communication systems (GMCA) |  Quicker Delivery | <ul style="list-style-type: none"> Ensure all buses fitted with audio and visual communication systems by the end of 2023 |
| | <ul style="list-style-type: none"> Ensure all buses to be Euro 6 compliant or better sooner than the current predicted date of 2030 with an aim of achieving this by 2024 (GMCA) |  Quicker Delivery | <ul style="list-style-type: none"> Ensure all buses will be Euro 6 compliant by September 2021 |
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | Enhance service delivery to reduce the impact of incidents by: <ul style="list-style-type: none"> Funding additional Signal Engineer within TfGM Urban Traffic Control (UTC) Fund additional inspector resource within UTC for better monitoring and informing of accidents |
| B. Customer | <ul style="list-style-type: none"> Consistent and comprehensive information provision (Franchise and GMCA) Present information in an easy to understand way on a number of channels (GMCA) Adapt to new technology and the integration of different travel services, often called ‘Mobility as a Service’ (GMCA) |  Materially Exceeds / Quicker Delivery | <ul style="list-style-type: none"> Provide the digital and back office infrastructure for both the app and the website Provide a technology managed service to TfGM for both future Franchised and Partnership areas |
| | <ul style="list-style-type: none"> Provide a single point of contact for customers to make enquiries and to resolve issues (Franchise and GMCA) |  Meets | <ul style="list-style-type: none"> Provide a single point of contact for customers to make enquiries and to resolve issues |
| | <ul style="list-style-type: none"> Provide accurate information that is up to date, consistent, correct and where relevant, in real time (Franchise and GMCA) |  Quicker Delivery | <ul style="list-style-type: none"> Provide the data required for TfGM to feed into customer facing journey planning, tracking and wayfinding technology Comply with open data regulation |
| | <ul style="list-style-type: none"> Provide consistent service standards (Franchise) |  Meets | <ul style="list-style-type: none"> Publish an annual commitment to customers, including targets on service standards and report performance |
| | <ul style="list-style-type: none"> Commit to a high standard of cleanliness across all services. All buses to receive external clean daily; light interior clean pre-service; interior deep clean once a month (GMCA) |  Materially Exceeds | <ul style="list-style-type: none"> Work with TfGM to implement mid journey cleaning for all main corridor services |
| | <ul style="list-style-type: none"> Propose accelerated roll out of Wi-Fi (Franchise) |  Quicker Delivery | <ul style="list-style-type: none"> Implement Wi-Fi on all our buses |
| | <ul style="list-style-type: none"> Employ additional customer service staff / additional ticketing inspectors (Franchise) |  Meets | <ul style="list-style-type: none"> Retain inspectors throughout the course of the Partnership and deploy additional customer experience staff |
| | <ul style="list-style-type: none"> Implement a unified brand for the bus network (Franchise and GMCA) |  Meets | <ul style="list-style-type: none"> Adopt the appropriate TfGM led (franchise proposed) branding and to achieve a near identical brand across Greater Manchester |
| | <ul style="list-style-type: none"> Improve driver training (Franchise) Improve driver behaviour (GMCA) Ensure appropriate professional standards and training of drivers (GMCA) Ensure drivers undertake appropriate customer service training within the last year within three years of intervention (GMCA) |  Materially Exceeds | <ul style="list-style-type: none"> Continue to offer best in class training and seek to raise the industry standard within the Greater Manchester region Offer a Bus and Coach Engineering Technician Level 3 Apprenticeship Programme and a Bus & Coach Level 2 Apprenticeship Programme to small and medium sized operators Make Stagecoach driver training available to small/medium sized operators |

| | GMCA Objectives/Franchise Scheme will... | Comparison | South Manchester Partnership Offer will... |
|-----------------------------------|---|--|---|
| C. Fares, Ticketing & Retail | <ul style="list-style-type: none"> Provide universal ticket and fares structure across Greater Manchester and a significant reduction in number of tickets available (Franchise) |  Meets | <ul style="list-style-type: none"> Reduce the numbers of fare bands Permanently introduce carnet tickets Provide flat fares for adults travelling on buses between 19:00 - 24:00 (current rate of £1.50 for shorter trips and £2.00 for longer) and 24:00 - 04:00 (current rate of £2.50) every day Provide a Single Suite of Period Tickets |
| | <ul style="list-style-type: none"> Make period tickets valid on any bus service within one year of an intervention (Franchise and GMCA) |  Meets | <ul style="list-style-type: none"> Participate with TfGM and other operators in the delivery of a multi-operator arrangement Raise the multi-operator scheme profile by promoting multi-operator tickets on buses and online. Subject to integration with Tram and Rail, multi-modal tickets will also be promoted Propose that TfGM offer a policy to allow a buyer of a ticket for a commercial service, to use it on a tendered service |
| | <ul style="list-style-type: none"> Standardise single fares so that there are similar fares for similar journeys within one year of intervention (GMCA) |  Meets | <ul style="list-style-type: none"> Understand the fare stage distance proposed in the franchise area and seek to achieve standardisation Phase out historical tickets to support the simplified ticketing principle |
| | <ul style="list-style-type: none"> Cap products in the bus network (for day and week tickets) as soon as possible (GMCA) Introduce multi-modal capped products as soon as possible (GMCA) |  Quicker Delivery | <ul style="list-style-type: none"> Cap fares on all Stagecoach buses by Summer 2021 Create a plan to introduce fares capping with both bus and Metrolink along similar timeframes Commit to a future multi-operator fare capping system which works with the Franchised and South Manchester Partnership bus services |
| | <ul style="list-style-type: none"> Improve efficiency and integration, balancing affordability with social and economic objectives (Franchise) Take a framework approach to consider any further discounted tickets within one year of intervention (GMCA) |  Meets | <ul style="list-style-type: none"> Continue to participate in the existing schemes and to cooperate on any broader Greater Manchester scheme initiatives |
| D. Network Planning & Performance | <ul style="list-style-type: none"> Ensure a high standard of reliability, punctuality and regularity is maintained across the network (GMCA) Provide a range of measures which are related to objectives (Franchise) Speed of bus journeys stabilises or improves in each year with no deterioration within three years of intervention (Franchise) The bus service provides journeys that take as short a time as possible (Franchise) |  Materially Exceeds | <ul style="list-style-type: none"> Increase the minimum notice period for route change consultations Share the delivery schedule of change and adhere to date changes Provide a full suite of KPI, Performance, Metrics reporting, including monthly data for any routes that are not covering marginal costs / are at risk of revision Commercialise [REDACTED] tendered route [REDACTED] Ensure the South Manchester Partnership Fund and TfGM work with others (Highways / Districts) to implement congestion reducing measures |
| | <ul style="list-style-type: none"> Implement a performance regime for operators under contract to GMCA with financial penalties to manage their reliability and punctuality (Franchise) |  Meets | <ul style="list-style-type: none"> Participate in Performance Accountability Regime which is similar to that used in Franchised area. This includes key quality metrics, such as reliability, journey times and vehicle requirements with stated measures and tolerances |

| E. Community & Employee | GMCA Objectives/Franchise Scheme will... | Comparison | South Manchester Partnership Offer will... |
|-------------------------|---|--|--|
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | <ul style="list-style-type: none"> Continue current partnership with a suitable Waste Services supplier so they recycle 100% of the waste from Stagecoach vehicles |
| | <ul style="list-style-type: none"> Franchisees will be expected to continue with the TfGM offer to provide free journeys to unemployed people or the recently employed (whilst not specified in the Franchise Scheme, it is assumed to be a minimum requirement) |  Meets | <ul style="list-style-type: none"> Continue scheme that allows customers who present their Jobcentre Plus card to receive half-priced single fare tickets Continue working with TfGM with their offer of providing free journeys to unemployed people or the recently employed |
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | <ul style="list-style-type: none"> Continue to partner with charities who work within Greater Manchester |
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | <ul style="list-style-type: none"> Participate in the Greggs Breakfast Club Programme in Manchester |
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | <ul style="list-style-type: none"> Pay the entirety of the permanent and fully trained workforce the Real Living Wage |
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | <ul style="list-style-type: none"> Continue to work with trade unions to better engage the workforce Continue to engage with our employees, and track progress through annual engagement surveys |
| | <ul style="list-style-type: none"> Not Specified |  Materially Exceeds | Ensure employee wellbeing and mental health: <ul style="list-style-type: none"> Health and wellbeing champions Counselling service Time to talk pledge Employee interaction platforms Employee magazine Local recognition schemes |
| E. Community & Employee | <ul style="list-style-type: none"> Active management to improve safety in partnership with the police |  Meets | <ul style="list-style-type: none"> Continue to participate within the TravelSafe Scheme |

The below table shows the GMCA and Franchise commitments and objectives that are not directly comparable within the South Manchester Partnership, due to the scope of the Partnership being South Manchester and therefore, whole network commitments cannot be directly compared.

| Notable but not Comparable Objectives | GMCA Objectives/Franchise Scheme will... | Comparison | South Manchester Partnership Offer will... |
|---------------------------------------|---|--------------------------------|---|
| | <ul style="list-style-type: none"> Run bus services with a view of being net revenue neutral (Franchise) Use all income for the bus service to provide the best service possible (Franchise) | N/A Not Directly Comparable | <ul style="list-style-type: none"> Assign contributions derived from realised savings and profit share from all Partnership members and TfGM to a fund for reinvestment Provide a robust Governance Framework which creates an environment where incentives are aligned |
| | <ul style="list-style-type: none"> Lay on additional resource to monitor and manage performance. (Franchise commitment) Control planning of entire network, enabling more efficient resource allocation (Franchise) | N/A Not Directly Comparable | <ul style="list-style-type: none"> Provide a robust Governance Framework with the creation of a Network Planning Board that provides greater visibility and network planning control. This Board reports to the Partnership Strategy & Delivery Board and in turn to the Executive Board |
| | <ul style="list-style-type: none"> A single accountable organisation for all franchised bus services in Greater Manchester | N/A Not Directly Comparable | <ul style="list-style-type: none"> Achieve Partnership accountability, through the Performance Accountability initiative, in addition, through the proposed robust Governance Framework it will achieve an appropriate level of responsibility and accountability for operators, TfGM and GMCA |

2.3 Benefits

2.3.1 Key Benefit Themes

As part of the principle of ensuring transparency and accountability, we have identified the following key benefit themes. It is by these benefits and outcomes that we will measure ourselves. We firmly support the overarching Greater Manchester Transport Strategy 2040 and Vision for Greater Manchester, and are driving towards the same outcomes with our proposed South Manchester Partnership.

Below is a summary of the key benefits we forecast will be achieved through the Partnership. The benefits described have been formed on a basis of achievability across any operators that participate in the South Manchester Partnership.

Figure 1.7



2.4 The Expedited Timeline for Change

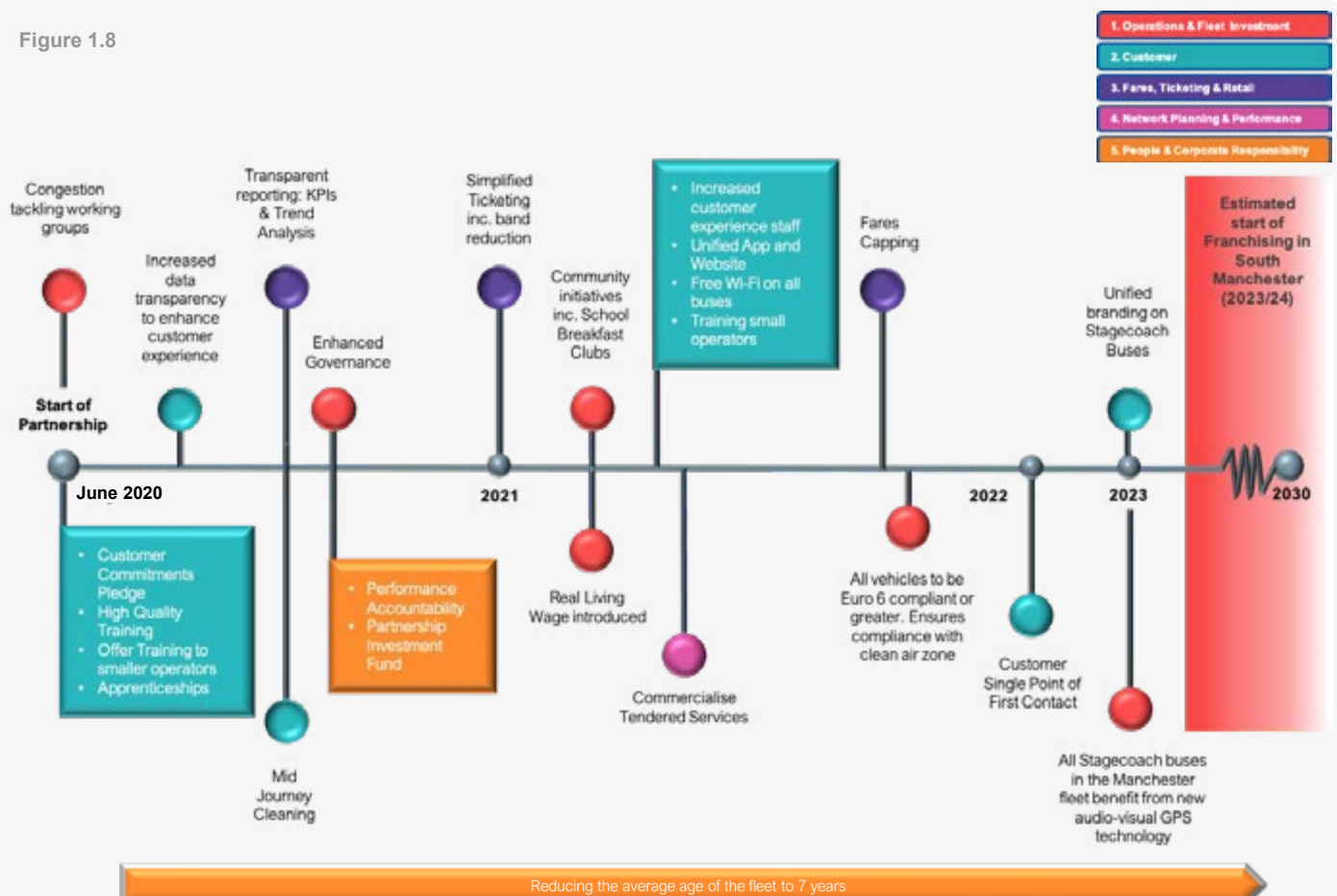
We recognise the need for significant change and the need for the GMCA to be able to signpost improvement with immediate effect. As such, we will expedite the implementation of the proposed initiatives by the end of 2023. To ensure a strong start and to signify a step-change to customers and the community, we propose a number of initiatives to be implemented and in place at the start of the Partnership. Details of our roadmap are shown in Fig. 1.8.

This expediency can benefit the proposed franchising programme across the remainder of Greater Manchester through the early introduction of a number of schemes in the south, using this area to provide proof of concept to the GMCA for a number of its schemes, whilst offering economies of scale for investments in to complex and expensive areas such as ticketing and retailing.

2.4.1 10-year Roadmap

We are confident that we can mobilise our plans, based upon our vast experience in mobilising large programmes of work, and would look to work with the GMCA to introduce a South Manchester Partnership from June 2020. This would require a high level of co-operation throughout early 2020.

Figure 1.8



We already have in place and will continue to do the following:

- Flat fares on evening services
- Multi-operator ticketing
- Carnet Tickets
- Socio-economic discounts
- Retaining inspectors
- 100% Recycling
- Provide data for journey planning and wayfinding tools
- Support for the unemployed
- TravelSafe scheme
- Employee engagement
- Charity and Community engagement

There is significant effort required to set up and mobilise implementation in order to achieve the proposed deliverables within this roadmap. Stagecoach will continue to offer the programme leadership and management to ensure a robust and effective programme of work is planned and delivered upon. It is imperative this planning commences early January and includes involvement and sponsorship from our key external stakeholders, including TfGM.

3. Governance Framework & Reporting

3.1 Governance

A robust governance framework will ensure compliance to the principles set (see section 1.3.2) and will create a foundation of control for how the South Manchester Partnership is run throughout its term, it will also provide the correct level of accountability and responsibility for the continuous review, check, test and improvement of the services the Partnership provides to customers.

Our proposed governance framework ensures robust and appropriate transparency and accountability, meaning that the network planning and value for money aspirations of the GMCA are met. At the same time, our proposed partnership approach allows the GMCA to address the key areas where it can best support better bus use, principally through delivering better infrastructure and less road congestion. This in turn will lead to better bus journeys and a more economically and environmentally sustainable public transport network.

It is understood that the Partnership will require joint control and accountability from various roles and organisations, including TfGM and GMCA and therefore, we have considered those roles intrinsically within the framework.

We propose that the top tier of governance (Tier 0) is chaired by the Mayor, the annual frequency of the South Manchester Partnership Executive Board is devised to be a face-to-face meeting and we expect communications and visibility to this board to run throughout the year via the regular reporting proposed through Tier 1 and 2 of the framework.

3.1.1 Governance Structure

A simple 3-tiered structure is proposed:

Figure 1.9

| | Outputs | Members | Frequency |
|------------------------------------|---|---|--------------------------|
| Tier 0 | South Manchester Partnership Executive Board | | |
| | <ul style="list-style-type: none"> Ultimate executive leadership of the Partnership | <ul style="list-style-type: none"> Chair – Mayor, TfGM – CEO, COO & ED Participating Operators– CEOs & COO's | Annual |
| Tier 1 | South Manchester Partnership Strategy & Delivery Board | | |
| | <ul style="list-style-type: none"> Agree Partnership annual Business Plan and report progress to Executive Board. TfGM to share annual transport plans for GM Bi-Annual report to CA / Quarterly reporting to Transport Committee Agree Overall KPI's and review / challenge working group reports Agree expenditure plans from Partnership Investment Fund | <ul style="list-style-type: none"> TfGM COO (or equivalent) TfGM Partnership Contract Managers Participating Operators – COOs / MDs | Bi-Annual Month 1 & 6 |
| Tier 2 | Working Groups | | |
| Customer Board | <ul style="list-style-type: none"> Agree annual Customer Commitments Set Customer Pledge targets and report performance Customer Insights to inform Partnership Fares and Ticketing Plans Discuss and track Brand implementation Stewardship of Travel Safe activities | <ul style="list-style-type: none"> TfGM Participating Operators – MD, Commercial Director, Head of Service Delivery (or equivalent) External (Transport Focus?) | Quarterly |
| Operations Board | <ul style="list-style-type: none"> Agree and measure Operations KPIs Agree and measure Emissions KPIs Agree and measure Congestion KPIs and facilitate congestion forum Assess operator led interventions and improvements Create sub-working groups for initiatives set | <ul style="list-style-type: none"> TfGM Participating Operators – MD, Operations Director, Engineering Director | Quarterly |
| Network Planning Board | <ul style="list-style-type: none"> Agree and measure Network Planning KPIs Quarterly Performance Meeting Agree and implement consultation Best Practice Consider future tendered service requirements Oversee and make recommendations for Partnership Investment Fund | <ul style="list-style-type: none"> TfGM Participating Operators – MD, Commercial Director Consideration Local Authority – Road Space engagement involvement | Quarterly |
| Fares & Ticketing Board | <ul style="list-style-type: none"> A Multi-Operator Board (replicating current GMTL Board – System One) Form Fares and Ticketing structure, to be cognisant of TfGM Fares Policy and regulatory requirements and procedure Strategies for Multi-Operator initiatives Schemes | <ul style="list-style-type: none"> TfGM – Commercial Director, Metrolink Representative Rail (TfN, Others TBC) Business Representatives Operators – Commercial Director | Quarterly |

3.1.2 Engagement

It is recognised that regular and appropriate communications will need to be maintained throughout the Partnership, with all Greater Manchester bus operators, District Leaders, Business Representatives, as well as industry stakeholders and influencers. We propose the Partnership will facilitate this further by hosting an annual event to share Partnership best practice and to present the forward looking Partnership Business Plan.

3.2 Reporting

As partners, there is opportunity to share information and collaborate to increase performance and better run bus services across Greater Manchester. For maximum success of the Partnership, it will require a robust governance structure and effective reporting mechanisms at an operator and whole industry basis. This reporting should be used to identify and proactively manage risks and issues before they crystallise and should be used to actively identify improvements and share best practice within the Partnership and across Greater Manchester.

3.2.1 Reporting Schedule

Stagecoach is dedicated to providing full transparency and ensuring we hold ourselves accountable. Stagecoach will provide a full suites of Key Performance Indicators, Performance, Metric and Governance reporting, with specific focus on the following:

Figure 1.10

| | Monthly | Quarterly | Six-Monthly | Annually |
|------------|---------------------------------------|--|---------------------------------------|--------------------------------|
| Governance | | Customer Board Reporting Suite | Partnership Strategy & Delivery Board | Partnership Executive Board |
| | | Operations Board Reporting Suite | | Annual Business Plan |
| | | Network Board Reporting Suite | | |
| | | Fares Board Reporting Suite | | |
| Customer | Performance Accountability | Customer Commitments Tracking | | Customer Commitment Definition |
| Operations | | Operations, Emissions & Congestion KPI reporting | Emission Reduction Reporting | |
| Network | Network Performance Metrics Reporting | Trend Analysis Reporting | | Route Change Schedule |
| | | Unprofitable Route Reporting | | |

3.2.2 Specific Reports

Customer

Performance Accountability

Stagecoach will partake in a performance regime similar to that adopted in the Franchise area, that would ensure a consistent level of quality across South Manchester Appendix 6.1 initiative D.2 for more detail).

Customer Commitments Definition and Tracking

Stagecoach propose publishing an annual commitment pledge to customers to protect transparency and drive accountability for the quality of service (see Appendix 6.1 initiative B.5 for more detail).



Operations

Operations Emissions & Congestion KPIs

Within Operations Governance Board, detailed in the Governance Framework (see section 3.1.1), Stagecoach will set and report on Emissions and Congestion KPIs. The reporting parameters and format will look to mirror what has been agreed in the multi-operator VPA, where appropriate.

Emissions Reduction

Stagecoach will work with TfGM to develop a joint plan on how to reduce emissions within the Greater Manchester area. This plan will be developed, aligned with TfGM's Clean Air Plan, with a set of KPIs against which Stagecoach will hold ourselves accountable. This plan be reviewed on a semi-annual basis and adjustments made in line with any new initiatives or legislation. Greater Manchester is currently developing Clean Air Plans to bring levels of NO2 on local roads to legal limits as soon as possible and as such alignment between TfGM and Stagecoach to a tangible and measurable emissions reduction plan is key to ensuring consistency and continual improvement to air quality within the Greater Manchester area.

Stagecoach will develop an annual plan with TfGM at the start of each South Manchester Partnership Year (June), with a 6-month checkpoint to review and refine any objectives and KPI's agreed to at the beginning of the year.



Network

Network Performance Metrics

Stagecoach will publish an aggregated network metrics report monthly. Stagecoach consistently report on: passenger journeys, punctuality, passenger growth/decline, average passenger per journey, financial contribution, complaints and lost/operated mileage. Stagecoach would also encourage other operators to do the same.

Network Trend Analysis

Stagecoach will use performance metrics to identify good and variable areas of performance and conduct research to understand the reasons behind and performance variance. Stagecoach will use this information to recommend changes. The analysis will be performed in house on a quarterly basis by a Stagecoach employee. Stagecoach will take the findings of this analysis to Network Performance Meetings.

Consultation and Stability of Route Changes

Stagecoach will share the schedule of change and adhere to change dates. The delivery schedule of change will be shared annually in February following Stagecoach financial planning with an interim update meeting in August (see Appendix 6.1 initiative D.1 for more detail).

Provide Route Performance Data for All Routes Which are Not Covering Marginal Costs

Stagecoach will provide TfGM with quarterly performance data for any routes that are not covering marginal costs and are at risk of revision. Any route that is not recovering its costs will be reported using the following report parameters: Service number; total revenue; running costs; operating costs; % margin for each of those services. The goal is to proactively address financial concerns to ensure minimal to no disruption of customer journeys. Stagecoach will deliver this information by day one of the Partnership. The information will be discussed as part of the agreed Governance Framework.



4. The Legal Framework

Stagecoach is confident that the proposed South Manchester Partnership and its objectives can be achieved within the existing statutory legal framework available to TfGM and operators.

It is intended that the South Manchester Partnership is initiated by way of a Voluntary Partnership Agreement ("VPA") between Stagecoach and TfGM, with certain essential elements linked to the establishment of one or more Advanced Quality Partnership Scheme ("AQPS") on key corridors in South Manchester. A VPA template is in draft based on the best practice of previous VPAs. This will be developed further with TfGM, to be agreed ahead the commencement of the Partnership.

Although a Voluntary Partnership Agreement between TfGM and Stagecoach (and potentially other operators) can achieve many of the initiatives and measures, it should be noted that it may not go far enough in securing benefits for TfGM and bus passengers. Clearly, TfGM would wish to ensure all operators operating in South Manchester (currently or in the future) are committed to maintaining high standards. Further, it would be counterproductive and unfair not to ensure that all operators providing services in the Partnership will adhere to the relevant standards. This can be achieved through the introduction of one or more AQPS, which would apply to all operators providing local bus services on the key corridors. It is envisaged that the AQPS would be made by TfGM within a reasonable period of time, which would allow the relevant statutory procedures to be complied with and then for other operators to adjust.

Our legal analysis has not identified any obstacle to achieving the objectives of the South Manchester Partnership through the measures and provisions proposed. In particular, the competition tests under Schedule 10 of the Transport Act 2000 appear capable of being met in relation to the terms of the VPA and supporting AQPS. However, care is required to ensure that the implementation of the initiatives complies with relevant areas of law and will necessarily be subject to further discussion with relevant regulatory stakeholders.

5. Dependencies & Assumptions

A number of key assumptions and dependencies have been identified in order for the South Manchester Partnership to be most effective.

Partnership Start Date & Duration

- June 2020 for 10 years

Legal Framework

- It is intended that the South Manchester Partnership is initiated by way of a Voluntary Partnership Agreement ("VPA") between Stagecoach and TfGM, with certain essential elements linked to the establishment of one or more Advanced Quality Partnership Scheme ("AQPS") on key corridors in South Manchester. A negotiation will be required and is expected to take place in early 2020 and will be undertaken by suitably experienced and authorised individuals from both TfGM and the operators within the Partnership.
- It will be important to ensure that implementation also fits within the relevant legal parameters and it will be necessary to consult regulatory stakeholders in this regard.

Commercial Freedoms

- South Manchester will remain a truly commercial market, where any operator can provide bus services at their own risk. This will be subject to the standards set out and agreed in the AQPS process.

Initiatives within the South Manchester Partnership

- We have formulated the Proposal as a package.
- Unless an alternative funding source is expressly referenced within an initiative, all initiatives should be funded by the appropriate operator at their own commercial risk.
- A number of initiatives will require IT or external deliveries to conclude before the initiative can in turn deliver. Therefore a close dependency review with these projects is required throughout implementation.

Central Funding

- Euro 6 Compliancy is subject to agreed Defra funding for retro-fitting.
- Through the Tier 1 governance meeting, detailed in the Governance Framework (see section 3.1.1), TfGM and Stagecoach will work collectively to maximise central funding opportunities for the benefit Partnership area (other operators can work equally as collaboratively with TfGM).

Policy & Governance

- TfGM and members of the Partnership are required to fully participate in the Governance Framework (see section 3.1.1).
- A requirement within the proposed governance is to create a Multi-Operator Board, which would broadly replicate the current GMTL Board – System One.
- TfGM to agree that Stagecoach can use its facilities to dispose of waste and keep their cleaning equipment on site.
- TfGM and members of the Partnership to fully participate in the Partnership Investment Fund.
- A number of commercial negotiations will be required to be resolved in order to commit and commence with the Partnership.
- The Partnership term is proposed as 10-years, therefore, initiatives will remain active during its term, there is an assumption that the proposed governance will monitor the Partnership in the closing years of its term to ensure the Partnership is handled in the most appropriate way. There is however, a clear level of uncertainty today, of what post 10-years will entail.

Ticketing & Retail

- Multi-operator tickets will still exist (known today as System One), with a revised Governance Framework (see section 3.1.1) in place to reflect a different ownership for bus services in the new model. A transitional governance will also need to be agreed.
- Single operator tickets will still exist in South Manchester and a Northern multi-operator ticket (to cover services in sub areas A & B) will be created to cover journeys wholly within the franchised area.
- A policy will need to be developed that allows ticket acceptance on tendered services.
- TfGM and members of the Partnership are required to create fare capping rules that will include the wider franchising space.
- TfGM to agree to sell Stagecoach tickets through their digital retail channels.
- TfGM to agree for Stagecoach to commercialise a number of tendered services.
- The fares described within this document, are not committed to be frozen for the duration of the Partnership, the appropriate fares setting reviews and changes would still take place and therefore, fares may change during the course of the Partnership.

Resourcing

- Any resources funded by Stagecoach that are under the working control of TfGM e.g. the Urban Traffic Control Room will require confirmation of responsibilities, full systems access and support to fulfil the role.

Branding

- TfGM and Stagecoach must work together to determine how to brand Stagecoach vehicles with TfGM-led (franchise proposed) branding, unify TfGM and Stagecoach's app and website and unify TfGM and Stagecoach's digital communications channels and real time information.

Data Sharing, Reporting & Improvement Plans

- A joint data strategy will need to be agreed upon, which will include what data will be shared between which parties, data ownership and data processing.
- A plan will be required to be built, jointly, between Stagecoach, TfGM and other participating operators.
- Stagecoach will work with TfGM to build requirements for a unified customer app and website.
- Stagecoach will work with TfGM to form the strategy, requirements and schedule for delivering a single first point of contact for customer support.
- TfGM and members of the Partnership are required to equally share data to achieve the collective data strategy.

Commercial in Confidence
Not for Distribution and
Subject to Agreement

6.1 South Manchester Partnership – Detailed Proposition

This Proposition articulates the details of the South Manchester Partnership in terms of the initiatives and propositions offered. It lays out the problem statements, opportunities, description of initiatives, benefits and delivery target dates for each initiative offered.

It will remain under review and development, with additional feedback, requirements refinement and commercial negotiation to be captured in the future to ensure that this remains relevant to both customers and operators. It is not intended to detail how to implement any of the requirements or limit the implementation of the requirements.

This Proposition supports the offering of an alternative to franchising in South Manchester and is reliant upon the effective interaction of several key stakeholders, including TfGM, GMCA and operators. Further work will be required to engage these stakeholders and customers to understand and refine their requirements.





A.1

Vehicle Age & Investment

Reduce Fleet Age

Franchise Match:



Exceeds

Challenge/Opportunity

Pollution is costing the public their health, and the NHS is spending hundreds of millions per year linked to health conditions associated with air pollution exposure⁵. The GMCA has set itself ambitious emissions goals within their Clean Air Plan, which are dependent on the compliance and action of bus operators to introduce new vehicles that emit fewer greenhouse gas emissions.

What is it?

Stagecoach will support and accelerate the GMCA's Clean Air Plan through the following initiatives:

Average Vehicle Age

Stagecoach will reduce the average age of our fleet in Manchester from [redacted] years (the average age of vehicles currently operating in Manchester today) to 7.0 years by replacing older buses with new, more environmentally friendly vehicles. We will ensure this age is maintained over the duration of this partnership. To achieve this fleet profile, Stagecoach will acquire [redacted] buses in the first 3 years. This is in addition to the 32 electric vehicles that will be purchased shortly before the South Manchester Partnership starts.

Maximum Vehicle Age

TfGM currently has a policy in place stating the maximum operating age of a vehicle within Greater Manchester is 15 years. We will maintain this maximum age for our fleet. This will be achieved in tandem with reducing the average fleet age to 7.0 years by replacing the oldest vehicles.

When will this be Delivered?

Stagecoach will reduce the average age of our fleet to 7.0 years old by December 2023 and will maintain a maximum fleet age of 15.

Benefits

Reduced Pollution and Environmental Impact



Lower average age of the fleet and a minimum age reduces emissions from vehicles and has a positive impact on the population health

Better Customer Experience



Experience on newer vehicles is more positive due to improved features (e.g. WiFi, audio-visual information systems)

A.2

Vehicle Age & Investment

Fit/Retro-Fit Audio-Visual to all Vehicles

Franchise Match:



Exceeds

Challenge/Opportunity

TfGM have stated their goal to make public transport within the city inclusive and accessible to all within their Greater Manchester Transport Strategy 2040. Getting a bus can be confusing for passengers if they are not familiar with the route or area and can be a deterrent from using a service. Audible and visible next steps and route information systems are one way to mitigate this challenge, encouraging more people to use buses which inform them of where they are on their journey and what the next stop is.

What is it?

Stagecoach will improve accessibility across our entire fleet by extending the introduction of audible and visible information systems.

Audio-visual information systems will be retro-fitted on all Stagecoach buses that do not currently have them, and all new buses will be fitted with the systems at purchase. These systems use GPS technology to share real-time next stop information, allowing all passengers to be aware of their location on the route. They announce and show customers what the final destination on the route is, reassuring them that they are on the correct bus.

When will this be Delivered?

When the Partnership starts we will have 52 buses fitted with audio-visual information systems. Stagecoach will fit audio-visual information systems on the remaining [redacted] buses in the fleet by December 2023.

Benefits

Increased Accessibility



People with disabilities can use the service more easily

Better Customer Information



Customers easily receive information in a more timely and user-friendly way

Improved Safety



Drivers not getting distracted by questions from passengers



Challenge/Opportunity

Buses are a significant contributor to the UK's air quality problems⁶. The GMCA Clean Air Plan to ensure the reduction of pollution within Greater Manchester requires that all buses be Euro 6 compliant by September 2021. Efforts to reduce pollution can be further accelerated with the use of ultra-low or zero-emission vehicles.

What is it?

Stagecoach will work to improve air quality in Greater Manchester by increasing the number of Euro 6, ultra-low and zero-emission buses on the road ahead of the current Confederation of Passenger Transport ambition of 2025. In line with commitments to the U.K Government emissions reduction pledge, we will also purchase Euro 6, ultra-low or zero-emission vehicles for every new vehicle we purchase, for operation within the South Manchester Partnership from the start of the Partnership.

Euro 6 Compliance

Compliance will be executed through a combination of new vehicle purchases and retro-fitting older vehicle engines. We will retro-fit [REDACTED] buses by September 2021, subject to Defra funding and agreed terms for retro-fit.

Ultra-Low or Zero-Emission Vehicles

As part of the commitment to ensure our fleet are Euro 6 compliant, Stagecoach will utilise a balance of new vehicles (which are Euro 6, ultra-low or zero-emissions) and Euro 6 retro-fits. By September 2021, 45% of our South Manchester fleet will be better than Euro 6 compliant as they will be ultra-low or zero-emission vehicles.

When will this be Delivered?

Stagecoach currently operates [REDACTED] Euro 6 compliant or ultra-low / zero-emission vehicles which meet the future standards set by Greater Manchester. We commit to delivering a Euro 6 compliant fleet in Manchester by September 2021 (based on a current fleet size of [REDACTED]) and continuing to upgrade our fleet based on the profile outlined above.




Benefits

Reduced Pollution and Environmental Impact



Reduced emissions from vehicles contribute to a lower-carbon environment and align with the GMCA Clean Air Plan to reduce pollution across Greater Manchester



| Challenge/Opportunity | What is it? | Benefits |
|---|--|--|
| <p>In recent years congestion in Manchester has worsened due to lack of restraint on car use, increased focus on the development of the regional centre, the availability of cheap car parking and lack of highways resilience as roads are at capacity in the peaks. This has a huge impact on the average time and variability of a journey, which directly impacts confidence and patronage.</p> | <p>Stagecoach are committed to working with TfGM to solve congestion problems in Greater Manchester. We propose the following initiatives to address these challenges:</p> <p>Set up a Congestion and Traffic Management Working Group</p> <p>Stagecoach propose setting up a working group that includes both Franchise and private operators, highway authorities and TfGM. This group would be a powerful and coordinated force in proposing and accelerating changes that would reduce journey time variability, increase journey time reliability and reduce congestion for all bus operators and the general public of Greater Manchester. It is recognised that much effort has been put into the framework of a similar working group, as part of the Multi-Operator Partnership and as such, we would look to utilise that framework as the basis to building the Terms of Reference for this Working Group.</p> <p>This group will form part of the shared South Manchester Partnership Governance Framework (see section 3.1.1), sitting under the Operations Board and providing relevant reporting. Key KPIs and targets will be agreed to improve bus reliability, reduce journey time variability and reduce congestion. As part of the that Board, we will need highway authorities to sign up to measures to mitigate the impact on key bus networks and tighten rules on when work occurs. Operators will need to commit to reviewing resources and sharing punctuality data so that all partners can make informed decisions to mitigate impacts on bus reliability.</p> <p>Stagecoach's believes that through the proposed profit share and the creation of a South Manchester Partnership Fund (see Appendix 6.1 initiative D.5) that monies which are identified within this fund should be invested in schemes within South Manchester, with those which reduce congestion through route prioritisation being a high priority. Investment decisions from this fund will be made within the South Manchester Partnership Strategy & Delivery Board (Tier 1 of the proposed governance) meaning that TfGM and Operators can collectively decide on investments to achieve optimal outcomes for the industry.</p> <p>Fund an Additional Signal Engineer</p> <p>Stagecoach will fund an additional senior signal engineer to sit within the TfGM central Urban Traffic Control ("UTC") room. This person will look at new designs and maintenance of current road systems, as well as analysing traffic, spotting variances and intervening to help free up traffic. Although funded by Stagecoach, the individual would be a TfGM employee as TfGM has the requisite expertise to recruit, train and manage such a specialist.</p> <p>Fund an Additional Inspector within TfGM UTC</p> <p>An inspector's job is to control and manage the daily operation of a service / group of services, ensuring that the standards of customer service and operational quality are achieved. This additional capacity will mean we are better able to monitor and inform on congestion and accidents. This will allow quicker responses to incidents and faster updates to customers.</p> <p>Stagecoach recognises that there is a need to monitor roads around the clock and as such we will extend inspector time in the UTC room. We propose increasing current resources to widen coverage where it is needed most. We will increase coverage from 13.5 hours to 18 hours on weekdays and from 8 hours to 12hours on weekends.</p> <p>When will this be Delivered?</p> <p>Stagecoach will set up the working group at the start of the South Manchester Partnership. For the additional resources (the Signal Engineer and Inspector), working with TfGM we will initiate recruitment for both roles in the lead up to the Partnership.</p> | <p>Stability and Resilience of Services </p> <p>Greater coverage at the times Greater Manchester needs it most, meaning incidents, disruption and issues can be identified, mitigated and responded to in a timelier manner</p> <p>Better collaboration Between bus operators </p> <p>Collective industry focus, effort and funding to realise improvements for known customer pain points</p> <p>Increased Reliability </p> <p>Journey times made more reliable through reduced congestion</p> <p>Better Customer Information </p> <p>Increased live updates on service disruption to customers</p> |



| Challenge/Opportunity | What is it? | Benefits | | | | |
|--|---|--------------------------------|------------------|------------|--|--|
| Due to multiple bus brands operating in Greater Manchester, it has been stated that customers feel the current offering is confusing and have reported varying experiences across bus services. A more unified brand across customer touchpoints will create a seamless experience for customers and ensure a more intelligible, usable and trusted service. | <p>Due to multiple bus brands operating in the Greater Manchester region, it has been stated that customers feel today's offering could be confusing and have reported varying experiences across bus services. A more unified brand across customer touchpoints will create a seamless experience for customers and ensure a more intelligible, usable and trusted service.</p> <p>Stagecoach will adopt the appropriate TfGM led (franchise proposed) branding for Stagecoach vehicles and work to achieve a near identical brand across Greater Manchester to alleviate customer confusion. This is proposed in the following ways:</p> <table><tr><th>Customer Channels & Collateral</th><th>Proposed Outcome</th></tr><tr><td>Bus Livery</td><td><p>All Stagecoach buses will be completely re-branded (painted) using TfGM branding guidelines. We will retain a small identifier to ensure a customer can identify that they can use a Stagecoach ticket on that bus, which is likely to be on the front and at the door to the vehicle. This process of rebranding of the fleet will complete within three years of the South Manchester Partnership. For the branding of buses in the short term (three months into the South Manchester Partnership), we will implement a transitional brand by applying a clearly identifiable partnership branding to our buses. It is important to reduce customer confusion, and we must ensure the brand identifies where a customer can use single operator tickets. Below is a concept that shows the Stagecoach brand on any chosen unified Partnership brand, this is to show our intent to keep any Stagecoach branding to a minimal, and therefore, enable GMCA to achieve their proposed branding benefits.</p><p>The brand changes do not impact Stagecoach's current advertising on buses strategy, and the plan will be for Stagecoach to continue to retail that advertising space.</p></td></tr></table> | Customer Channels & Collateral | Proposed Outcome | Bus Livery | <p>All Stagecoach buses will be completely re-branded (painted) using TfGM branding guidelines. We will retain a small identifier to ensure a customer can identify that they can use a Stagecoach ticket on that bus, which is likely to be on the front and at the door to the vehicle. This process of rebranding of the fleet will complete within three years of the South Manchester Partnership. For the branding of buses in the short term (three months into the South Manchester Partnership), we will implement a transitional brand by applying a clearly identifiable partnership branding to our buses. It is important to reduce customer confusion, and we must ensure the brand identifies where a customer can use single operator tickets. Below is a concept that shows the Stagecoach brand on any chosen unified Partnership brand, this is to show our intent to keep any Stagecoach branding to a minimal, and therefore, enable GMCA to achieve their proposed branding benefits.</p> <p>The brand changes do not impact Stagecoach's current advertising on buses strategy, and the plan will be for Stagecoach to continue to retail that advertising space.</p> | <div><div>Better Customer Experience</div><div>A consistent brand experience across all bus transport touchpoints, leading to less confusion</div></div> <div><div>Integrated Network</div><div>The ability for customers to move between services more seamlessly</div></div> |
| Customer Channels & Collateral | Proposed Outcome | | | | | |
| Bus Livery | <p>All Stagecoach buses will be completely re-branded (painted) using TfGM branding guidelines. We will retain a small identifier to ensure a customer can identify that they can use a Stagecoach ticket on that bus, which is likely to be on the front and at the door to the vehicle. This process of rebranding of the fleet will complete within three years of the South Manchester Partnership. For the branding of buses in the short term (three months into the South Manchester Partnership), we will implement a transitional brand by applying a clearly identifiable partnership branding to our buses. It is important to reduce customer confusion, and we must ensure the brand identifies where a customer can use single operator tickets. Below is a concept that shows the Stagecoach brand on any chosen unified Partnership brand, this is to show our intent to keep any Stagecoach branding to a minimal, and therefore, enable GMCA to achieve their proposed branding benefits.</p> <p>The brand changes do not impact Stagecoach's current advertising on buses strategy, and the plan will be for Stagecoach to continue to retail that advertising space.</p> | | | | | |





What is it?

| | |
|------------------------|--|
| Ticket Marketing | For marketing messages displayed on buses, Stagecoach would give significant prominence to promotion of multi-operator tickets from year one of the South Manchester Partnership. |
| Uniforms & Badges | In line with the Franchise consultation, Stagecoach will retain our independent staff uniform design. However, we will incorporate joint-branded items such as badges or lanyards to act as a signifier of a unified bus service for customers and to build their confidence and trust in the Partnership bus service for customers. |
| Digital Comms Channels | <p>Stagecoach propose to offer our established digital infrastructure, both app and website, as a managed service to the area, enabling the acceleration of customer improvements across the Franchised area too. In the short term, Stagecoach would apply an interim co-branding to our digital channels.</p> <p>We will work with TfGM to agree a future development schedule and outline timeframes in which the unified app and website can be put in place and introduced on a phased basis throughout the early years of the Partnership.</p> |
| Real-time Information | Stagecoach are fully supportive of the intention to deliver a bus open data digital service and will provide the data required to respond to the customer need for more centralised sources of information about bus times routes and fares. |

When will this be Delivered?

Please see specific commitments within the brand scenarios section above. Interim branding will happen within three months of the South Manchester Partnership. Complete re-branding will happen within three years of the start of the Partnership.



Challenge/Opportunity

There are currently many digital touchpoints, including multiple operator apps and websites, which can create confusion and increase the time it takes to access information. Stagecoach and TfGM share a common goal to create a seamless experience for the customer, regardless of where they travel within Greater Manchester.

What is it?

Stagecoach is willing to offer elements of our existing digital technology to be used for the whole of the South Manchester Partnership and Franchised region, supporting the GMCA objective to create an integrated network and a consistent customer experience.

Stagecoach will provide the digital and back-office infrastructure for a shared Greater Manchester Bus application and website. This will enable a single source of travel information across Greater Manchester accessible via one platform.

Stagecoach has well-developed digital technology that is used nationwide and has therefore benefited from substantial group-wide investment. Our app functionality includes real-time tracking and “bus on a map” features. By using existing technology, we can accelerate innovation and lower South Manchester Partnership and Franchise costs. Additionally, the product will be made available for the customer in a shorter time frame.

We see this arrangement working as a technology managed service with TfGM for both future Franchised and South Manchester Partnership areas. A development schedule will be agreed in line with the specifications set by TfGM. In line with the brand strategy, the app and website will significantly utilise the appropriate branding used for Franchised services.

When will this be Delivered?

Stagecoach work with TfGM to agree to a schedule for development of the managed service based on outlined goals and discovery outputs. Assuming a phased approach will be required for TfGM, an interim position will be agreed with TfGM for delivery early in the South Manchester Partnership with the associated commercial details. We will provide the commercial costs at a later date once the schedule has been agreed.

Benefits

More Investment and Innovation



Delivery of app and website before the Franchise timeline. Lower cost as much of the app and website infrastructure is already built

Better Customer Experience



Improved user experience and one source of information

Better Customer Information



One source of accurate information fed by multiple data sources



Challenge/Opportunity

Customers expect to be connected digitally and given the right information that allows them to take a journey, be that in advance of travelling, during travel or at times of disruption. These tools and data are not currently offered by all bus operators within Greater Manchester.

What is it?

Stagecoach will provide data to improve the travel information provided to customers to allow better journey planning and manage their journeys better in real-time. We will make our appropriate data available as open data to allow third parties to develop apps which will benefit customers, we would adhere to the Department for Transport “Open Data” regulation, and expect for this initiative to extend beyond that policy. This will enable a centralised source of information to provide customers with simple and straight-forward information about their travel options prior to and during travel. As part of this initiative we will comply with DfT open data regulations, and any further regulation passed during the 10-year South Manchester Partnership.

When will this be Delivered?

Stagecoach will provide the data from month three of the Partnership. Any effort to determine how the data feeds into customer-facing technology (e.g. journey planner) sits outside of this delivery target.

Benefits

Stability and Resilience of Services



Potential to use the information for network planning

Better collaboration Between bus operators



A shared pool of information for TfGM and bus operators to draw from

Better Customer Information



Better, more accurate information on bus location and timetables



| Challenge/Opportunity | What is it? | Benefits |
|--|--|--|
| Today customer service channels do not have a unified point of contact, which can make it challenging for customers when looking for support. Alongside the ambition to create a joined-up approach to buses across Manchester, there is an opportunity to simplify and streamline the way we interact with customers. | <p>Stagecoach propose that the TfGM digital app and website should provide customers with a single point of contact, on first contact, for each customer service channel. This point of contact will be TfGM owned and will provide simplicity and clarity for customers, aligning with the wider strategy to create one unified experience.</p> <p>Stagecoach will partner with TfGM to explore a range of feasible options and agree the best way forward at the start of the South Manchester Partnership, this will include identifying the most effective business processes e.g. triage, issue resolution for various scenarios, service quality and hand-off, to support this change. We will work to ensure current customer service resources and systems are made available and accessible in order to achieve these commitments, for example for inquiries related to lost items. It is understood that each party are responsible and accountable for their own services and therefore, are also responsible for any complaints received related to their services. Illustrative example options below:</p> <ul style="list-style-type: none"> Unified Social Media Services - Stagecoach see social media services transitioning into a centralised function operated by the TfGM Franchise team. The TfGM led Twitter feed will provide network-wide updates on service performance and delays. Any contact from customers through social channels will be dealt with initially by TfGM and triaged out to other operators, if necessary. Any contact received to the Stagecoach social media accounts would be dealt with the same way as today, whereby, we provide a recognition of the contact and offer a contact to the correct department to deal with the topic raised. Single Route for Customer Support - Stagecoach will work with TfGM to provide a single point, on first contact, for customer service queries via phone. This simplified system will mean the customer will only have to dial one number to get access to support. As with social channels, calls will be dealt with initially by TfGM and then triaged out to other operators if necessary. This phone number will be clearly displayed on the shared app, on the website, at bus stops and on buses. Common 'Best Practice' Standards - Physical customer service will continue to be offered on board and at bus stations (by Stagecoach and TfGM). Through Stagecoach's proposed training standards (see Appendix 6.1 initiative B.9 and B.10), we will seek to raise the standards of customer service across small and medium sized bus operators. <p>When will this be Delivered?</p> <p>Stagecoach will deliver this at the point that TfGM are onboarding the successful operators of franchises in of sub-area A Franchise (From April 2021, as per consultation document).</p> | <p>Better Customer Experience </p> <p>Simplified experience for the customer and a single touchpoint across all bus operators</p> <p>Better Customer Information </p> <p>Access to information on buses across Greater Manchester</p> <p>Better collaboration Between bus operators </p> <p>Sharing best practice to raise standards across all bus operators</p> |



| Challenge/Opportunity | What is it? | Benefits |
|---|--|---|
| Visible commitments are an effective way of driving accountability for the quality of service delivered, establishing credibility and trust with customers. | <p>Stagecoach propose publishing an annual commitment pledge to customers to protect transparency and drive accountability for the quality of service.</p> <p>This pledge will act as a means for us to hold ourselves to account and will link to any Performance Regime (see Appendix 6.1 initiative D.2) that is agreed to as part of the South Manchester Partnership.</p> <p>The pledge will be structured as follows:</p> <ul style="list-style-type: none"> Commitments - These are pledges that Stagecoach will make annually. We will continually refer to these pledges and they will inform decisions made on customer-related initiatives. Targets - We will set clear targets to be measured against. These will be fully aligned to KPIs, metrics, measurements and reporting proposals in the South Manchester Partnership. <p>We will measure and report against targets on a monthly, quarterly, and six-monthly bases. Commitments will be reviewed annually through the South Manchester Partnership business plan.</p> <p>When will this be Delivered?</p> <p>Stagecoach will deliver the Customer Commitments Pledge from day one of the South Manchester Partnership.</p> | <p>Better Accountability of Bus Operators </p> <p>Stagecoach is regularly measured against standards we set ourselves</p> <p>Higher Industry Standards </p> <p>Setting these standards may encourage other operators to do the same</p> <p>Better Customer Experience </p> <p>A clear way to make commitments to customers that provides full transparency</p> |



Challenge/Opportunity

While Stagecoach buses are in service there are currently no facilities that allow for mid-journey cleaning and waste disposal. During this period, waste from customers throughout the day builds up.

What is it?

Stagecoach will ensure buses are an attractive alternative for customers by working with TfGM to implement mid-journey cleaning for all main corridor services.

We propose using TfGM facilities to dispose of waste, with cleaning and disposal either performed by a Stagecoach or TfGM employee. In the case of using a TfGM employee, Stagecoach would expect to fund that activity. When Stagecoach buses stop at interchange stations (operated by TfGM) the bus will need access to cleaning facilities and waste disposal facilities. This offer will be supported by an agreed Service Level Agreement.

When will this be Delivered?

Stagecoach commit to delivery of mid-journey cleaning by December 2020.

Benefits

Better Customer Experience



Cleaner services for customers creates a better on-board experience



Challenge/Opportunity

The consultation document has stated its intention to implement free WiFi throughout the Franchised area. Stagecoach recognises the importance of ensuring uniformity of service offerings across Greater Manchester.

What is it?

Stagecoach commit to rapidly implementing free WiFi on our entire South Manchester fleet, allowing customers to connect quickly and for free.

Stagecoach plan to implement WiFi on all new vehicles purchased and will retro-fit older buses that do not already have WiFi installed. This will ensure uniformity of service offerings within buses across Greater Manchester, including the Franchised area.

When will this be Delivered?

Stagecoach commit to implementing free WiFi on all buses in our South Manchester fleet by the end of year one of the South Manchester Partnership.

Benefits

Better Customer Experience

Allow customers to make productive use of their travel time and enjoy entertainment using their mobile devices during the journey

Better Customer Information



Allow customers to easily plan journeys and check journey updates



Challenge/Opportunity

Providing the right quality and quantity of inspectors is key to providing a high-quality and consistent experience for customers. Stagecoach has for a number of years provided inspectors and believes they play a vital role in enhancing customer experience, ensuring punctuality of services, promoting safety and providing essential customer support.

What is it?

Stagecoach will continue to provide a high ratio of inspectors to protect and maintain a high-quality of service. [REDACTED] Inspectors duties include:

- Service Regulation - On-street service regulation at key points on the network such as Interchanges. This involves monitoring service performance and adjusting services to minimise disruption to customers.
- Traffic Control - Liaising with TfGM and other partners in Urban Traffic Control ("UTC") to mitigate delays across the network.
- Revenue Protection - This involves duties such as checking tickets of customers on board.
- Attending Major Incidents - Inspectors are often deployed to be the first Stagecoach supervisory presence at the scene of major incidents to liaise between the depots, emergency services and other partners and to look after the welfare of Stagecoach's employees and customers at the scene.

Additional Customer Service Staff will be deployed in the South Manchester Partnership area, enabling every bus station in the area to have an inspectorate presence during peak periods to assist and support customers and maximise service performance.

When will this be Delivered?

For the additional resources, we will initiate recruitment for all roles in the lead up to the Partnership with the aim to have those resources in place for the start of Partnership.

Benefits

Increased Reliability



Punctuality of services is effectively monitored and managed

Better Customer Experience



Essential customer support is consistently delivered to a high-quality

Improved Safety



Customer safety is promoted and prioritised by trained inspectors



Challenge/Opportunity

Establishing consistency and a high industry standard for training is key to increasing safety across Greater Manchester and improving the customer experience overall.

What is it?

Stagecoach will continue to offer best in class training and work to raise industry standards within the Greater Manchester region.

Stagecoach will continue to deliver training to our drivers that put an emphasis on customer experience as well as core driving skills. Our courses consist of 5 key modules: Know Stagecoach, Know your Product, Know your Customer, the Stagecoach Service Six, Driver Moments of Truth. Stagecoach continues to refine and adapt the curriculum to best address customers' needs and ensure the highest level of safety and competence.

When will this be Delivered?

Stagecoach will continue to maintain the high-quality training offered to drivers today and will continue to enhance course materials throughout the term of the South Manchester Partnership.

Benefits

Better Customer Experience



Drivers trained to deliver high-quality customer experience on-board.

Improved Safety



Fewer accidents due to better safety standards and driver skills

Higher Industry Standards



Setting these standards may encourage other operators to do the same



Challenge/Opportunity

Stagecoach have a well-established and effective training programme and see an opportunity to offer this training to small and medium sized bus operators, who do not have access to the appropriate training facilities or courses today.

What is it?

Stagecoach will offer high-quality training to small and medium sized operators to share best practice and establish a consistent standard across Greater Manchester.

Stagecoach propose making our driver training available to small and medium sized operators at a market appropriate commercial rate. This will consist of 5 days of driver training, including training on customer experience and safety. The training would enable smaller operators that do not have access to effective training programmes, facilities and instructors the opportunity to receive high-quality training.

Stagecoach will to offer places on the scheduled training programmes to other operators. If there is enough demand to run a full course, and the training facilities are not being used, we will facilitate additional courses for these operators.

When will this be Delivered?

Stagecoach will deliver training to small and medium sized operators within year one of the South Manchester Partnership.

Benefits

Higher Industry Standards



Setting these standards may encourage other operators to do the same

Better Customer Experience



Customers should see and feel a better level of consistency in the customer service they receive

Improved Safety



Increased safety standards across the driver population



Challenge/Opportunity

GMCA's vision is to lead the way in apprenticeship employment in the UK. The goal is to provide quality opportunities for learning and development for anyone looking to develop their career. Stagecoach see the value that high-quality, sustainable apprenticeships can add to the business and recognise the need to invest in this opportunity.

What is it?

Stagecoach will provide industry-leading apprenticeships that equip participants with the right knowledge, skills and certifications to excel. The following apprenticeship programmes are currently offered:

Bus & Coach Engineering Technician - Level 3 Apprenticeship

This is a 3-year long engineering apprenticeship, which can be studied in mechanical engineering, electrical engineering or coachwork engineering. There is an optional add on of a fourth-year which allows the apprentices to also gain certification from The Institute of Motoring Industries.

Passenger Transport Driver - Bus & Coach Level 2 Apprenticeship

This is a 1-year long apprenticeship It is delivered in conjunction with Stagecoach's lead apprenticeship training provider partner. There are 4 weeks dedicated to soft skills workshops during the course, which are designed to improve skills and knowledge in customer service, accident prevention, technical skills and problem-solving, teamwork and decision making. People who complete this course will be awarded a Department for Education's Level 2 Apprenticeship certification. This course is a great example of how we are leading the way in training as no other bus operator has developed driver staff to gain this Level 2 apprenticeship yet.

When will this be Delivered?

Stagecoach will continue to deliver both types of apprenticeship from the start of the Partnership and will continue them throughout the duration of the Partnership.

Benefits

Employment Opportunities



Provide the General Public within Greater Manchester with fulfilling and developmental job opportunities

Community Engagement:



Supports the overall employment level in Manchester

Better Customer Experience



Improved customer service and therefore customer experience

The landscape for bus fares in Greater Manchester will change exponentially in the coming years and the successful fusion of a partnership co-existing alongside franchising will be critical to this. The various initiatives detailed below are those offered as part of a South Manchester Partnership. Ultimately the most critical outcome with regards to fares is to ensure that all customers have a seamless experience (see Appendix 6.1 initiative B.2) when travelling on buses across Greater Manchester. This should happen regardless of which business model underpins the service a customer is travelling on (be that franchised or commercial operations). Making the Bolton to Manchester Airport journey as seamless as a Stockport to Holmes Chapel one. Stagecoach is committed to ensuring multi-operator tickets are simple to purchase and use.

Clearly different ownership structures will require a new governance framework to replicate the existing GMTL (System 1) board to reflect new ownership structures for bus services post-franchising. We would work with TfGM and other South Manchester Partnership operators throughout early 2020 to consider how this new governance could be implemented.

C.1

Ticket Simplification

Simplified Fares & Ticketing

Franchise Match:



Meets

Challenge/Opportunity

There is perceived complexity related to fare structures as indicated in the consultation document which states that fares and ticketing are confusing with too many fares available to customers. Simplifying the ticketing estate is key to addressing this and will make it easier for customers to determine the best value fare.

We have identified a number of geographical variants on Stagecoach Manchester Period Tickets.

What is it?

Stagecoach has consistently made efforts to simplify our product range but recognise there is more it can do to reduce complexity and simplify fares for customers. We will implement the following early mitigations:

A Reduction of Fare Bands

There are currently five fare bands offered by Stagecoach depending on the route, corridor and time a bus is taken. [REDACTED] reducing the total number of fare bands to four.

A Single Suite of Period Tickets

There are currently multiple period tickets offered by Stagecoach depending on the ticket zone in which a customer uses a service, we will simplify this down to a set of three options (daily, weekly and monthly) across all South Manchester corridors and geographies, to ultimately make it easier for a customer to make value-based decisions.

When will this be Delivered?

Stagecoach reduce the number of fare bands we have and offer a single suite of period tickets by January 2021.

Benefits

Integrated Network



The simplification of Stagecoach fares builds towards the overall ambition for network and fare integration across Greater Manchester

Better Customer Experience



Simplified ticketing experience for the customer

Better Value



Better value than the current fare bands for the customer

C.2

Ticket Simplification

Carnet Ticketing

Franchise Match:



Meets

Challenge/Opportunity

Working professionals have increasingly flexible schedules with many choosing to work compressed hours or from home, leading to a customer need for flexible ticketing that provides increased value. A regular-season ticket may result in the customer paying for but not using those journeys. A carnet ticket is a suite of tickets that the customer can use when needed.

What is it?

Stagecoach will permanently introduce carnet tickets that deliver flexibility and value for money to customers.

Stagecoach have previously recognised the need for flexible ticketing, successfully running a pilot for carnet tickets. Carnet tickets will consist of x5 unlimited daily tickets which can be purchased in advance and used within a 3-month time period. These tickets will provide better value for customers over the purchase of a single ticket on the day of travel.

When will this be Delivered?

Stagecoach will provide carnet tickets to customers by January 2020.

Benefits

Better Customer Experience



A more tailored fare type that meets the needs of customers

Better Value



Increased fare value for less frequent bus users



Challenge/Opportunity

When a largely similar tendered evening or Sunday service is operated by a different operator to that of the main daytime service, customers cannot currently use the daytime Operator's tickets on the tendered element, leading to fare purchasing complexity, higher costs for the customer and decreased customer satisfaction. Working together to create a policy to ensure a seamless as possible transfer between services is key. In addition, initiative D5 'Planning the Future - Commercialise [REDACTED] Tendered Services' will significantly reduce this customer challenge.

What is it?

Stagecoach propose that TfGM offer a policy to allow a buyer of a commercial operator ticket to use the same ticket on a largely similar tendered service that is operated by another operator at different times.

The initiative would require TfGM to alter the way it contracts Tendered services in South Manchester. This would involve altering contract conditions to mandate the acceptance of the main daytime operator ticket on the tendered element. This would result in higher contract prices to TfGM in some instances, but this additional cost would be largely mitigated by the initiative D.3 (Commercialise [REDACTED] Tendered Services). We would look to consider a mechanism of compensation to TfGM, with the intention to agree this position before the commencement of the Partnership.

When will this be Delivered?

Stagecoach requests that TfGM look to implement this policy within year one of the South Manchester Partnership

Benefits

Integrated Network



Allows customers to use the same geographical service at different times regardless of operator with no additional cost.

Better Customer Experience



Reduces complexity and offers an improved value proposition.



Challenge/Opportunity

Fare capping is key to providing customers with an increasingly seamless journey and, as supported by the Franchise consultation, maximising convenience and confidence that the fares they pay offer value for money.

What is it?

Stagecoach will implement fare capping across our South Manchester bus services to reduce complexity and deliver better value for money to customers. We will deliver the following initiatives:

Fare Capping on all Stagecoach Buses

Stagecoach will implement a fare capping system on all of our buses across South Manchester, allowing our customers to take unlimited journeys across our South Manchester bus services to an agreed daily and weekly limit. Customers will be able to tap with their contactless payment method and will be appropriately charged to a maximum daily price or a maximum weekly price.

Commitment to a Future Multi-Operator Fare Capping System

Stagecoach also commit to participate in a multi-operator fare capping system, working with TfGM to agree the rules that will include future Franchised areas. This will require TfGM to provide Stagecoach with a representative seat within subsequent governance and decision making in order to ensure that the system is fair and equitable for both Franchised and South Manchester Partnership areas.

As part of this commitment, we will support the technology scoping and discovery efforts that will permit systems to interact and expedite capping across Greater Manchester. In addition to multi-operator capping systems, we will work closely with TfGM to ensure that the introduction of capped systems co-operating with the Metrolink tram can be expedited, with a Stagecoach/Metrolink capped product introduced shortly after the introduction of our scheme. The proposed Governance Framework (see section 1.2.1) makes recommendation for replicating current GMTL Board – System One to accommodate this initiative.

When will this be Delivered?

Stagecoach will deliver fare capping across Stagecoach South Manchester buses by the Summer of 2021. We will seek to deliver a capped product between Stagecoach and Metrolink by the end of 2021 (subject to technical feasibility of this being ascertained following a detailed scoping exercise). Stagecoach will work with TfGM on an ongoing basis to deliver fare capping that works for both Franchised and South Manchester Partnership areas in line with TfGM plans to implement capping in the franchised area.

Benefits

Integrated Network



Alignment to TFGM and Mayor initiatives around better value for money and reduced complexity

Better Customer Experience



Better customer experience that allows post-pay for tickets and eliminates the need to purchase multiple tickets for your day's journeys

Better Value



Increased choice for customers and better value for money. Customers will be confident that they have been charged the correct and best value fare for their journey(s)



| Challenge/Opportunity | What is it? | Benefits |
|---|---|---|
| Stagecoach recognises the need to simplify fares and offer greater value for money as stated in the consultation document | <p>To offer better value and simplicity for customers, Stagecoach will continue to offer both the reduced maximum fare and flat fare for adults travelling on buses between 19:00 - 24:00 (current rate of £1.50 for shorter trips and £2.00 for longer) and 24:00 - 04:00 (current rate of £2.50) every day. The flat fare will allow customers to make unlimited journeys, within the allotted times, on the specified day.</p> <p>When can it be delivered?</p> <p>Stagecoach will continue our offer of reduced maximum fares in the evenings throughout the course of the South Manchester Partnership.</p> | <p>Better Customer Experience </p> <p>Reduced fare complexity for customers</p> <p>Better Value </p> <p>The same price for the journey no matter how far the customer travels</p> |



| Challenge/Opportunity | What is it? | Benefits |
|--|---|--|
| It is crucial that the GMCA are able to present bus services as one within Greater Manchester and that any Mayoral derived schemes with relation to fares are offered on a Greater Manchester wide basis, no matter if the services are run under a Franchised or South Manchester Partnership basis. As such Stagecoach would expect the GMCA to consult with operators in a South Manchester Partnership when planning to introduce any new schemes which would see fares discounted based on socio-economic benefits. | <p>Stagecoach will continue to participate in the existing schemes and to cooperate on any broader Greater Manchester scheme initiatives to ensure a consistent experience for customers.</p> <p>The schemes, similar to the Our Pass scheme, will be prescribed by the GMCA and managed centrally by TfGM. Stagecoach propose a collaborative approach to agreeing on future strategies and requests the right to participate in the consultation process for agreeing on schemes that benefit Greater Manchester. Stagecoach would evaluate each scheme to determine whether it could support it commercially or on a Local scheme basis.</p> <p>When will this be Delivered?</p> <p>Stagecoach will continue to participate in schemes it is currently a part of and aligning on implementation timelines of any future schemes as set out by the GMCA.</p> | <p>Community Engagement </p> <p>Positive impact on the community by offering lower-cost options</p> <p>Increased Accessibility </p> <p>Enables underprivileged or people with mobility impairments to access the bus network</p> |



| Challenge/Opportunity | What is it? | Benefits |
|---|---|---|
| GMCA's aim for a fully integrated transport system across Greater Manchester requires a more efficient and integrated customer experience for ticket purchasing. It requires single operator tickets to be made available through TfGM channels and increased promotion and sale of multi-modal tickets through Stagecoach retail channels. | <p>Stagecoach has participated in a multi-operator scheme for many years and will continue to participate and promote the delivery of schemes that support a more efficient and integrated customer experience, in line with the 'Seamless Digital Experience' (see Appendix 6.1 section B.2). We propose the following initiatives to improve ticket purchasing:</p> <p>Utilising TfGM Digital Channels</p> <p>Stagecoach propose that TfGM sell Stagecoach single operator bus tickets through its digital channels (web and app) in addition to its current Travelshop retail channel. It is acknowledged that this would be subject to agreeing the commercials on any commission rates. Stagecoach will, however, make the multi-operator ticket the main retail focus.</p> <p>Promoting Multi-Operator / Multi-Modal tickets</p> <p>In line with TfGM's aspirations to enhance the use of multi-operator / modal tickets, Stagecoach will work to raise the multi-operator scheme's profile by promoting multi-operator tickets. Following this, we will promote multi-modal tickets that include the tram, and once in place, multi-modal tickets that include trains.</p> <p>When will this be Delivered?</p> <p>Stagecoach will promote the sale of multi-operator tickets and multi-modal tickets (that include the tram) within year one of the South Manchester Partnership. Stagecoach requests that TfGM endeavours to sell Stagecoach single operator bus tickets through our digital channels within the first year of the South Manchester Partnership.</p> | <p>Better Customer Experience </p> <p>A more integrated and seamless ticket purchasing journey across both TfGM and Stagecoach retail channels</p> <p>Integrated Network </p> <p>Increased use of multi-operator and eventually multi-modal ticket types in line with TfGM initiatives</p> <p>Better Customer Information </p> <p>Ticketing information available on both TfGM and Stagecoach channels</p> |



D.1

Stability

Stability of Route Changes & Consultation

Franchise Match:



Exceeds

Challenge/Opportunity

Transparency over route changes and extended timelines for consultations with customers and political stakeholders are key. They help to limit passenger disruption and maintain customer satisfaction.

What is it?

Stagecoach will promote transparency over South Manchester route changes, delivering and acting upon best practice when engaging key stakeholders. To do this, we propose the following initiatives:

Increasing the Minimum Notice Period for Route Change Consultations

Stagecoach propose that the current minimum of 10 weeks' notice to TfGM be increased by an additional 28 days. This will provide additional time to consult on any route changes across the South Manchester network that Stagecoach currently operates, before registering a change with the Traffic Commissioner.

Sharing the Schedule of Change and Adhering to Dates

Stagecoach will share the delivery schedule for route changes with TfGM so that they have a clear view of upcoming impacts to Stagecoach operated routes. We will continue to adhere to the recognised change dates to allow for forward-planning and to publish changes earlier to limit the disruption to customer journeys.

Consultation Good Practice Guide

Stagecoach will, alongside TfGM, develop a good practice guide on how customer and political stakeholder management consultations should be conducted. Varying levels of consultation would be proposed depending on the likely impact on customers:

- Low impact - Changes such as timetable amendments to improve punctuality or add-in additional journeys will follow the current minimum of 10 weeks' notice.
- Medium impact - Changes such as when lightly used individual journeys are reviewed or frequencies altered would require more advanced consultation with the additional 28 days given on top of the minimum 10 weeks' notice. This would allow more advanced discussions with TfGM to take place. Service enhancements, new routes and frequency increases would be considered medium-level as these would not impact detrimentally on current users, but additional notice would assist in integrating into bus station capacity and with publicity changes.
- High impact - Changes that would significantly alter routing or see major changes to frequencies will have an extended period of consultation where stakeholder feedback on the proposals would be sought prior to any changes being actioned.

When will this be Delivered?

Stagecoach propose to enact the commitment to increase the current minimum notice by 28 days at the start of the South Manchester Partnership. The delivery schedule of change will be shared annually in February following Stagecoach financial planning with an interim update meeting in August.

The best practice guide will be in place for day one of the South Manchester Partnership.

Benefits

Stability and Resilience Of Services



Greater stability with relation to network planning for TfGM with more advance

Better Customer Experience



Customers are better informed about route changes and able to plan for any disruption or change to their journey



Challenge/Opportunity

Providing a service to customers comes with standards and quality expectations. Stagecoach pride themselves on the level of quality currently provided and would welcome as such is happy to participate within a performance regime similar to that adopted in the Franchise area, that would ensure a consistent level of quality across the South Manchester Partnership.

What is it?

Implement Quarterly Performance Meetings

Stagecoach recommend implementing quarterly performance review meetings with representatives from all operators involved in the Partnership, bus users and the mayor's office. These forums will be used to review published performance metrics and discuss the findings of the trend analysis. Where an area of poor performance has been identified the group will come up with remedial actions. Stagecoach will ensure the timing of these meetings are aligned with service change dates.

Performance Accountability

Performance accountability is central to our proposition and is expected to include key quality metrics, such as reliability, journey times and vehicle requirements with stated measures and tolerances. Underperformance against these measures would incur a penalty. Stagecoach expect to be held accountable for our performance and as such would expect the performance indicators on which we will be measured by to be within our / the operator's control. Events such as late planned roadworks and music/sports events should not be measured and penalised in the same way.

When will this be Delivered?

Stagecoach will set up Performance Meetings from the start of the partnership. Stagecoach will provide and adhere to performance measures within the first 6 months of the Partnership.

Benefits

Better Accountability of Operators

Accountability through transparent reporting and regular measurement against commitment

Higher Industry Standards

Common service quality standards for customers

Stability and Resilience Of Services

Greater stability of services due to forward planning based on assessment done in quarterly performance meetings



Challenge/Opportunity

In line with Stagecoach commitments to maintaining a high level of transparency with TfGM and in order to ensure network stability, where routes are not covering marginal costs, we will proactively share route performance data with TfGM.

What is it?

Stagecoach will provide quarterly performance data for any routes that are not covering marginal costs and are at risk of revision.

Any route that is not recovering its costs will be reported using the following report parameters: Service number; total revenue; running costs; operating costs; % margin for each of those services. The information and reporting format will be discussed as part of the agreed governance structure.

The goal of reporting on this data is to enable TfGM to proactively address financial concerns and plan for potential route changes to ensure minimal to no disruption of customer journeys.

When will this be Delivered?

Stagecoach will deliver this information by day one of the South Manchester Partnership. The information will be discussed as part of the agreed Governance Framework (see section 3.1.1).

Benefits

Stability and Resilience Of Services

Information shared will feed into planning with TfGM to ensure the stability of the service across Manchester

Better Customer Experience

TfGM are able to use the information to ensure bus services cover the whole of Greater Manchester



| Challenge/Opportunity | What is it? | Benefits |
|--|--|---|
| <p>The current tendered market in South Manchester represents [REDACTED] (excluding school services), of which Stagecoach currently operates [REDACTED] of these contracts. To show Stagecoach's commitment to the South Manchester Partnership, and to allow TfGM to consider opportunities to broaden the reach of further subsidised services in South Manchester, we will operate a number of these tendered routes on a commercial basis.</p> <p>The commercialisation of tendered services would simplify the ticketing offering for customers who currently need to use both commercial and tendered service, requiring the purchase of two separate tickets.</p> | <p>Stagecoach will commercialise a proportion of any current tendered route [REDACTED]</p> <p>Accordingly, Stagecoach will operate these services which are not currently economic, foregoing the subsidy which stagecoach had tendered for previously.</p> <p>[REDACTED]</p> <p>Stagecoach's aspiration via the South Manchester Partnership Fund (see section 1.4.2) is that these savings are reinvested in schemes within South Manchester, such as kick-starter services (see Appendix 6.1 initiative D.5 for more examples).</p> <p>The framework and process for this initiative would form part of the remit of the South Manchester Governance Framework (see section 3.1.1) and would need to be closely monitored within that remit.</p> <p>When will this be Delivered?</p> <p>[REDACTED]</p> | <p>More Investment And Innovation </p> <p>Opportunity to enhance the network though the increased focus of a commercial operator looking to grow a market rather than a series of short-term subsidised contracts</p> <p>Higher Industry Standards </p> <p>Common service quality standards for customers with Stagecoach operating all services</p> <p>Better Collaboration Between Operators </p> <p>Opportunity for TfGM via the South Manchester Partnership fund to reinvest such savings into broadening the bus network offer in South Manchester</p> <p>Better Customer Experience </p> <p>Reduced customer confusion over the validity of tickets between commercial and tendered services</p> |



| Challenge/Opportunity | What is it? | Benefits |
|---|---|--|
| <p>Funding can be sparse and is often allocated to areas and initiatives that are deemed a priority, meaning other areas and initiatives often and repeatedly do not get investment. Stagecoach have identified a way of providing alternative funding, whereby realised savings that were previously allocated within the South Manchester Partnership can be reassigned to initiatives in South Manchester.</p> | <p>The principle of the South Manchester Partnership will see contributions derived from realised identified savings from all Partnership members and TfGM assigned to a fund. In addition, the proposed profit share arrangement will provide further contributions to the South Manchester Partnership Fund.</p> <p>The Fund will be allocated to various South Manchester Partnership initiatives (e.g. route prioritisation schemes) and to enhance the provision of local bus transport facilities, services and customer experience in South Manchester - areas that would otherwise not usually receive extended funding. An overarching principle is that all members contribute and all of South Manchester would benefit from the funding.</p> <p>Examples of where savings may be realised from include:</p> <ul style="list-style-type: none"> • Marketing funding • Peak Vehicle Requirement savings • Profit share • Section 106 funding • Corporate funding • Performance / penalty funds • Benefits from infrastructure <p>A example of how savings could be realised includes current tendered services, which are operated by Stagecoach and funded by TfGM. As part of the South Manchester Partnership being considered, Stagecoach propose to commercialise [REDACTED] tendered services (see Appendix 6.1 initiative D.4 for more detail).</p> <p>The mechanics of the South Manchester Partnership Fund would be underpinned by an agreed framework that will provide a clear definition of what the savings equate to and set the rules of the fund. This would include the decision making of allocation, contribution mechanism, dispute management and conditions. Decisions regarding spending from this partnership fund will be made within the South Manchester Partnership Strategy and Delivery Board (Tier 1).</p> | <p>More Investment And Innovation </p> <p>Investment in areas that would not have previously received investment</p> <p>Better Collaboration Between Operators </p> <p>A collective investment strategy and agenda</p> |



Examples of areas that could benefit from investment as part of the South Manchester Partnership Fund include:

- Zero-emissions vehicles on a specific route
- New routes
- Kick start initiatives
- Social & economic
- Infrastructure changes
- Night services
- Congestion solving measures
- Expediting roadworks to avoid congestion

When will this be Delivered?

Stagecoach will produce the framework, principles and mechanics (to include wind-down procedures) of the investment fund within the first six months of the South Manchester Partnership. They would look to align with the rules of the framework as to when the funds would be allocated.



E.1

Our People

Real Living Wage

Franchise Match:

Exceeds

| Challenge/Opportunity | What is it? | Benefits |
|---|--|---|
| <p>Stagecoach is registered to the Greater Manchester Good Employment Charter. A key principle of the Charter establishes the introduction of the Real Living Wage as a minimum standard. We recognise our role in championing responsible employment practices and, as a good corporate citizen, the need to support employees to achieve a decent standard of living⁸.</p> | <p>Stagecoach is committed to providing a fair wage to our employees and promoting responsible employment. We currently pay the majority of staff at least the recommended level set by the Living Wage Foundation (currently £9 per hour) and will pay the entirety of the permanent and fully trained workforce this wage. Currently, [REDACTED]</p> <p>We will adjust future wages in line with the Living Wage Foundation for the duration of the South Manchester Partnership.</p> <p>When will this be Delivered?</p> <p>Stagecoach will implement the Real Living Wage for all fully trained and permanent employees by the end of year one of the South Manchester Partnership.</p> | <div>Promoting Responsible Employment</div> <p>Stagecoach will champion responsible employment by paying their permanent staff the Real Living Wage</p> |

E.2

Our People

Workplace Engagement & Voice

Franchise Match:

Exceeds

| Challenge/Opportunity | What is it? | Benefits |
|--|--|---|
| <p>Another key principle of the Greater Manchester Good Employment Charter is to improve workplace engagement and employee voice. It's essential that employees feel engaged and contribute to the direction and success of the organisation, shaping their roles within it.</p> | <p>Stagecoach will continue to maintain and promote a culture of openness and accountability across the business, listening to and acting upon the voice of our employees.</p> <p>We recognise that trade unions facilitate the expression of our employees' collective voice and will continue to work with these unions to better engage our workforce.</p> <p>Stagecoach will continue to prioritise employee engagement, measuring and tracking our progress through annual engagement surveys. The surveys have been successful so far with an 83% response rate and a 75% engagement score. We use the survey responses to launch communication campaigns that playback key messages and enable employees to shape action plans and future improvements.</p> <p>Finally, Stagecoach have an independent whistle-blowing policy which allows employees to raise serious concerns constructively and without fear of victimisation, subsequent discrimination or disadvantage.</p> <p>When will this be Delivered?</p> <p>Stagecoach will continue to work with trade unions and deliver annual engagement surveys throughout the South Manchester Partnership to drive greater workplace engagement and strengthen the employee voice.</p> | <div>Promoting Responsible Employment</div> <p>Championing responsible employment by valuing the voices of employees and enabling them to contribute to the direction and success of Stagecoach</p> |



Challenge/Opportunity

The wellbeing of staff is a Stagecoach priority. Given that the majority of Stagecoach staff are drivers who spend their day by themselves, we recognise the importance of a support network for employees to maintain good physical and mental health.

What is it?

Stagecoach have implemented the following initiatives to ensure our workforce feel supported and are a part of a wider community:

- Health and wellbeing champions - they help implement and support the company's wellbeing strategy. This is achieved by raising awareness of wellbeing activities and promoting a healthy lifestyle including mental health.
- A counselling service - this allows people to explore and express their feelings in a safe and non-judgmental space. This will improve mental health and help people who are struggling to get the help they need.
- The "Time to Talk" pledge - this supports organisations to put best-practice interventions and policies in place that help staff work in ways that promote positive mental wellbeing.
- Employee interaction platforms - a range of employee interaction platforms that encourage employee-wide participation and open conversation.
- An employee magazine - this is sent out quarterly, which includes employee stories and business updates to foster a connected Stagecoach community.
- Local recognition schemes - schemes across the country that ensure our workforce feel appreciated for their hard work including a monthly national recognition "Stagecoach Star" scheme and a national awards event to recognise excellence.

In addition to these initiatives, Stagecoach have signed a Diversity and Inclusion pledge that commits us to creating a workplace culture where everyone is able to be themselves and where differences are celebrated for what they bring to the business.

When will this be Delivered?

Stagecoach will continue to run the six schemes listed above for the duration of the South Manchester Partnership.

Benefits

Promoting Responsible Employment



Stagecoach will champion responsible employment by caring for their employees' health and wellbeing



Challenge/Opportunity

The Greater Manchester Transport Strategy for 2040 has an ambitious environmental agenda and buses have an important role to play in driving its success. The GMCA have set a target for Greater Manchester to recycle 60% of their waste by 2025.

What is it?

Stagecoach recognises the importance of our role and we will continue to support Greater Manchester in achieving their ambitious environmental goals.

Stagecoach will continue our partnership with a suitable Waste Services supplier so they can recycle 100% of the waste from Stagecoach vehicles. Approximately half of the waste is recycled, and half is used to create refuse-derived fuel ("RDF"). The RDF is produced from part of the mixed municipal waste. The recycled waste consists of paper, cardboard and mixed municipal waste.

When will this be Delivered?

Stagecoach will continue to recycle 100% of waste from our vehicles for the duration of the South Manchester Partnership.

Benefits

Reduced Pollution and Environmental Impact



Stagecoach are leading the way in sustainable business practices to reduce waste and help the environment



Exceeds

Challenge/Opportunity

The GMCA is focused on increasing the employment rate within the Greater Manchester area. The GMCA have forecast that employment levels will grow at an annual average of 0.5% per year up to 2036 and Stagecoach is committed to supporting this collective goal⁹.

What is it?

Stagecoach will continue to support and promote jobseekers in Greater Manchester by continuing to offer a scheme that allows customers who present their Jobcentre Plus card to receive half-priced single fare tickets.

Additionally, Stagecoach will continue to work with TfGM on their offer of providing free journeys to unemployed people or the recently employed. This is offered in partnership with TfGM, System One and Jobcentre Plus to ensure unemployed people do not struggle with travel costs whilst searching for employment. This scheme offers a range of travel tickets from a single day pass to a 28-day period pass. This pass can be obtained through an individual's Jobcentre Plus advisor or their Work Programme by a customer who has gained employment and is signing off the out of work benefit they are currently receiving.

When will this be Delivered?

Stagecoach will continue to offer our scheme that provides the unemployed with half-price tickets, and our partnership with TfGM and the JobCentre to provide free travel for unemployed people for the duration of the South Manchester Partnership.

Benefits

Community Engagement



Stagecoach are helping to make it easier for people to get jobs which will drive forward local economies

Employment Opportunities



Stagecoach are enabling people to get to job interviews without having to pay to get there, making more interviews feasible to attend



Exceeds

Challenge/Opportunity

For several years Stagecoach have partnered with local charities to contribute to the development of local communities within Greater Manchester. This has enabled charities to better provide a range of services that positively impact health, literacy and the environment along with other areas.

What is it?

Stagecoach will continue to partner with charities who work within Greater Manchester. These partnerships take many different forms and involve a range of activities. Partnerships are selected for a period of 2 years. Stagecoach has previously partnered with the Royal Manchester Children's Hospital to support fundraising and have recently partnered with the charity Forever Manchester.

Forever Manchester are a charity that raises money to fund and support community activities across Greater Manchester with the aim to make neighbourhoods happier and safer places. The charity works with local people in their communities to inspire and encourage grassroots projects across Greater Manchester. We are partnered with Forever Manchester until 2021 and will work with them to raise money and launch projects that give back to communities.

Along with charitable partnerships, we work across a wide range of sectors to support the communities we operate in, including:

Literacy for Young People

Stagecoach has donated a bus to Medlock Primary School to be used as a static library and has provided several buses to various local primary schools to be used as locations for literacy classes.

We provide discounted travel to schools and youth groups to enable them to attend Z-Arts, a local charity, which delivers cultural, creative and art events across Greater Manchester. Stagecoach have also sponsored exhibitions aimed at improving literacy in young people including the World Inside a Book exhibition celebrating 20 Years of The Gruffalo, which included book giveaways.

Environmental Improvements

Stagecoach regularly works with local authorities, community partnerships and primary schools to redevelop community spaces. In recent years, we have redeveloped areas of Davyhulme Park in Urmston and Hullard Park in Trafford and supported tree planting activities at a number of local schools.

Tackling Loneliness

Stagecoach worked in partnership with local charities and community centres to connect people in the area as part of our Bringing People Together campaign. This involved hosting a series of events from indoor curling, to exercise classes, to supporting retirees living in Greater Manchester to attend community get-togethers and have a cup of tea and meet people using the city's transport links.

Benefits

Community Engagement



Stagecoach are engaging with local communities in several ways allowing their staff to give back

Improved Safety



The projects Stagecoach are helping fund and getting involved with improving local areas and their safety

Promoting Responsible Employment



Stagecoach will champion responsible employment by helping to develop the local communities their employees live in



Exceeds

Health

Stagecoach supported Prevent Breast Cancer Charity's BreastFest, an ambitious month-long breast cancer campaign aimed at driving awareness in Greater Manchester.

Stagecoach have also sponsored a number of health-related charity events including a charity football match in support of a local men's mental health charity Place 2 Pace and a Body Confidence event to help promote body confidence, self-esteem and overall well-being.

Stagecoach has also participated in Macmillan Cancer Support World's Biggest Coffee Morning, raised funds for the Royal British Legion's Poppy appeal and donated to enable all drivers who choose to wear a poppy to do so.

Veterans support

On Remembrance Sunday free travel is offered to armed forces personnel carrying a military ID card and to veterans wearing the veteran's badge.

When will this be Delivered?

Stagecoach will continue to partner with local charities in Greater Manchester for the duration of the South Manchester Partnership.



Exceeds

Challenge/Opportunity

In a recent survey by the national education union, more than half of the respondents indicated that their students had experienced hunger as a result of poverty¹⁰. Stagecoach recognises the urgent need to ensure local government and schools are supported in their efforts to ease hardship in underprivileged areas and that children within Greater Manchester do not have to attend school hungry.

What is it?

Stagecoach will participate in the Greggs Breakfast Club programme in Manchester once we receive a list of schools to partner with from the Greggs Foundation, funding a portion of partner school breakfasts. As part of the South Manchester Partnership and in line with our efforts to increase safety on buses, we will also visit primary schools that we have funded with breakfast to talk about using buses and general bus safety.

When will this be Delivered?

Stagecoach will contribute to the Greggs Foundation from the start of the South Manchester Partnership and will continue to work with the Foundation for the duration of the Partnership.

Benefits

Community Engagement



Stagecoach are engaging with young people in Greater Manchester to improve their quality of life and knowledge about safety



Exceeds

Challenge/Opportunity

The TravelSafe Partnership ("TSP") was formed to keep public transport safe across Greater Manchester. Transport for Greater Manchester and Greater Manchester Police (GMP) have partnered with Stagecoach and other operators to help prevent and deal with incidents of crime, antisocial behaviour and fare evasion. The scheme puts a dedicated team of Police Constables, Police Community Support Officers, Special Constables and TravelSafe Officers on patrol on bus and tram services on a regular basis.

What is it?

Stagecoach are committed to maintaining our current level of support for the TravelSafe scheme, providing four employees on a part-time basis to help patrol Greater Manchester's bus and tram services. We will continue to participate as the scheme evolves throughout the duration of the South Manchester Partnership.

When will this be Delivered?

Stagecoach are committed to maintaining our current level of support throughout the South Manchester Partnership and will continue to work with TfGM and GMP to maximise the benefit of the TravelSafe scheme over the next ten years.

Benefits

Community Engagement



Provide reassurance and high visibility to encourage more people to use public transport and to feel safe whilst doing so.

Improved Safety



Reduce crime and antisocial behaviour and increase passenger safety

6.2 Profit Share

Please note that this profit share arrangement is proposed by Stagecoach to GMCA. Any other operator who wishes to participate in a profit share scheme should propose their own arrangements directly to GMCA. We would welcome the chance to discuss the components of this arrangement in a face to face meeting at the earliest opportunity.

Target profit is defined as 'Profit on ordinary activities before taxation' as reported in the statutory accounts for Greater Manchester Buses South Limited.

[REDACTED]

Profit Share will commence from year 2 of the Partnership, assumed as year end April 2022.

The target profit is set for years 2-5 (year ended 2022-2025) as [REDACTED], subject to indexation per year.

Due to uncertainties around longer term forecasting it is proposed that the target profit should be reset from year 6 (FY 2025/26) onwards of the Partnership. This will be reset, through agreement reached in calendar year 2024, to be implemented from financial year 2025/26.

Profits in excess of [REDACTED] are shared [REDACTED] TfGM, [REDACTED] South Manchester partnership fund, [REDACTED] Stagecoach.

We would propose that the [REDACTED] to TfGM, acting on behalf of GMCA is used to invest in initiatives which benefit the bus user experience and encourage modal shift to bus, as it sees appropriate across any of the Greater Manchester geography, but seek no involvement in any decision-making process as to where this [REDACTED] is spent.

The [REDACTED] from profit share which is allocated to the South Manchester Partnership fund should be governed by the same principles as referenced in section 1.3.2. Namely, this should be used to support initiatives which benefit the bus user experience and encourage modal shift to bus in South Manchester (such as bus priority schemes or kick-starter programmes.) These would be proposed and agreed collectively between Operators and TfGM under the Tier 1 and Tier 2 governance proposed in section 3.1.1.

Profit share is only paid by Stagecoach (there are no proposals for profit support if profit is below the target threshold).

The following assumptions underpin this Stagecoach profit share proposal:

- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
- [REDACTED]

To facilitate the creation of a South Manchester Partnership fund, the following process will be followed:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

6.4 Bibliography

1. Stagecoach leads industry with 13 UK Bus Awards. (2019). Stagecoach Group plc. [online] Available at: <https://m.stagecoach.com/media/news-releases/2019/2019-11-20.aspx> [Accessed 18 Nov. 2019].
2. DOING BUSES DIFFERENTLY - Consultation Document. (2019). [online] Greater Manchester Combined Authority. Available at: <https://greatermanchester-ca.gov.uk/what-we-do/transport/doing-buses-differently-consultation-on-proposed-franchising-scheme/> [Accessed 18 Nov. 2019].
3. Transport Focus (2019). Bus Passenger Survey. [online] Available at: <http://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2019/03/13201611/Bus-Passenger-Survey-Autumn-2018-overall-report.pdf> [Accessed 18 Nov. 2019].
4. Greater Manchester Transport Strategy 2040. (2017) [online] Transport for Greater Manchester. Available at: <https://downloads.ctfassets.net/nv7y93idf4jq/1W2LPpKzCQCswygYyuklwm/05c300a3d59a3147ad7a51c5b8c28188/2-17-0078-GM-2040-Full-Strategy-Document.pdf> [Accessed 18 Nov. 2019].
5. UK Health Forum (2018). Estimation of costs to the NHS and social care due to the health impacts of air pollution. [online] PHE publications. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836720/Estimation_of_costs_to_the_NHS_and_social_care_due_to_the_health_impacts_of_air_pollution.pdf [Accessed 18 Nov. 2019].
6. Revolution In The Way We Travel. (2010). [online] Stagecoach Group plc. Available at: <https://www.stagecoach.com/~media/Files/S/Stagecoach-Group/Attachments/pdf/sustainability-strategy-v2.pdf> [Accessed 18 Nov. 2019].
7. Adecco.co.uk. (2019). Flexible working on the rise | Adecco UK. [online] Available at: <https://www.adecco.co.uk/blog/entries/flexible-working-on-the-rise> [Accessed 18 Nov. 2019].
8. Greater Manchester Good Employer Charter. (2019). [online] GMCA. Available at: https://www.greatermanchester-ca.gov.uk/media/1128/final_emp_charter_summary_doc_5_mar_18.pdf [Accessed 18 Nov. 2019].
9. Economic Forecasts for Greater Manchester. (2019). [online] Greater Manchester Combined Authority. Available at: https://www.greatermanchester-ca.gov.uk/media/1731/final_gmfm2018_forecast_paper_web.pdf [Accessed 18 Nov. 2019].
10. National Education Union. (2019). Child Poverty. [online] Available at: <https://neu.org.uk/child-poverty> [Accessed 18 Nov. 2019].



8th January 2020

Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M1 6EU

Dear Sir

DOING BUSES DIFFERENTLY CONSULTATION

This letter constitutes our formal response to the 'long questionnaire'. It is submitted by Transdev Blazefield Ltd, parent company of Lancashire United Ltd, Burnley and Pendle Travel Ltd and Rossendale Transport Ltd.

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? For more information see page 33 of the Consultation Document

No. These appear to be corrections of errors and omissions.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? For more information see paragraph 3.5 of the Consultation Document

Applying a franchising scheme across the entirety of Greater Manchester may seem logical as it coincides with the boundaries of the Combined Authority. However there is a risk that application across all ten authorities will mean some local market characteristics are overridden in the drive for standardisation. There are corridors in some districts where the main service is a cross boundary one. As these services would be run on a permit basis the relevance of the franchise to these corridors is limited. It may be better to draw the boundaries to exclude those areas without a local GM bus service.

Q3. Do you have any comments on the local services that are proposed to be franchised? For more information see paragraphs 3.6 to 3.8 of the Consultation Document.

No.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? For more information see paragraphs 3.9 to 3.14 of the Consultation Document.

Transdev Blazefield

Transdev Blazefield Commercial Department
Queensgate Bus Depot, Colne Road,
Burnley. BB10 1HH

No – though we would be interested to understand the how the boundaries had been arisen at and if there is scope for flexibility between zones 1 and 2.

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? For more information see paragraphs 3.15 to 3.16 of the Consultation Document

No.

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? For more information see paragraphs 3.17 to 3.18 of the Consultation Document.

No.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? For more information see paragraphs 3.19 to 3.21 of the Consultation Document.

No.

Q8. Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? For more information see paragraph 3.22 of the Consultation Document.

We feel that nine months is broadly reasonable – however there is significant delivery risk, particularly if operators are expected to procure buses as lead times can be at least six months. While there will be a mix of new and older vehicles involved, should contracts be let to non-incumbent operators there will be a large number of buses to get in place at once.

There also appears to be overlap between award of phases – eg phase 1 services will go live in month 9 and phase 2 will be awarded in month 12. This suggests there is little scope to learn from the implementation of phase 1 before procuring phase 2.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

We are surprised that consultation appears to only take place after the expiry of the first contracts, suggesting there is no opportunity to learn lessons.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

Transdev is categorised by TFGM as an 'Other Large' operator, rather than an SME - . The definition of SME used is a turnover of €50mn and fewer than 250 employees. Our Rosso business meets this criteria, but we appear excluded by virtue of our ultimate parent. While we appreciate the logic in providing a number of smaller contracts for SMEs, but this has a number of risks. It is presumably there to enable small operators to continue at their current scale, but could end up being unduly restrictive. In some cases there may be only one SME suitably located to bid for the route and this may not provide good value for money.

There is a risk that operators who are not termed SMEs are disadvantaged if all they can do is bid for larger contracts as there appears to be no option for them to bid for work within their current scale.

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

We believe this approach simply replicates the structure of the larger operators and will retain any inefficiencies in built. Overtime the depot estate of First in particular and Stagecoach to an extent has been rationalised, and the map reproduced below shows how depots are concentrated in the east of GM. Bury is very isolated from any of the strategic depots as is Rochdale and much of Salford. The former First operations in Bury deteriorated in reliability terms when the depot closed in 2017 with remote operation from Bolton providing challenging.

Should franchising progress we would be interested in bidding for a network of services in the Rochdale and Bury districts building on our market knowledge and experience. This would be a blend of routes from our existing depot at Rochdale and other depots such as Bolton and Oldham. We are concerned that the large franchises will simply perpetuate the current route to depot allocation and therefore preclude this.

Transdev owns a depot in Rochdale which is larger than the Stagecoach depot in Middleton and Arriva's Wythenshawe depot and excluding this from the Strategic depots seems inconsistent. We find it a satisfactory location for serving both our Rochdale and Bury operations. It has a current allocation of 71 for 62 PVR – with space for around ten more vehicles. Stagecoach Middleton has 59 vehicles for a 52 PVR and Wythenshawe has around 45 vehicles allocated.

Figure 4: Greater Manchester Strategic Depots



As noted in our answer to Q11 there is a disconnect between 'large GM', 'other large' and 'SME'. While Transdev, globally, is a large operator, its Rossendale Transport Ltd entity meets the SME criteria. The franchise scheme is effectively committing to absorb, one way or other, the property of the 'large GM' operations and ensure there is a mechanism from SME's to continue to participate. Other large operators seem to be excluded from proposals for their depots to be purchases, leaving

them with assets to dispose of. We feel there ought to be a consistent approach.

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? For more information see paragraphs 4.15 to 4.21 of the Consultation Document.

We would agree that the bus market is not performing as well as it could. We challenge the summary in 4.18 that a high degree of value for money and innovation is not achieved. Greater Manchester operators have undertaken many innovations including hybrid, micro hybrid and now electric buses; contactless payments; mobile ticketing; smart ticketing; audio visual next stop announcements; real time tracking; on bus Wi-Fi; USB device chargers; business to business ticketing deals; marketing partnerships with key destinations; telematics. Transport Focus Bus Passenger Survey 2018 had a 66% satisfied/very satisfied score with Value For Money v an average of 64% across all areas in the survey. This compares to Metrolink with a VFM score of 60% (v tram networks average of 68%). Value for Money satisfaction on Northern rail, Manchester's main rail operator is 55%.

Fare increases are generally a product of cost increases and comparison with inflation is irrelevant as this simply compares with a basket of other prices. Indeed we note that GMCA plans to continue to increase fares above inflation under franchising.

The accusation of a lack of co-ordination of networks, particularly with Metrolink and Rail is a surprising accusation given the availability of season tickets for Bus and Tram, or bus and train yet there is no equivalent ticket allowing use on both tram and train despite both being under public control. We are also aware of significant changes in the bus networks on corridors where Metrolink has been introduced, such as between Rochdale and Oldham and through Moston.

The suggestion that services for social and economic need are not provided where they are not profitable is a simplistic proposition and ignores the fact that operators run some such services on a marginal basis and also offer commercial journeys at quieter times, for example Rosso providing commercial journeys serving Fairfield Hospital from 0550. Operators also continue to take the revenue risk on occasions when TfGM contracts in additional services or journeys. TfGMs spending on tendered services has reduced in recent years.

The complexity of the fares system is subjective and while there is scope for simplification – this does tend to result in some customers being worse off as a result. Generally speaking customers regularly use the same route or corridor and in most cases have a choice of single, day, weekly or longer period ticket, or a multi operator version of the same. It is irrelevant to most customers in (say) Rochdale that there are different tickets available in Wigan or Stockport.

There are also significant differences in the factors affecting bus operation in different parts of GM. Manchester City Centre is blighted by severe traffic congestion and historic pedestrianisation schemes have reduced the ability of buses to penetrate the city centre. There are other congestion pinch points elsewhere in GM, commonly around the approaches to motorway junctions. Congestion on the M60 leads to significant 'rat-running' in Bury and Rochdale and when accidents and closures commonly occur the communities are often gridlocked.

Q13a. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? For more information see paragraphs 4.15 to 4.21 of the Consultation Document.

PLEASE TICK ONE BOX ONLY.

o Strongly agree

o Tend to agree YES

o Neither agree nor disagree

o Tend to disagree

o Strongly disagree

o Don't know

Q13b. Why do you say this?

There is a definite need to address congestion and some form of change may be necessary to enable this which could be either firm commitments from operators through partnership or franchising.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? For more information see paragraph 4.22 of the Consultation Document.

The objectives as set out are logical at face value. However we have some concerns. We note the objective to provide integrated and simple fares; and ensure fares offer value for money. We are not sure both can be achieved. Page 29 of the Strategic Case states "in the first instance, the fare level for a Greater Manchester ticket would be set at the lowest current single operator fare for the larger incumbent operators, pending longer-term review with government of transport funding regimes in Greater Manchester; single fares would be simplified as far as possible." Based on current prices this would be £16/week. This will represent a 6.7% increase for customers using Rosso's GM Saver ticket and therefore we would challenge the notion that this represents value for money. The reference that single fares would be simplified as far as possible is open to challenge. A GM wide flat fare is the ultimate simplification – and is certainly possible, however will lead to disparities in value for money depending on how far the customers travel. However we do not believe a flat fare this is planned by GMCA, merely that the number of singles will be reduced – which suggests simplification is not been implemented as far as possible.

We also query whether meaningful improvements in some of these measures are possible the 2018 Bus Passenger survey shows quite high scorings in many of the qualitative measures.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? For more information see paragraphs 4.29 to 4.37 of the Consultation Document.

Combined answer to Q15/Q16 below

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

We believe both franchising and partnership can meeting GMCA's objectives. There are strengths and weaknesses in each and we feel that the appraisal of the partnership option is somewhat negative.

Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options; • provide the most economic value (Net Present Value); and • create the best platform from which further economic value could be delivered. Do you have any comments on this? For more information see paragraphs

4.43 to 4.63 of the Consultation Document.

We are concerned that a significant part of the economic benefits appear to come from unification into a single network. The evidence base is theoretical for this and must carry a high risk. It is not clear why it is concluded that the scheme forms the best base for future economic benefits.

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraphs 4.73 to 4.75 of the Consultation Document.

We would like GMCA to consider an alternative approach to how it packages franchises and its approach to revenue risk. We think packaging into smaller geographic lots would allow more flexibility, and sharing revenue risk will encourage operators to stimulate growth and harness our skills in marketing, branding and promotion

We have worked tirelessly to transform our operations in Greater Manchester and across the North and had great success in growing customer numbers. While we understand the desire for a radical change to a centralised controlled network, we have a lot more to offer than a simple operating contractor. Our vision for a franchised network is:

- A simple and comprehensive planned network

- Contracts packaged geographically around specific markets, not necessarily structured around depot availability – perhaps with smaller lots of 50/60 vehicles

- A marketing and branding package focused on local markets (as we have in Bury and Rochdale) or core routes (as we do with Witchway)

- A revenue risk sharing approach which incentivises operators to deliver high standards and to promote and market the network to maximise customers and revenue in a collaborative manner with TfGM

We believe the above mix allows Greater Manchester to have the best skills from all parties. Strong operations, strong marketing from operators underpinned by a holistically planned network. This will improve the competitiveness of the procurement process and help reduce the burden of revenue risk to TfGM. It will allow us to build on the successes we have had in growing customer numbers in Bury and Rochdale and apply it to other corridors should we bid successfully.

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraph 4.76 of the Consultation Document.

Our preference would be to enter into a seven or ten year contract period as this would allow us to lease buses at the most economic rates and offer a maximum vehicle age of seven or ten years on any new contract awarded to us for non schools work.

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraph 4.77 of the Consultation Document.

GMCA retaining revenue risk is the practical outcome for the franchise as specified. However we question whether this is an appropriate risk for GMCA to take. The bus partnership proposed by One Bus offers a significant amount of control and influence on network, price and increased accountability. There is a big risk when measuring benefits. The auditor highlighting significant

concerns with the evidence base for benefits accruing from a single identity. Transdev's strategy is one of local branding with core routes separately highlighted and since this was rolled in Bury and Rochdale since we purchased Rosso in January 2018 we have increased customers in Greater Manchester by 6% in 2018 and a further 6% in 2019. Vantage, Stagecoach Gold, Magicbus, Arriva Sapphire are examples where segmented branding has helped grow the market which suggests that the uniform branding favoured by GMCA is less likely to generate benefits.

The BCR of partnership is only slightly lower than franchising – but with much lower costs and a burden of revenue risk placed on operators (willingly). It seems a high risk strategy to incur significant extra costs predicated on a risky profile of benefits when there is a much less risky approach.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators as set out in the Commercial Case? For more information see paragraphs 4.78 to 4.83 of the Consultation Document.

The application of TUPE is appropriate. We are concerned that the planned use of 'strategic depots' may result in employees having to relocate. This is particularly relevant for our employees as our depot is not 'strategic'. There are also a range of different Terms and Conditions across the GM operators and the move to franchising will effectively pool work at depots and it seems likely that drivers at these depots may be doing the same work on different terms. This may lead to pressure for standardisation which is likely to lead to increased costs.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraphs 4.85 to 4.87 of the Consultation Document.

The 'strategic depot' approach places us at a disadvantage to other operators as we feel they will have competitive advantage in bidding for contracts operating from 'their' depot as they will have full knowledge of the costs involved. We also note that our Rochdale depot has a larger fleet than two of the ten depots (Middleton and Wythenshawe) determined as strategic. It is also inconsistent that GMCA are proposing acquiring depots from some operators should they exit the market but not others.

We would prefer an opportunity to bid for a network of routes based on an optimum depot location, rather than necessarily be fixed to operating from one of the strategic sites.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraphs 4.88 to 4.90 of the Consultation Document.

The residual value mechanism indemnifies operators against loss of use of fleet assets. There are a few items which are not clear:

- Does the RV mechanism apply to the fleets of existing operators
- Would operators of 2nd franchises be compelled to accept the vehicles of the outgoing operator.
- Who is responsible for bringing any substandard vehicles to the right standard.
- Should the 2nd franchise which to introduce additional new vehicles instead of inheriting the existing fleet, would the 1st operator be guaranteed the residual value or would they be required to sell on the open market. Or is this a risk the 2nd operator needs to bear
- The assumption in the strategic case that non incumbent operators would bid with a new fleet

and the additional costs would be balanced by higher qualitative scores must be reflected in the scoring mechanism. Or alternatively bidders should be mandated to submit 'all new' fleet options for comparative purposes.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraph 4.91 of the Consultation Document

Standardisation of ticket machines makes sense. However there is a risk that this creates a residual value issue for operators' existing machines and a staged approach may be more effective and cost less for GMCA.

Q25. Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case? For more information see paragraphs 4.92 to 4.93 of the Consultation Document.

As noted in earlier answers, we believe there is a role for a medium sized franchise (51-100) buses despite the market insight suggesting these are only of value to those with 100+ contracts. It may be worth splitting some larger contracts into two lots to provide alternative options. It is feasible that two operators could bid for 2x 75 bus lots using their own modern depots for a lower price than 1 operator could for 1x 150 bus contract using an existing, old depot obtained through the 'strategic depots' process. Ruling this option out seems perverse.

Care needs to be taken with a negotiation approach. Previous experience of this has led to added value offers from one bidder being added into the final specification, removing any advantage unfairly. The tightly specification proposed for the franchises may offer limited scope for negotiation

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case? For more information see paragraphs 4.97 to 4.101 of the Consultation Document.

Transdev operates a number of cross boundary services into Greater Manchester in Bolton, Bury, Manchester, Rochdale and Salford districts. Other than peak and school services these comprise:

- The 1 Blackburn to Bolton via Astley Bridge – it is the sole bus service north of Astley Bridge on Blackburn Road and provides just under ½ of journeys south of Astley Bridge
- Witchway X43 Skipton and Burnley to Manchester via Prestwich. This provides a limited stop service along the A56 from Prestwich to Manchester as well as longer distance travel into Manchester from Rawtenstall, Burnley and beyond. It is the main service on Bury New Road through Higher Broughton (operating every 15 minutes along with the hourly 96)
- Irwell Line 481, 482 and 483 from Blackburn, Accrington, Burnley and Rawtenstall to Bury via Walmersley – these run every 15 minutes and provide 50% of the service into Bury from Walmersley
- The 464 Accrington to Rochdale – the main service along Whitworth Road into Rochdale
- The R3/R13 Wallbank to Rochdale – the only service through Shawclough.

For all these services the element of local patronage within Greater Manchester is critical to their sustainability and we welcome the consideration of a permit based approach to permit continued cross boundary operation. We are concerned with some elements – particularly the assessment of likely abstraction from franchise routes. This is reasonable where a new cross boundary service is

introduced, but less justifiable where there is an established operation.

We also note GMCA would not permit franchise network ticketing to be available on cross boundary services for various reasons. We do not believe this should be entirely ruled out, even if there are currently barriers to achieve this.

As noted above some of our cross boundary services are the sole or main local bus service in parts of GM and we would be willing to explore how these could be enhanced to potentially release resources from franchised services to redeploy elsewhere.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? For more information see paragraph 4.102 of the Consultation Document.

The previous questions provide more detailed answers, but our view is that GMCA should maintain flexibility in contract size, depot provision and fleet provision.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? For more information see paragraphs 4.103 to 4.108 of the Consultation Document.

The bus operators for Greater Manchester have presented a partnership proposal and has made a number of enhancements recently. We believe partnership can achieve similar levels of benefits at a lower risk to the public purse. Critically it increases the level of control and influence GMCA, TFGM and the mayor has in terms of network planning and fare structures, provides additional resource, additional accountability, a performance regime and a method to reinvest at least 50% of financial benefit gained from publically funded infrastructure improvements.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? For more information see paragraph 4.110 of the Consultation Document

We would agree that it has limited impact.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? For more information see paragraphs 4.111 to 4.136 of the Consultation Document.

No – we have not had the opportunity to undertake a detailed appraisal of this.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? For more information see paragraphs 4.137 to 4.145 of the Consultation Document.

No – we have not had the opportunity to undertake a detailed appraisal of this, however the concept of partnership is to ensure benefits can be delivered without recourse to additional public revenue funding.

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? For more information see paragraphs 4.150 to 4.157 of the Consultation Document.

Some roles currently identified as being undertaken by operators are expected to transfer to GMCA. Given that operators have experience of this work, could GMCA consider contracting this out? As an example West Yorkshire Combined Authority recently contracted Transdev to develop design principles and exemplars for new printed and at stop information, West Yorkshire wide. Contracting out may allow GMCA to benefit from wider experience of operators more effectively than simply recruiting or transferring personnel

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? For more information see paragraphs 4.158 to 4.166 of the Consultation Document

No

Q34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? For more information see paragraphs 4.167 to 4.174 of the Consultation Document.

No

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? For more information see paragraphs 4.176 to 4.185 of the Consultation Document

We note the comments re cross boundary impacts and would like to engage with TFGM on this in more detail.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? For more information see paragraphs 4.186 to 4.190 of the Consultation Document.

While we note the comments that there is a risk that partnership may not remain in the long term, but equally there is the opportunity that it thrives, grows and expands.

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? For more information see paragraphs 4.193 to 4.200 of the Consultation Document.

We note the reference to the residual value mechanism for fleet assets and the comment at 4.195 that this would apply to fleets of existing operators. Many of the vehicles we use are on fixed term leases and thus not covered by the residual value matrix and if we cannot redeploy them we will be left with lease commitments that cannot be serviced by revenue. We also recognise the opportunity to expand through successful bids.

Q38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? For more information see paragraphs 4.201 to 4.202 of the Consultation Document.

No.

Q39a. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? For more

information see paragraphs 4.201 to 4.202 of the Consultation Document.

PLEASE TICK ONE BOX ONLY.

o Yes *TICK*

o No

o Don't know

Q39b. If so, please explain what you think those positive or negative impacts would be

Franchising presents both a risk and opportunity for Transdev. Our world wide operations include extensive franchised bus networks. Should franchising be adopted we would be a willing bidder, committed to delivering great customer service. We also see the opportunity for our growing cross boundary services from Lancashire and Blackburn to continue to flourish and grow further.

Clearly there is a risk that we are unsuccessful and assuming our cross boundary operations continue the limit of exposure is our Rochdale depot and associated fleet.

Under partnership we expect to continue our strategy of growing patronage through strong marketing, branding and good customer service. We would also actively influence the wider partnership to deliver similar outcomes.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? For more information see paragraphs 4.203 to 4.204 of the Consultation Document.

No. We have covered revenue risk earlier.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? For more information see paragraphs 4.205 to 4.214 of the Consultation Document.

No.

Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? For more information see paragraphs 4.215 to 4.226 of the Consultation Document.

Pragmatically, we believe given the high risk associate with franchising and the close BCRs that a better way of progressing would be to engage to increase the benefits of partnership- where the risk profile lies with the operators.

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

No

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? For more information see the draft Equality Impact Assessment (Section 5)

No

Q45a. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? PLEASE TICK ONE BOX ONLY.

- ☐ Strongly support
- ☐ Tend to support

☒ Neither support nor oppose TICK

- ☐ Tend to oppose
- ☐ Strongly oppose
- ☐ Don't know

Q45b. Why do you say this?

Whether through the Partnership promoted through One Bus or the Franchising scheme proposed by GMCA or somewhere in between, Transdev is committed to continuous improvement for bus users in Greater Manchester. We seek an active role in developing networks and marketing buses to customers, existing and new.

Q46a. Are there any changes that you think would improve the Proposed Franchising Scheme? PLEASE TICK ONE BOX ONLY.

- ☐ Yes

☒ No TICK

- ☐ Don't know

Q46b. Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

We have made a number of suggestions in our earlier answers but have no further ones to add

Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? PLEASE TICK ONE BOX ONLY. ☐ Extremely likely ☐ Quite likely ☐ Neither likely nor unlikely ☐ Quite unlikely ☐ Extremely unlikely ☐ Don't know

N/A

Q48. Finally, do you have any other comments you want to make?

Please see supplementary document sent by email.

Yours Sincerely



Paul Turner
Head of Commercial Development

Doing Buses Differently January 2020



Jan 2020

we are transdev BLAZEFIELD

Transdev BlazeField is a wholly owned subsidiary of Transdev Group.

Transdev Group is the world's number one truly multi-modal mobility provider with a turnover of over €6 billion and over 85,000 employees across 19 different countries.

Transdev empowers its local businesses to make the best decisions for local customers and partners, but with the support of a global visionary organisation, operating buses, trains, trams, taxis, cycles and ferries, employing the best use of technology to create personalised and environmentally advanced mobility systems.

All of us at Transdev subscribe to our core values:



PASSION



PERFORMANCE



PARTNERSHIP



COMMITMENT

Transdev BlazeField is a highly regarded and pioneering bus operator, with a strong reputation for creativity, innovation and an excellent track record in the development of the bus travel alongside its partners.

We boast a turnover of £62 million, we employ 1,250 people across Yorkshire, Lancashire & Greater Manchester and we operate 500 buses across a network of over 60 routes across the north of England, with a mixed portfolio of urban, interurban, express, schools and contracted work.



In the past year, we have solidified our reputation with a renewed focus on investment and customer growth. This includes spending £9 million on new, highly specified buses across the north, new routes to improve regional connectivity and new ticketing and information systems to make accessing the bus as easy as possible.



We have set out a simple vision of being The Amazing Bus Company based on three strong beliefs ...

1 employing people who are happy to work for us

2 serving people who are proud to be our customers

3 creating a business which is innovative and successful

We are certain that collaboration works best for customers as they demand an increasingly personalised travel experience. To achieve the bold aims of the local authorities and businesses we work with, we fully support the idea that the bus can play a huge role in enabling the growth within our local economies throughout the region and, of course, the ambitions of TfGM.

We see ourselves firmly embedded into the communities we serve. This has been emphasised recently with the relaunch of Rosso which was purchased by Transdev in January 2018. Individual strong route brands have been introduced on six corridors with a new family identity brought together under the Rosso name. We are always one of the biggest employers in the towns in which we operate and our continuing to develop stronger relationships within our communities.



Our new brands have brought amazing buses and a splash of colour to the roads of Rossendale and Greater Manchester.

1 OUR SUBMISSION



“ Transdev, as one of North England’s most innovative operators is delighted to respond to the challenge of ‘Doing Buses Better’. We have invested in growing customers with 5.2mn customers boarding our buses in Greater Manchester in 2019 – 6.8% more than in 2018. We have done this by improving service delivery, improving the quality of our vehicles, greater customer engagement, strong localised route branding, partnership working with local businesses and class leading marketing. We are also one of the main operators of cross boundary bus services into Greater Manchester, running five routes from Lancashire and Blackburn with Darwen.

Whether through the Partnership promoted through One Bus or the Franchising scheme proposed by GMCA or somewhere in between, Transdev is committed to continuous improvement for bus users in Greater Manchester. We seek an active role in developing networks and marketing buses to customers, existing and new.

Transdev has submitted a detailed response to the long questionnaire with constructive suggestions and critique on the proposals. This document sets out the vision behind this response. ”



Alex Hornby
CEO
Transdev Blazefield

2 TRANSDEV IN GREATER MANCHESTER

Transdev expanded its operations in Greater Manchester in January 2018 by purchasing Rosso. Prior to this we operated cross boundary services into Manchester from Accrington and Burnley and into Bolton from Blackburn. Rosso adds two more cross boundary services from Rossendale into Bury and Rochdale plus a local commercial network and a number of local bus and schools tenders operated for TfGM. The cross boundary work operates from a depot in Blackburn, the work wholly in Bury and Rochdale works from our depot in Rochdale, which accommodates 70 vehicles currently

Of the 5.2mn customers, 3.9mn (75%) use Rosso buses. This is 8.6% higher than last year and 18% higher than 2017, Rosso's last year in Rossendale Council ownership.



5%

reduction to our
young person's weekly ticket

23%

of our passengers now pay
with contactless which has
been introduced on all of
our main routes



better connections in
Rawtenstall for simple
transferable tickets to Manchester

the **witchway** **464**



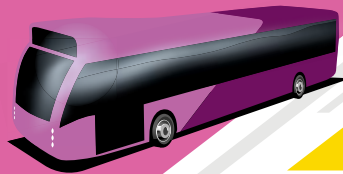
£18

£1.50/trip

Greater Manchester
12 journey ticket

16

brand new
buses introduced
on **464**



10



newer double deckers to replace
older buses on school services



WiFi & USB Power
on

43

buses

35

buses to be upgraded
to Euro 6 standard

54%

of the fleet has
been replaced
by better buses



3 FRANCHISING

Transdev would seek to bid for franchises should the decision be taken to progress. The bulk of Transdev's global footprint is based on large contract operations across the world, from city and town based networks to regional concessions throughout Europe, North and South America and Australasia.

We have worked tirelessly to transform our operations in Greater Manchester and across the North and had great success in growing customer numbers. While we understand the desire for a radical change to a centralised controlled network, we have a lot more to offer than a simple operating contractor. Our vision for a franchised network is:

- ▶ A simple and comprehensive planned network
- ▶ Contracts packaged geographically around specific markets, not necessarily structured around depot availability – perhaps with smaller lots of 50/60 vehicles
- ▶ A marketing and branding package focused on local markets (as we have in Bury and Rochdale) or core routes (as we do with Witchway)
- ▶ A revenue risk sharing approach which incentivises operators to deliver high standards and to promote and market the network to maximise customers and revenue in a collaborative manner with TfGM

We believe the above mix allows Greater Manchester to have the best skills from all parties. Strong operations, strong marketing from operators underpinned by a holistically planned network. This will improve the competitiveness of the procurement process and help reduce the burden of revenue risk to TfGM. It will allow us to build on the successes we have had in growing customer numbers in Bury and Rochdale and apply it to other corridors should we bid successfully.



Rochdale Runners

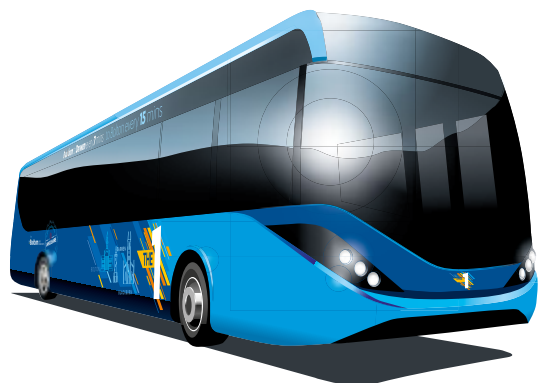


Witchway

4 CROSS BOUNDARY

Transdev operates a number of cross boundary services into Greater Manchester in Bolton, Bury, Manchester, Rochdale and Salford districts. Other than 'peak' and school services these comprise:

- ▶ The 1 Blackburn to Bolton via Astley Bridge – it is the sole bus service north of Astley Bridge on Blackburn Road and provides around 50% of all journeys south of Astley Bridge. This is relaunched with high spec, brand new Euro 6 buses from 19th January 2020
- ▶ Witchway X43 Skipton and Burnley to Manchester via Prestwich. This provides a limited stop service along the A56 from Prestwich to Manchester as well as longer distance travel into Manchester from Rawtenstall, Burnley and beyond. It is the main service on Bury New Road through Higher Broughton (operating every 15 minutes along with the hourly 96). New buses will be delivered during 2020 for this route which we anticipate will 'raise the bar' in terms of new bus comfort and quality
- ▶ Irwell Line 481, 482 and 483 from Blackburn, Accrington, Burnley and Rawtenstall to Bury via Walmersley – these run every 15 minutes and provide 50% of the service into Bury from Walmersley. Buses were refurbished 'as new' in 2019



The 1



Irwell Line

- ▼ The 464 Accrington to Rochdale – the main service along Whitworth Road into Rochdale – new buses were introduced in autumn 2018
- ▼ The R3/R13 Wallbank to Rochdale – the only service through Shawclough

For all these services the element of local patronage within Greater Manchester is critical to their sustainability and we welcome the consideration of a permit based approach to permit continued cross boundary operation.

We are concerned with some elements – particularly the assessment of likely abstraction from franchise routes. This is reasonable where a new cross boundary service is introduced, but less justifiable where there is an established operation.

We also note GMCA would not permit franchise network ticketing to be available on cross boundary services for various reasons. We do not believe this should be entirely ruled out, even if there are currently barriers to achieve this.

As noted above some of our cross boundary services are the sole or main local bus service in parts of GM and we would be willing to explore how these could be enhanced to potentially release resources from franchised services to redeploy elsewhere. Examples include:

- ▼ Additional short journeys on the 1 to run from Astley Bridge to Bolton making a bus every 7 minutes with the short journeys replacing the 534 to Oldhams Estate
- ▼ Improved frequency on Irwell Line through Walmersley with extra buses from Ramsbottom to replace the 472/474
- ▼ A consolidated timetable with limited stop cross boundary and local journeys along the A56 from Prestwich into Manchester

5 PARTNERSHIP

We are members of One Bus and have proactively influenced the partnership proposal submitted by One Bus on behalf of the bus operators of Greater Manchester. The partnership will achieve the strategic aims of GMCA but with a significantly lower risk profile to the public section. It will:

- ▼ Offer significant control and influence on the commercial bus network to TfGM through the partnership board and working groups
- ▼ Increase investment levels rolling out new low emission buses faster than otherwise with resulting air quality benefits
- ▼ Provide customer benefits through integrated customer contract services
- ▼ Improve the network through a data led planning process between operators and TfGM
- ▼ Simplify and standardise ticketing, improving integration focusing core messaging on multi operator products
- ▼ Include a performance regime with published data to ensure accountability and high standards are met
- ▼ Collaborative work with TfGM and the districts to tackle congestion with reinvestment of benefits into the network
- ▼ Additional resources to deliver improved services to new developments

If partnership is adopted we will continue to strive to increase customer levels and influence the partnership to embrace focused local branding, marketing and promotion to build on the successes we have achieved in our network.





THANK YOU FOR READING OUR COMMENTS.

We hope the information in the document helps you to understand a bit more about why we do what we do the improvements we we continue to make, as well as our response to the consultation.

If you would like to discuss this in any further detail please contact us directly.

Alex Hornby

Chief Executive

alex@transdevplc.co.uk

07968 960889

Paul Turner

Head of Commercial Development

paul.turner@transdevplc.co.uk

07741 907713



Warrington's Own Buses

| | |
|--|--|
| Organisation Name | Warrington's Own Buses |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Warrington's Own Buses are supportive of this |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | Warrington's Own Buses are supportive of this |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Broadly supportive of the approach and would like eligibility to bid for all sizes of franchise |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | In future iterations of large franchises it may be possible to shorten this. 3 to 6 months would be viable for the smaller franchise packages. |

| | |
|---|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | Small and medium sized operators should be considered eligible to bid for all sizes of franchise, including the larger ones. It is also important to maintain the principle going forwards that the larger franchise operators don't bid low (incrementally), thereby taking advantage of their more dominant position, for the smaller franchises. This will keep more operators and a more vibrant market. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | In broad agreement with this |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | All bus services under any model of ownership would benefit from the 'phase 2' suggestions. Frozen fuel duties, cheap/free car parking, cheap car finance and the exclusion of all cars (but inclusion of most buses) from the forthcoming GM Clean Air Zone have a negative impact upon bus passenger numbers. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |
| Q13b Why do you say this? | A greater degree of unification, identity and fare structure is likely to bring benefits to Greater Manchester. A truly multi-modal public transport system (including rail, bus, tram, cycle etc) will have an economic benefit. 'Phase 2' interventions are important too. |

| | |
|--|---|
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>Franchising appears to meet the GMCA's goals more than the other options and provides better value for money. Phase 2 additional measures will be required to achieve the proportion of trips by non-car modes to 50% by 2040 as set out in the Draft Delivery Plan. There should be some 'anti' car measures taken.</p> <p>Metrolink appears to have had a considerable impact on bus passenger numbers.</p> <p>We support the service permit scheme for cross boundary schemes but would ask TfGM/GMCA to ensure that the routes can pick up and set down at all existing bus stops. This is to protect the existing revenues and recognising that some of these services rely on de minimis funding and existing farebox. Equally, the loss of System One (and any reduction in current fares) should be subsidised. We'd also ask for operator-own existing branding to be permitted.</p> <p>Compared to the other options (partnership etc), franchising would allow our company to bid for new contracts in Greater Manchester, which is a good commercial opportunity for us. This is therefore our preferred option.</p> |
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | |
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>We recognise that even with a 'generous' approach to a partnership (p167), franchising appears to offer better vfm to GMCA</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Small/medium operators should be permitted to bid for all sizes of franchise.</p> |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Supportive of this approach. One issue with the existing methodology for bidding is that operators have to rely on survey bus passenger numbers from TfGM, which always gives an advantage to the incumbent operator, who knows the actuals. Bids often contain a degree of extra cost to cover this risk. Moving to a gross cost regime means this is no longer an issue.</p> |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | <p>It is important to note that different areas are different labour markets, with differing rates.</p> |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Cross boundary services may have a slightly different spec |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | See earlier comments on cross boundary. Loss of System One and any reduction to existing will need a solution. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | Not all bus operators in GM are part of OneBus or the suggested VPA being put forwards. |

| | |
|---|-----------------------------|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | Supportive of this approach |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | Supportive of this approach |

| | |
|---|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | Wouldn't offer the same opportunity to Warrington's Own Buses and other 'new entrant' bus operators |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | There are benefits to the unified approach of franchising |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | It could be difficult for our company to sign up to the suggested partnership approach, of which we haven't played a part |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | Yes |
| Q39b If so, please explain what you think those positive or negative impacts would be. | Hopeful that passenger numbers will rise on cross-boundary services and that there will be the opportunity to bid for new, gross cost contracts. Such contracts present a new commercial opportunity and certainty of future revenues. |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Supportive of this approach |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Supportive of this approach |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | Supportive. Maintain cross-boundary with solution to System One Allow SMEs to bid for the larger franchises Allow cross-boundary to operate with existing branding and own tech (but room for adjustments) |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | As per previous |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |

| | |
|--|---|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | We would support a full London style approach with tranches of routes available. In the case of the existing plan, SMEs to be eligible for large franchises |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | |

BACK

BY SPECIAL DELIVERY

By Post: Freepost GM BUS CONSULTATION

By Email: gmbusconsultation@ipsos-mori.com

Our Ref:
SCM/SD/008050.0149

07 January 2020

Dear Sirs

Our Client: Rotala PLC

We are instructed to act on behalf of Rotala PLC ("our client") in regard to the Consultation by Greater Manchester Combined Authority ('GMCA') on a proposed franchising scheme ('the scheme')

In accordance with the deadline of 8 January 2020, please find enclosed our client's response to the Consultation ('the Response') whereby the 53 questions raised in the long survey are responded to.

In summary our client is strongly opposed to the scheme and makes the following points to support its response:-

- The assumptions that the economic assessment is based on are fundamentally flawed as is evidenced by a reputable Economist Report
- The financial assessment reveals that the cost of franchising is massively underestimated and has a risk of being passed onto the tax payer by increasing Council Tax.
- There is a real risk that, if implemented, the scheme will eliminate long standing Manchester operators from the market, risking employment and pensions of real people
- Franchising proposes a fare increase of 64% over a 10-year period
- The rail network is evidence of the lack of success of franchising
- A decision to franchise will be challenged by operators
- Manchester is a different City to London, businesses worked together to build the city and continue to do so.
- Operators support partnership
- Partnership provides a better solution at less risk to GMCA, operators and the public

**BACKHOUSE
JONES**

The Printworks
Hey Road
Clitheroe
BB7 9WD

T: 01254 828 300
F: 01254 828 301

22 Greencoat Place
London
SW1P 1PR

T: 0207 855 9633
F: 0207 855 9634

backhousejones.co.uk

- Partnership will achieve all of the Phase 1 and 2 aims simultaneously
- Franchising remains an option in the unlikely event partnership is unsuccessful

Should you require any further information please do not hesitate to contact us.

Kindly acknowledge safe receipt.

Yours faithfully



Libby Pritchard

Backhouse Jones

Libby.pritchard@backhouses.co.uk

This matter is being dealt with by the Clitheroe office, please direct all correspondence to that address.

Enc

ROTALA RESPONSE TO GREATER MANCHESTER COMBINED AUTHORITY
CONSULTATION ON PROPOSED FRANCHISING SCHEME

I. Executive Summary

This is the response (the “Response”) of Rotala Plc (“Rotala”) to the consultation by Greater Manchester Combined Authority (“GMCA”) (the “Consultation”) on a proposed franchising scheme (the “Proposed Franchising Scheme”).

Rotala, which has been listed on the Alternative Investment Market since 2005, achieved revenues of £62.4 million in the fiscal year ended 30 November 2018. Under the brands Diamond Bus, Preston Bus, Wings, and Hallmark, it operates bus and coach services in the North West, and West Midlands, as well as at Heathrow. Following its acquisition earlier this year of the Bolton depot of First Manchester (which has been incorporated into Diamond Bus North West), Rotala is the second largest bus operator in the Greater Manchester area. Rotala owns the former First Manchester depot in Bolton (which is now the headquarters of Rotala in the North West), as well as two smaller depots in Atherton and Eccles, and operates 88 bus services in Greater Manchester.

For the reasons detailed in this Response, Rotala is strongly opposed to the Proposed Franchised Scheme.

GMCA has put forward an entirely radical proposal, *i.e.*, the Proposed Franchising Scheme, that will require significant amounts of public funding (necessitating increases in Council Tax levels in Greater Manchester) but have considerable risks attached to it, for both GMCA and bus operators, particularly during the transition period and certainly without any guarantee of success. The radical proposal is aimed at addressing perceived problems with the current bus system in the Greater Manchester area, although the basis for intervention is underpinned by flawed analysis (*e.g.*, relating to bus patronage and the benefits of the Proposed Franchising System relative to the benefits of alternatives) and incorrect costings and revenue assumptions (*e.g.*, a blanket 7.5% operator margin, fare rises above sustainable levels, and exaggerated increased patronage), as well as not dealing with matters such as the Clean Air Zone and congestion that will have an impact on patronage and need to be dealt with regardless of the particular bus system to be implemented in Greater Manchester. GMCA has equally chosen to ignore what is in reality the dubious performance of bus franchising in Greater London, while

overlooking the extremely impressive results achieved with partnership schemes in other parts of the country.

GMCA has not taken into account a key difference between franchising in London and the Proposed Franchising Scheme in Greater Manchester, namely, that buses in London were controlled by the public sector at the time franchising was introduced in London whereas bus operations in Greater Manchester are in the hands of the private sector, ranging from small to large private businesses. In the context of Greater Manchester, franchising poses real risks to private sector operators ranging from significant financial detriment to, in some cases, closure of their business if they are not successful in tendering for one or more franchises. Private operators are backed by individuals who have invested time and money in their businesses and rely on it for their livelihood and pension, both of which could be lost overnight through a reckless and potentially unlawful proposal to implement franchising without considering this risk or making provision for compensation for these businesses. That this aspect has not been considered is abundantly clear as the Consultation makes no provision for the cost of litigation when assessing the affordability of franchising. The reality is that, if the Proposed Franchising Scheme were to be implemented, it would have a negative impact on a large number of the bus companies operating in Greater Manchester and this will lead to costly and expensive legal challenge that would give rise to negative publicity.

Rotala, together with other members of the OneBus consortium, has commissioned an expert economist report by Jacobs (the “Jacobs’ Review of Consultation Economic Case”). This report clearly demonstrates that:

- The Economic Case and Financial Case are skewed in favour of the Proposed Franchising Scheme as compared with other options such as partnership;
- The Economic Case and Financial Case are based on high fare increases across the life of the Proposed Franchising Scheme, an operator margin that is not likely to be reflective of real-world commercial factors, incorrect assumptions (both from a cost perspective and otherwise), lack of evidence, and unbudgeted sums; and
- TfGM has underestimated the significant risks associated with the Proposed Franchising Scheme.

- Ultimately, the Proposed Franchising Scheme is simply not affordable based on the Economic and Financial Cases.

Rotala considers that a revised partnership option (“Partnership Plus”) could achieve all of the objectives sought by GMCA, including: (a) simpler, more cost-effective ticketing systems across Greater Manchester; (b) new, faster, and more reliable routes; (c) more convenient bus stops; (d) better-equipped buses; (e) less road congestion; (f) greener buses; (g) better air quality; (h) ticketing inspectors to ensure all passengers support the network; and (i) trained staff that support passengers wherever they need to go. Moreover, these benefits would be met through operator revenue and would not require any increase in Council Tax for Greater Manchester residents.

The Partnership Plus would further entirely avoid unintended consequences that are likely to flow from a massive upheaval of the existing market structure and radical franchising proposal and would certainly avoid the need for any significant transition period with its significant attendant risks. Rotala believes that there is a significant risk of there being negative impact on operators, the citizens of Greater Manchester, and also GMCA due to the potential for the Proposed Franchising Scheme to fail. Greater Manchester is a city that has been built by businesses trading in it and is successful due to the community ethos in which it operates. Rotala considers that Partnership Plus would thrive on this and be a success due to the way Greater Manchester operates. Further, in addition to achieving Phase 1, Partnership Plus has the real potential to achieve Phase 2 from the outset, with the commitment of GMCA and operators. Partnership Plus presents a more realistic and practical solution with the potential to provide real benefit to GMCA, bus operators, and the citizens of Manchester whereas the Proposed Franchising Scheme provides no guarantee of achieving Phase 2 and simply provides a hint that it may happen but with no committed funds or plan to achieve Phase 2. Of course, if the Partnership Plus option proved not to be successful – Rotala believes that it would be highly successful – there would be the potential to introduce the franchise model at that juncture. Undoubtedly, however, the considerably less risky Partnership Plus option should be attempted before a radical franchise model.

Finally, Rotala considers that material benefits of ongoing and dynamic competition would be lost through operation of a franchise regime. As recently explained by the Competition Appeal Tribunal opening a market up to competition only periodically in the form of tenders limits the dynamic evolution of the market and risks locking in a sub-optimal outcome as a result of, for

example, a bidder under-bidding and needing to compromise on delivery quality or not being subject to sufficient competition in the tendering process.¹ Problems associated with periodic tendering are also evident from the high-profile franchise failures in the rail sector. When there is the potential for the same benefits to be achieved through the Partnership Plus option while maintaining the ongoing and dynamic competition, Rotala believes that the Partnership Plus option is undoubtedly superior to the Proposed Franchising Scheme from a competition and ultimately consumer perspective.

While Rotala appreciates that a considerable number of stakeholders will be submitting responses to the Consultation, it seeks to highlight that, when the responses are considered, GMCA needs to give weight to the quality and analysis in the responses and not merely the number in favour of one or other of the options. Equally as important, Rotala seeks to stress that TfGM and GMCA should be approaching the question of whether to proceed with the Proposed Franchising Scheme with an open and objective mind pending review of the responses to its Consultation. Given that TfGM appears to be advertising jobs in connection with a franchising approach, Rotala is very concerned that TfGM may appear already to have made up its mind on the question of franchising.

The remainder of this document responds to the specific questions raised in the Consultation documents.

II. Response to Questions

1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

Rotala does not have any comments on the corrections and changes made to the Proposed Franchising Scheme.

2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

Rotala considers that the Proposed Franchising Scheme should not be implemented at all regardless of whether it is to apply to the entirety of Greater Manchester or only to a part of

¹ *Achilles Information Limited v Network Rail Infrastructure Limited*, [2019] CAT 20, para. 296 (https://www.catribunal.org.uk/sites/default/files/2019-07/1298_Achilles_Judgment_CAT_20_190719.pdf).

Greater Manchester. Moreover, the benefits and advantages of a unified service throughout the Greater Manchester region can equally be achieved through a Partnership Plus approach that could apply to the entirety of Greater Manchester. Such an approach would not risk losing the benefits of dynamic competition and locking in sub-optimal results through periodic tendering. Rotala's further reasons for adopting this position are explained in more detail below.

3. Do you have any comments on the local services that are proposed to be franchised?

GMCA envisages that the Proposed Franchising Scheme would be implemented in stages based on the view that this would allow the bus market to move smoothly and efficiently to the new way of operating. This would be achieved by splitting the Proposed Franchising Scheme into three sub-areas and introducing the Proposed Franchising Scheme in Sub-Area A on 2 April 2021, in Sub-Area B on 25 March 2022, and in Sub-Area C on 10 March 2023.

As Sub-Area A covers the areas in which Rotala currently operates in Greater Manchester, Rotala considers that there would be a risk that, should it not be successful in winning tenders within Sub-Area A or its operations in Sub-Area A were reduced as a result of the initial phase of franchising, it would render it difficult for Rotala to continue operating in the Greater Manchester area at all, thereby removing or diminishing the competitive force of what is currently the second largest bus operator in the region. Moreover, having lost its current operations in Greater Manchester, there would be material barriers to re-entry on subsequent renewals of the franchises.

Given that Stagecoach, currently the largest bus operator in Greater Manchester, has operations in all three Sub-Areas and is considerably better resourced than Rotala – Stagecoach achieved revenues of £1.879 billion in the fiscal year ended 27 April 2019 – it is Rotala's view that there would be less risk to reducing competition in the bus market in Greater Manchester if GMCA were to introduce the Proposed Franchising Scheme first in either Sub-Area B or Sub-Area C. Further, as explained in more detail below, Rotala equally considers that GMCA, if it were to decide to proceed with the Proposed Franchising Scheme, should introduce franchising on a route-by-route basis as occurred in London.

It is worth emphasising that there is the potential for Rotala to be affected negatively not only in the Greater Manchester area but also in other regions of its operations. The Bolton depot

provides the overhead structure for Rotala's operations in Preston and Eccles and so these operations would also be at risk if Rotala exited the Greater Manchester area.

Rotala notes that the unintended risks to competition associated with moving to the Proposed Franchising Scheme owing to the need for a staged introduction in different Sub-Areas would be entirely avoided through Partnership Plus. The proposed Partnership Plus would not require a staged introduction and remove complications stemming from a staged changeover period. It would also avoid issues associated with cross-boundary services and the proposed permit regime which are discussed in further detail below.

4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

In response to question 3 above, Rotala has already explained the potential for reduced competition arising from introducing the Proposed Franchising Scheme first in Sub-Area A. This risk will not necessarily be avoided through introducing the Proposed Franchising Scheme in one of the other two Sub-Areas first. In this context, Rotala notes that the franchising system in London was introduced on a route-by-route basis so as to avoid the potential complications and unintended consequences that can arise from introducing franchising across areas as large as the proposed three Sub-Areas. The sheer extent of the changes necessitated by introducing franchising in the whole of Greater Manchester with staged introductions in the three Sub-Areas would constitute a massive reorganisation of the bus market in Greater Manchester and change on this scale inevitably creates sizeable areas of risk, as well expending considerable management time and resources.

While a route-by-route introduction would to some extent mitigate these risks, the “all or nothing” nature of the Proposed Franchising Scheme in which depots would be part of the larger franchises, is likely to push operators out of the market entirely if they lose a larger depot. Such operators would be faced with considerable costs associated with exit and considerable costs associated with re-entry. The London franchise regime is different in this respect and rather encourages bus operators to stay in the market regardless of small route losses.

It would be possible to implement Partnership Plus in one stage without the need for a transition period or Sub-Areas.

5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?

While Rotala understands that cross-boundary services not listed in the Proposed Franchising Scheme would operate pursuant to a permit, the Consultation documents do not properly explain the process for obtaining permits or the associated costs. Rotala further understands that GMCA plans to consult on such cross-boundary services and permits assuming that the Proposed Franchising Scheme were to be adopted.

Rotala in any event considers that there would likely be practical issues associated with the proposed permits not least as, in Rotala's experience, the need to obtain permits tends to discourage operation of applicable bus services, thereby ultimately leading to less passenger options and reduced competition. Rotala is also concerned that cross-boundary services would not be permitted to stop at all stops along the routes they operate within Greater Manchester for fear of detracting from the proposed franchises. This would negatively impact on passenger travel options.

Partnership Plus would negate the need for any form of permits for cross-boundary services.

6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

Given the questions that Rotala has raised with GMCA in relation to the Proposed Franchising Scheme, together with the considerable opposition being voiced against the Proposed Franchising Scheme, Rotala believes that it would be premature for GMCA to take the decision on the Proposed Franchising Scheme as early as 6 March 2020 – unless of course GMCA has been persuaded that the Proposed Franchising Scheme is not the best option. Moreover, Rotala is still awaiting responses to certain FOI requests that are material to its review of the Proposed Franchising Scheme and considers that it would be contrary to principles of fairness and transparency for GMCA to proceed prior to responses being provided. The recent change of government and its as yet unannounced detailed plans for investment in transport infrastructure would also counsel caution in trying to take such a significant decision with such large implications at this time.

7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

Before being able to comment on this aspect of the Proposed Franchising Scheme, Rotala has requested that clarification be provided by GMCA as to what precisely will occur on the dates on which the Local Service Contracts may first be entered into (2 April 2021 for Sub-Area A, 25 March 2022 for Sub-Area B, and 10 March 2023 for Sub-Area C) pursuant to Article 4.1 of the draft Greater Manchester Franchising Scheme for Buses 2020 given that it is envisaged that there may be up to a nine-month delay until the Local Service Contracts start being provided pursuant to Article 4.2.

Rotala would nevertheless comment that Partnership Plus could be implemented before the first tranche begins in April 2021. Indeed, Rotala considers that, with sufficient engagement from TfGM, it should be possible to implement Partnership Plus within around six months – this was the timescale for implementing an equivalent partnership in the West Midlands (*see* further the response to question 14 below).

8. Do you have any comments on the nine-month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

Rotala considers that the proposed nine-month period between entering into the Local Service Contracts and starting to provide the applicable services is insufficient. In London the equivalent period (where, it should be noted, franchising has been implemented on a route-by-route basis and covers approximately 20 vehicles per franchised route), is between eight and ten months. Accordingly, Rotala believes that the transition time required in Greater Manchester for the larger franchises, given their size (which could run to 200 vehicles) and particularly where whole depots are involved, should be 24 months.

9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

Rotala does not have any comments on the proposals by GMCA to consult organisations representing bus users immediately after expiry of the first franchise contracts.

10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

With a view to encouraging small and medium operators to have access to the Proposed Franchising Scheme, GMCA proposes to offer approximately 25 small franchises and 10 large franchises, as well as resource-based contracts for schools. It is intended that there would be a restriction on how many small franchises could be awarded to a single operator with the aim of reducing the risk of a single operator being able to dominate the market and enabling small and medium operators to participate in the Proposed Franchising Scheme.

Rotala has a number of comments on this aspect of the Proposed Franchising Scheme:

- While the Public Contract Regulations 2015 envision encouraging small and medium-sized businesses to enter into public contracts for example by contracting authorities' dividing larger contracts into smaller lots, it is not clear how a restriction on the number of franchises being awarded to a particular bus operator would comply with the Public Contract Regulations 2015. At the very least, such restrictions are likely to lead to legal challenges and the costs associated with such challenges if contracts are not awarded to those bus operators that best satisfy the award criteria. Of course, the award of new franchises to existing franchisees might be subject to merger control rules that in principle could prevent a bus operator from taking on new franchises to the extent that it would give rise to a substantial lessening of competition but it is not within GMCA's sphere of competence to apply the merger control rules.
- Although offering a number of smaller franchises may encourage smaller bus operators to tender for such franchises, the requirement to re-tender the franchise on a five-year basis gives rise to material challenges for smaller bus operators. If a smaller bus operator were dependent on one or a few smaller franchises and subsequently lost one or more of those franchises, the smaller operator would be at risk of insolvency and exiting the market, thereby reducing competition in the market. Barriers to re-entry on subsequent renewals of franchises would also be high.
- It is not clear what size operators would fall within the category of small and medium bus operators. Rotala has requested that GMCA clarify this aspect of the Proposed Franchising Scheme. In Rotala's view, bus operators need to accumulate in the region of 50 vehicles in order to have an efficient operating

platform. Consequently, to the extent that a smaller operator subsequently lost one or more franchises so as to be operating less than 50 vehicles, this might create an incentive to exit the market.

- The Consultation states that the procurement process for small franchises would be appropriate to the size and scale of small and medium operators. In particular, GMCA would set appropriate requirements and simplify the procurement process to reflect the size and scale of these franchises to avoid creating barriers to entry. The Consultation does not, however, provide any further details on the envisaged simplified procurement process. To the extent that there might be lower requirements in terms of the age and specification of vehicles, this would naturally not facilitate achieving the overall strategy set out in the plan to 2040.
- There is potential for GMCA's cost model to be adversely affected in the event that there were a significant number of different operators providing franchised services.

It is Rotala's view that the proposed Partnership Plus would avoid all of these issues.

11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

Rotala has severe reservations as regards the proposal that GMCA would provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme particularly where it is envisaged that GMCA would seek to take control of strategic depots and provide these to operators of large franchises for the delivery of franchise operations. GMCA considers that, where it is not possible to negotiate the transfer of some or all strategic depots at the outset of franchising (given that they are owned by incumbent operators), GMCA's options would include: (a) provision of short-term temporary depot facilities by GMCA; (b) amending the commercial model for the first round of franchising so that strategic depot provision became the responsibility of the operator; (c) building new depots by GMCA; and/or (d) Compulsory Purchase Orders to take ownership of existing strategic depots.

Although the Bus Services Act 2017 permits GMCA to provide facilities that it considers it would be appropriate to provide, Rotala would question whether GMCA could satisfy the stringent test of being “compelling in the public interest” and therefore lawfully use Compulsory Purchase Orders to purchase depots particularly in circumstances where the depot use would not change, depots could remain under their current ownership and, to the extent necessary (*e.g.*, because, through franchising, a depot incumbent lost a portion of its bus services using that depot and therefore had spare capacity at the depot) be shared on commercial terms with other franchisees. GMCA would no doubt also open itself up to compensation claims that would give rise to considerable resources and legal expenses that do not appear to have been taken into account in the Assessment. Claims by bus operators subject to Compulsory Purchase Orders would include the fact that the depots are worth more to operators than merely the market value not least as depots may be used as regional hubs and for other activities within the bus operator group.

Compulsory purchase of depots would equally give rise to significant practical difficulties for bus operators where depots serve a broader purpose within the operations of the bus operator. By way of example, the headquarters for Rotala’s entire North Western business is located at its depot in Bolton and in addition all drivers in the Rotala group are trained at this depot. These activities would need to be relocated at considerable cost if Rotala were to lose the Bolton depot pursuant to a Compulsory Purchase Order.

Ownership of depots by bus operators is part and parcel of the competitive dynamic among bus operators and compulsorily forcing their sale would disrupt this dynamic to the detriment of the Greater Manchester bus market and ultimately consumers.

Again, Partnership Plus raises none of the above issues.

Assessment Summary

12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

The Assessment of the Proposed Franchising Scheme observes a decline in bus patronage and considers that the decline has the potential to make bus services less viable. In particular, if there are fewer passengers, bus operators *prima facie* make less profit. This could mean that

operators cut bus services, which in turn could reduce the number of people who would choose to use buses even further and creates a “spiral” of decline.

The Assessment rightly acknowledges that the decline in bus patronage is partly due to external trends, including (a) changes in the nature of travel demand in Greater Manchester with a declining number of trips made per person; (b) an increase in car ownership; (c) congestion in Greater Manchester that leads to longer bus journey times; (d) changes to competing modes of transport, principally the growth of patronage on the Metrolink light rail system; and (e) technological change particularly the rise in ride hailing services such as Uber. However, Rotala does not believe that GMCA places sufficient emphasis on these factors, while wrongly concluding that the decline of bus patronage is more closely associated with the bus service itself, so-called “supply-side” factors, and how the Greater Manchester bus market currently operates.

Of central importance to these issues is the fact that the analysis carried out by Transport for Greater Manchester (“TfGM”) on behalf of GMCA and contained in the Assessment is fundamentally flawed and this entirely undermines the conclusions and proposed strategy drawn from the analysis. Indeed, Rotala has examined the statistics contained within the Assessment and determined that there has in fact been only a 5% reduction in bus passenger journeys in the Greater Manchester area between 2010/2011 to 2017/2018 once the effect of switching to Metrolink light rail services has been taken into account and further that a large portion of this 5% reduction is accounted for by a reduction in bus passenger journeys arising from significantly lower levels of funding for supported bus services. In more detail:

- Table 3 on page 49 of the Assessment shows that total passenger journeys on public transport services in Greater Manchester decreased from 224 million in the period 2010/2011 to 194.3 million in the period 2017/2018. This equates to an overall reduction of 29.7 million bus passenger journeys, representing a 13.3% decrease since 2010/2011.
- Paragraph 6.2.10 on page 65 of the Assessment estimates that 65% of the decrease in bus passenger journeys is attributable to bus passengers’ switching to the Metrolink light rail service. If this portion of the reduction in bus passenger journeys is stripped out from the overall figures for reduction in bus passenger journeys, this implies that bus passenger journeys reduced by the

considerably lower figure of 10.4 million in the period from 2010/2011 to 2017/2018, representing only a 4.6% decrease since 2010/2011.

- Rotala is aware that the supported bus service budget in the Greater Manchester area has reduced from £45 million in 2010 to £27 million today. Adjusting the figures for inflation, this implies that there has been approximately a 50% reduction in funding for supported bus services over the period in question. Table 16 on page 2010 of the Assessment shows that, of the total 65,510,172 miles accounted for by buses in the Greater Manchester area in 2018/2019, 55,080,288 were accounted for by commercial services and 9,429,884 were accounted for by supported services. If one conservatively assumes that the passenger density on supported service is approximately 50% of the density of passengers in commercial services, this implies that supported services (at present funded to the level of £27 million) currently represent approximately 7.9% of overall bus passenger numbers in the Greater Manchester area based on the data examining the number of miles undertaken by buses. Assuming that a 50% increase in funding for supported services would give rise to a proportionate increase in the number of miles covered (still assuming that passenger density on supported services is approximately 50% of the density of passengers in commercial services) and grossing up the overall number of miles currently covered, this implies that supported bus services would today account for 11.4% of bus passenger services at the higher funding level. Accordingly, this implies that the reduction in supported services has given rise to a 3.5% reduction in bus passenger journeys over the applicable period.

Rotala therefore considers that the reduction in bus passengers is considerably less material than postulated by TfGM and that this entirely contradicts the assumption in the Strategic Case that bus patronage is on a downward spiral in the Greater Manchester area, thereby justifying GMCA's proposal to intervene in the bus market and to introduce the Proposed Franchising Scheme, which would give rise to a radical change in market structure and a considerable upheaval for bus operators.

The above analysis also undermines the Financial and Economic Assessments given that it contradicts the assumption that GMCA will stabilise the decline in bus patronage through the

Proposed Franchising Scheme – indeed, the above figures suggest that the postulated decline is significantly less material than GMCA suggests.

It bears emphasis that the considerably smaller reduction in bus passenger journeys (once light rail figures have been stripped out and account is taken of significantly lower levels of funding for supported bus services) is consistent with Rotala's experience in other regions such as the West Midlands, by way of example, where there has been no material decline in the number of commercial bus passengers over the period from 2010/2011 to 2017/2018. More generally, Rotala would add that it has not witnessed material falls in bus passenger numbers in established bus markets absent a major disruption such as large-scale roadworks.

This is supported by the Transport Focus Bus Passenger Survey Autumn 2018 where Greater Manchester's bus network scored 86% for overall satisfaction (in comparison Metrolink scored 89%). Greater Manchester's bus network ranked 6th for overall satisfaction out of the 26 Local Authority areas surveyed.

It further bears emphasis that, while London has in fact witnessed declining bus patronage in recent years – in contrast with other regions of the country – London in any event operates under a franchise model. GMCA should not therefore be under any illusion that switching to a franchise model will of itself help to sustain or increase the number of bus passengers.

Contrary to the views expressed in the Consultation for purposes of justifying the Proposed Franchising Scheme, Rotala contends that performance of the bus market in the Greater Manchester Area is rather intrinsically linked to central and local government strategies, including the following:

- Reductions in the Bus Service Operators Grant which forces bus fares to rise;
- Local strategy on the development of the Metrolink light rail services which, as the analysis shows in the Assessment prepared by TfGM, has a direct and significant impact on bus patronage;
- Policies on car ownership and car control; and
- Reduction in subsidies for bus services that are not commercially viable for operators (provides less bus options for passengers).

Rotala considers that, rather than move to the Proposed Franchising Scheme as a knee-jerk reaction to falling bus patronage, it would be make eminently better sense to tackle pollution, congestion, car usage, and the price of parking with a view to driving the public more to use bus services. Indeed, use of the Low Emission Zone in London has had a direct impact on bus patronage there.

Finally, one of the “supply-side” challenges that in GMCA’s view is contributing to the lower levels of bus patronage is limited competition. However, this importantly ignores the fact that since the time of the Assessment the number of larger bus operators active in the Greater Manchester area has increased from three large operators (Stagecoach, First Manchester, and Arriva) to five large operators (Stagecoach, First Manchester, Diamond Bus (Rotala), Go North West, and Arriva).

13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

As noted in response to question 12 above, Rotala considers that the analysis undertaken by TfGM underpinning GMCA’s case for the Proposed Franchising Scheme is fundamentally flawed. This also means that GMCA has not correctly identified the challenges facing the local bus market in Greater Manchester and is not correct in its assessment that the Proposed Franchising Scheme is the answer. It also bears emphasis that the proposed annual fare increase of RPI + 1.4% is not sustainable and will have a negative impact on the perception of the value for money of bus travel in Greater Manchester.

Rotala nevertheless does agree that there are challenges facing the local bus market in Greater Manchester and that there are ways in which the bus market could be stimulated. Rather than introducing the Proposed Franchising Scheme, Rotala believes that the better way of stimulating the bus market – indeed, bus patronage will not grow without dealing with these issues – would be to tackle pollution, congestion, car usage, and the price of parking as explained in response to question 12 above.

To the extent that switching to a franchise model might yield benefits and help stimulate bus patronage, Rotala firmly believes that switching to the Partnership Plus model would provide the same results in a faster timescale, at lower cost, and with considerably less risk from a financial, reputational, and political perspective.

14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

GMCA has highlighted four main objectives for the future provision of bus services in the Strategic Case. These comprise:

- *Network* – the network should be integrated and as accessible and reliable as possible to a variety of destinations with the lowest possible journey times. Harmful emissions should be reduced.
- *Simple and integrated fares* – this should allow passengers to travel on all buses. Fares should offer value for money and account-based smart ticketing should be introduced at the earliest opportunity.
- *Customer experience* – service information should be easy to understand, comprehensive, and accurate. Safety and on-board experience should be improved.
- *Value for money* – there should be value for money for public investment in bus services. Intervention should be affordable and feasible, as well as being sustainable in the long term.

Rotala believes that all of these four broad objectives are much more likely to be achieved through the Partnership Plus option as compared with the Proposed Franchising Scheme and, importantly, in a shorter timeframe, at lower cost, and with less risk. To the extent that the Consultation downplays the benefits of the Partnership Option, it bears emphasis that it is based on an earlier version of the partnership proposal by the OneBus group of bus companies and therefore does not reflect what is now being proposed by OneBus. Moreover, the Partnership Plus would preserve the benefits of ongoing and dynamic competition as opposed to the Proposed Franchising Scheme that would, in Rotala's view, risk stifling innovation with periodic tenders and potentially limited numbers of bidders. The risks associated with franchising are evident from the disappointing results achieved in the London bus franchising market (notwithstanding the significant level of funding and obvious restrictions on car usage), as well as the results of franchising in the rail sector.

The four tables below take each of the four objectives in turn and confirm that the objectives that GMCA seeks to achieve through the Proposed Franchising Scheme can realistically be achieved through the proposed Partnership Plus.

Summary Of Objectives To Be Achieved By Proposed Franchising Scheme Compared With Proposed Partnership Plus

1. Network

| Proposed Franchising Scheme | Partnership Plus | Objective Achieved |
|---|--|--------------------|
| Planned by GMCA as a single network – enabling more efficient resource allocation to optimise passenger benefits. | The network would be planned with GMCA with an element of operator profits used to provide the resource for agreed new services. | ✓ |
| Performance regime for operators under contract to GMCA with financial penalties to manage their reliability and punctuality. | Performance regime for operators with financial penalties for failings within their control to make them more accountable. | ✓ |
| GMCA would specify the vehicle to be used with the base level of investment being that required to renew the fleet on a rolling basis as operators would do in the Do Minimum option. | Operators will renew their fleets to maintain the seven-year average age with at least 450 new buses over the first three years. | ✓ |
| | Operators would pool resources with TfGM to identify congestion hotspots and jointly agree on interventions so as to increase bus speeds and get passengers to where they need to be without sitting idle on gridlocked roads. | ✓ |
| | Working with TfGM bus services would be revised to call at new bus stops sited as close as possible to Metrolink stations and busy railway stations. | ✓ |

As noted in the table above, Rotala has no doubt that the Partnership Plus option can meet the network objectives set out in the Consultation. Rotala also seeks to clarify a number of further points as follows:

- The Assessment states that, under the Partnership Plus option, the network would be unlikely to change significantly and it may not be simplified or made more integrated. However, this ignores the fact that there is already multi-operator ticketing systems available to achieve greater integration. Furthermore, Transport for West Midlands, focusing on a partnership approach, does not

appear to have had any difficulty coordinating network reviews with operators in order to achieve its network change objectives.

- Reliability and punctuality are mostly affected by levels of congestion and road works over which bus operators have no control. Accordingly, if congestion levels remain the same, reliability and punctuality issues will continue to exist regardless of whether or not the Proposed Franchising Scheme were to be introduced. Penalties for operators under the Proposed Franchising Scheme will simply increase the risk for operators and will likely be factored into tender prices. It is therefore congestion levels that TfGM should be seeking to tackle prior to taking a measure as extreme as the Proposed Franchising Scheme.
- Under the Partnership Plus option, Rotala envisages that the network would be planned with GMCA and, using a percentage of incremental profits from highway interventions that would improve bus services, Rotala and other bus operators would work with TfGM to identify where this value could be used to meet agreed network deficiencies, thereby reducing or eliminating situations in which passengers sit idly on gridlocked roads.
- The Assessment states that, while targets for reliability and punctuality could be imposed under the Partnership Plus option, operators would decide how to reach these targets and such targets themselves would remain voluntary. However, this is incorrect. Punctuality and reliability targets are not in fact voluntary but rather are enforced by DVSA and the Traffic Commissioners. Currently, services must be no more than one minute early and up to five minutes late for at least 95% of the time in order for operators to avoid being called to a public inquiry with the Traffic Commissioner. In addition, the Partnership Plus option envisages a performance regime for operators with financial penalties for failings within their control so as to make bus operators even more accountable.
- Reliability and punctuality statistics in London where franchising already exists are no better than they are in the Greater Manchester area. Indeed, there is a risk that, with TfGM proposing to impose reliability and punctuality targets under the Proposed Franchising Scheme, rather than utilising the DVSA and

Traffic Commissioner regime, the enforcement regime could well – perversely – become less effective.

- Rotala has already ordered 130 Euro VI buses – this is in fact in excess of the commitment sought under the Proposed Franchising Scheme – and, with the commitment of other bus operators, there is potential for Partnership Plus to become Euro VI compliant by 2024 (*i.e.*, the same target date as for the Proposed Franchising Scheme).
- Rotala believes that an important part of improving air quality and CO² emissions would be to introduce a Clean Air Zone and this should be undertaken regardless of whether the Proposed Franchising Scheme or Partnership Plus option were to be introduced. Such a Clean Air Zone would dictate emissions standards and therefore the ages of buses.

2. Simplified and Integrated Fares

| Proposed Franchising Scheme | Partnership Plus | Objective Achieved |
|--|--|--------------------|
| Period Fares would be set at the same price as the lowest of the largest incumbent operator. | Period Fares would be set at the same price as the lowest of the largest incumbent operator. | ✓ |
| All period tickets (e.g. Day or week) would be valid on all franchised buses. | All period tickets (e.g. Day or week) would be valid on all buses in the Partnership Plus. | ✓ |
| Simpler fares – universal ticket and fares structure across Greater Manchester and a significant decrease in the number of ticket types available. | Simpler fares – universal ticket and fares structure across Greater Manchester and a significant decrease in the number of ticket types available. | ✓ |
| No change to fares on discounted corridors. | No change to fares on discounted corridors. | ✓ |

As noted in the table above, Rotala has no doubt that the Partnership Plus option can meet the objectives for simplified and integrated fares set out in the Consultation. Rotala also seeks to clarify a number of further points as follows:

- Partnership Plus envisages the following simplified and integrated fares:
 - Integrated ticket prices would be set (yet to be agreed) from May 2020 with a freeze for two years and then subject to subsequent reasonable increases as agreed among the bus operators and TfGM/GMCA. Single operator tickets would be retained to offer customers choice.

- All multi operator period tickets (*e.g.*, day or week) would be valid on all buses within Greater Manchester. Operator-own tickets would be simplified to a single suite of tickets.
- A transitional arrangement would be introduced for those young people coming off Our Pass which is the current concessionary scheme by which 16 to 18-year-old passengers travel at a reduced fare.
- There would be commitment to a TfGM-led project to deliver “tap on tap off” (*e.g.*, Oyster Card type) technology across all operators in Greater Manchester.
- More generally, there would be simpler fares (universal ticket and fare structure) across Greater Manchester and a significant reduction in the number of tickets available.
- There would be no change to fares on supported corridors.
- Rotala and other bus operators are committed to working with Transport for the North to introduce regional products so as to deliver price savings for bus users.

3. Customer Experience

| Proposed Franchising Scheme | Partnership Plus | Objective Achieved |
|--|---|--------------------|
| Improvements in driver training. | Improvements in driver training. | ✓ |
| Accelerated rollout of WIFI. | Accelerated rollout of WIFI. | ✓ |
| Comprehensive unified branding. | Comprehensive unified branding. | ✓ |
| Additional Customer Service staff. | Additional Customer Service staff. | ✓ |
| A single point of contact for customers to resolve all issues. | A single point of contact for customers to resolve issues with the addition of operators retaining the direct link to maximise customer accountability with them. | ✓ |
| Consistent and comprehensive information provision. | Consistent and comprehensive information provision. | ✓ |
| Additional ticketing inspectors. | Additional ticketing inspectors. | ✓ |
| Additional resource to monitor and manage performance. | Additional resource to monitor and manage performance. | ✓ |
| Consistent service standards. | Consistent service standards across all operators. | ✓ |
| A single accountable organisation for all franchised bus services in Greater Manchester. | Each operator accountable for their own service provision under a financial penalty regime. | ✓ |

As noted in the table above, Rotala has no doubt that the Partnership Plus option can meet the customer experience objectives set out in the Consultation. Rotala also seeks to clarify a number of further points as follows:

- The Assessment raises concerns about customer experience under the Partnership Plus option. These include that (a) while a Greater Manchester travel brand could be introduced, a certain degree of separate branding would continue to exist; (b) although there might be one source of information for all operators, additional partial sources would remain; (c) a partnership is unlikely to make any difference, on its own, to the safety of passengers; and (d) any commitment to a cleaning regime and accredited driver training would be delivered in-house.
- Rotala does not consider that this is a fair appraisal. In particular:
 - There is no evidence that a degree of continued separate branding would be prejudicial to establishing a more integrated bus service across the whole of Greater Manchester. The only evidence presented relates to a

20-year old study with respect to a hail and ride service in London that bears no relation to the proposed restructured bus services market in Greater Manchester and where it is not even clear that linked trips are as prevalent as compared with London. With appropriate marketing, a comprehensive unified livery with customer focused route and corridor branding would be sufficient to enable bus users to appreciate the existence of a seamless, integrated service. This would also have the advantage of not needing to entirely abandon brands that have been built up over time in Greater Manchester. It may further be noted in this regard that the London franchise is in any event now co-branded. Furthermore, partnership routes in the West Midlands are run under a single Transport for West Midlands ('TfWM') brand, regardless of which operator is actually running the bus caught by the passenger. Operators participating in a partnership route discreetly add their own branding to the livery mandated by TfWM. There is no evidence at all that passengers find this dual branding in any way confusing or unhelpful.

- It is envisaged that there would be additional customer service staff and a single point of contact for customers to resolve issues under the Partnership Plus option. Bus operators, however, would retain the direct link with the customer so as to maximise accountability with the bus operator.
- Bus operators would commit to additional ticketing inspectors and resource to monitor and manage performance from a customer perspective.
- There would be consistent service standards across all operators but with each operator remaining accountable for their own service provision under a penalty regime.
- There would be the introduction of a joint process to identify congestion hotspots with interventions to increase bus speeds.
- CCTV installed at bus stops at which passengers feel most vulnerable would considerably assist in passenger concerns over safety.

- More generally, although the bus network in Greater Manchester has a degree of complexity, it is considerably easier to navigate than it used to be through the use of smartphone apps designed to address this issue.
- To demonstrate the bus operators' full commitment to the new approach, operators would sign up to a Performance Regime and regular audits to ensure high, consistent service levels across all services and backed by financial penalties where operators fail to deliver.

4. Value for Money

| Proposed Franchising Scheme | Partnership Plus | Objective Achieved |
|--|--|--------------------|
| Bus service run with a view to being net revenue neutral – not generating surplus over time but reinvesting any funds available or reducing fares. | Operators continue to take the revenue risk and decline the option of accepting a guaranteed publicly funded profit through franchise contracts. Ongoing and dynamic competition maintained. | ✓ |
| All of the income for the bus service would be used to provide the best service possible. | No excessive public funding required to provide the best service possible. | ✓ |

As noted in the table above, Rotala has no doubt that the Partnership Plus option can meet the value for money objectives set out in the Consultation. When making improvements across the transport network, it is important that all passengers using the service receive value for money and that the funding needed is properly measured so as to ensure improvements are sustainable and to avoid large deficits seen elsewhere in the country.

Rotala also seeks to clarify a number of further points as follows:

- Under the Partnership Plus option, operators would continue to take on the revenue risk and decline the option of accepting a guaranteed publicly funded profit through a franchising contract. There would be no excessive public funding requirement in order to provide the best service possible.
- Operators would fund the staff needed to operate the refreshed bus network directly from existing revenue.
- The Partnership Plus option would involve a Profit Share Scheme according to which Partnership Interventions would grow profit to reinvest into services rather than to be provided in dividends to shareholders.

- The Partnership Plus option would avoid the need for GMCA to spend further public funds on renewing contracts should an operator exit the market, as well as no additional staff costs and other resources for preparing, managing, and monitoring the proposed franchise contracts.
- It is evident that the Proposed Franchising Scheme involves both significant risk and considerable costs with an uncertain outcome, whereas Partnership Plus entails considerably lower risk not least as it can be tackled in smaller, incremental steps and can be modified through experience gained along the way. Franchising is an all-or-nothing type approach with a material risk of total failure, while Partnership Plus can be introduced in stages and be subject to close monitoring as it develops.

Rotala therefore considers that the Partnership Plus option would achieve all of the GMCA's objectives and, to the extent there might be marginal benefits from the Proposed Franchising Scheme, these are outweighed by the considerable risks and costs associated with the Proposed Franchising Scheme.

Rotala further believes that there is already movement towards the objectives sought by GMCA through the current bus system in the Greater Manchester area and that, with evolving technology, it will be possible to achieve them more readily in future.

While Partnership Plus could undoubtedly achieve the objectives sought by GMCA, Rotala considers that the Proposed Franchising Scheme is not in fact likely to achieve them. Indeed, statistics on the bus market in London demonstrate that it is not working effectively in a number of respects. In particular:

- The average age of buses within the London fleet is 5.9 years old.
- In 2019/2020 the London franchise was operating at a deficit of £722 million, the highest annual bus subsidy in history. This deficit was £82 million higher than the previous year, with £38 million due to reduced demand.
- The operating cost of 2019/2020 will be £2,155 million, 2% higher than the previous year, with £56 million of this increase attributable to contract inflation.

- Since 2014/2015 the number of bus passenger journeys in London has decreased year on year. This trend is forecast to continue in the medium term owing to a squeeze on incomes, lower growth in young adults in London and wider changes in consumer behaviour. The decrease in bus passenger journeys is occurring notwithstanding that bus reliability is at historically high levels and notwithstanding the degree of regulation in Greater London through the franchising scheme.

Conversely, there is compelling evidence that partnerships are working effectively in other regions of the country and have the ability to meet the type of objectives set by GMCA. In particular:

- West Midlands introduced a bus partnership scheme in 2015.² The West Midlands Bus Alliance comprises seven local authorities in partnership with over 20 bus operators, the police, and Transport for West Midlands. A 2018 report issued by the West Midlands Bus Alliance shows that it has been effective in achieving its objectives of improving emissions standards,³ providing better value for money,⁴ tackling congestion and journey times,⁵ attracting young

² <https://www.tfwm.org.uk/media/3408/2018-bus-alliance-achievements-final.pdf>.

³ A Low Emissions Bus Delivery Plan has been developed while the West Midlands Bus Alliance won the Passenger Transport Award 2016 at the National Air Quality Awards. Funding has been provided to ensure that buses meet Euro 6 standards, as well as funding for hybrid double-decker buses. All Transport for West Midlands buses currently meet at least the Euro 5 standard.

⁴ Discounted fares for students and NHS staff have been introduced.

⁵ There has been more than £7.3 million invested in bus priority schemes and updated traffic signals that detect buses, as well as opening new bus lines (*e.g.*, a 2 km lane into Solihull town centre that is reported to save eight minutes of time). The West Midlands Bus Alliance has also been managing network resilience to ensure any delays are minimised and to encourage a shift in mode. Birmingham City Council, Transport for West Midlands, and National Express have further developed a Network Development Plan for Birmingham City Centre to establish how the network will develop as land changes and other developments continue.

people,⁶ making it easier to purchase tickets and catch the bus,⁷ and making it more pleasant to travel by bus.⁸

- West Midlands in December 2019 published an Enhanced Partnership Plan.⁹ The nine objectives sought for the Midlands Enhanced Partnership as set out in the 2019 Enhanced Partnership Plan comprise:
 - (a) A UK leading low emission bus fleet with zero emission corridors serving the most affected areas of air quality.
 - (b) A fully integrated bus network, including demand responsive and rapid transit services supporting interchange with rail, coach, and Metro to form one network.
 - (c) Simple, convenient, and easy to use payment options, including full capping, providing a network which is value for money and affordable for customers.
 - (d) Fewer private car journeys by making bus the mode of choice and creating better access to jobs and long-term change.
 - (e) Creating a safe, secure, and accessible mode for all and tackling long-held barriers and perceptions.
 - (f) Accountable network performance management, tackling issues causing congestion and reliability problems.
 - (g) World-leading customer information, utilising 5G and all available technologies and platforms.

⁶ Apprentices and trainees are granted half price travel if under 18 years old. Low fare zones (£1 fares) have been introduced.

⁷ In April 2007, Diamond Bus invested £600,000 in new ticket machines. Mobile ticketing has also been introduced, while there have been moves towards contactless technology (*e.g.*, by September 2018, National Express West Midlands had reached 1 million contactless payments).

⁸ Operators have invested in new buses (some high quality), as well as refurbishing existing buses. Bus operators have agreed that police officers can travel free to and from their work duties and assist if need be with any issues of anti-social behaviour. The 24/7 control centre has been expanded with access to 1,000 cameras on the network.

⁹ Transport for West Midlands Strategic Vision for Bus

- (h) All young people under 25 supported by discounted travel, as well as addressing barriers for excluded groups.
 - (i) An evolving network to support a 24/7 thriving economy, connecting people to new and developing destinations and attractions.
- Rotala believes that the West Midlands partnership has already achieved significant benefits for the bus market in the region, while the Enhanced Partnership Plan shows that partnership options can achieve all of the objectives that TfGM seeks to achieve through introduction of the Proposed Franchising Scheme but at little or no risk to taxpayers and the public purse.
- A report issued in 2012 shows that the Greater Bristol Bus Network had achieved significant improvements in bus travel in this region.¹⁰ This includes: (a) 120 new buses; (b) 1,000 improved bus stops; (c) 30 real-time information displays; (d) bus priority signals and lanes; (e) road widening; (f) introduction of discounts and promotions; (g) commitments to reduce carbon emissions; (h) introduction of a smartcard system; (i) investments in services (including a £42.3 million investment from the Department of Transport, £22.5 million from First, £13.9 million from a local developer, and investments in infrastructure to improve the reliability of buses). The Greater Bristol Bus Network has also entered into a quality partnership scheme to maintain high standards of bus services that are reported to have raised the standard of services across the area.
- The Buses for Sheffield partnership, which was formed in 2012, won two awards at the UK Bus Awards in 2013. The achievements of this partnership include introduction of contactless payments in 2017, £40 million in investment, rolling out 200 new vehicles, including 44 new Euro VI buses, in 2018, and a 3% increase in punctuality in 2017. Moreover, the customer feedback from the public consultation at the time of establishing this partnership was used to inform service charges.

¹⁰<https://www.bristol.gov.uk/documents/20182/34076/GBBN%20brochure%20-%20March%202012.pdf/7dbc7128-2faf-41a8-b26d-8c26443a07ae>.

- Brighton and Hove regards its partnership as a real success story.¹¹ Achievements include: (a) 3,000 buses a day use city centre bus lanes; (b) 14% of residents travel to work by bus; (c) bus patronage – 46.5 million journeys in 2014 – has doubled in the last 20 years, with a 50% increase in the last 10 years; (d) 20km of bus lanes in the city; (e) high levels of bus satisfaction; and (e) NTA Transport Authority of the Year in 2005, 2010, and 2016. The council has ensured bus priority of road space, improved passenger waiting areas, real-time information displays, an Intelligent Transport System, and bus lane and traffic regulation enforcement. Bus operators have in turn ensured improved service frequencies, value for money fares and tickets, investment in new buses, enthusiastic staff, and effective marketing. Bus operators have also signed up to multi-operator ticketing, while smart ticketing has also been introduced with 80% of all fare transactions on the network now ticketless.
- Partnerships in Barnsley, Doncaster, Lothian, Nottingham, Merseyside, Rotherham have achieved similar successes.

The Consultation has currently concluded, based on the Assessment, that the Proposed Franchising Scheme is more favourable from an economic perspective than the Partnership Plus option. However, it must be pointed out that TfGM did not start asking bus operators about the cost structures of the Partnership Plus proposal until after the Assessment had been completed. Indeed, OneBus is continuing to prepare the information subsequently requested by TfGM, although the collection and collation of commercially sensitive information must be carried out in compliance with applicable competition rules and is therefore a time-consuming process. The Assessment cannot therefore have accurately compared the current partnership options with the Proposed Franchising Scheme, as it claims to do. Moreover, TfGM continues to refuse to disclose the assumptions it has made in putting together its partnership models, which it has then used to compare with the Proposed Franchising Scheme. OneBus therefore does not endorse any of the partnership options used by GMCA in the Assessment.

15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

¹¹<https://www.local.gov.uk/sites/default/files/documents/The%20Brighton%20Story%20-%20Mark%20Prior%20%281%29.pdf>.

In addition to the comments already provided in response to question 14 above, Rotala notes that GMCA's objectives will not be met until implementation of the Phase 2 measures. Crucially, there are no committed funds or a timescale to Phase 2 but only that Phase 1 would enable Phase 2 to be implemented. In Rotala's view, this constitutes a sizeable risk when there is no guarantee of Phase 2. In particular, there is no specific plan for a more enhanced network, no proposal for greener buses, zero investment to improve bus quality, and no planned or budgeted measures to tackle congestion and deliver faster or more reliable journeys.

Phase 2 could be achieved more swiftly under the Partnership Plus option as more money could be invested towards achieving this result. In particular, bus operators would be willing to offer up profit over a certain percentage to achieve this, while monies collected for performance-related fines could also be used for this purpose. Moreover, Rotala considers that GMCA is reluctant to introduce congestion charges in the city centre when the reality is that this would certainly increase bus patronage and achieve GMCA's 2040 aim.

Given that the Partnership Plus option could achieve all of the GMCA's objectives and the level of funding required for the Proposed Franchising Scheme, Rotala believes that it would be worthwhile at least testing a partnership option before implementing franchising. To the extent it becomes clear over time that the partnership option is not working – Rotala does not consider that this would be the case – GMCA would continue to have the option of franchising at this point in time and the framework would already be in place as a result of trialling the partnership.

16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

As discussed in response to question 14 above, Rotala considers that the Partnership Plus option would undoubtedly achieve all of the GMCA's stated objectives. Moreover, as mentioned in response to question 15 above, Phase 2 could be implemented more swiftly under the Partnership Plus option as compared with the Proposed Franchising Scheme – this is particularly the case given that the franchise costs could be diverted into Phase 2 immediately.

The "tap on tap off" system is likely to increase bus patronage considerably and this could be introduced sooner under the Partnership Plus option.

17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- **offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options;**
- **provide the most economic value (Net Present Value); and**
- **create the best platform from which further economic value could be delivered.**

Do you have any comments on this?

The Consultation states that the Proposed Franchising Scheme is set to deliver an additional £208 million of wider economic benefits compared with £51 million for the proposed partnership and £78 million for the ambitious partnership.

Rotala has serious misgivings that these figures are accurate or represent the actual level of economic benefits to be achieved. The assumptions on which the assessment are based are flawed and do not withstand scrutiny. This reflects the following key considerations:

- It is assumed that passengers will be forced to accept annual fare rises of RPI + 1.4%. This means that fares would increase by 64% over a 10-year period. This is entirely unrealistic and indeed there are likely to be similar political pressures in Greater Manchester for fare freezes as has been the case in London. Further, it may be noted that West Midlands bus fares have reduced across the whole of the West Midlands through the introduction of Low Fare Zones. Such fares were introduced to combat the price sensitivity of bus users and to drive modal shift towards buses.
- As noted in the Jacobs’ Review of Consultation Economic Case, modelling over a 30-year period has the potential to advantage the option with the longest time frame, *i.e.*, the Proposed Franchising Scheme. Partnerships, which represent a far more flexible and dynamic set of arrangements, are of course unlikely to be in place for that duration. Sensitivities should have been run by modelling the Proposed Franchising Scheme over a shorter period of time or a scenario in which the partnership options were renewed during the appraisal period.

- The baseline model for cost and its calculation require modification as they do not properly reflect recent increased employment costs (pensions, apprentice levy, minimum wage, and recent pay increases).
- There are several areas of concern within the Demand and Revenue Model for the Proposed Franchising Scheme as identified by Jacobs on pages [41] and [42] of the Review of Consultation Economic Report.
- The costs for implementing the Proposed Franchising Scheme are undoubtedly understated and far too optimistic. For example:
 - While increased annual costs for achieving a fully Euro VI fleet have been taken into account, additional costs of ad blue and exhaust maintenance do not appear to have been considered.
 - When considering wage bills to calculate driver costs, TfGM has not taken into account incremental driver wages that increase with length of service.
 - TfGM has not included a sufficient number of Revenue Protection Officers when compared with the number of such Officers employed in Greater London.
 - TfGM has not allocated sufficient funds for managing the franchise contracts efficiently especially in circumstances where TfGM predicts that the franchising will give rise to 1.4 million more passengers per year by 2040. This will also require bus operators to invest in additional service control staff.
 - TfGM estimates costs for “on bus equipment and branding – Wi-Fi, driver radio, telematics, CCTV” at approximately £3,850 per bus. However, an assessment for bus franchising in Wales suggests that the figure should be closer to £15,000 per bus.
 - It is stated that TfGM would redeploy the equivalent of 30 buses to underserved links and evening and Sunday services and that this would be revenue neutral. However, it seems likely that the current use of the buses

is profitable and therefore redeployment of these vehicles is not likely to be commercially efficient.

- In terms of the Wider Economic Impacts, the level of local impact on business to business interactions appears to be especially large given that the majority of business trips are typically not made by bus.
- The differential in service quality benefits between the Proposed Franchising Scheme and the partnership options is significant at £125 million. The driver for this is the value given to ticket inspectors and branding. In particular, it is assumed that there will be a 4.1 pence per trip benefit to users with the Proposed Franchising Scheme. However, the evidence presented (in the case of branding) is demonstrably not relevant and no evidence is presented of the other elements of this per trip benefit. It is feasible that there might be an element of double counting in that better service quality is already captured elsewhere in the calculations.
- The transition to a franchise system poses more risk to passengers than the use of a partnership approach.
- The Assumptions within the Assessment of the Partnership models are understated. This includes, for example, the fact that the OneBus partnership proposal to TfGM included a commitment of a unified brand for which TfGM estimates an economic benefit of £102 million under the franchising option. Even assuming that this is a realistic figure – as noted, Rotala considers that the evidence for this figure does not withstand scrutiny not least given that it is based on 20-year old research conducted on a hail and ride service in London – this substantial benefit should therefore have been applied to the partnership model too and not have been limited to the Proposed Franchising Scheme. More generally, Rotala considers that Partnership Plus could achieve and no doubt exceed the benefits of the Proposed Franchising Scheme.

Overall, Rotala considers that the assumptions under the Proposed Franchising Scheme are overestimated while the benefits of the partnership options are underestimated. The modelling

undertaken by TfGM is significantly skewed in favour of the Proposed Franchising Scheme but without satisfactory evidential backing.

It is to be noted that in the limited timescale available for Jacobs to prepare their report, they have been able to address serious and significant flaws in the Assessment and would undoubtedly be able to highlight further material issues, if time allowed. Ultimately, the responsibility for the financial performance of the franchised bus network will rest with GMCA and the negative political impact would prove fatal if it were to show that the Assessment was underestimated, as the Jacobs report suggests.

18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

The Commercial Case has two main aims, namely, (a) to deliver franchised bus operations that offer quality of service and value for money and (b) to maintain access to the market for small and medium operators.

Pursuant to the packaging strategy for franchise contracts under the Proposed Franchising Scheme, it is considered that an optimal balance would be achieved by permitting a large number of franchises (5-10) to cover the majority of the network with one large franchise per strategic depot, while around 25 small franchises would provide their own depot. School contracts would remain as they are. It is proposed that the optimal length of contract would be 5 years with option to extend by 2 years. School contract terms would be between 3 and 5 years.

Rotala considers that the reality is that, with 10 large contracts, this will give rise to a number of existing larger operators in the Greater Manchester area exiting the market as there will be other bus operators with more experience of the franchising model and better placed to win franchise contracts.

It is not clear how having one franchise per strategic depot will work in practice where the operator that currently owns or leases the depot is not awarded the contract. See further Rotala's response to question 11 above.

19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

In addition to Rotala's views generally as to the inappropriateness of a franchise regime in Greater Manchester, Rotala considers that five-year franchise contract cycles shift operators' focus to short-term profitability while at the same time stifling investment and the long-term development of routes, personnel, and infrastructure.

The proposed five-year length for a franchise contract appears to have been based on the London experience. However, the franchising market in London is radically different from the system proposed by GMCA. In London, franchises are granted by route in a cycle which ensures that there is a continuous series of route franchises to be bid for. Every operator in the London market therefore sees an opportunity to build its market share and is a long-term player in that market. In contrast, GMCA intends to use a system of 10 or so large franchises based on area and the same five-year contract duration as in London. This approach gives operators very little prospect of building market share and brings with it the considerable risk to the operator of being completely out of the market at the end of the franchise contract. Inevitably therefore, in such a system, operator focus will become very short term; to the end of the franchise period. This will automatically inhibit investment and innovation as there will be no obvious incentive.

In addition, Rotala is concerned about the negative affect that franchising will have on employees (*see answer to question 21 below*).

If these large, by area, franchise contracts are to be used, it is clear that the franchise length would need to be much longer – probably at least ten years – in order to avoid these pitfalls. However, to adopt such a long period would inevitably reduce competition as such lengthy franchise periods would favour the incumbent operator. Thus, the core is the proposal to use franchise by area. In Rotala's view this is simply unworkable and detrimental to the interests, not only of bus users, but, importantly, to employees.

20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme as set out in the Commercial Case?

Rotala has considerable concerns with the proposed risk allocation between GMCA and the bus operators under the Proposed Franchising Scheme as set out in the Commercial Case.

Table 1 of the Commercial Case Risk Allocation Paper envisages that GMCA will take the “consumer price and wage inflation and fuel price risk” in order to avoid operators building these risks into their tenders and thereby increasing the price. However, if GMCA takes the wage inflation risk, it must be questioned what incentive bus operators would have to resist requests for wage increases. Moreover, if wage inflation includes pensions, the entirety of the pension risk would be borne by GMCA and operators would have no incentive to resist increases in these only partially controllable costs.

Table 1 of the Commercial Case Risk Allocation Paper envisages that bus operators will take the congestion risk. However, there is no commentary as to how this might affect tender prices and certainly more details should be provided before GMCA can take an informed view on this element of the Proposed Franchising Scheme.

More generally, Rotala considers that taking away from bus operators what are standard commercial risks for bus operators is likely to remove the normal incentives to innovate that competition between operators typically engenders, thereby harming the market and consequently consumers.

21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators as set out in the Commercial Case?

Rotala has concerns about the potential impact of the Proposed Franchising Scheme on employees of operators based on the Commercial Case. In particular:

- Rotala is concerned about the lack of work stability for employees through the potential to move between bus operators both at the time of the initial franchise and on franchise renewals. In essence, every member of staff would need to re-earn their position every five years. This is entirely inimical to job loyalty, removes the sense that working for a bus operator can be a career for life, and considerably increases concerns about job security.
- It seems likely that under the Proposed Franchising Scheme many retained employees will have much narrower roles as compared with previously and therefore roles that are intrinsically less rewarding. This will make it difficult to attract capable managers into the Greater Manchester bus industry and retain

them. This is a flaw caused by the “all or nothing” approach to the franchising regime and is not a flaw present in the London franchising model.

Accordingly, the Proposed Franchising Scheme will do nothing to enrich jobs or to create job satisfaction.

22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme as set out in the Commercial Case?

Rotala repeats here the comments made above in response to question 11 about the proposed approach to depots under the Proposed Franchising Scheme.

23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme as set out in the Commercial Case?

GMCA proposes that it would specify the vehicles to be used with the base level of investment being that required to renew fleet on a rolling basis.

Rotala considers that larger bus operators are likely to have considerably greater purchasing power than TfGM owing to the volumes they acquire across their national businesses and the ability to flex delivery to match much larger orders. Moving to a franchised model would introduce further cost as it would reduce the flexibility that enables operators to negotiate lower prices.

Rotala is aware of TfGM making vehicle procurement decisions in the past (*e.g.*, purchase of Optare Hybrid buses) that have proved to be poor decisions and led to sub-optimal performance. Rotala considers that poor bus procurement decisions may at least in part be a function of a relative lack of experience on the part of TfGM and GMCA. Rotala is concerned that this inexperience could result in poor decisions when specifying vehicles to be used under the Proposed Franchising Scheme and is indicative of the problems with TfGM and GMCA employing staff with the requisite experience for implementing and managing the Proposed Franchising Scheme.

Rotala would reiterate that it has itself committed to purchase 130 Euro VI buses for Greater Manchester and these are due to start service in 2020.

24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme as set out in the Commercial Case?

The Commercial Case suggests that efficiencies and a consistent customer experience will be achieved through standardisation of operational and maintenance procedures and that this will reduce the risks associated with a significant number of interfaces.

Rotala considers that technology is constantly developing and permits interoperability to be implemented on a wide scale. It would not seem necessary to introduce the Proposed Franchising Scheme to achieve the Intelligent Transport Systems sought by GMCA but rather this could be achieved equally well under the Partnership Plus option. Indeed, Intelligent Transport Systems have been introduced in other partnership models such as Brighton and Hove.

GMCA and TfGM should nevertheless not underestimate the efforts required to achieve an Intelligent Transport System. Complex IT projects are inherently difficult to implement and tend to require more resources than initially envisaged. It is not clear why TfGM considers that it might be better placed from a resource and personnel perspective to introduce an Intelligent Transport System as compared with the private sector. It is considered that this will take significantly longer than anticipated and at a higher cost than budgeted for.

25. Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

GMCA has conducted market analysis to identify potential bidders for franchises in Greater Manchester. This appears to suggest that there are 13 large operators who might be interested in tendering for franchises. However, it bears emphasis that there is actually little appetite among existing bus operators in Greater Manchester for the Proposed Franchising Scheme and there can be no guarantee that bus operators will in fact tender when the franchises are open for tender. The potential lack of interest in bidding for franchises represents a significant risk for the Proposed Franchising Scheme and could give rise to sub-optimal results from a competition perspective. Further, since the Consultation work was carried out, there have been significant developments in the bus industry which may have the effect of reducing interest in the Greater Manchester market. A significant number of the operators consulted by GMCA

are European state-owned entities whose appetite to invest in the United Kingdom market post-Brexit is simply unknown.

Rotala is also concerned that lack of experience within TfGM in centralising contracts and difficulty in obtaining prompt decisions are likely to give rise to issues with the Proposed Franchising Scheme.

26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case?

As recognised at para. 7.6.3 of the Commercial Case, the critical impact on the policies of neighbouring authorities that changes to the bus market in Greater Manchester will affect is any impact on the running of cross-boundary services. Rotala believes that the Proposed Franchising Scheme will have a negative impact on the running of cross-boundary services not least as (a) assuming that cross-boundary services conform to the same quality standards as required by the Proposed Franchising Scheme, it may be difficult for such services to be able to sustain the increased costs and (b) there may presumably be a reluctance – indeed, this is even suggested in the Consultation – to permit cross-boundary services to serve all bus stops along the routes into Manchester as this would decrease the income for franchised services.¹² It would be a perverse and unwelcome consequence of the Proposed Franchising Scheme which is aimed at removing fare and ticketing restrictions that passengers waiting at bus stops may not be permitted to take the bus that passes the stop first if it happens to be a cross-boundary service and appears to be replacing one restriction with another. The negative impact of this does not appear to have been considered in the Assessment.

27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

GMCA concluded that it would be able to secure the operation of services under franchised contracts because the franchise structure, the asset strategy, and procurement approach would collectively support the achievement of the key commercial aims of delivering franchises that offer quality of services and value for money and allow access to the market for small to

¹² To the extent that cross-boundary services are permitted to serve all bus stops along routes into Manchester, it is not clear that this has been taken into account in modelling the Proposed Franchising Scheme.

medium operators. The assumption built into the assessment is that there is a high degree of appetite for franchising.

As discussed above, Rotala nevertheless disagrees with the assumption that there is a strong appetite from bus operators for the Proposed Franchising Scheme. Rotala considers that it would itself tender for the areas in which it already operates but would not likely seek to tender for other large franchises that cannot be guaranteed to have any longevity. Indeed, although Rotala has a depot at Heathrow, it does not tender for BAA or TfL contracts. Further, while there might be new entrants into the Greater Manchester bus market, it seems likely that there would equally be a large number of exits.

More generally, with no firm commitment to spending at present following the recent General Election, it may also be queried whether the requisite funding commitments will be forthcoming for the North and for GMCA's Proposed Franchising Scheme.

Rotala considers that the incremental approach of a partnership is a much safer route and more flexible as opposed to a "big bang" franchising approach.

28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

As discussed, the partnership options considered by TfGM in the Commercial Case were less advanced and sophisticated than the Partnership Plus option and there was therefore a material understatement of the benefits of the partnership options. This Response has made clear the benefits that could be achieved with the Partnership Plus option and the fact that the Partnership Plus option could satisfy the key objectives sought by GMCA. The Partnership Plus option would be less costly to implement and could in effect be implemented much more quickly as compared with the phased introduction of the Proposed Franchising Scheme – indeed, much of the funding required for Phase 2 could be taken from the proposed investment in franchising. Risk would remain with the operators under the Partnership Plus option and there would be a significantly less risk to public funds.

29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

Rotala considers that a partnership option would not involve any of the negative consequences flowing from a franchised scheme as discussed in response to question 21 above. With a partnership, employees would not have any job security concerns, employee loyalty can be built up over time, employees have the potential to work for bus operators for their entire career, employees would retain their current functions and have more fulfilling roles, and there would be no disruption from transferring to new businesses.

Partnership would also enable operators to retain control over their employees in order to action suggestions from employees and to retain intrinsic rewards for working for the business in order to do so.

30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

According to the Assessment, the Proposed Franchising Scheme would require an initial upfront investment of £122 million during the transition period. The position across later years is a forecast cumulative net surplus of approximately £94 million with a mixture of forecast surpluses and deficits in specific years. It is proposed that the funding requirements would be met by Local Authorities and the Mayoral precept and it is advanced that the funding requirements are affordable. Importantly, page 72 of the Consultation makes clear that a requirement to raise the funding would be an increase of Council Tax to Band B and Band D properties in Greater Manchester.

Rotala has a number of specific and serious concerns as regards the alleged affordability – and political sustainability – of the Proposed Franchising Scheme as follows:

- As made clear in Jacobs' Review of Consultation Economic Case, the modelled revenues of the Proposed Franchising Scheme are likely to be a significant overestimate given that (a) fares are expected to increase by RPI + 1.4% annually whereas the average fare yield growth across English metropolitan areas since 2004/2005 has been at a rate below RPI – the proposed increase would see a Manchester weekly ticket rise from £19.00 to £21.00 by 2023, which would be higher than the rate in London and is simply not credible;

(b) there is likely to be political pressure to limit any increase in fares – there has been a freeze on fare increases in London since 2016; and (c) bus use by pensioners is likely to fall as car use becomes more affordable for this group. This will in turn require an increase in public funding but with little gain for taxpayers in light of the fact that the same objectives can be achieved through a partnership option with bus operators taking the risks.

- The Financial Case model for the Proposed Franchising Scheme is not realistic or feasible. The financial model applies a long-term average EBIT margin of 7.5% which equates to a mark-up on operating costs of approximately 8.1%. The additional margin allowance of 0.4% is considered to be sufficient to account for any potential differences between the Greater London bus market and the Greater Manchester bus market and takes into consideration the commercial proposition for franchising and the impact on the required EBIT margin of factors such as the franchising authority assuming revenue risk. However, there are issues with the assumptions underlying this financial model:
 - Although the Financial Case is based on the historic costs of Greater Manchester bus operators, TfGM has used the London model as their guide and selected a low EBIT figure from that environment when seeking to identify an appropriate EBIT metric. The London model is nevertheless based on leased vehicles as opposed to ownership of vehicles (as tends to be the case in Greater Manchester) and therefore the cost structures are entirely different. In particular, the costs of renting buses would likely be higher because more of the risk of ownership is borne by the lessor. In essence, TfGM has not recognised that there is a higher lifetime cost to renting that has not been factored into the Financial Case. To the extent that the proposal is that bus operators in Greater Manchester should be renting buses, the Financial Case profit and loss models will have been based on the wrong cost structures and would need to be subject to wholesale revision.
 - TfGM's Financial Case appears to be based on the accounting standards for operating leases before the change to IFRS 16. Prior to the change, operating leases were charges in arriving at EBIT. After the change, the

operating cost is split between depreciation and interest components in the profit and loss account. This will leave part of the cost of renting the asset above EBIT and part in the “I” line and this in turn means that selection of the profit margin at the EBIT line is not sustainable.

- The assumed blanket 7.5% operator margin across all franchise contracts also ignores operational risks, potential bidder interest, and the number of routes contained within particular franchises. Actual operator margins are likely to vary across franchises based on these considerations and therefore the average 7.5% margin assumed may not be reflective of real-world commercial factors as noted in Jacob’s Review of Consultation Economic Case.
- It seems likely that, should TfGM control the depots and bus operators do not need to exhibit any long-term commitment, bus operators will be more content to focus on achieving higher margins without the need to fill up depots. This may be contrasted with the situation where bus operators own depots and there is an incentive to fill up depots and to become even more competitive on the last few routes.
- As noted in Jacob’s Review of Consultation Economic Case, there is considerable risk that the modelling approach double counts benefits from the introduction of interoperable tickets and more frequent service levels. Given that each of these aspects is likely to give rise to similar benefits, modelling the two separately is likely to overstate the resulting benefit.
- As noted in Jacob’s Review of Consultation Economic Case, service quality improvements are assumed to have a significant impact on levels of demand and therefore revenues flowing from the Proposed Franchising Scheme. However, there is only limited evidence to support this contention.
- The Pensions Paper appended to the Assessment assumes that the deficit payments being made by First and Stagecoach must be sufficient in the near term to meet the exit liability should either of those employers run out of “active” employees because of the franchising proposal. There is, however,

insufficient detail in either the operators' statutory accounts or in the Greater Manchester Pension Fund accounts to test this assumption:

- The operators' statutory accounts and Greater Manchester Pension Fund disclose that First in 2018 had approximately 165 employees still in the Local Government Pension Scheme and Stagecoach approximately 75. While these are relatively low numbers, both employers are paying a contribution of 30% of salary which produced a contribution of £1.3 million for First and £0.5 million for Stagecoach. In addition to this, First was paying deficit contributions of £5 million per annum and Stagecoach of £0.5 million.
- The Greater Manchester Pension Fund accounts do not reveal the individual Funding Strategy Statements for each employer – there will of course be one – and so it is not possible to determine what the recovery periods are set at, although it could be up to 20 years.
- It seems likely that TfGM will have underestimated the impact of exiting the Local Government Pension Scheme on any employer because the reinsurance calculation at this point would need to cover the risks of all deferred and pensioner members at the time. This is in effect a discontinuance method of valuation and produces a different funding calculation from the one used if the employer is still active in the pension scheme.
- TfGM assumes that a franchisee would offer to join the Local Government Pension Scheme in respect of any employee currently in that Scheme who was transferring under TUPE to a new employer. However, if TfGM actually envisage taking the wage inflation risk, the employer would be left with the exit payment risk at the end of the franchise if that employer was then required to leave the Local Government Pension Scheme through having no active members. This has the potential to be a large sum of money even for relatively few employees since it is based on a reinsurance calculation.

- It seems likely that TfGM has underestimated the cost of acquiring bus depots. Even assuming that it might be lawful for TfGM to subject depots to Compulsory Purchase Orders, there will be considerable legal costs associated with forced divestitures not least as bus operators such as Rotala are likely to resist such legal moves. Depots have intrinsic value to bus operators over and above their market value and this should be taken into account in the costs of acquiring depots. It equally seems unlikely that the configuration of depots will remain the same under the Proposed Franchising Scheme given that different service patterns are likely to arise once franchises have been awarded.
- In terms of transitional costs, Rotala is aware that key depots would need major capital expenditure post acquisition that has not been accounted for in the transitional costs. This includes, based on Rotala's own due diligence, approximately £1 million required on the roof of the Queens Road depot. As mentioned elsewhere, it is also not clear that TfGM has sufficiently budgeted for costs associated with potential Compulsory Purchase Orders (even assuming that such Orders could be used for the intended purpose) and the cost of legal challenge against the decision to franchise and/or for damage caused to business the cost of which is likely to be significant.
- In relation to incremental ongoing costs such as staff and management (the forecast sum is £3.3 million) and bus equipment (forecast to cost £12 million following the transition period), Rotala believes that these cost forecasts are too low. Rotala has also already commented in response to question 17 on other areas in which TfGM's cost estimates are clearly understated.
- Although the Consultation presumes that the Proposed Franchising Scheme can generate an increase in patronage of 1.2 million passengers by 2040, this needs to be balanced against the fact that the existing network has been designed to maximise patronage and revenue. To the extent that social objectives (such as frequency of service regardless of demand) are included within the design of the network, the network is likely to be less economically efficient.
- The Financial Case does not take into account recent inflationary increases in the costs of providing bus services. Leaving aside green bus tenders (which

have a different cost base) and school contracts (which have a higher cost per mile owing to the peak bus cost), Rotala currently operates 1,233,959 tendered live miles annually for £2,334,701, thereby representing a cost of £1.89 per mile. In recent tenders submitted by Rotala for April 2020, Rotala has tendered for 1,436,122 live miles at a total cost of £3,503,488, thereby representing a cost of £2.44 per mile. This constitutes a 29% increase in costs and is due to increased driver rates of pay, increased overheads, and the removal of the Atherton depot and addition of the Bolton depot.

- Rotala has compared TfGM revenue and costs with Rotala's own ratios and it appears that TfGM vehicle costs are too low, as are fuel costs and drivers' wages.
 - In the case of vehicle costs, it is worth noting that the cost of replacing buses is assumed to increase in line with RPI but this is inconsistent with Rotala's own experience, while a higher level of vehicle specification as proposed under the Proposed Franchising Scheme is likely to result in higher vehicle costs.
 - As regards fuel costs and drivers' wages, these are based on service mileage and hours only, ignoring dead miles, paid breaks, and testing and so forth.

Accordingly, these are further reasons for considering that TfGM's forecast gross profits are over-optimistic.

- The Assessment assumes that the Bus Services Operator Grant ("BSOG") will be maintained at current levels. However, BSOG is currently under review and there is in any event no entitlement for electric vehicles, thereby increasing operating costs.
- The cost sensitivities applied by TfGM in the Assessment are too mild. An example is that wage inflation in the industry is far higher than the forecast RPI + 1.5% and has recently been as high as 25%. Other examples are reinsurance costs and claims costs which are increasing faster than RPI + 1% for Rotala.

Indeed, Rotala's reinsurance costs have jumped a staggering 25% this year which is entirely out of kilter with inflation.

- The assumption that concessionary reimbursements will begin to rise in 2020/21 (when TfGM becomes the payee) is flawed. Firstly, the RPI +0.7% increase assumption for concessionary fares is overstated. DfT Guidance makes clear that where real fare increases are implemented, the reimbursement factor should be dampened to account for passholders paying zero fares. This yields a lower reimbursement than projected. Secondly, the number of Greater Manchester passes in issue in 2017/18 reduced by 11%, evidencing a likely continued decline. No evidence has been provided to support an increase from 2020/21 (particularly when internet shopping is on the rise, as is the computer knowledge of the older generation). As such it is considered that the income GMCA estimates it will receive for concessionary reimbursements is considerably overstated. This is supported by Rotula's own data which evidences that concessionary patronage is dropping.
- There is provision for meeting the cost of Clean Air Zone ("CAZ") Compliance the cost of which would be substantial. Rotala is aware of the response to the Assessment submitted by Mr. Peter Nash ("PN") who it considers to be a well-respected and knowledgeable member of the bus industry. PN has calculated that if fleet renewal took place at a rate to maintain average fleet age then, by the end of the first round of franchising, 58% of the fleet would not meet the required standard. The cost to convert the remaining fleet would be around £23 million (this is taken from the low carbon partnership vehicle technology guide which specifies that TfL have allocated over £80 million to retro-fit over 4,000 Euro V and VI diesel and diesel-electric hybrid buses with SCR technology by the end of 2020). This sum is unlikely to be met by central Government in full so will have to be sourced locally with a risk of it being recovered from the tax payer. It should also be noted that there is an increase in the annual cost associated with a fully Euro VI fleet (exhaust maintenance and ad blue additive consumption) and this has not been accounted for. This is likely to cost around £2.5 million a year (based on the annual cost of £1500 per vehicle). Again, this will have to be met locally and may well fall to the tax payer.

- Mayoral Intervention into drivers pay is, in Rotala's view, inevitable (as has occurred in London in 2002, 2016 and 2017). This has not been accounted for in the Assessment and it is arguable that this is more likely to occur given the unification agenda of franchising which logically includes pay parity.
- The Assessment only provides for 30 revenue protection officers ("RPOs"). This equates to one RPO in each Metropolitan District on each shift (it is intended that this number will decrease to 13 after 6 years). To put this into perspective, TfL employ 220 RPOs and, if this is pro-rated to Greater Manchester, it translates to a requirement of 48 RPOs (Greater Manchester's PVR is 22% of London's). Failure to have sufficient RPOs invites fraud and reduces overall revenue (especially with the proposed RPI +1.4% annual increase in fares and the reduced incentive for drivers to monitor due to the fact that revenue management does not rest with the employer). Any loss of revenue will far outweigh any saving made on having the bare minimum of RPOs as clearly is the plan for the Franchising Scheme.

In summary, Rotala does not believe that TfGM and GMCA have made out their case for the affordability of the Proposed Franchise Scheme and that the reality is that the actual costs of managing and operating the Scheme will be significantly above the levels forecast and likely to be at least double, as illustrated above, while the overall revenues achieved from the Scheme will be significant lower. It is clear, therefore, that there will be a large gap between the budgeted cost and the actual cost, which will be required to be sourced from central Government or the taxpayer. The recent comments of Dominic Cummings highlight the perception that there is a need for reform in the Civil Service and a lack of individuals with the required skills. It is clear that the financial cost of Franchising has been grossly underestimated and will cost more than is necessary and the costs will be further increased by it being managed by people without the requisite skills.

31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

Rotala considers that the level of cost estimated for the partnership options to be excessive and it is entirely unclear where the costings have come from. As noted above, OneBus is currently in the process of preparing the costings requested by TfGM.

It is further noted that the risks identified for partnership availability of resources have not been identified for franchising. Given the level of new staff required for the Proposed Franchising Scheme as compared with a partnership option and the drastic change constituted by franchising, Rotala considers that such risks should be as great for the Proposed Franchising Scheme.

32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

It is envisaged that under the Proposed Franchising System TfGM would take on significant additional responsibilities in managing much of the customer interface, overseeing the commercial performance of the network, and managing the contractual relationship with the franchisees. It is contemplated that the operating model would comprise franchise management, commercial development and network planning, and support activities.

Rotala believes the bus operators will not likely be willing to release the best qualified and most experienced employees, while Rotala itself is likely to retain staff at its Bolton depot as this depot services the whole of Rotala's North West region activities. Rotala further considers that the proposed salary costs are approximately 10% too low and this will mean that TfGM would be unable to recruit the staff they require unless they recruit from outside the bus sector, but then such staff would lack the requisite experience.

33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?

Rotala has already commented above on the flaws in the Financial Case from the perspective of the transition and implementation of the Proposed Franchising Scheme.

As mentioned in response to question 32 above, Rotala believes that the contemplated salaries reserved for these aspects are too low, while the prospect of recruiting outside the industry will mean that personnel with insufficient experience will be recruited. This is particularly crucial when, as recognised by TfGM, it is during the transition period that some of the biggest risks arise from the Proposed Franchising Scheme, including risks associated with patronage, revenue, interest from operators in bidding into the Greater Manchester market, operational

continuity, mobilising services when franchising starts, TfGM and GMCA reputation, and customer experience.

Partnership Plus does not have any of these issues as operators would retain their own staff members, while the staff required at TfGM for a partnership option would be minimal (between six and eight staff depending on the partnership model) and could be trained up with the assistance of existing Greater Manchester bus operators.

34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

The Assessment recognises that, while there would be no major procurement phase with a partnership option, the partnership itself would need to be fully co-designed, new systems would need to be introduced, and the required people resources deployed. Although Rotala accepts these points, it considers that, under a partnership model, TfGM employed staff could undergo the applicable retraining through working with bus operators from which they would learn and develop. While there is a skills gap, bus operators could fill the gap with their retained staff. Moving to a franchise would effectively remove the majority of the overhead to enable operators to support TfGM and GMCA in this way and create a staff shortage that could not be filled.

35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

Rotala considers that bus service passengers in Greater Manchester are likely to be negatively affected by the Proposed Franchising Scheme particularly as compared with a partnership option. The Assessment recognises that the Proposed Franchising Scheme would have the biggest impact on bus operators through a shift in the market structure from competition “in” the market to competition “for” the market. As discussed elsewhere, Rotala considers that competition “for” the market is an inferior form of competition model which has been

recognised recently by the Competition Appeal Tribunal¹³ and will inevitably have a negative impact on the ultimate consumers of bus services.

There is also the potential for the Greater Manchester bus network to be unreliable during the transition period and even longer term especially if the staff needed to manage the Proposed Franchising Scheme are not available and/or do not have the right skill set.

36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

The Assessment considers that the Proposed Franchising Scheme has greater potential than the partnership options to deliver any additional interventions in the bus network which would, in turn, deliver more passenger benefits. The Assessment further considers that it would be very difficult and, in some instances, not possible due to legal constraints to implement equivalent interventions in relation to fares or the frequency of certain services and, as a result, any potential interventions may deliver fewer passenger benefits under the partnership options.

Rotala entirely disagrees for the reasons provided throughout this Response. In summary:

- The Assessment has understated the benefits of the partnership options (and unfairly skewed the results in favour of the Proposed Franchising Scheme).
- The Assessment has not taken into account proposed changes to the partnership option on offer from OneBus.
- Partnership Plus could provide all of the benefits that it is believed would flow from the Proposed Franchising Scheme, including improvements to the network, reduced fares, simplified and interoperable tickets, and improved customer service. The fact that these benefits are achievable is evidenced in partnerships entered into in other regions of England, including the West Midlands partnerships.
- Partnership Plus would provide a better service to passengers at less risk and with no transition period. It may be noted in this regard that TfGM itself

¹³ *Achilles Information Limited v Network Rail Infrastructure Limited*, [2019] CAT 20, para. 296 (https://www.catribunal.org.uk/sites/default/files/2019-07/1298_Achilles_Judgment_CAT_20_190719.pdf).

recognises that among the biggest risks of the Proposed Franchising Scheme are operational continuity, mobilising services when franchising starts, and customer experience. The Assessment also recognises the potential for complexity and confusion for some customers particularly during the transition period.

- There are no legal restraints to implement equivalent interventions under a partnership option.

37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

The Assessment acknowledges that the Proposed Franchising Scheme would have the most significant impacts on operators not least as it would involve a change in the market structure and an alternative model of competition – competition “for” the market rather than “in” the market. Rotala agrees that the Proposed Franchising Scheme will undoubtedly have the most significant – and negative – impact on bus operators. Detailed reasons have been provided on this point in response to earlier questions in this Consultation and may be summarised as follows:

- The proposed profit margin under the Proposed Franchising Scheme is based on incorrect assumptions and will consequently likely be too low.
- The costs estimates on which the Proposed Franchising Scheme are based are not accurate and will result in operators either operating at a loss or needing to exit the Greater Manchester bus market.
- Potential forced divestiture of depots, or at least attempts to require such divestitures, will negatively impact operators and their shareholders, as well as creating litigation as a result of the loss of property, goodwill, and commercial assets.
- Insufficient value provided by GMCA for stranded depots (noting that depots have considerably more intrinsic value to operators than the mere market value).
- Insufficient value provided for bus fleets that are no longer needed following a franchise loss.

- Operators may face a pension cost risk. In particular, should TfGM take the wage inflation risk, the employer bus operator would be left with the exit payment risk at the end of the franchise if that employer was then required to leave the Local Government Pension Scheme through having no active members. This has the potential to be a large sum of money even for relatively few employees since it is based on a reinsurance calculation.
- A requirement to obtain permits for cross-boundary services and the potential for boundary services to be limited on the corridors on which they operate within Greater Manchester.
- Reductions in staff levels as control of the bus system in Greater Manchester moves to GMCA and bus operators cannot continue to justify the overheads.
- Demotivated staff in light of reduced roles and uncertainties over success in franchise awards both at the outset of the Proposed Franchising Scheme and throughout subsequent franchise renewals.
- Potential exiting from the Greater Manchester bus market with significant re-entry barriers.
- Potential inability of small and medium sized businesses to compete in tenders for the smaller franchises.

Rotala would like to make it clear that it considered there to be a real risk that implementation of the Franchising Scheme will result in operators exiting the market and losing their business. This will result in costly litigation for both GMCA and the operator which could delay introduction of the Scheme. Ultimately, incumbent operators and GMCA need to behave in a constructive and supportive way for the Scheme to be a success which, in its current format, simply will not happen.

It bears emphasis that none of these issues would arise with the Partnership Plus option and worth noting that operators have a real appetite for this to work.

Furthermore, if GMCA are, despite its obvious pitfalls, still committed to implementing the Proposed Franchising Scheme, they may want to consider purchasing the businesses/depots of incumbent operators in order to avoid the inevitable litigation.

38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

Assuming an appropriate partnership arrangement, Rotala believes that a partnership option would have a positive impact on bus operators since, as noted in detail above, it would give rise to an improvement in services, materially increase bus patronage, and enable bus operators to allow price to reflect costs in a competitive environment.

39. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? If so, please explain what you think those positive or negative impacts would be.

Rotala has explained in detail above the negative impacts the Proposed Franchising Scheme will have on its business and provided a summary in response to question 37 above.

40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

Rotala considers that the Proposed Franchising Scheme will negatively impact on GMCA. In particular, Rotala envisages that the Scheme will result in a shortage of staff and GMCA will be faced with needing to fund a large deficit in the Proposed Franchising Scheme which it may have to pass on to the taxpayer

The Franchising Scheme is an underfunded model and is likely to lead to negative public reaction and criticism which will fall at the door of GMCA and ultimately, the Mayor.

41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

Rotala believes that the objectives sought by GMCA could be equally well – in fact better – achieved through a partnership option as compared with the Proposed Franchising Scheme. In this circumstance, it is difficult to see how it could be in the interests of taxpayers in Greater Manchester to be faced with an increase in Council Tax levels for no significant operational benefit without Phase 2. It is all the more concerning given that there are strong grounds for

concluding that the Financial and Economic Cases for the Proposed Franchising Scheme are under-budgeted and therefore it seems likely that further public funds may need to be raised through additional increases in Council Tax over and above the current forecast. This is also evidenced by the way in which franchising is underperforming in London and Rotala cannot see why it would be any different in Greater Manchester.

As noted in Jacob's Review of Consultation Economic Case, the methodology used to calculate the wider economic benefits from introducing the Proposed Franchising Scheme raises significant concerns. Such benefits typically accrue to businesses which benefit from an increase in productivity as a result of improvements in journey transport times. However, as only a small proportion of journeys made during the day by passengers on work duties are made by bus, it is unlikely that such benefits will be realised.

42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

For the reasons provided throughout this Response, Rotala vigorously disagrees that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. In short, Partnership Plus is capable of satisfying GMCA's objectives to improve bus services in the Greater Manchester Area in the near term and without the significant risks to public funding or any need to raise funding from an increase in Council Tax levels.

43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

As explained in detail above, Rotala considers that the Assessment is fundamentally flawed on a number of levels. This includes that it is not based the most up-to-date partnership proposal, there is an inaccurate assessment of decrease in bus patronage, while the Financial and Economic Cases for the Proposed Franchising Scheme are based on unrealistic and incorrect assumptions, skewed in favour of the Proposed Franchising Scheme, lacking in evidence, and not fully budgeted.

The present CAZ proposal excludes private cars (which account for 75% of traffic). If GMCA is committed to increasing bus patronage and reducing harmful emissions, then it should include cars in the CAZ proposal, however unpopular that decision is.

Equality Impact Assessment

- 44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?**

Rotala does not have any comments on this.

- 45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?**

Rotala opposes the introduction of the Proposed Franchising Scheme for the reasons provided above.

- 46. Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.**

Rotala does not believe that there are changes that would improve the Proposed Franchising Scheme but considers that a partnership option could achieve more than franchising in a timelier fashion and at less risk as detailed in the Response to this Consultation.

- 47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?**

Rotala would support introduction of a partnership option.

- 48. Finally, do you have any other comments you want to make?**

Rotala does not have any further comments.

About You

- 49. Are you responding on your own behalf or on behalf of an organisation or group?**

This Response is being provided on behalf of Rotala.

50. What is your name, role and name and address of organisation/group on whose behalf you are submitting this response? These details of your organisation or group may appear in the final report.

Rotala PLC, Hallbridge Way, Tipton Rd, Tividale, West Midlands B69 3HW (Diamond Bus (North West) Limited is a subsidiary of Rotala and an affected operator

51. What category of organisation or group are you representing?

Bus operator in Greater Manchester.

52. Please write in the total number of employees/members in the organisation or group that you are representing. Please include yourself in the total, if applicable.

The North West subsidiary of Rotala which operates in Greater Manchester, Diamond Bus (North West) Limited, employs the following:

- 102 members of staff at its Eccles depot
- 580 members of staff at its Bolton depot.

53. Please tell us who the organisation or group represents, and where applicable, how views of members were assembled.

Not applicable.

| | |
|--|---|
| Organisation Name | Blackburn with Darwen Borough Council |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Blackburn with Darwen Borough Council supports GMCA's analysis in terms of challenges facing the Greater Manchester bus market, which mirrors background conditions experienced within the Borough of Blackburn with Darwen, in relation to lack of co-ordination of networks (either with the same mode or intermodal with rail / tram etc), the lack of commercial services at particular times of the day or week, and complex / numerous ticketing arrangements between different private operators. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |

| | |
|--|---|
| Q13b Why do you say this? | The Council is supportive of GMCA's proposal to introduce a Franchising Scheme for the Greater Manchester area, in order for GMCA to achieve its strategic objectives in terms of supporting sustainable economic growth, improving quality of life for all, protecting the environment and developing an innovative City Region. The Council also notes limitations within the current legislative arrangements regarding allowing current bus operators to fully integrate fares and ticketing. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | The Council notes the assessment which has been undertaken in line with HM Treasury requirements and is positive in terms of the greater expected passenger, environmental and societal benefits of the Franchising Scheme. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | As operating costs will be borne by Greater Manchester taxpayers (with the potential for costs being offset by Central Government), the Council has no further comments to make on how the ongoing scheme would be funded. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | The Council is in agreement on the key objective relating to the preservation of cross-boundary bus services that provide access to employment, leisure and services in Greater Manchester. The permitting system is understood, and whilst there are potential implications for cross-boundary services which originate outside Greater Manchester (and potentially have the bulk of mileage outside Greater Manchester) in terms of revised routes and boarding/alighting points, the assertion that GMCA would seek to maintain cross-boundary services working with neighbouring LTAs (and operators) to mitigate any adverse impact is welcomed. Furthermore, the opportunities to put in place new fares and ticketing arrangements (which could benefit Blackburn with Darwen residents travelling into Greater Manchester) must be taken forward as part of the Franchising Scheme's development and implementation. The excepted Scholar's Services not providing transport to the general public are noted. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | |

| | |
|--|---|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Similar to previous comments on cross boundary bus services and representations made in 2018 as part of initial consultations, the Council is aware of the adverse impact that the introduction of the Franchising Scheme could have on local bus services originating outside the Greater Mancehster area. The Council would want to be part of the decision making process (under the 2000 Act) in relation to permitting, and the granting of a permit, either through a benefit to passengers making journeys within the Franchise Area or not impacting adversely on local Franchised services. The latter is particularly important for BwDBC marginal services which are currently operated commerically cross-boundary at infrequent service intervals, which may be rendered uneconomic should unrealistic service amendments be required within the Franchise Area. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Quite likely |
| Q48 Finally, do you have any other comments you want to make? | |

Date: 7th January 2020
Your
Our Ref:



Andy Burnham
Mayor of Greater Manchester
Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M16EU

Leader of Bolton Council
2nd Floor
Town Hall
Bolton
BL11RU

Tel no. 01204 331094

www.bolton.gov.uk

Dear Mr Mayor,

Proposed Greater Manchester Bus Reforms

Bolton Council welcomes the proposed reforms to bus services Greater Manchester Combined Authority is seeking to implement under the Buses Act 2017.

We feel that the proposed franchising scheme has the potential to offer an opportunity to make a real difference to connect people to places through modern fleet and a revamped bus transport network the bus transport network across Greater Manchester. It will also create better connectivity, reduce Co2 emissions, provide affordable and sustainable travel choices.

The Council agrees that the current bus market is not performing as it should across Greater Manchester however the problems in Bolton are more acute. There is inadequate network coverage and absence of commercial services to some of our major employment sites such as Middlebrook and Logistics North. There is the manifest problem of the poor performance record of some of the service providers in the Borough. As a result, some of our communities are isolated by lack of public transport.

We would like to point out at the outset that Bolton unlike many of the other Boroughs in Greater Manchester does not have the benefit of having the Metrolink Tram System. Therefore, it is imperative that this is recognised in the network planning at the initial stage of the introduction of the new franchise so that there are tangible and measurable improvements in the area, and Boroughs such as Bolton, without the benefit of the Metrolink, have a greater level of provision to recompense for this fact.

Lack of a Metrolink Service in Bolton supports the argument that the town should benefit from increased or enhanced bus services. This applies to the whole of the Borough. Network improvements should also ensure better linkage by bus from Bolton to Metrolink services at Radcliffe. It is imperative that these links to the Metrolink services are not an aspiration but are an essential of the initial bus service network to be operated and are non-negotiable. Emphasis needs to be given to the latent unmet demand for linking local communities with each other and to the town centres of Bolton, and to the local rail stations.

An essential requirement of any new franchised network is that it is more comprehensive serving the needs of the local people than that which is already in place.

There are serious operational issues with bus services in Bolton with buses often not turning up leaving gaps in services, punctuality issues and lack of quality bus shelters. It is therefore imperative that services introduced under the proposed franchising scheme offer better quality services than at present. Some operators are not providing the real time information to TfGM so the '84268' text message service is of little value.

Currently in Bolton and indeed across Greater Manchester services are very fragmented with tickets not being interchangeable between different operators' services. Fares need to be set to a uniform standard and ticketing interchangeable not only between bus services but between tram and train services across the conurbation.

Vehicles need to be low emission, modern and comfortable and offer similar comforts to the train such as free Wi-Fi and charging facilities. To encourage bus usage, we also feel it is important to introduce smart bus stops that show real time information so that those waiting for the bus are aware exactly when their next bus will arrive and have more confidence in using public transport.

It is very important that the representatives from GMCA Authorities should be closely involved in the planning and shaping the network and exercise strategic overview of performance in order to ensure that service delivery is closely aligned to the needs of the conurbation.

The most significant risk to the scheme will be how it is funded. We appreciate that at this stage that farebox risks are anticipated to sit with GMCA, however we have serious concerns with regards to shortfalls in funding and ongoing Council Tax precepts on residents. However, it is important to stress and make it conditional that the franchising option must not lead to increasing and ongoing extra financial burden on the ten council and their council taxpayers.

Much of the bus fleet across Greater Manchester is old and does not meet the latest greener emission standards. Older and in-efficient fleet of buses contribute significantly to high levels of air pollution in towns.

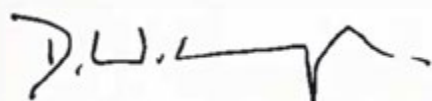
Buses have an important part to play in helping reduce carbon emissions by reducing the number of car journeys made. It is therefore imperative that a modern, environmentally friendly fleet is introduced.

With the right network, bus fleet and operating model buses have the potential to make a significant contribution to helping Bolton and Greater Manchester meet its targets around improving air quality, reducing congestion on the roads and reducing carbon emissions as well as enabling residents to access employment and leisure opportunities.

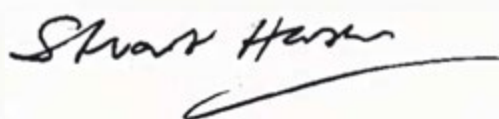
Lastly, whilst recognising the strategic importance of reforming buses and truly create a London style public transport, it has to be said that a strongest possible case needs to be made to the Government to make good the stark difference that exists between the subsidy towards public transport in Greater London compared to the North West with figures of nearly £2000 and £500 a head respectively. In other words, GM can't hope to have London style transport without substantial increase in funding from Government; otherwise a disproportionate burden would fall on local taxpayers which is not possible because of other budget pressures.

We will of course work closely with both GMCA and TfGM in developing the proposed bus franchise and developing a bus network fit for purpose.

Yours sincerely



Cllr David Greenhalgh
Leader of Bolton Council



Cllr Stuart Haslam
Executive Member for Highways & Transport

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

Bolton Council has no objections or any comments to the corrections and changes made to the proposed franchising scheme. The Council sees this as a function of Transport for Greater Manchester (TfGM) as they have the expertise to understand best the effect of corrections and changes and their potential impact on the proposed franchising scheme.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

From a Bolton perspective the Council agrees that it should be part of the franchising scheme. The franchising scheme should apply to the whole of Greater Manchester to ensure consistency in standards.

However, it is important to point out at the outset that Bolton unlike many other boroughs in GM does not have the benefit of having the Metrolink tram system and therefore it is imperative that this is built into the network planning of the franchise. Lack of a Metrolink service in Bolton we feel supports the notion that there should be increased/enhanced services in the Borough to compensate for this. GM Boroughs (including Bolton) that are not served by Metrolink should have more bus services than those that do to ensure fair distribution of public transport services across GM.

Q3. Do you have any comments on the local services that are proposed to be franchised?

The Council agrees that all services should go into the proposed franchising scheme from day one. However, a review of the network and emerging transport should also run in tandem in the initial planning so that required improvements to meet local needs are appropriately addressed. Sustained improvements in services must be included in the set of objectives that can be measured over time.

The Council notes that there appears to be no reference to Local Link or Ring and Ride Services as part of the franchising arrangements. These demand responsive services such as the Logistics North Local Link Service offer vital demand responsive links to places of employment, health care, leisure, etc. We feel it is important that these are included within the franchising arrangements.

The Council would like to see improved bus links from Bolton to Radcliffe Metrolink Station which in turn will improve links into Manchester from the South (Little Lever) and East (Broughton and Harwood) of the Borough, particularly those living in Little Lever.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

The Council does not disagree with the approach to be undertaken in that the proposed franchising scheme will be phased in and Greater Manchester split into three sub-areas.

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?

The Council does not have any objections to some services being excepted from regulation. However, the Council needs to understand whether some of the Bolton services that operate to Bury will fall into this group and what affect this may have if any before we confirm that we are happy with them being exempt.

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

Bolton has no objections to the date being proposed.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered?

TfGM hold the expertise to better understand proposed timescales around contracts.

Q8. Do you have any comments on the nine-month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

TfGM have the expertise to better understand proposed contract timescales.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

How would GMCA ensure they have reached the right people. What methods are to be used? Would any support be required from the ten GM Local Authorities? We feel it is important that any consultation undertaken to determine how the franchise is working is used to implement passenger-led improvements.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

TfGM hold the expertise in bus franchising. However, in order to maintain competitiveness, it is important to maintain healthy competition amongst operators in order to provide good value for money bus services. The franchise should not inhibit competition and smaller operators are not disadvantaged to encourage innovation and new initiatives.

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

TfGM are best placed to provide depots to bus operators and manage the leases and all the necessary admin around this. However, the Council would like to be kept apprised of which strategic site is of interest in our Borough.

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

Bolton Council would agree that the current bus market is not performing as it should across the GM area. In the case of Bolton, the problems are even more acute with inadequate network coverage, absence of commercial services to major employment sites such as Logistics North. The same

applies to rural areas and new residential developments within the Borough. All this amounts to limited travel options available to people to travel to work, health centres and recreation.

It is very fragmented, and services are not integrated across the bus network nor with other modes of public transport in GM such as train and tram. Tickets are often not interchangeable between operators and fares can differ. Some neighbourhoods are not well served with bus services and services can often be withdrawn due to them not being profitable.

First Manchester, before its withdrawal from Bolton withdrew services 575, 501 and 502 leaving some communities isolated. TfGM have had to step in, in some cases to subsidise a service to ensure an evening service is available in that area. The 502 and 575 were fortunately picked up by other bus operators.

Diamond who have taken over First's depot and services in Bolton appear to be suffering with operational issues, with gaps in services. Punctuality and reliability and lack of quality bus shelter and real-time information are major obstacles in making public transport a genuine alternative to the car.

Q13a. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?

For more information see paragraphs 4.15 to 4.21 of the Consultation Document.

PLEASE TICK ONE BOX ONLY.

Strongly agree

Tend to Agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Q13b. Why do you say this?

Currently services in GM are operated on a commercial basis and operators base what services they operate on the amount of profit they make. Need is not considered. Where routes are not profitable, they are often withdrawn or reduced. This sometimes leave communities isolated. New technological approaches to bus tracking and smart bus stops in order that passengers can see when the next bus is due could encourage more people to use buses.

It is important that profitability from popular routes is shared across the network in GM so that residents have access to defined criteria in terms of network coverage and passenger experience.

The bus fleet should be modern with internet access, comfortable seating, CCTV, etc. to make travelling an enjoyable experience and encourage people to reduce single car journeys.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

Bolton Council supports GMCAs objectives for the future provision of bus services in GM. We support the objective of improving reach and stability of the bus network and enhancing the quality of service provision. Fares need to be integrated in order that they can be used across all modes of transport in GM. Buses need to be clean and safe to enhance the customer experience. Buses need to be of a quality standard and contribute to GMCAs objective to reduce CO2 emissions.

It must however be pointed out that the objectives should be expanded to include sustainable improvements that can be measured over time. Otherwise one must fundamentally question the rationale for paying more through a levy and one-off funding for the same services.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

TfGM are the best placed to assess the benefits of a franchising scheme. The Council agrees to any surplus going back into reducing fares or being reinvested into modernising the fleet. The Council supports GMCA's objectives to be able to determine routes, fare prices and frequency of service and the simplifying of the network into one single efficient system with single fares, one brand, etc.

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

A partnership agreement is unlikely to bring about the changes required to improve the system. Bus Operators would still dictate routes, fares and frequency and services would still be operated on a commercial basis.

Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options;
- provide the most economic value (Net Present Value); and
- create the best platform from which further economic value could be delivered.

Do you have any comments on this?

TfGM are best placed to assess which model offers the best value for money, etc as it has strategic grasp of network planning and provision required.

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

TfGM are best placed to comment on the best approach to franchising and how the bus network should be split.

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

TfGM are best placed to comment on the length contracts should be set under a franchising scheme.

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme as set out in the Commercial Case?

TfGM are best placed to understand the allocation of risk between GMCA and Bus operators.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators as set out in the Commercial Case?

TfGM are best placed to understand the potential impact on employees of incumbent operators. However, the aim must be to harmonise pay and conditions and reward good performance.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme as set out in the Commercial Case?

TfGM are best placed to understand the approach to Bus Depot Management.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme as set out in the Commercial Case?

No comment. TfGM are best placed to understand the approach to bus fleet.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme as set out in the Commercial Case?

The Council supports GMCA's approach to having a common integrated intelligent transport system put in place. This will allow passengers to track services in real time and enable integrated ticketing.

Q25. Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

TfGM hold the expertise and knowledge to better understand the approach to procuring franchised contracts. However, it is important to ensure that a healthy market of good quality operators is maintained along with competition in the marketplace to ensure good value for money.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case?

TfGM are best placed to understand any impacts this may have and hold the necessary relationships with neighbouring transport authorities.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

No comment.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

The Partnership options do not offer the same controls as the proposed franchise scheme in terms of services to be run, uniform and integrated ticketing that can be used across all modes of transport. Neither will TfGM be able to insist on a certain standard of vehicle or deal with services that are underperforming.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

No comment except that it is a sub-optimal model.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

The consultation states that the farebox risk will sit with GMCA. What will happen if there is a shortfall in funding? This is the most significant risk that is inherent in the franchising model. Private sector has managed this very well in the main and achieved significant profits for their shareholders.

The million-dollar question is would TfGM be able to reap the same benefits for whole of the GM area? If it does, then there is no doubt it would be very successful and the returns can be applied back into improving transport services even further.

Failure to do so represents a major risk and therefore it is important that the franchise is managed successfully like a commercial and social enterprise with robust standards of accountability, performance and governance, along with audits and probity.

Financial, reputational and service risks of not achieving the required level of commercial success amounts to considerable risks for GM as a whole and it is therefore imperative that risks are recognised at the outset along with strategies for overcoming the many challenges that no doubt lie ahead.

Costings appear to be based on a range of assumptions. It is important that the franchising scheme is fully funded by GMCA/TfGM, without ongoing financial recourse on the ten GM local authorities. There is mention of £17.8 million which appears to be a one-off funding cost between the ten GM Local Authorities, how is this to be split between them?

A figure of £2 million per authority has been mentioned. Mitigation measures are also mentioned which refer to reducing the size of the network or an increase in fares. Reducing the size of the network would not improve bus services but could have a negative impact.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

Need to emphasise that any option taken forward be it franchise or one of the partnership options should not lead to additional costs being borne by the local authorities. The franchised scheme would be the most favourable option as under a Partnership Agreement the individual operators would retain farebox revenues.

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

Bolton Council supports the concept that TfGM should take on management of the franchising operation. They have the necessary skills and knowledge to procure bus services, plan and design the networks and put the necessary performance measures in place.

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?

TfGM are best placed to manage franchised bus operations in Greater Manchester on behalf of GMCA.

Q34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

TfGM hold the expertise and the relationships with bus operators and so are best placed to implement the management of a partnership approach.

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

TfGM with their knowledge and expertise on the bus industry and linkages with neighbouring transport authorities is best placed to understand the impacts on passengers of the introduction of a franchising scheme.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

TfGM with their knowledge and expertise on the bus industry and linkages with neighbouring transport authorities is best placed to understand the impacts on passengers of the differing partnership options.

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

The introduction of the franchising scheme will have a greater impact on some operators. However, it will open opportunities to potential new operators to move into GM and potentially allow some smaller operators to grow. Services will no longer be operated on a profit and loss basis and there will be a higher standard of service/vehicles improving the passenger experience.

Bus operations will be managed by TfGM on behalf of GMCA. Local Authorities should have a greater input into having a strong say in shaping the network to their local service needs. This needs to be recognised at the outset so that the franchising model is rooted in meeting the needs of the whole of the GMCA.

There should be a formal governance and decision-making framework under the auspices of GMCA, with membership drawn from all of the ten boroughs.

Q38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

The Partnership options will have a limited impact on the operators as they will continue to run services and retain farebox profits. They will also continue to determine the timetables, ticketing, etc. meaning that very little would change.

Q39a. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business?

PLEASE TICK ONE BOX ONLY.

No

Yes

☒ Don't Know

Q39b. If so, please explain what you think those positive or negative impacts would be.

Not applicable to Bolton Council. We may subsidise some services through TfGM however we rely on TfGM to understand the positive and negative impacts of operating bus services through certain models.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

TfGM are best placed to advise GMCA on the impacts of the different options on them as an organisation. Bolton feel none of the risk should be transferred to each of the ten GM local authorities.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

TfGM are best placed to understand the impact of the different options on wider society. However, with a partnership option little will change whereas the franchising option could potentially increase patronage, reduce single journey car usage and encourage use of public transport.

Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

Bolton Council agrees that the proposed franchising scheme is the best way to achieve GMCAs objectives to improve bus services across GM provided risks are mitigated and managed and benefits shared.

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

No comments at this stage. TfGM are best placed to advise on the Assessment of the Proposed Franchising Scheme.

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

No comment. TfGM are best placed to advise GMCA on the potential impact on persons with protected characteristics.

Final Questions

Q45a. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?

PLEASE TICK ONE BOX ONLY.

- ☐ Strongly support
- ☒ Tend to support
- ☐ Neither support nor oppose
- ☐ Tend to oppose
- ☐ Strongly oppose
- ☐ Don't know

Q45b. Why do you say this?

The franchising scheme could bring about improved public transport across GM. It could improve bus services that are integrated with other transport modes, services will be delivered on need rather than profit. In addition, there will be integrated ticketing services, better quality vehicles,

improved bus patronage across GM reducing the number of car journeys by providing a more reliable service and better customer experience.

GMs current bus fleet is made up of a large number of vehicles that do not meet the latest CO2 emission standards. The fleet must be updated with cleaner, greener buses that meet emissions standards and contribute to reducing Co2 emissions. In turn the fleet should be modern and comfortable and complimented by smart bus stops which will provide greater confidence to those who may wish to use public transport instead of taking single car journeys. Improved buses have a key role to play in helping to reduce Co2 emissions and in the long term reduce the impact of vehicle emissions on the GM environment and contribute to improved air quality.

Q46a. Are there any changes that you think would improve the Proposed Franchising Scheme?

PLEASE TICK ONE BOX ONLY

Yes

☒ No

Don't Know

Q46b. Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

The emphasise of the consultation has been on buses alone. However, bus services need to be linked up to other modes of transport such as train and tram. In order to provide a truly integrated solution, it is important to make the buses as part of the host of other transport solution in order to enhance travel choices and customer experiences and thus reduce reliance on car journeys.

Buses should link up with trams, trains and cycle-hubs and buses should cater for cycle racks likes trains do.

Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

PLEASE TICK ONE BOX ONLY.

Extremely likely

Quite likely

Neither likely nor unlikely

Quite unlikely

Extremely unlikely

Don't know

Q48. Finally, do you have any other comments you want to make?

Not applicable.

About you

The following questions will help us to understand the range of people and organisations which respond to the consultation(s). The information you provide will not be used for any purpose other than assessing responses to this consultation and for other reasons explained in this questionnaire.

Q50. Are you responding on your own behalf or on behalf of an organisation or group?

PLEASE TICK ONE BOX ONLY.

☐ I am providing my own response – GO TO Q55

☒ I am providing a response on behalf of an organisation or group – GO TO Q51

PLEASE ANSWER QUESTIONS 51 TO 54 IF YOU ARE PROVIDING A RESPONSE ON BEHALF OF AN ORGANISATION OR GROUP.

Q51. What is your name, role and name and address of organisation/group on whose behalf you are submitting this response? These details of your organisation or group may appear in the final report.

PLEASE WRITE IN BELOW

Your Name (optional) Tony Oakman

Your Role Chief Executive

Name of Organisation or group

Bolton Council

Postcode of organisation or group

BL1 1RU

Q52. What category of organisation or group are you representing?

PLEASE TICK ALL BOXES THAT APPLY.

- ☐ Academic
- ☐ Action Group
- ☒ Elected Representatives (includes MPs, MEPs and local councillors)
- ☐ Environment, heritage, amenity or community group (includes environmental groups, schools, church groups, residents' associations, recreation groups and other community interest organisations)
- ☒ Local Government (includes county councils, district councils, parish and town councils and local partnerships)
- ☐ Other representative group (includes chambers of commerce, trade unions, political parties and professional bodies)
- ☐ Other transport group (includes passenger representative's groups, for example)
- ☒ Statutory Agency
- ☐ Transport, infrastructure or utility organisation (includes transport bodies, transport providers, infrastructure providers and utility companies)
- ☐ Professional Body
- ☐ Bus Operator
- ☐ Charity/Voluntary Sector Group
- ☐ Other

Q53. Please write in the total number of employees/members in the organisation or group that you are representing. Please include yourself in the total, if applicable.

1000+

Q54. Please tell us who the organisation or group represents, and where applicable, how views of members were assembled.

The organisation is Bolton Council. Views have been assembled from Elected Members.

PLEASE ANSWER QUESTIONS 55 TO 64 IF YOU ARE RESPONDING AS AN INDIVIDUAL AND PROVIDING OUR OWN RESPONSE.

We would be grateful if you could answer the following questions to help us in analysing the results of the consultation. Please remember that the response from and the information you provide may be subject to publication or release to other parties or to disclosure under regimes such as the Freedom of Information Act 2000, and the Environmental Information Regulations Act 2004.

Disregarded questions 55 to 64 as these relate to individuals.

Bury Council

| | |
|---|---|
| Organisation Name | Bury Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | <p>We welcome the proposal applying to all of Greater Manchester. Whilst Bury has Metrolink provision which provides services into Manchester city centre and regional/national links, the connectivity with neighbouring towns of Bolton, Oldham and Rochdale through bus transport remains vital. Particular care is to be made in dealing with journeys travelling into GM, in Bury's case from south Lancashire and to reaffirm proposals won't have a negative effect on such arrangements, and where possible can lead to improvements in consistency of standards and ticketing.</p> |

| | |
|---|--|
| <p>Q3 Do you have any comments on the local services that are proposed to be franchised?</p> | <p>Buses play a vital role of travel within the Borough away from the Metrolink line which roughly north-to-south from the southern edge of the Borough, so west-east within the Borough (including areas with the greatest density of deprivation in the Borough) and north of Bury town centre towards Ramsbottom - any franchise arrangements should reflect the local need both now and the future. This latter point refers to developments within the GMSF, such as ready, affordable and quick access from the Borough to the Northern Gateway site. GMCA and TfGM</p> <p>The Bury Labour Manifesto calls for improvement transport links between Tottington and Ramsbottom, and between Tottington and Bury town centre and Members would like to see this reflected in future timetables/plans.</p> <p>Are any further local provisions under consideration, such as Ring and Ride?</p> |
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> | <p>It is noticeable that the Borough is split between franchising scheme sub-areas A and B which is not ideal for this Borough but recognise the nature of travel around the conurbation means a line has to be drawn somewhere. This would result in part of the Borough being in the franchised area for a year whilst the remainder of the Borough not. As such further clarity on the operational effect of this would be welcome, along with very clear communication approaches being taken to help explain this within the Borough's interchanges/wider messaging to public. This would be particularly important for exceptions such as those outlined in Annex 4 namely services to Bolton via Ainsworth, Breightmet and Little Lever/Radcliffe. It is noted and appreciated that the sub-areas are for transitional period only, again it is felt this point will need significant communication.</p> <p>Bury's NO2 exceedance areas could become compliant earlier if the franchise timetable for sub areas A and B are adhered to.</p> |
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | |
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | |

| | |
|---|--|
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Extra attention for the specific engagement of Communities of Interest, hard to reach group and the socially isolated should be made, in addition to any existing bus-user fora. The Council would look to support any engagement as required to ensure the Bury voice sufficiently heard. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | Encouraging an active competition across operations (and potential future operators from a social entrepreneurial perspective) should be encouraged and so proposal welcomed |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | Whilst not against the proposal the Council would like the earliest possible engagement on such matters to consider strategic sites, both in the context of the GMSF and our Local Plan, particularly in relation to potential employment opportunities and air quality. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>The challenges outlined in the consultation proposals are recognised by Bury including the fragmentation of services between providers, between other modes of public transport in terms of ticketing and service performance in relation to changes in operators with the region in 2019 outlined in the report.</p> <p>Congestion is a particular issue for Bury, particularly around Bury town centre and the knock on effects this has in terms of air pollution, such as at Bolton Street.</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |

| | |
|--|--|
| Q13b Why do you say this? | The current market approach is less adaptable to changes in social infrastructure, such as new employment sites or housing development, resulting in inconsistent access to services and opportunities. It is thought the proposed franchise model would allow more proactive activity to address this. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | Bury Council support the objectives as set out for future provision to provide greater consistency and quality to the network, improving provision for local people and steps to reverse recent trends on bus usage – this to increase access to services and opportunities whilst promoting modal shift from cars with the associated benefits in terms of emissions, contributing towards our tackling climate change ambitions. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |

| | |
|---|--|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | Governance of scrutiny of franchise performance and overall risk management should continue to be a focus of promotion to stakeholders including the public and local authority leaders. This should be managed through the GMCA with transparent and regular reporting. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | This provides an opportunity for considerable action to be taken in terms of environmental (air quality) improvement, with a focus on an electric fleet and EV Charging point infrastructure. Longer term this should include hydrogen fuel cell technology. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | <p>A number of comments need to be considered and ideally clarified:</p> <ul style="list-style-type: none"> • Confirmation the one-off funding requested from local authorities is just that and figure to be controlled/scrutinised. How is the £17.8m figure split between the 10 LAs? • Further detail on the 'revenue funding' potential and how this would be used in conjunction with the ten local authorities (ie balance between offset against precept or LA contribution to costs) • Implication of franchising both financially and strategically on future infrastructure improvement works, for example Bury interchange, should fare income not meet targets as expected. • How are risks being identified and mitigation in terms of above forecast rises (re page 15 of the consultation document), including should there be an economic downturn post-Brexit. • Will pricing be zoned as per Metrolink and similar price fare increase approaches? |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |

| | |
|---|---|
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | The view is supported that TFGM manage the operations should they provide the GMCA with robust validation of their ability and experience in carrying out such functions. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | Don't know |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Agreement with recommendation of the consultation document though would welcome above feedback being noted and acted upon where appropriate. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Agreement with recommendation of the consultation document though would welcome above feedback being noted and acted upon where appropriate. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | Agreement with recommendation of the consultation document though would welcome above feedback being noted and acted upon where appropriate. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Quite likely |
| Q48 Finally, do you have any other comments you want to make? | <p>Bus tickets/cards (where technology – like on your App is unavailable) should be made from a non-plastic, environmentally friendly material</p> <p>Promotion of social value to be intrinsic to any franchise agreement, as per the GM Good Employment Charter.</p> |

CONSULTATION ON A PROPOSED FRANCHISING SCHEME FOR GREATER MANCHESTER

RESPONSE FROM CHESHIRE EAST COUNCIL

Q1. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

The nature of challenges facing the local bus network, as set out in the Strategic Case, are familiar to Councillors, residents and bus-users in Cheshire East. Nevertheless, it is noteworthy that the scale, usage and levels of investment prevailing for most of the bus network within GMCA remain considerably greater than those in the neighbouring Cheshire East borough.

Given the scale of economic interaction and shared labour markets between our local authority areas, it is vital that any changes to re-vitalise the local bus market facilitate ever greater and more seamless travel by bus between these local authority areas. Our fear is that the franchise proposals risk creation of a hard boundary between different forms of governance, at locations that sever passenger's desire-lines and obstruct travel to key regional economic centres - both those in GMCA and those in Cheshire.

We consider that there remains work to do to ensure that the interests of people reliant on the 116 services crossing the GMCA boundary are fully reflected in the proposals. It is a particular concern that the proposals for permitting cross boundary services seem to be deferred until after the Franchise Scheme is operational (paragraph 4.99). We take the view that for all parties, including operators, to take informed investment and service planning decisions, the conditions relating to cross-boundary services should be known at the time of any decision to adopt franchising.

Q2. The Strategic Case says that reforming the bus market is the right thing to do to address challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

Many of the factors recognised in the strategic case are shared with Cheshire East Council, and are acknowledged to impact on the use of local buses. Shared issues that support a case for change include:

- Lack of a coherent network
- Lack of a common identity (brand)
- Complexity of fares and tickets
- Lack of local accountability
- Unclear value-for-money on public funding

It is also noticeable that, since 1986, there has been a clear exception in bus performance in Greater London. Whilst industry structure is not the sole explanation for this, there is a compelling case that a different regulatory and planning model for buses has made a significant impact on these trends.

Based upon the principles set out in the Strategic Case we agree that there is a rationale for fundamental change in the nature of local bus provision to better serve the needs of local people. Our caveat would be that this needs to be implemented across a geography that truly reflects functional economic and travel areas. Bus operators and passengers work across the Cheshire East / GMCA boundary and it is not yet clear that this will be enabled and improved through the emerging permitting scheme.

Q3. The Economic Case concludes that the proposed Franchising Scheme provides the best value for money compared to Partnership options. Do you have any comments on this?

The Economic Case shows that the Franchising Scheme is the “High cost – High benefit” option. It has been shown to generate greater net value (NPV) than the alternatives appraised. We note that in conventional benefit to cost (BCR) terms it performs marginally worse than the alternative options considered.

Under these circumstances the key questions are affordability and availability of investment. We consider it is a matter for GMCA to be content that the financial requirements of the Franchising Scheme are sustainable.

A concern for neighbouring local authorities and neighbouring bus markets is the potential for the Franchising arrangements to distort unduly the landscape for future investment decisions – both private and publically funded. There is historical precedent in the authorities bordering Greater London for local bus services to be disadvantaged by the attractiveness of franchises within the GLA area. We note that you observe that local operators are expressing considerable interest in prospective franchises. This could be bad news for neighbouring authorities. What arrangements will GMCA put in place to monitor for any distorting impacts of franchises that may be to the detriment of adjacent local authorities?

Q4. Are there any changes that you think would improve the Proposed Franchising Scheme?

Paragraph 46.8 of the Bus Franchising in Greater Manchester Assessment document states that a consultation “would take place after all the first franchised contracts have expired, and then at such other times throughout the life of Franchising Scheme as the GMCA may require” in order to evaluate how well the Proposed Franchising Scheme is working.

Cheshire East consider that it would be more appropriate to undertake a consultation during the franchised contracts and certainly prior to expiry, in order to ensure that any requisite alterations/improvements are addressed in successor franchised contracts.

Paragraph 46.8 also states that “the current proposals assume that few changes will be made to the network upon any implementation of the proposed scheme so the views of the public would be unlikely to assist the GMCA in helping it to transition from a deregulated market to the proposed Franchising Scheme”

Cheshire East Council attaches high importance to the engagement and consultation with customers and users of services, to help ensure that their prioritised expectations are understood and help shape service provision. Given the overall magnitude of change for transition to the proposed Franchising Scheme, the stated assumption that few network changes will be made upon implementation of the scheme has a risk that service design may not be aligned to the ongoing changing needs of the passenger market. Consultation within this period would provide an important opportunity to help avoid this and ensure that public resources are most effectively used within the transition period as well from the early stages in the life of the franchise contracts.

Given the foregoing comments, we respectfully request that GMCA reconsider its consultation proposals accordingly for evaluation of the Proposed Franchising Scheme.

Q5. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?

Approximately 2,000 buses are currently available to operate local bus services in Greater Manchester. The Franchise Scheme enables the GMCA to specify a minimum set of standards for vehicles to be used on franchise services including for emissions.

Currently, vehicles will either remain operating within Greater Manchester for all or most of their operational life, or be cascaded mid-life to other areas. Proposals for the Franchise Scheme appear to enable both scenarios to continue, with an understandable preference to retain for use on franchise services. It is important to ensure that the overall specification for vehicles used on franchise services enables them to be suitable for use outside the GMCA area without needing significant re-engineering.

There is a significant incremental cost of new zero / ultra-low emission buses compared to diesel powered vehicles. Accordingly, Cheshire East recommends that the GMCA works in collaboration with other major transport commissioners, the bus industry and central Government to collectively commit to future zero / ultra-low emission vehicle orders to enable vehicle manufacturers to reduce the price based on better economies of scale. Such an approach would help bring forward such benefits in many other geographical areas, particularly those with air quality management issues. This concept should also be considered by central Government within the scope of a long term Bus Strategy.

Q6. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?

Paragraph 33 of the Bus Franchising in Greater Manchester Assessment document refers to cross-boundary services and the Permit regime. Currently, there are only 3 registered local bus services between Cheshire East Council (CEC) and Greater Manchester, of which 2 are supported financially by CEC. We note that the current

Stockport - Hazel Grove – Disley service is included in the schedule of franchise services (Annexe 1, page 128) suggesting that the franchise provisions are expected to operate beyond GMCA, though it is unclear under what provisions. We feel it is important to recognise that there are other existing cross-boundary services that should be considered in the franchise proposals, perhaps in a similar manner; for instance the 130 service linking Macclesfield – Wilmslow – East Didsbury. However, the Council highlights the importance of practical and fair arrangements for services crossing the GMCA boundary, (whether operated on a commercial basis or with financial support managed by the GMCA, by another local authority or other commissioning body such as a school or an employer), in the wider regional context.

Paragraph 33.1.3 refers to a Permit scheme for cross-boundary services within the proposed Franchise Scheme, which gives the GMCA the ability to attach conditions to these permits if it undertakes a consultation on the detail of such conditions. The Transport Act 2000 would require the GMCA to satisfy two conditions to grant a permit:

- That the proposed service will benefit those making journeys in the franchised area
- That the proposed service will not have an adverse effect on the local services that are part of the Franchising Scheme

Rather than “assuming that Transport for Greater Manchester (TfGM) would be responsible for making that assessment”, (as stated in paragraph 33.1.3, although paragraph 33.1.5 states that the assessment would be by the GMCA) it is considered that the assessment should be led by an appropriate independent regulatory body such as Transport Focus or Office of the Traffic Commissioner.

Measures are needed to avoid otherwise appropriate cross-boundary services that TfGM consider do not satisfy the above two conditions having to terminate at the Franchise Scheme boundary. It is important to highlight that the wording of the first condition does not specifically refer to those making journeys **within** the franchise area, therefore cross boundary services that include a boarding or alighting point within the franchised area should therefore generally satisfy that condition.

Paragraph 33.1.4 refers to the complexity of assessing whether a cross boundary service satisfies the second condition of not having an adverse effect on local services that are part of the Franchising Scheme, particularly in terms of the extent of revenue abstraction. Introducing any boarding or alighting restrictions on these services within the franchise area will have an adverse cost impact and undermine viability for the operator / funding body and have adverse impacts on communities outside the GMCA area which must be avoided. Furthermore, use of multi-journey tickets, mobile ticketing and concessionary travel passes make it impractical to determine a passenger’s destination when boarding.

Information is obtainable for existing cross-boundary services which should be allowed for as a benchmark, in respect of revenue projections for the Franchising Scheme.

Cheshire East Council seeks assurance that the Franchising Scheme would not inhibit development of regional or pan North of England ticket products (for road and rail public transport) or future ticket integration between cross border bus services and Metrolink. Similar assurance applies in respect of not adversely impacting on ticket products for express coach services that are registered as local bus services.

A reasonable approach needs to be taken in respect of other conditions for these services, for example in terms of vehicle emissions. Local authorities (and operators of commercial services) outside the GMCA may not be in a position to specify the same vehicle emission standards to match those that are part of the Franchise Scheme.

A long term rational approach is essential that maintains the viability of cross-boundary services that have clear aims of providing connectivity to & from the franchised area and rely on fare revenue within the franchised area. Understandably the GMCA will seek to avoid the introduction of services that aim to include a cross-boundary element as a basis to directly compete with services that are part of the Franchise Scheme.

This is a matter of significant impact to non GMCA local authorities, and therefore specific test proposals should be set out in this consultation (to facilitate an informed response to the overall franchising implications) rather than at a later date as currently proposed. Paragraph 33.1.5 acknowledges that cross-boundary services have an important role of discouraging use of private transport in the franchise area which reinforces the importance of now having collaboration to set out an appropriate way forward. There is the risk of perverse incentivising increasing car travel into GMCA, if cross boundary services are adversely affected and withdrawn.

Cheshire West & Chester Council

FREEPOST
GM Bus Consultation

Department: Place Strategy

Address
4 Civic Way
Ellesmere Port
Ch65 0BE

Tel: 01244 976785

Our ref.
Your ref

Please ask for: Lisa Harris
Email lisa.harris@cheshirewestandchester.gov.uk
Web: www.cheshirewestandchester.gov.uk

Date: 20th December 2019

Dear Sir / Madam

Re: Cheshire West and Chester Council response to the "Have your say on how buses are run – consultation"

Cheshire West and Chester Council welcomes the opportunity to have an influence on this important consultation, and support the Greater Manchester Combined Authority's (GMCA) commitment to improve bus services in their area. Although as a non-devolved area, Cheshire does not have access to the same suite of powers as the GMCA, we share similar concerns about the decline in bus patronage and the need for greater influence over future services. We are also keen to support GMCA in ensuring that any new arrangements work effectively for councils outside the GMCA boundary, but which may be affected by your proposals.

This submission is made on behalf of Cheshire West and Chester Council, providing comments on relevant questions of the "Response form – long version".

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

Paragraph 46.8 of the Bus Franchising in Greater Manchester Assessment document states that a consultation "would take place after all the first franchised contracts have expired, and then at such other times throughout the life of Franchising Scheme as the GMCA may require" in order to evaluate how well the Proposed Franchising Scheme is working.

Cheshire West and Chester Council consider that it would be more appropriate to undertake a consultation during the franchised contracts and certainly prior to expiry, in order to ensure that any requisite alterations/improvements are addressed in successor franchised contracts.

Paragraph 46.8 also states that "the current proposals assume that few changes will be made to the network upon any implementation of the proposed scheme so the views of the public would be unlikely to assist the GMCA in helping it to transition from a deregulated market to the proposed Franchising Scheme"



Cheshire West
and Chester

Cheshire West and Chester Council attach high importance to the engagement and consultation with customers and users of services, to help ensure that their prioritised expectations are understood and help shape service provision. Given the overall magnitude of change for transition to the Proposed Franchising Scheme, the stated assumption that few network changes will be made upon implementation of the scheme has a risk that service design may not be aligned to the ongoing changing needs of the passenger market. Consultation within this period would provide an important opportunity to help avoid this and ensure that public resources are most effectively used within the transition period as well from the early stages in the life of the franchise contracts.

Given the foregoing comments, Cheshire West and Chester Council respectfully request that GMCA reconsider its consultation proposals accordingly for evaluation of the Proposed Franchising Scheme.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?

Approximately 2,000 buses are currently available to operate local bus services in Greater Manchester. The Proposed Franchise Scheme enables the GMCA to specify a minimum set of standards for vehicles to be used on franchise services including for emissions.

Currently, vehicles will either remain operating within Greater Manchester for all or most of their operational life, or be cascaded mid-life to other areas. Proposals for the Franchising Scheme appear to enable both scenarios to continue, with an understandable preference to retain for use on franchise services. It is important to ensure that the overall specification for vehicles used on franchise services enables them to be suitable for use outside the GMCA area without needing significant re-engineering.

There is a significant incremental cost of new zero / ultra-low emission buses compared to diesel powered vehicles. Accordingly, Cheshire West and Chester Council recommends that the GMCA works in collaboration with other major transport commissioners, the bus industry and central Government to collectively commit to future zero / ultra-low emission vehicle orders to enable vehicle manufacturers to reduce the price based on better economies of scale. Such an approach would help bring forward such benefits in many other geographical areas, particularly those with air quality management issues. This concept should also be considered by central Government within the scope of a long term Bus Strategy.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?

Paragraph 33 of the Bus Franchising in Greater Manchester Assessment document refers to cross-boundary services and the Permit regime. Currently, the only registered local bus services between Cheshire West and Chester and Greater Manchester are those operated on behalf of National Express. However, the Council highlights the importance of practical and fair arrangements for services crossing the GMCA boundary, (whether operated on a commercial basis or with financial support managed by the GMCA, by another local authority or other commissioning body such as a school or an employer), in the wider regional context.

Paragraph 33.1.3 refers to a Permit scheme for cross-boundary services within the Proposed Franchise Scheme, which gives the GMCA the ability to attach conditions to these permits if it undertakes a consultation on the detail of such conditions. The Transport Act 2000 would require the GMCA to satisfy two conditions to grant a permit:

- That the proposed service will benefit those making journeys in the franchised area
- That the proposed service will not have an adverse effect on the local services that are part of the Franchising Scheme

Rather than "assuming that Transport for Greater Manchester (TfGM) would be responsible for making that assessment", (as stated in paragraph 33.1.3, although paragraph 33.1.5 states that the assessment would

be by the GMCA) it is considered that the assessment should be led by an appropriate independent regulatory body such as Transport Focus or Office of the Traffic Commissioner.

Measures are needed to avoid otherwise appropriate cross-boundary services that TfGM consider do not satisfy the above two conditions having to terminate at the Franchise Scheme boundary. It is important to highlight that the wording of the first condition does not specifically refer to those making journeys within the franchise area, therefore cross boundary services that include a boarding or alighting point within the franchised area should therefore generally satisfy that condition.

Paragraph 33.1.4 refers to the complexity of assessing whether a cross boundary service satisfies the second condition of not having an adverse effect on local services that are part of the Franchising Scheme, particularly in terms of the extent of revenue abstraction. Introducing any boarding or alighting restrictions on these services within the franchise area will have an adverse cost impact and undermine viability for the operator / funding body and have adverse impacts on communities outside the GMCA area which must be avoided. Furthermore, use of multi-journey tickets, mobile ticketing and concessionary travel passes make it impractical to determine a passenger's destination when boarding.

Information is obtainable for existing cross-boundary services which should be allowed for as a benchmark, in respect of revenue projections for the Proposed Franchising Scheme.

Cheshire West and Chester Council seeks assurance that the Proposed Franchising Scheme would not inhibit development of regional or pan North of England ticket products (for road and rail public transport) or future ticket integration between cross border bus services and Metrolink. Similar assurance applies in respect of not adversely impacting on ticket products for express coach services that are registered as local bus services.

A reasonable approach needs to be taken in respect of other conditions for these services, for example in terms of vehicle emissions. Local authorities (and operators of commercial services) outside the GMCA may not be in a position to specify the same vehicle emission standards to match those that are part of the Proposed Franchise Scheme.

A long term rational approach is essential, that maintains the viability of cross-boundary services which have clear aims of providing connectivity to & from the franchised area and rely on fare revenue within the franchised area. Understandably the GMCA will seek to avoid the introduction of services that aim to include a cross-boundary element as a basis to directly compete with services that are part of the Proposed Franchise Scheme.

This is a matter of significant impact to non GMCA local authorities, and therefore specific test proposals should be set out in this consultation (to facilitate an informed response to the overall franchising implications) rather than at a later date as currently proposed. Paragraph 33.1.5 acknowledges that cross-boundary services have an important role of discouraging use of private transport in the franchise area which reinforces the importance of now having collaboration to set out an appropriate way forward. There is the risk of perverse incentivising increasing car travel into Greater Manchester, if cross boundary services are adversely affected and withdrawn.

If you would like any further information, please contact Sean Traynor, Senior Manager – Transport and Infrastructure (sean.traynor@cheshirewestandchester.gov.uk)

Yours faithfully



Director of Place Strategy

| | |
|--|---|
| Organisation Name | Chorley Council |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | No - agree that there are many issues with the current bus market. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |
| Q13b Why do you say this? | It is important to encourage the use of sustainable modes of transport including buses in order to have a positive impact on reducing the impacts of climate change. Improving the bus network will encourage more people to travel by bus rather than by car and help to achieve this. However there are concerns regarding the impact of the proposed franchising scheme on cross boundary services running to/from Chorley to Greater Manchester. Whilst the consultation document states that GMCA will work with neighbouring authorities it is not clear what the financial impact will be on these services and whether conditions would be attached to the permit which would make the service unviable. It is also not clear whether there will be a charge for the service permits that will be required to continue to operate these services. |

| | |
|--|----|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | No |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|----|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | No |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|--|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Agree that the Proposed Franchising Scheme is the best option for Greater Manchester but there are concerns regarding the impact on cross boundary services. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | As stated previously it is agreed that the Proposed Bus Franchising Scheme is the best option to improve the bus market in Greater Manchester provided that there is no negative impact on existing cross boundary bus services running to/from Chorley. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |

| | |
|---|----|
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | No |

Derbyshire County Councils response to GMCA bus franchise consultation

Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

A- Derbyshire County Council has no comment to make on this question.

Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

A- Derbyshire County Council, DCC, has concerns about the potential impact of the Proposed Franchising Scheme on services in the area of Derbyshire immediately adjacent to the boundary of the scheme such as Glossop, and on cross boundary services more generally. The inevitable disruption caused by the introduction of the scheme could affect the bus operator's ability to continue to run these services which would have a significant impact on the residents of Derbyshire. GMCA needs to work constructively with Derbyshire County Council and the operators effected to mitigate the impact on the users of these services.

Q3 Do you have any comments on the local services that are proposed to be franchised?

A- The way the list of services to be franchised is presented in the consultation document with no existing route numbers and a mix of routes from different areas across GMCA makes it difficult to identify if any of the routes which also serve Derbyshire are affected. A clearer form of presentation by existing route number and area would have made it easier to understand.

Q4 Do you any comments on the proposal that the Proposed Franchising Scheme would be split into three sub areas and on other arrangements proposed for the transition?

A- Looking at the experience of when franchising was introduced into the London in the 1980s and 1990s this was done on a route by route basis. The areas proposed do seem large and it will require a considerable amount of work to franchise all the services within them in the timescale proposed.

Q5 Do you have any comments on the services which have been excepted from regulations under the Proposed Franchising Scheme?

A- The list doesn't include details of the cross boundary services. For completeness these should have been included to make it clearer which services were involved.

Q6 Do you any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

A- DCC is concerned at the limited amount of time between the end of this consultation and when a final decision will be taken to commence the proposed scheme. There has been very limited discussion to date between TfGM and DCC regarding the potential impact of the proposals on cross boundary services and the bus market more generally in the parts of Derbyshire adjacent to the proposed franchise area. Derbyshire does not want to replicate the situation in the areas immediately adjacent to the boundary of Greater London when franchising was introduced there. DCC therefore urges GMCA to engage in more meaningful discussion prior to the scheme being implemented.

Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

A- Looking at the experience in London when franchising was introduced there the whole process took a considerable number of years to complete from the late 1980s until the mid1990s. The timetable proposed in the consultation does seem very quick considering the number of services involved.

Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise and the start of a service under such a contract?

A- The timetable proposed in the consultation does seem very quick considering the number of services involved.

Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

A- The consultation needs to be widened to also take account of the views of bus passengers and other stakeholders from areas outside of the franchise zone.

Q10 Do you have comments on GMCAs plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchise Scheme?

A- DCC welcome this however we do however find it surprising that you are not proposing to provide them with depot facilities in the same way as the larger franchise operators as this may discourage certain small and medium size companies from taking part.

Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchise Scheme?

A- DCC has no comment to make.

Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you any comments on this?

A- DCC has no comment to make on this question.

Q13 The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

A- To meet the challenges outlined will require more than simply changing the planning and control model of the bus network. Other factors such as demand restraint measures to ensure car users pay the full cost of their travel decision also need to be considered.

Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

A- DCC thinks consideration should also be given in the objectives to providing connections to areas outside the franchise zone.

Q15 Do you have any comments on how the Proposed Franchise Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

A- DCC has no comment to make on this question.

Q16 Do you any comments on how the partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

A- DCC has no comment to make on this question.

Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would-

- Offer a high ratio of benefits to cost to GMCA, which is broadly comparable with the partnership options,
- Provide the most economic value (Net Present Value) and
- Create the best platform from which further economic value could be delivered.

Do you any comments on this?

A- DCC has no comment to make on this question.

Q18 Do you any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

A-Whilst this is a decision for GMCA to make DCC does find the package strange as it seems to be attempting to replicate the existing arrangement with the 10 large franchises area being based on the 10 large bus depot currently in operation. The opportunity to encourage more small and medium size operators to take part by packaging contracts on a route by route basis, such as was done in London when franchising was introduced there, will be lost under the arrangements proposed.

Q19 Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

A- Whilst this is a decision for GMCA to make DCC thinks a variety of different length contracts would have been advisable to reduce the need to retender a large number of services at the same time and to provider operators with a steady stream of potential services for them to bid for.

Q20 Do you have any comment on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?

A- DCC has no comment to make on this question.

Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial case?

A- DCC has no comment to make on this question.

Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme as set out in the Commercial Case?

A- As explained in the answer to question 10 DCC does find it strange that a similar proposal is not being offered to small and medium size franchise operators.

Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme as set out in the Commercial Case?

A- Whilst this is a decision for GMCA to make DCC thinks this may well stifle the opportunity for operators to come forward with proposals for new vehicle fleets as part of their response to the tenders.

Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme as set out in the Commercial Case?

A- DCC agrees with the logic of these proposals.

Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

A- Whilst this is a decision for GMCA to make, DCC as explained in the answer to question 18, does find it strange that the proposal seeks to replicate much of the existing operation and the opportunity to encourage more small and medium size operators into the market by franchising on a route by route basis has not been taken.

Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case?

A- DCC has concerns that the potential impact of the proposals on neighbouring authorities has not been looked at in sufficient detail. The inevitable disturbance in the bus market the franchising scheme will create will effect services in a wide region outside of the GMCA area. The impact on cross boundary services also has the potential to effect a considerable number of passengers and may in some cases affect the long term viability of the operators of these services. The GMCA does now need to engage in more meaningful discussions with neighbouring authorities about the proposals in a way which takes account of their legitimate concerns and seeks to resolve these to the satisfaction of both sides.

Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

A- DCC has no comment to make on this question.

Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

A-DCC has no comment to make on this question.

Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

A- DCC has no comment to make on this question.

Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have comments on these matters?

A- DCC has no comment to make on this question.

Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

A- DCC has no comment to make on this question.

Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

A- DCC has no comment to make on this question.

Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case.

A- DCC has no comment to make on this question.

Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

A-DCC has no comment to make on this question.

Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers as set out in the sub section Impacts of the different options?

A- DCC has concerns that the GMCA proposals fail to take proper account of the potential impact on bus passengers in neighbouring local authority areas. The scheme will create disturbance in the bus market in far wider area than just the franchise zone which may affect the operation of services which have no direct connection to the GMCA area. The potential loss of commercial services as result of this would be particularly serious as DCC would be faced with having to fund additional supported routes to fill the gaps created.

The same is true of cross boundary services such as the 199 where the impact of major changes on a route as a result of permit conditions could threaten the long term viability, not only of that particular route, but of the operator more generally. The permit conditions set out in section 33 of the Assessment need to also take account of the impact on passengers traveling on cross boundary services outside of the franchise area. By concentrating purely on the needs and requirements of passengers inside the franchise area it could result in serious impacts on those passengers who use the service elsewhere.

The Assessment also seems to give TfGM sole responsibility for deciding what the terms of any permit scheme should be in relation to cross boundary services. Because of the importance of these services to the local highway authority areas outside of the franchise zone, DCC thinks that this should be a shared responsibility with both TfGM and the relevant highway authority jointly agreeing any permit conditions.

Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub section impacts of the different options?

A- DCC has no comment to make on this question.

Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

A- DCC has concerns about the potential impact on smaller operators running cross boundary services. This could be significant and therefore needs to be given greater consideration.

Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-sections Impacts of the different options?

A- DCC has no comment to make on this question.

Q39 If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? If so, please explain what you think these positive or negative impacts would be?

A- Not applicable

Q40 Do you have any comments on the impacts of the different options on GMCA as set out in the sub section Impacts of the different options?

A- Whilst this is a decision for GMCA to make, DCC has a concern regarding the long term sustainability of funding the scheme with GMCA taking the revenue risk as all the options shown in figure 4.61 show bus usage continue to decline over the long term.

Q41 Do you have any comments on the impacts of the different options on wider society as set out in the sub section Impacts of the different options.

A- DCC has no comment to make on this question.

Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you any comments on this?

A- DCC has no comment to make on this question.

Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme.

A- DCC has no comment to make on this question.

Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

A- DCC has no comment to make on this question.

Q45 To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

A-Whilst the final decision to take the proposed franchising scheme forward is one for GMCA to take DCC has particular concerns relating to the current proposals. It is inevitable that the disturbance in the bus market that the franchising scheme will create will effect services in a wide region outside of the GMCA area. The impact on cross boundary services also has the potential to effect a considerable number of passengers outside the franchise area and may in some cases affect the long term viability of the operators of these services.

To date there has only been very limited discussion between TfGM and DCC about the proposal and the tone of this engagement and this consultation document makes it clear that GMCA feel they should have final say on a number of issues which will impact on bus services beyond the franchise area. DCC needs to be involved in any decision which will affect the long term viability of bus services in Derbyshire. We would therefore urge

GMCA/TfGM to engage in a more meaningful way with DCC, to take account of our legitimate concerns, and to seek to resolve these issues to the satisfaction of both sides.

Q46 Are there are changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

A-The Assessment proposals in relation to cross boundary service permits needs to be changed to create a shared responsibility with both TfGM and the relevant highway authority being jointly responsibility for agreeing any permit conditions. More consideration also needs to be given to the effect of the proposals on services completely outside the franchise area and what can be done to mitigate these impacts.

Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made.

A- Whilst DCC neither supports nor oppose the proposals, if changes were made in relation to minimising the impact of the scheme on bus services outside the franchise zones and on cross boundary services, it would certainly improve the schemes viability e for bus passengers in Derbyshire.

Q48 Finally do you have any other comments you want to make?

A-GMCA and TfGM need to engage in a more meaningful way than they have to date with the adjacent local highway authorities prior to and during the implementation of the Franchise Scheme.



My Ref

Your Ref

7 January 2020

Freepost GM BUS CONSULTATION

Dear Greater Manchester Combined Authority,

Doing Buses Differently - proposed franchising scheme for Greater Manchester

Thank you for the opportunity to consider proposals for the bus franchising scheme for Greater Manchester. Whilst High Peak lies outside of Greater Manchester, many of our residents and businesses are dependant on essential services and job opportunities within the conurbation. As such it is vital that every opportunity is taken to improve transport connectivity between Greater Manchester and High Peak, particularly via public transport.

High Peak Borough Council is not the local authority responsible for public transport in the Borough. Derbyshire County Council fulfils this role across the County. However, given the relationship between the Borough and the conurbation, the Borough Council is keen to respond to the current consultation. In this context, the Council's Public Transport Working Group met on 6th January to discuss the proposals. The Council has a number of queries and concerns that should be addressed before any further decisions are taken on the franchise scheme, namely:

- Whilst the franchise scheme seeks to improve integration of bus services with other public transport and facilities, it is not clear if or how improved integration will be achieved in High Peak.
- Re-assurance is sought that the franchise scheme will not adversely affect the ability of High Peak residents to access vital services in Greater Manchester, including education and health care establishments. This is particularly important given the extent to which High Peak residents are dependent on services provided outside of the Borough.
- Clarification is sought on the impact of specific bus services that operate between High Peak and Greater Manchester. The precise implications for cross boundary services such as the 199 (Buxton – Stockport / Manchester Airport) and 236/237 (Glossop / Hadfield –Ashton-under-Lyne) in terms of timetables and fare structures are unclear.



- There is concern regarding the impact of the franchise scheme on bus operators that run cross boundary services between High Peak and Greater Manchester. As highlighted in the consultation document, pick up points in Greater Manchester for services which are not part of the franchise are likely to be restricted under the new permit regime and this could undermine the economic viability of these services. The implementation of the franchise arrangements may also lead to disruption of services. This could put cross boundary services at risk and have an adverse impact on the availability of bus services within High Peak. Given the objective of reducing car journeys, it would be highly regrettable if the franchise scheme resulted in a reduced bus service for High Peak residents. Indeed, this could exacerbate existing congestion issues on routes such as the A6 and A57 and at hospital car parks in Greater Manchester.

In light of the above, the Council would like to invite a representative of the Greater Manchester Combined Authority to a future committee meeting to discuss the issues raised and to explore the scope to better integrate the proposals with neighbouring areas such as High Peak. There is historic precedent for the planning of public transport services across our boundary.

The timescales for the implementation of the franchise scheme are ambitious. However, I believe that further consideration of the above will help to ensure a better outcome on both sides of our boundary.

Yours sincerely,

Cllr Anthony McKeown
Leader
High Peak Borough Council

GM Bus Consultation

Via email

gmbusconsultation@ipsos-mori.com

Email: Oliver.starkey@lancashire.gov.uk

Your ref:

Our ref: GMCA Bus Consultation

Date: 07/01/2020

GREATER MANCHESTER COMBINED AUTHORITY 'DOING BUSES DIFFERENTLY' CONSULTATION

Lancashire County Council welcomes the opportunity to be able to comment on the consultation document about how GMCA proposes buses in Greater Manchester should be run in the future.

We have assessed the documents provided, as part of the consultation process as a statutory consultee, and although we have a neutral view to a number of the more technical or operational questions being posed we would like to respond to a number of key questions, including those that may affect bus services operating across the boundary, into the Lancashire administrative area.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

Understanding the needs and requirement of customers will be an important aspect of the franchising proposals. Although 46.8.3 suggests there will be few changes made to the network upon implementation of the proposed scheme, does this take into account customers changing requirements over the franchise period? It may therefore be beneficial to consult prior to franchise expiry so customer comments can be included within any new contract arrangements. It may also be worthwhile using an external body like Transport Focus to undertake an independent assessment of customer requirements to ensure impartiality. It would also be important to include those authority areas outside GMCA to ensure that all customers' views are sought.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

There are currently a number of small and medium sized bus operators running services across the North West of England. It is important that the franchised approach recognises these types of companies and gives them an opportunity to continue to provide services, if they chose to do so.

It is important that the financial viability of these operators is safeguarded as many may also operate in neighbouring authority areas which would not wish to see a reduction in small to medium sized operators as they provide vital services at often a lower cost base.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case?

There are currently a number of key commercial bus services operating from Lancashire into Greater Manchester. These services not only provide access to employment and leisure for Lancashire residents travelling into the Manchester area but also to Manchester residents travelling into the Lancashire for work and leisure opportunities. Should the permit scheme place restrictions on the operation of these services in the Greater Manchester area, for example changes to stopping places or route, it may affect the overall commercial viability of the service and could potentially lead to a service deregistration that would affect both Lancashire and GM residents ability to travel.

The county council would not wish to see any restrictions that would affect a services commercial viability, as any withdrawal may restrict resident's ability to travel by bus, therefore potentially generating additional car trips and other unwanted consequences.

The county council would wish to seek assurance that the GMCA would work closely with neighbouring authorities to ensure that cross boundary services remain commercially viable in any future franchise arrangements.

This issue is also been raised as a concern by our District Council colleagues which state that any loss of service would be detrimental to their local residents and may affect future opportunities.

We would welcome close working with regard to any new ticketing arrangements to encourage cross boundary travel but this should not impact on any future local or regional ticketing proposals or developments in neighbouring areas.

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

It would be appropriate to include ongoing engagement with neighbouring authorities as a work stream to ensure that either implementation options takes into consideration the views of neighbouring authorities for the operation of cross boundary services. (Q26 above)

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

The proposed franchising scheme may have a more positive impact on passengers than the do nothing approach. This would be welcomed. As mentioned above (Q26) the county council would have concerns about the viability of some cross boundary services with the implementation of the permit scheme and changes in fares arrangements. We

would not want any negative impacts of these changes to be imposed on Lancashire residents therefore we would welcome close working with GMCA to ensure any impacts are avoided.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

From the information available, it would appear the partnership approach would not bring the same level of benefits for passengers as the proposed franchising scheme. However, the partnership approach may have less risk of a negative impact on neighbouring authority cross boundary services than the franchising scheme, as there would be no permitting process in place-status quo.

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of different options?

We would reiterate the issues already raised about the financial viability of some bus operators running cross boundary routes. Forced changes to routes or stopping points may make services less viable therefore may lead to service withdrawals outside the GMCA boundary, to the detriment of neighbouring authorities passengers. It may also lead to marginal operators withdrawing from the wider market with the knock-on consequences for neighbouring authorities.

Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

The GMCA must consider neighbouring authorities emerging transport policies and objectives, especially relating to cross boundary routes and services. Residents in some smaller towns within GMCA may align themselves more with areas in a neighbouring authority, rather than with central Manchester, therefore how services operate across boundaries is of great importance for both GMCA residents and those of its neighbours.

We trust these comments are constructive and help shape the consultation process. Lancashire County Council would wish to work closely with the GMCA to ensure those concerns raised are considered. Should you have any questions, or would like any clarification on any aspects of our response please let me know.

Yours faithfully



Oliver Starkey
Head of Service
Public and Integrated Transport

Manchester City Council

Response to GMCA Statutory Consultation

Doing Buses Differently - Proposed Franchising Scheme for Greater Manchester

The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

The City Council would agree strongly with this broad conclusion for the reasons set out below.

Bus services are critically important to Manchester and to its people. Buses are used by many more city residents each day than the tram and rail networks. They perform a vital role in connecting residents of the city to their places of work and to the many other places that they travel to each day including shops, libraries, doctors' surgeries, education, open space, leisure and cultural facilities and places to meet with friends and neighbours.

The standard of service offered through the current deregulated model of bus operation has, however, been a long standing concern to the Council. These concerns have been raised on a number of occasions by Members of the Council and by local residents. A particular concern is that the current level and quality of service differs significantly across the city. Similar areas see quite different service standards and while some variation in service is inevitable, given differing demands, the current variation in standards is not considered acceptable. Some parts of the city simply do not have access to the high quality public transport connections that they need. For example while the Oxford Road and Stockport Road Corridors have an extremely extensive and frequent level of service, services on some other key routes are far less comprehensive, particularly off peak, in the evenings and at weekends. The quality of service offered on some routes in the north of the city is a particular concern where some areas are without evening services altogether and financial constraints have meant that it hasn't been possible for TfGM to provide a subsidised alternative. The result of inadequate local public transport can often be social isolation, which in turn can lead to poorer health outcomes and increased costs to other parts of the public sector. Increasing the frequency or the density of services in these locations would bring significant benefits in terms of connecting residents to the facilities they need to reach. A franchised system of operation could provide the platform to address some of these key issues and ensure a common set of enforceable standards relating to service quality covering areas such as vehicle standards and cleanliness, driver training, customer service skills, employment terms and conditions as well as standards relating to safety and security. It would also enable a simplified and single point of contact for customer complaints;

As well as this variation in service quality, the Council would like to highlight the following key concerns that it sees as a feature of the deregulated model of operation:

- the current system has led to significant differences in fare levels and in the ticketing offers that are available on different routes and in different parts of the city. As many tickets are only valid on one operator's services, changing

between services run by different operators often results in a financial penalty. The recent ending of the agreement for operators in the north of the city to operate a joint ticketing scheme, and honour each other's products is a recent example of where bus users lack a simple fare offer that enables them to switch between different operators' services;

- fare structures in Greater Manchester are complex and , particularly for “walk on” single journeys, are high. They can discourage bus travel for less regular bus users. A franchising scheme would enable fares to be set and for a fare scheme to be established which was easier to understand and was more affordable, particularly for single journeys. This could involve the introduction of a flat fare scheme on any given route. Simplifying fares is likely to have a range of benefits, including reducing uncertainty and anxiety for passengers;
- there is an emphasis on radial travel in and out of the city centre. While these radial routes are clearly very important, services connecting neighbourhoods not on these main routes are much less frequent and cross city travel can be challenging. This can often affect access to important services, including hospitals (North Manchester General, for example is particularly difficult to reach by bus from parts of North Manchester), doctors' surgeries, shops and employment opportunities beyond the city centre;
- city residents often need to access facilities in neighbouring parts of Greater Manchester and the current bus network does not always provide the cross boundary connections required;
- when bus services were deregulated in 1986 the Government's aspiration was that increased private sector involvement would improve service to the passenger, lead to improved customer service, innovation and increased investment. In practice the services offered on some routes are unreliable, buses are often old and unattractive and levels of genuine innovation have been very limited. It would be important for a franchised system to allow and encourage innovation in future, including the potential for on demand services where these would represent an effective option;
- the current system has led to an unstable and volatile bus network where changes to some services can happen quite frequently as operators are able to de-register services or introduce new ones by giving 70 days' notice to the Traffic Commissioner. This can be a particular concern for residents who want to plan longer term on the basis of a stable public transport connection being available. It can be a particular issue for employees making employment choices or for parents and schoolchildren who could potentially choose a school on the basis of its accessibility by bus, only to find that the relevant service could subsequently be withdrawn. A franchised system in contrast is likely to lead to a more stable network which can be marketed on a consistent basis to new customers and to visitors to Greater Manchester, thereby encouraging patronage growth. This growth can in turn help to drive healthier revenues while also tackling car dependency, emissions and transport congestion as more people choose to make use of an integrated transport network along with higher levels of walking and cycling;

- Manchester's recently approved Local Industrial Strategy, emphasises the importance of connecting people to the opportunities created by Greater Manchester's economic growth. Although the City Centre and the Airport are the primary locations for economic growth, new job opportunities are also expected to arise in other key locations both in the city and across Greater Manchester as a whole. Ensuring good public transport connections to the jobs available across Greater Manchester should be a priority for a bus network in a sustainable and inclusive city. The current system of bus operation means however that it is often not possible for local Councils or prospective employers to plan and guarantee good public transport access to key employment locations from across the local labour market. A planned and coordinated franchised system of bus service provision would enable such planning to take place in a much more systematic way and integrated way;
- a further key area of concern is that Greater Manchester has failed, over the years since 1986 (when buses were deregulated), to achieve a fully integrated and attractive ticketing system of the type that is enjoyed in London and is in place in many cities in continental Europe. Introduction of a franchised model of bus operation is likely to make achieving such a system much easier. A wide range of ticketing offers is available to bus passengers in Greater Manchester. While innovation is to be welcomed, the current system often leads to a confusing range of tickets which the travelling public often find hard to understand. As many tickets are only available and valid for travel on one operator's services, bus passengers who may need to use more than one bus to complete their journey or who travel on one operator's services for an outward leg, and another for the return leg, are often unable to make use of the multi-journey tickets offered by some operators and can suffer a financial penalty as a result. The problem is often compounded for passengers who need or wish to change between a bus and train or tram service. While multi modal tickets are available between trains and Metrolink tram services, those that also include bus travel are often expensive and make changing modes more costly and less convenient than would be the case if the system was truly integrated. At present therefore the deregulated model creates significant barriers to developing a truly integrated public transport network, including ticketing and the coordination of timetables and routes.
- much of Greater Manchester's bus fleet is made up of buses that do not meet the latest emission standards. In some key locations in the city buses currently make a considerable contribution to the illegal levels of air pollution which exist. While buses, when well used, are an inherently environmentally more sustainable form of transport than the private car, emitting less carbon and other emissions per passenger, there is a need to make rapid improvement to the environmental performance of the current fleet if the potential benefits of buses are to be fully realised. In a city which has declared a climate emergency and which is finalising plans to tackle currently illegal levels air pollution, a franchised model of bus operation would provide a sounder platform for public investment in low or zero

emission buses than the current deregulated model. It would also provide more certainty to support investment in improved infrastructure such as greener and better lit bus shelters powered by green energy. Critically it would provide certainty that the vehicles, provided with public funding support would remain in Greater Manchester and that the outputs and benefits that the public investment would deliver would be assured;

- the standard of available bus information currently varies across Greater Manchester. Some areas have good information, up to date and available, however there is generally very little or no real time information for those without mobile phones. Under a franchised system it would be possible to ensure a more consistent standard of passenger information and to require operators to publish more information on their operations, making data on services and fares publicly available. A franchised system could also drive up standards of information available on buses to passengers including both audible and visual messages regarding the route and next stop. This would be particularly beneficial to passengers who are unfamiliar with the route or who have visual or hearing impairments enabling them to know when to prepare to alight;
- Manchester is a fast growing and dynamic city. Over the last twenty years new communities have developed and after a prolonged period of decline in the latter half of the twentieth century the city's economic fortunes have turned around. Areas of the city have seen a resurgence in economic activity and have seen large rises in population. The bus market however has often been slow to innovate and recognise the opportunities that the city's growth and regeneration brings. This is true of its response to changing working patterns as well as to changing geographical demands. Two examples of where the bus network has been poor at responding relate to a) the growing night time economy where late night services haven't responded to demand changes and shift work, at places such as Manchester Airport and its neighbouring Enterprise Zone where services haven't been expanded to meet the changing demand of workers. A franchised model would enable a much closer relationship to exist between transport and land use planning and enable transport services to be planned to be in place from day one of a new development or residential area, rather than there often being a time lag as is the case at present.

The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

The City Council considers that for the reasons set out above the current deregulated market has failed to deliver the consistency and quality of bus services that the city aspires to nor an effectively integrated public transport system. A franchised model would give the public sector control over standards of service, fares, frequencies, vehicle standards and ticketing— the key factors that make for an attractive and effective bus and wider public transport service.

The Council does not believe that an enhanced partnership model would be capable of delivering the same benefits as a franchised system of operation.

The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- *offer a 'high' ratio of benefit to the cost to GMCA, one which is broadly comparable with the partnership options,*
- *provide the most economic value (Net Present Value), and*
- *create the best platform from which further economic value could be delivered.*

Do you have any comments on this?

The Council supports the overall conclusion of the assessment. There has been a long standing concern regarding the lack of transparency that exists in terms of the overall value for money to the public sector that is provided through the current system of bus operation, given the very substantial levels of public funding that are devoted to its support. An enhanced partnership model is unlikely to alter the current situation. A franchised system of operation in contrast, would allow the public sector to specify the key outputs that it expects in return for the substantial levels of public investment resources and subsidies devoted to the bus network. It would lead to a much greater level of transparency regarding overall costs and benefits and better value outcomes while, at the same time reducing the potential for any super profits to operators. A franchised system would create the platform necessary for the public sector to invest with greater confidence in service improvements, alongside private sector service providers:

The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

We will continue to work with GM Treasurers on ensuring there is transparency on the financial implications and that a reasonable funding strategy is developed. This will need to take into account other priorities GMCA are seeking to fund eg free travel for 16-18 year olds, the impact on the council tax precept and the potential availability of other sources of GM funding.

Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

The Council fully supports this conclusion and the introduction of a franchised system of bus operation for the reasons set out above.

Other Issues

The proposal to introduce the Franchising scheme in three separate tranches will mean, uniquely in Greater Manchester, that different parts of the City of Manchester would see the transition to a franchised model take place at three different times. While

the rationale for this approach is understood TfGM is requested to continue to consider how this transition can take place in a way that minimises disruption to bus users in the city. If the decision is taken to proceed with a franchising scheme the Council would be keen to discuss the detail of the transitional arrangements further as the process develops and to offer its assistance in informing residents of the proposed transition process and in minimising any disruption during this period.

8/1/20



Oldham
Council

Mr. Andy Burnham
Mayor of Greater Manchester,
Churchgate House
56 Oxford Street
Manchester
M1 6EU

Chief Executive
Oldham MBC
Level 3, Civic Centre
West Street, Oldham OL1 1UG
Tel: 0161 770 4190

Dear Mr. Burnham,

Re: Oldham Council Resolution – Better Buses for Greater Manchester

The full Council at its meeting on 6th November 2019 debated the following motion:

"This council notes that following deregulation of the UK bus network outside of London in the 1980s, bus companies run whatever routes they like, charging what they like, with various ticketing structures. This means that in 2017 there were 140 types of tickets available in Greater Manchester, across 22 different bus companies, and usage is declining as passengers opt for simpler alternatives.

The Greater Manchester Combined Authority is now consulting on how our buses are run, proposing to introduce a franchising system that will make the bus network better coordinated, simpler, more far reaching, and responsive to the needs of residents rather than for private profit."

Full Council resolved to request that I write to you on this matter, calling on you to choose to regulate the buses in Greater Manchester, which you have the power to do following the consultation.

Full Council also resolved to encourage residents to complete the GMCA's consultation into bus franchising and explain the benefits of bus franchising for Oldham.

I look forward to your reply.

Yours sincerely,

Dr Carolyn Wilkins OBE
Chief Executive/Accountable Officer
Email: carolyn.wilkins@oldham.gov.uk



**LIVERPOOL
CITY REGION**
COMBINED AUTHORITY

METRO MAYOR
LIVERPOOL CITY REGION

Our ref: FR/CMc*

Your ref:

Contact: Frank Rogers

Tel: 0151 330 1101

Date: 07 January 2020

Eamonn Boylan
Chief Executive of the GMCA and TfGM
2 Piccadilly Place
Manchester
M1 3BG

By email: gmbusconsultation@ipsos-mori.com

Dear

Eamonn,

Doing Buses Differently

Consultation on a Proposed Franchising Scheme for Greater Manchester

Thank you for your letter of October 2019 regarding Greater Manchester's consultation on a proposed bus franchising scheme for Greater Manchester. We have read your consultation document with interest, and behalf of the Liverpool City Region Combined Authority (LCRCA), I am pleased to offer a number of comments.

Firstly, we support Greater Manchester Combined Authority's (GMCA) use of devolved powers and the Bus Services Act 2017. As a Mayoral Combined Authority, we fully understand the importance of local decision making. As you will be aware, we are also undertaking an assessment of options afforded to Mayoral Combined Authorities under the Act, to further improve our bus service provision and deliver a new Vision for Bus that we set out in July 2019. These options include franchising, enhanced partnership and the continuation the Liverpool City Region Bus Alliance. We have already concluded that future funding challenges for both the public and private sector demonstrate the need for increased public sector intervention in bus services.

We fully support your vision for an integrated transport network, with simplified fares and a consistent customer experience, and which offers value for money. As you progress through the consultation phase, there are a number of areas on which we would wish to work with you, to ensure the outcome is mutually beneficial.

Cont/.....



As neighbouring authorities, there are a small number of bus services which cross between the Liverpool City Region and Greater Manchester, including:

- 156 Garswood/Ashton - Lea Green/St Helens (Merseytravel Supported)
- 157 Rainford Station - Ashton-in-Makerfield (Cumfy Bus)
- 352 St Helens - Wigan (Arriva)
- 34, 34A St Helens - Newton-le-Willows/Leigh (Arriva)
- 22, 22A Warrington - Earlestown – Ashton/Wigan (Network Warrington)

These services will be affected by the first wave of franchising, since your first proposed franchise area includes the LCR boundary. We are assuming that these services are not included in the list of services proposed to be franchised as set out in Annex 1. We acknowledge that you have identified that such services, i.e. those which operate outside an area in which a franchising scheme has become effective, would still need to register their services with the relevant Traffic Commissioner. This is to be expected. Importantly, we would wish you to mitigate the potential risk of existing cross boundary services being withdrawn should they become commercially unviable as a result of Greater Manchester's franchising scheme.

We also note that the service operator would additionally need to obtain a service permit, from yourselves, to operate within Greater Manchester. You have indicated that the service permit scheme would be consulted on, before the Proposed Franchising Scheme becomes operational. Should the LCR take a future decision to franchise the bus network, we would like to work collaboratively with you on this in order to align cross boundary permit schemes, and to determine a process for future cross boundary network reviews.

In terms of your proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme, we would be interested in how this progresses in practice. The LCRCA's view is that local control of bus depots may be an appropriate course of action under a variety of different delivery models in order to support a move to zero emission bus fleets. We would be particularly interested in this subject where you may have identified potential depot locations close to the LCR boundary.

Your Strategic Case sets out the challenges facing the local bus market and how it is not performing as well as it could. We would be happy to continue providing support around the development of any further partnership options available to GMCA, through our experience of the LCR Bus Alliance. As I am sure you are aware, the Alliance was recognised in 2018, and again in 2019, at the National Transport Awards for Improvements to Bus Services. The Alliance has invested millions of pounds in the bus network delivering major improvements to the region's bus services. The LCR now has one of the youngest and most environmentally



friendly bus fleets in the country; by working together and making the best joint use of resources, the LCRCA and the bus operators have delivered a 15% increase in fare paying passenger journeys since 2013/14 resulting in 91% customer satisfaction among bus users.

We note that you have acknowledged the potential impacts of the options on the achievement of the objectives of neighbouring transport authorities. As noted above, as a neighbouring authority we would not expect to see LCR residents disadvantaged, particularly in those communities closest to the boundary (such as Billinge, Crank, and Rainford), who need access to both their own and neighbouring authority areas for basic services, in addition to ensuring they have access to employment opportunities on both sides of the border. Indeed, we would wish to work together on the basis of strengthening cross-boundary bus links where this might be achievable.

With respect to the implementation and management of the partnership options, we would highlight the obvious benefits of collaborative working in order to ascertain if there are potential efficiency opportunities – e.g. systems, processes, people, market engagement and procurement – if both the LCRCA and GMCA were to pursue similar regulatory options. This would also apply to the future alignment of ticketing, to ensure seamless cross boundary travel by bus, and to ensure the aspirations and objectives of both CAs can be delivered.

In conclusion, we would welcome ongoing engagement with you in relation to bus services, and to this end, please don't hesitate to contact Matt Goggins, Assistant Director for Bus, to make appropriate arrangements.

Yours sincerely

Frank Rogers
Chief Executive
Liverpool City Region Combined Authority



Chief Executive Office

Steve Rumbelow
Chief Executive

**Floor 3, Number One Riverside, Smith Street,
Rochdale,
OL16 1XU**

Phone: 01706 924702
www.rochdale.gov.uk

By email to:

gmbusconsultation@greatermanchester-ca.gov.uk

Dear Sir/Madam

Your Ref:

Enquiries to:

Email:

Date:

Steve Rumbelow

steve.rumbelow@rochdale.gov.uk

8 January 2020

ROCHDALE COUNCIL RESPONSE TO “DOING CONSULTATION

Thank you for providing the Council with the opportunity to comment on the “Doing Buses Differently” Bus Reform consultation and the options for how bus services are run in Greater Manchester in the future. The Council is supportive of the move towards a franchised bus network of services.

Bus Services are critically important to Rochdale Borough and are used by significantly more residents than the other modes of public transport. They perform a vital role in connecting residents to employment and many other services such as shops, health centres, education, leisure activities and to meet with friends, with some people relying on them to live independent lives.

The standard of services offered through the current deregulated model has been a long standing concern to the Council, which increased in the last year or so with the fragmentation of local bus services in the Borough. Concerns continue to be raised by both Council Members and local residents on the quality and differential levels of service from area to area and at different times of the day and week. Not all parts of the Borough have the transport connections they need.

Much of the southern part of the Borough is served by a far less comprehensive and efficient service off-peak in the evening and at weekends. Other concerns include:-

- Significant variation in fares and ticketing offers on different routes with tickets bought from one operator not valid on services run by other bus operators meaning passengers incur a financial penalty when changing services. The ending of joint ticketing agreements between operators in the Borough has further fragmented fare offers to bus users. The provision of information on fares to passengers particularly new bus users is also unsatisfactory;
- Access to local hospitals by bus is becoming increasingly difficult (particularly North Manchester General). More frequent and direct services are required to meet patient and visitor needs;

- There are also areas of the Borough where the pattern and frequency of bus services is sparse, more so in the evenings and weekends and increases in service frequencies and their coverage would bring major benefits in connecting residents with job opportunities and local services. In Heywood this will become more stark as the Northern Gateway housing and employment allocations are delivered if access by bus is not substantially enhanced;
- The current de-regulated system results in service changes happening frequently as bus operators are able to de-register services or introduce new ones at 70 days' notice to the Traffic Commissioner. This can be a concern for residents who want to take long term jobs or for parents and schoolchildren who choose a school on the basis of its accessibility by bus but then find subsequently that the service is withdrawn;
- The recently approved Local Industrial Strategy emphasizes the importance of connecting people to the opportunities created by Greater Manchester's economic growth. The Northern Gateway is a primary location for economic investment and growth in the north of the sub-region and connections to these jobs and dwellings should be a priority for a bus network required to step up to meet the challenges of a sustainable and inclusive economy;
- Clarity is required on ticketing, pricing and the limited availability of tickets that permit multi-modal travel;
- There are disparities in the bus fleet regarding meeting the latest emission standards. While the bus is an environmentally sustainable form of transport, emissions per passenger need to continuously improve across the fleet. A franchise model can set standards and targets for the provision of cleaner vehicles. Transdev Blazefield since taking over Rosso services have been proactive in this over the last year locally, rolling out modern cleaner vehicles on many of the cross-boundary services in and out of Rochdale Borough;
- The current model presents significant barriers to integrating the bus network with rail and tram including ticketing and the co-ordination of timetables and routes.

Currently the bus market is slow to respond to the changing economic fortunes of the borough and in response to surges in areas of economic activity and growth and realizing the opportunities these changes bring. Bus franchising must enable a closer relationship to develop between transport and land use planning, enabling transport services to be in place on "day one" of major new residential and commercial developments rather than there being a time lag resulting in missed opportunities continuing to occur.

The Borough also must be part of a fully integrated ticketing system across public transport in Greater Manchester equivalent to that operating in London and in many cities around the world making travel for all public transport users much easier.

For these reasons reforming the Greater Manchester bus market is the right thing to do to address the challenges it is facing. Deregulation has failed to deliver the consistency and quality of bus services passengers deserve. A franchised model would give the public sector control over standards of service, fares, frequencies and vehicle quality which are key in providing attractive and effective bus services.

The Franchised model also addresses concerns regarding the lack of transparency that exists in understanding the overall value for money to the public purse of the current de-regulated system and the enhanced partnership options presented in the consultation will not address these.

The Proposed Franchising scheme is planned to be introduced in three tranches with bus services in Rochdale included in the second tranche. In the light of the current fragmentation of services and fares currently taking place in the local bus market between operators, is it possible for the franchising of the Borough bus services be considered for inclusion in the first tranche in 2021?

Accompanying this letter are more specific responses to the questions set out in the consultation document. Only questions on which we have comments are included.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'SM. Rumbelow', with a long horizontal stroke extending to the right.

Steve Rumbelow
Chief Executive Rochdale Council

Rochdale Council's Response to "Doing Buses Differently" Consultation

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

No

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester ?

A consistent, clear and transparent process is required that makes the service requirement standards, vehicle quality and fare levels understandable for all parties and that services that cross GM boundaries are treated equally despite the process for tendering for these services is different. Investment in some vehicles operating on some cross-boundary services over the last year have improved them markedly with further investment in similar vehicles planned on other routes. Bus passenger expectations must be met as currently quality of services vary depending on the patronage levels they attract.

Q3. Do you have any comments on the local services that are proposed to be franchised ?

No, but any franchising scheme should be seeking to reduce bus service duplication and better integrate bus, rail and Metrolink services do minimise duplication between the three forms of public transport.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on other arrangements proposed for the purposes of transition ?

The transition and Sub-area approaches are fine but more explanation is required on how the order in which sub-regions are being franchised has been decided. Why has Sub-Area A been chosen to franchise first when the changes to and fragmentation of bus service provision in Sub-Area B has had a detrimental impact on passengers. In the last year Rossendale Transport has been taken over by Transdev Blazefield and First have pulled out of running bus services and replaced by Go North West and Diamond. The latter have taken over operating 471 Service, which is inter-urban running between Rochdale, Bury, and Bolton. Integration of ticketing was in place between the two operators, but Diamond have announced they are ending this arrangement and increasing their fares and further fragmenting services in this part of Greater Manchester. As a result local bus passengers will be paying more for more incoherent services. Why in the light of this is Sub-Area B not being franchised first and stipulating that these bus services are better integrated ?

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may be entered into ?

The service contract dates are fine but based on the increasing fragmentation of bus services in recent months in the Borough, then Sub-Area B franchising that should be in place on 2nd April 2021 and Sub-Area A on 25th March 2022. Are there practical reasons why Sub-Area A services will be franchised first ? eg. to coincide with the end date of a number of contracts.

Q8. Do you have any comments on the nine month period it is proposed will expire between entering in to the franchise contract and the start of a service under such a contract ?

The Council would like the period to be shorter, but if 9 months is required to procure and register new / altered services, then this is acceptable.

Q9. Do you have any comments on the proposals for how GMCA will consult on how well the franchise is working ?

The consultation process is fine but bus users, local authorities and politicians prompt want action so that bus passengers and local communities feel the benefit quickly. There needs to be clear passenger understanding on how and which aspects of the franchised services will be monitored, enforced and how actions to rectify breaches implemented. It needs to be easy for passengers to complain, be heard and see action being taken if services are not satisfactory. Franchise enforcement should be properly resourced and passengers need to see it is much more effective than at present with penalties punitive for poor service.

Q10. Do you have any comments on GMCA's Plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme ?

This is strongly supported as a reason fares are high is the lack of competition between operators, with larger bus companies agreeing what services each will bid for in a cosy informal. Care needs to be taken that more operators does not mean more service fragmentation of services or a number of different operators competing for passengers on lucrative routes so the Proposed Franchising Scheme must consider these. Reputable small and medium sized operators can often provide higher standards of customer service as they are rooted in local communities and passengers will more easily forgive other issues if the customer experience is to their liking.

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme ?

It is reasonable for GMCA to provide depots if they are required. They should also prioritise employment of suitably qualified local workers at them.

STRATEGIC CASE

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this ?

Services are declining less frequent and less integrated with fares for multi-modal journeys in particular increasingly expensive. There is little co-ordination of bus service timetables with those for local Rail and Metrolink services. Too many bus services are run to maximise revenue and operator convenience rather than to meet passenger need. Bus Journey times do not compare favourably against those of other modes therefore have difficulty in promoting buses as a mode of choice. It is generally perceived to be the mode of travel of last resort.

Q13a. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this ?

Agree

Q13b. Why do you say this ?

Franchising a radical change to make but bold action is required to tackle the challenges the bus market is facing. Analysis indicates that all these challenges may not be met as even with a franchising scheme, the decline in bus journeys is only significantly slowed down, but not reversed. Radical reform is required to start addressing the issues but more invention and imagination is required through the franchise in the future to achieve passenger growth in the long term. Despite this the bus is still by far the most used mode of public transport.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case ?

These aims are laudable, however there little pressing successful operators to provide consistency in the high quality of vehicles across the GM bus network. There are differentials in the quality of service provision with city centre operated by more modern, cleaner, greener vehicles, while the age and quality of buses operating on routes to / from GM's sub-regional centres are generally older, less comfortable or reliable. In Rochdale Borough Transdev Blazefield (the Burnley Bus Company) who operate a number of the cross-boundary services to / from Lancashire have started to address this by upgrading their vehicles on the 464 service with plans to modernise the buses operating on other similar services. This consistency is required across the network.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case ?

It is expected to be much easier to facilitate interventions to benefit passengers under the Proposed Franchising Scheme especially through direct investment enhancing services to attract new or returning passengers or make fares more affordable. This is likely to have the greatest impact in the early years of new contracts.

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case ?

The Partnership Option only addresses the issues that Bus Operators are prepared to tackle or which benefits them commercially. It addresses to a much lesser degree the demands and priorities passengers want to see improved compared with the Proposed Franchising Scheme. The Partnership Options offer less appeal to potential new passengers or those people considering a switch from less sustainable modes. The chance to integrate bus services with those of other sustainable modes of travel are also less deliverable through the Partnership Options.

Q17. The Economic Case concludes that the Proposed Financing Scheme provides the best value for money compared to the Partnership Option because it would:

- offer a “high” ratio of benefits to the cost to GMCA, one of which is broadly comparable with the partnership options;
- provide the most economic value (Net Present Value); and
- create the best platform from which further economic value could be delivered

Do you have any comments on this ?

While the assertions in the question are correct and the Proposed Franchising Scheme has a much more wide ranging impact on improving bus services and tackling the decline in bus use, the alternatives have much less impact but have a lower cost and therefore offer a higher Benefit – Cost Ratio (BCR) than Franchising. Both BCR’s at over 3 however are high and of a level that should attract funding.

More needs to be made of the Proposed Franchising Scheme providing a platform on which to progress Phase 2 proposals that will tackle the rate of decline in bus usage which the partnership options do not. This should include early provision of new or improved services to access new strategic development areas particularly where existing services are lacking.

COMMERCIAL CASE

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme as set out in the Commercial Case ?

The packaging strategy seems appropriate especially as opportunities are given to small and medium sized operators to bid for smaller franchises and school contracts. Contract areas seem to be packaged based on the location of depots. Does this include depots that house vehicles that operate bus services in GM but are located outside the sub-region eg. Transdev Blazefield (Burnley Bus Company).

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case ?

No issues on the length of contracts proposed provided the successful operators deliver step change improvements of service quality to passengers. There is a need for conditions on service reliability, vehicle comfort and quality, service punctuality etc. which if not met must lead to remedial action or contract termination if standards are not reached.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators as set out in the Commercial Case ?

Employees should be transferred to new operators through a TUPE process so that their income is smoothly maintained during any process of changing employers and they and their dependents do not lose out financially. Many of these employees are modestly paid so any disruption in the transfer of their employment to a new franchised operator is a risk to their and their dependant’s livelihood.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme as set out in the Commercial Case ?

The approach to depots located within Greater Manchester is fine, however there is no indication whether there will be any impacts on depots located outside Greater Manchester which is the base for vehicles that operate cross-boundary services to / from GM. It is assumed that their current arrangements in the ownership of the bus operator will continue under the Proposed Franchise Scheme.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme as set out in the Commercial Case ?

The Council supports the standardising of Intelligent Transport System’s (ITS) to improve the current customer experience on the bus network and eliminate the gaps that currently exist in the choice of

integrated ticketing options for passengers. Ticketing arrangements across all the successful franchise operators should be standardised and enable passengers to pay for a journey once, by tapping in and out at the start and the end of their journey. This should be irrespective of the number public transport modes they use to make that journey. Fares are also currently too high and services do not offer value for money.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case ?

A number of key bus services serving the Borough run cross-boundary to / from Lancashire and Calderdale. These services are key for some passengers commuting or accessing facilities in this Borough but also people from the Borough seeking employment, use of amenities and leisure opportunities in neighbouring local authorities. The permit arrangement proposed under franchising needs to minimise the impact on these travel opportunities and be flexible enough to allow operators to enhance their services. It is these operators within the Borough that have recently invested in vehicles and are delivering the most noticeable progress in improving their services in the last year.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts ?

It is likely that they can although there is a possibility that some operators who provide services now may not be interested in working in a franchise environment and may leave the GM bus market. In this situation there is no guarantee that the new operator will find the services commercially attractive enough to tender for those services or may offer a lesser quality travel experience.

Q28. Do you have any comments on the assessment of the commercial implications of the Partnership Options as set out in the Commercial Case ?

The Partnership Options offer few new ideas that enhance current service provision under the existing tender processes and there are few promises of step-change service improvements. Under the Partnership Options Bus operators will still only provide commercial services on which they can achieve a profit and the only supported services are those that TfGM can afford to finance. The journeys passengers want to make is not currently a factor in this environment. Change under franchising is essential with more scope for the provision of services where there are gaps at the moment and more ambition is required to establish bus services to capture demand in areas where major development is planned. The major bus operators have also had it too comfortable for too long and opportunities local operators with a good reputation to capture their local market, compete and innovate. None of this is offered by any of the Partnership Options which lead to a managed decline of the bus network.

Q29. Do you have any comments on the potential impact of the Partnership Options on the employees of operators set out in the Commercial Case ?

As the Partnership Options augment the existing network I presume they will address any issues relating to employees as a result of any changes to conditions in a fair and honourable manner. It is expected that any changes are not used as an excuse to penalise employee salaries and working conditions.

FINANCIAL CASE

Q30. The Financial case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters ?

The approach to funding the scheme seems appropriate. There are concerns regarding the possibility of the Council having to contribute to the costs of the scheme through their levy as central government continues to reduce local authority funding.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the Partnership Options ?

The Partnership Options do not generate sufficient benefits in terms of service improvements for passengers to begin to tackle the decline in bus patronage, a key objective in setting up a franchising scheme. They are affordable but do not deliver the aims of franchising including a step change improvement in services for passengers.

MANAGEMENT CASE

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Financing Scheme as set out in the Management Case ?

It is not clear how TfGM / GMCA / GM Mayor will assess passenger dissatisfaction with bus services under the Proposed Franchising Scheme. The document is strong on the methodology of setting up the Proposed Franchising Scheme but not on tackling poor performance. Even on the high fares, the proposal is to freeze them for two years. This is not good enough and offers no assistance for people on low incomes who try to avoid travelling by bus as they cannot afford current fares. Tackling anti-social behaviour does not feature in the document at all and current procedures do not match passenger expectations with punishments being too lenient.

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA as set out in the Management Case ?

The Management Case addresses the issue of securing resources but does not offer any evidence that TfGM is capable and has the skills and experience to manage franchised bus operations to the satisfaction of bus users and with bus operator confidence. There is no evidence that the calibre and past track record of potential employees securing these jobs will have the experience and expertise required, therefore the Council cannot offer a clear view as there is no evidence on which to base an opinion.

Q34. Do you have any comments on the proposed approach to the implementation and management of the Partnership Options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA as set out in the Management Case ?

The Partnership Option only commits operators to provide and improve the services they choose to ie those that are commercially viable so improvements will be at best marginal. These options do not address the current deficiencies in bus service provision and will continue to restrict the powers TfGM will have to improve or introduce new services in the future. There is also no indication in the Partnership Options that bus operators will publish fares like train operators do. This is a barrier to attracting new passengers who have a right to know the cost of journeys and the most affordable ticketing product to make that journey.

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers as set out in the sub-section impacts of the different options ?

Most of the impacts identified suggest the Proposed Franchising Scheme will provide greater benefits to passengers than the existing process for tendering bus services. The Council has concerns regarding cross-boundary services which mostly run from depots outside the Borough. It is these operators that is doing the most to modernise their services and enhance their services at present.

The Council will expect the Proposed Franchising Scheme to include the introduction of new services to proposed strategic developments site such as South Heywood where the first residential completions are expected in 2022. On the first day of occupancy it is expected that bus services serving these will be in place at that time.

Q36. Do you have any comments on the impacts of the Partnership Options on passengers as set out in the sub-section impacts of the different options ?

The Partnership Options offer a much looser arrangement in contracting services than the Proposed Franchising Scheme and the scope for the improvement of services is more restricted. The benefits of the options proposed are much lower. The Council will expect however that new bus services will be improved where they are currently poor and infrequent, eg. Heywood.

Q37. Do you have any comments on the Proposed Franchising Scheme on operators as set out in the sub-section impacts of the different options ?

There needs to be more meaningful competition in the bus market and a move away from large operators dividing up the most profitable routes between them and the market operates as a cartel. Greater opportunities for small and medium sized operators to compete must be encouraged without this being

excessive as was the case when bus services were first de-regulated. Service quality needs to be maintained or enhanced and fares more transparent offering value for money for passengers.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out on the sub-section impacts of the different options ?

With regard to the requirement for the employment of additional staff by GMCA / TfGM to manage the Proposed Franchise Scheme or any Partnership Options, clarity is needed on the impacts on the levy, local authorities contribute to GMCA. Will the costs of the chosen option impact on the level of Transport Levy GMCA will be charging Local Authorities? If so what Council's will be getting for it as this is increasingly being challenged by Local Authority Finance Departments.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section impacts of the different options ?

The benefits to wider society are greater from the Proposed Franchising Scheme than from the other Partnership Options, however none of the proposals will address the current decline in bus patronage and bus frequencies. They will only reduce the rate of decline in bus patronage. This still offers plenty of benefits to society in providing more frequent and better quality services than are provided at present.

There may be some bus routes across GM that duplicate Metrolink and Heavy Rail lines. Some of these bus services may not be required if the three modes are integrated so passengers can use the tram or train as an alternative provided fares are integrated across the modes and are affordable.

Q42. Taking everything into account, the Assessment concludes that the Proposed franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this ?

The Council agrees, but more evidence is required to demonstrate that franchising will deliver all the aims set out in this consultation document to the satisfaction of bus users. GMCA/TfGM should put contingencies in place to address any teething problems and areas of the network where services become worse. The Partnership Options give too many opportunities to operators to provide modest improvements they are comfortable providing when a step change in the quality of the bus network is required to address the decline. Without franchising bus operators will be able to provide what they have always provided and be pushed towards meeting existing and changing passenger demands. Radical changes may result in bus users feeling the benefit of franchise improvements.

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme ?

There is a need to provide better services in areas where there are no or poor services at present eg. North-South between Manchester City Centre and Heywood and along corridors where there is likely to be substantial residential and employment development in the future eg Northern Gateway where the first dwellings are expected to be built and occupied in 2022.

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it ?

Equality Impact Assessments do not address impacts relating to the affordability of fares or the impact on people with mental illnesses.

Q45a. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme ?

The Council Strongly supports the Proposed Franchising Scheme.

Q45b. Why do you say this ?

Although it does not address all the issues currently being experienced by passengers on the Greater Manchester bus network there are significantly more positives offered by the implementation of a franchising scheme than the "Do Nothing" or Partnership Options. Locally franchising may prevent the recent and gradual fragmentation of bus services between different operators introducing their own increasing fare structure and is contrary to the ambitions of both the Council and GMCA for a more integrated public transport network.

Under a franchised system passengers are more likely to have their needs addressed as GMCA / TFGM are more accountable to bus users than operators.

Q46b. Please provide further details as to the changes you think would improve the Proposed Franchising Scheme ?

There is a need to implement it and allow it to operate for a while before improvements can be identified.

Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made ?

Not applicable.

| | |
|--|---|
| Organisation Name | Rossendale Borough Council |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | The bus market is not performing in many local areas outside GM, for similar reason to those in the consultation document. We are not close enough to the local market to comment on the details. We would however welcome any improvements that can be made. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |

| | |
|--|---|
| Q13b Why do you say this? | Based on the consultation document and supporting information, along with local knowledge, it highlights that something should be done to address the issues of the bus market within the local area, to prevent further decline. Therefore is a need for reform. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | The GMCA must also consider neighbouring authorities transport policies and objectives, along with our Economic Development plans for future growth. Rossendale Council would not like to see any detrimental impacts to cross boundary bus services as they are vital for our residents to access employment and services in GMCA and importantly for GMCA residents to access employment and services within Rossendale. Rossendale Council would welcome ongoing dialogue with the GMCA to ensure objectives are aligned with our own. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | |
| Q45b Why do you say this? | |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |

| | |
|--|---|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Neither likely nor unlikely |
| Q48 Finally, do you have any other comments you want to make? | Thank you for the opportunity to take part in this consultation. Rossendale Council would wish to work closely with the GMCA on the approach taken. We are keen to retain strong links with our neighbouring authorities to ensure our borough continues to grow and that we retain strong public transport links into all areas of Greater Manchester. |

Salford City Council

| | |
|---|--|
| Organisation Name | Salford City Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Salford City Council agrees that a GM wide approach to franchising is the best option. This would provide consistency to users across all the districts. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | <p>Without the route numbers, it is unclear to the general reader what the routes included in the schedule are. Please clarify whether the GMCA can include in the franchising scheme bus services which are wholly specified and funded by a third party. In Salford, this applies to the following bus services: VH1 Boothstown – Mossley Common circular; and VH2 Burgess Farm – Walkden circular</p> <p>Please clarify the position relating to the Vantage Service (Leigh Salford Manchester busway) and the existing contractual arrangement with First Bus.</p> |

| | |
|---|--|
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> | <p>The boundaries of sub-zone A, as shown on the map, are not contiguous with those of the district boundaries of Salford, meaning that Irlam and Cadishead and Broughton and Kersal are excluded from the first tranche. Bus services through Broughton and Kersal principally operate in the Bury corridor and the Irwell Valley presents a natural boundary, so it is understandable that these should be treated as one area.</p> <p>However, it is unclear why Irlam and Cadishead are included in sub-zone C when the routes serving these areas operate in the Eccles-Salford corridor and the Manchester Ship Canal offers a natural boundary. It would be preferable for Irlam / Cadishead to be included within sub zone A as this would provide a consistent approach for the majority of Salford's bus users in the first tranche. Salford City Council requests that Zone A be amended to include the SW area of Salford including Irlam & Cadishead.</p> |
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | <p>It is recognised that Scholars Services will be exempted from a franchised scheme. How do TfGM propose to maintain consistency regarding fares and vehicle standards between the franchised network and Scholars Services in the long term so that Scholars Services are not disadvantaged?</p> |
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | |
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | <p>As stated in the response to Q4, it would be preferable for Irlam / Cadishead to be included within sub zone A as this would provide a consistent approach for the majority of Salford's bus users in the first tranche and avoid a 2 year delay for passengers in this area becoming part of the main scheme. During this period there would be practical difficulties for travel due to cross ticketing.</p> |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | |
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>It will be important to regularly consult passengers on their experiences and ensure that the findings of the consultation are considered when evaluating future tenders so that the service can be improved.</p> |

| | |
|---|--|
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | The proposed mechanism of offering contracts of varying sizes that will suit the range of small, medium and large operators is a sensible approach that will enable existing operators to take part in the procurement process. It is understood that the procurement process will be proportionate to the size of the contract, so as not to disadvantage smaller operators. It would be helpful for TfGM to clarify whether other potential factors such as the vehicle requirements, that may be specified in future franchises are also set at a level that enables the existing operators a chance to participate, and if not whether there is a support mechanism for operators to upgrade fleets. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | It is anticipated that this proposal could result in significant additional costs and element of risk for the GMCA. The financial implications of the GMCA providing and operating depots to facilitate the larger contracts would need to be understood before a position on this proposal could be determined. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | The external challenges for the bus market in GM identified in paragraph 4.16 will remain regardless of the model of operation. Under a franchised model the negative impacts of these challenges on the successful operation of a bus network, will be the responsibility of the GMCA to manage. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Salford City Council supports a franchised operation as it offers the best opportunity for control and coordination of the network. This will allow the GMCA's core objectives around fares, customer experience and integration with other public modes to be realised. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | The passenger experience and perception of bus as a mode of travel is largely focussed on whether the bus network serves the destinations they wish to access, and the cost to the passenger for utilising the service. Integrated fares and the customer experience are also identified as important factors in increasing bus use. The objectives for reform identified in paragraph 4.2 are considered to be appropriate. |

| | |
|---|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Salford City Council supports a franchised operation as it offers the best opportunity for control and coordination of the network. This will allow the GMCA's core objectives around fares, customer experience and integration with other public modes to be realised. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Under a Partnership the operators would continue to make commercial decisions on the routes, timetables and fares. The Network would not be considered as a whole, meaning that the redistribution of resources that are currently in competition between operators would be limited. Opportunities for common ticketing and fare products would also be limited. Salford City Council does not believe that the GMCA's objectives for reform can be fully realised under a partnership agreement where control of these key elements remain with the operator. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | The future ridership forecasts for bus all show a steady decline in bus patronage between 2020 and 2050 of between 35 and 45 million boarding's per annum. The franchising model does show the best ridership forecasts of all the options, but in a declining market rising costs and reduced revenues is likely to be a challenge in the long term. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The proposed approach of franchising packages of routes of varying sizes is considered to be appropriate as it enables operators of varying sizes to be included. Careful consideration on the packaging of routes around depot locations must be made so that future market competition remains and franchises are accessible to multiple operators so that areas do not become dominated by certain operators, which could have a negative impact on costs and operation of the service. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The proposed length of contract for the large and small franchises is considered appropriate as it will provide operators and passengers with consistency for long term planning and investment in a service. |

| | |
|---|---|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | The allocation of risk between the GMCA and operators is considered to be appropriate. The GMCA will require control over fares and the network in order to deliver on its core objectives such as integrated ticketing and improved customer service provision. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | The allocation of risk between the GMCA and operators is considered to be appropriate. The GMCA will require control over fares and the network in order to deliver on its core objectives such as integrated ticketing and improved customer service provision, which means that the risk on these areas must be with the GMCA. |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | The provision of depots by the GMCA for the large franchises is likely to come at significant cost. Further information on the likely costs for the scenarios described in paragraph 4.86 would be required. |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | As noted in paragraph 4.195 existing operators may be negatively impacted by change to a franchised network if they fail to win enough tenders to support their existing fleet or depots. The mitigation for this is that the GMCA would buy strategic depots and introduce a mechanism for operators to realise some value from a redundant fleet via a residual value mechanism. There may be a risk that outdated buses and equipment are retained in Greater Manchester through this mechanism as older buses are offloaded by former franchise operators and reused by an incumbent operator without upgrading as part of new franchises. Further information on the mechanism for ensuring that fleets remain current and meet appropriate standards would be beneficial to ensure that passengers are protected. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | The proposed approach is considered appropriate, a common system for ticketing, vehicle location and driver communication will be vital in keeping passengers informed of the service. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The proposed approach is considered appropriate. |

| | |
|--|---|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | The proposed approach to cross boundary ticketing is considered appropriate. Further details on the proposals for cross boundary ticketing, including proposed fare structures and the local stopping services is required as proposals develop. Links to Warrington from Irlam and Cadishead in the SW of Salford are important and we would wish to see these maintained and improved where necessary. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | TfGM's analysis of the market indicates that the franchise model would likely be accepted by the operator market. We are aware that some existing operators, including one of the largest currently operating in Greater Manchester do not support the franchise model and would like to understand what impact, if any this may have on the franchise proposals. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | Salford City Council supports a franchised operation as it offers the best opportunity for control and coordination of the network. This will allow the GMCA's core objectives around fares, customer experience and integration with other public modes to be realised. The various partnership approaches do not enable the GMCA to control the core planning function of the bus network which would hinder the successful achievement of the core principles for improving buses. |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|--|---|
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>The approved funding proposal to cover the anticipated £122 million of transition costs within the first 5 years includes £17.8 million from Local Authorities from an increased statutory contribution in 2020/21. This has been agreed as a one off payment, it should be noted that any further ongoing contributions will have a detrimental impact on what authorities can deliver locally and so should not become the normal source of funding. Similarly, there are significant contributions from the Mayoral “earn back” funds (£78.0 million) and £22.7 million of Mayoral Precept funds in future years. More detail on the impact of utilising these funds on future GM projects / programmes would be beneficial.</p> <p>TfGM have indicated that the farebox revenue and other complimentary funding sources that would be received such as Bus Service Operator Grant (BSOG) and advertising revenue combine to make a package that is sufficient to pay for a franchised service currently. It is recognised that recent bus use has been on a downward trend and this will continue to be the case in the future. TfGM’s mitigation strategy in a scenario where farebox revenue drops and is not sufficient to support the existing services, is to reduce service availability and raise fares. Although this makes commercial sense, it would be a difficult proposition to put to the public, when public aspirations around the bus network have been raised through the franchise proposition. Although Salford supports the proposed franchising scheme it should be recognised that there may be further financial support required in the future, in order to maintain the service.</p> |
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | <p>Both of the partnership options have been appraised to operate at significant deficit over the appraisal period, indicating that this model is not financially sustainable. This analysis strengthens Salford City Council’s the view that a franchised model is the most suitable option.</p> |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | <p>It is essential that the proposed franchising scheme operates as efficiently as possible, for the financial sustainability of the operation. TfGM have indicated that an additional 57 FTE equivalent employees would be required. It would be beneficial to understand more detail on the rationale for these employees.</p> |

| | |
|--|--|
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | <p>Salford City Council agrees that a phased roll out to a full franchised network is the best approach to allow for the systems, procurement and operations to be set up over a period that minimises disruption to passengers. We would like to note our desire for Irlam and Cadishead to be aligned with sub area A rather than sub area C as currently proposed, as we believe that it would be more beneficial for passengers to have a consistent approach due to the nature of journeys in this area. This would avoid the need for cross ticketing and additional costs to the passenger.</p> <p>It is noted in paragraph 4.163 that passengers would be likely to experience some confusion due to cross ticketing between franchised and non franchised areas during the transition. TfGM's approach to mitigating this includes the use of low cost add on tickets and System One multi operator tickets. It would be helpful to understand more detail on the proposed fare model and financing around these options. Customer feedback on System One is poor due to the increased price point, which leads to a low take up.</p> |
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | <p>Fares are a key issue for commuters, it is encouraging that the proposed franchising scheme is forecast to result in no change or lower fares for the majority of passengers, with increased accessibility across the network.</p> |

| | |
|---|--|
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | As noted in paragraph 4.195 existing operators may be negatively impacted by change to a franchised network if they fail to win enough tenders to support their existing fleet or depots. The mitigation for this is that the GMCA would buy strategic depots and introduce a mechanism for operators to realise some value from a redundant fleet via a residual value mechanism. There may be a risk that outdated buses and equipment are retained in Greater Manchester through this mechanism as older buses are offloaded by former franchise operators and reused by an incumbent without upgrading as part of new franchises. Further information on the mechanism for ensuring that fleets remain current and meet appropriate standards would be beneficial to ensure that passengers are protected. |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Response already provided in Q's 30 and 32. No further comments. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | The proposed franchising scheme offers the best opportunity to control the specification of buses in the fleet, which will ensure a regular renewal of vehicles and the provision of engines that meet the latest environmental standards. This is key to delivering on the aims of the Clean Air Plan. |

| | |
|--|--|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Salford City Council agrees that a Proposed Franchising Scheme is the best option for bus operations in Greater Manchester. The analysis concludes that franchising provides the best option for increasing patronage and offers the highest Net Present Value (NPV), when compared to partnerships. Franchising also offers the best opportunity to control the Network, Fares and customer experience, which are the core principles of delivering a better bus experience for passengers. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | Salford City Council is satisfied that the Equality Impact Assessment shows that protected groups will not be adversely affected. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | At the full council meeting held on 20 November 2019, Salford City Council passed a motion supporting the Proposed Franchising Scheme as the best option for operating buses in Greater Manchester. Paul Dennet the City Mayor of Salford, subsequently confirmed this position in writing to the Greater Manchester Mayor Andy Burnham. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | The inclusion of Irlam and Cadishead into zone A, from Zone C as stated in Q 4. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |

| | |
|---|--|
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>Regarding the consultation, Salford members have received feedback from the public stating that the survey was difficult to complete, it is noted that there is a short and long version. The detail required for a response is significant and is likely to have prevented many people from responding.</p> <p>Salford City Council fully supports the implementation of a Franchising Scheme for Greater Manchester as we believe that it offers the best opportunity to improve the network for passengers in the long term. The City Council has been proactive in working with stakeholders including passenger, businesses and operators in recent years to undertake an audit of the current network in Salford, and determine what improvements and changes are necessary to support existing travel patterns and the ongoing growth within the city.</p> <p>Our Bus Network review was undertaken by an independent bus consultancy and outlines what we consider to be a deliverable and affordable network, copies of the Bus Network review have previously been shared with TfGM and we have engaged with officers with the aim of bringing forward the review's recommendations. Salford City Council feels that this will be an invaluable resource in the future planning of a franchised network and we are pleased to see that a large part of the City is included within sub area A for the first stage of delivery. We welcome the opportunity to engage further with TfGM's planning team to share our aspirations, knowledge and expertise gained through the Bus Network review so that we can deliver a better network for passengers.</p> |
|---|--|

| | |
|---|--|
| Organisation Name | Stockport Metropolitan Borough Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | Stockport Council is supportive of the corrections/changes made with regards to the scheme consultation document. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Stockport Council supports the proposed area of the franchise covering all the Greater Manchester area but would support further consideration about how the area will interact with locations outside of the area such as New Mills, Wilmslow and Glossop which currently benefit from transboundary services. These services have benefits for Stockport borough including helping to reduce congestion on routes into the borough. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | <p>The people of Stockport borough will be hoping for an increase in local services which run later, at weekends and in a greater frequency than currently is received. They will also have a great interest in there being buses put in place in the less well serviced areas at the periphery of the borough and improvements to orbital routes especially to areas of employment like Manchester Airport.</p> <p>Consideration should be given to the rerouting of services. For example, the 192 bus from Hazel Grove does not currently go into Stepping Hill Hospital grounds. Services should also encourage multi-modal use in the short-term, such as within Cheadle and the use of Metrolink and rail services from East Didsbury.</p> <p>Where possible the proposed franchising scheme and the possible rerouting of services should aim to improve access to specialist healthcare facilities, such as Christie.</p> <p>Stockport Council would expect that this proposal would allow greater local involvement in the provision of services within the local authority area.</p> |

| | |
|---|---|
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> | <p>With Stockport borough being in the last phase of the franchising process, Stockport Council would like to understand what processes would be in place to minimise negative changes to our services as a result of the franchising changes being rolled out in the other areas of the conurbation and what processes will be in place to address issues if they occur. There is also concern about the period where Stockport Council is paying into a process for which it is not receiving all the benefits of franchising. We ask there is consideration given to a greater speed of roll out or the potential to ensure that some benefits are realised in the borough sooner.</p> <p>Stockport Council would want to ensure that there is no deterioration of services in sub-area C during the transition period, especially with Stockport borough entering into the agreement at the latest date.</p> <p>Stockport Council want assurances that if there was a deterioration in services, there was a plan in place to manage services that continued to operate. Moreover, the Council does not want the later date of entry to be used as an excuse to not deliver on the scheme; Stockport needs the infrastructure to deliver on the ambitions that Stockport Council has for the whole of borough.</p> <p>There is concern over how Stockport Council would meet its clean air targets, especially with Stockport borough's date of entry into the franchise agreement not expected until at least 2023. Greater clarity is required on how improvements to the bus fleet for emissions to meet clean air requirements could be delivered before franchising commences in the area.</p> |
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | <p>Stockport Council would like consideration to be given to the idea that major routes traveling across the conurbation - rather than being exempt from the franchising model - were brought into the franchise as soon as the model is in place. This would ensure areas such as Stockport borough received some early gains from the roll out of the franchise from those services that crossed several districts across Greater Manchester.</p> <p>Concern was expressed regarding the need to ensure existing cross boundary connectivity is continued and improved. Stockport borough has bus routes which currently serve several locations in Derbyshire, High Peak and Cheshire East e.g. Buxton, New Mills, Glossop and Wilmslow. This helps to reduce congestion within Stockport and provides access to employment.</p> |

| | |
|---|--|
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | Stockport Council would be keen to gain assurances that the process is carried out in a rapid but organised way enabling the best results to be realised and expect that the date proposed has been selected to allow for this. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | As previously stated, the main concern of Stockport Council for the residents of Stockport is the time between the start of the franchising process and the time that they receive improvements to services in their area. Stockport Council wants to see some benefits before 2023. Stockport Council would welcome any proposed changes which increase the speed of delivery benefits to the Stockport area. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | While we understand that the nine-month process would be needed for the initial contracts we would hope that the companies involved, and the Combined Authority would become more efficient at delivering the contract franchises and so would like to see this be reduced to a minimum 6 months by the arrival of the role out of later sub-areas. We want to see every effort made so Stockport benefits earlier than Dec 2023 |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | <p>As well as the success of the franchising scheme, throughout the process we would like to see regular monitoring of those areas without the franchise to ensure that any negative effects happening in the areas to which the scheme has not been rolled out are captured and a package of measures implemented to address those impacts that may be felt.</p> <p>We would hope that once the franchising scheme was up and running, the Council, as well as local people, would have a greater say and more input over bus routing.</p> <p>We would expect that KPIs would be agreed at the outset of this work with the GM Authorities which allows performance to be monitored at GM, sub-area and local authority level.</p> <p>We are also keen to avoid a zero sum gain position in the early stages, ensuring franchise performance is not at the expense of non-franchised areas.</p> |

| | |
|--|--|
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>Stockport Council generally supports the principle of ensuring that small and medium sized operators have access to franchise opportunities. However, although this potentially brings more competition and may also allow new local providers to enter the local bus market, Stockport Council are cautious that this doesn't lead to a 'race-to-the-bottom' and impede improvements made to local bus services. Given the history of bus deregulation, Stockport Council would like to ensure, particularly with public transport, that we have excellent quality, reliable and clean services at a price people can afford.</p> <p>Stockport Council recognises that involving local providers can help to ensure that these operators have a stake in the local economy. However, what is needed is a set of minimum standards, driven by passenger needs, to guarantee and ensure that services operate for the people of Stockport.</p> <p>We also would want the GMCA to ensure that the quality of the vehicles - especially in terms of air pollution, accessibility and the quality of the driver training (especially in terms of the needs of the disabled and vulnerable groups) - was of the same standard or that a process was in place to assist them to rapidly reach the standards required.</p> |
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>While the identification and provision of locations for contractors of large franchises is seen as necessary, the location of these would need to be carefully identified and the costs of the depot facilities scrutinised to ensure that expenses are not bourn solely by the public purse where they previously have been privately provided.</p> <p>Location of such facilities would need to be agreed with Local Authorities and should not disadvantage access by existing employees or create issues for adjacent residents. In addition, the local authority would need to understand any potential traffic or congestion impacts from change of location.</p> |

| | |
|---|---|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>Stockport Council recognises the issues described with regards to the challenges facing the market and recognises that without actions to address supply problems, the opportunities to increase passenger numbers and demand are limited.</p> <p>Greater Manchester is changing and needs a good public transport system to support that change. Leisure, employment and access to facilities require as close as possible to 24-hour, 7 day a week service. The future of public transport is also central to Stockport's regeneration, with Stockport Interchange at the heart of the new Mayoral Development Corporation (MDC). For the MDC to reach its full potential, decent public transport must be at the heart of it.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |
| <p>Q13b Why do you say this?</p> | <p>Stockport Council supports the opportunity to address the supply issues that are facing bus users in Stockport borough and the wider conurbation. Stockport Council also supports the opportunity to ensure that there are bus provisions that support Greater Manchester's aging populations' aspiration for travel and its desire to address congestion issues in the borough and encourage the use of sustainable travel.</p> |
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>Stockport Council supports the objectives identified in the business case but believes they also need to be applied to cross boundary services. Once franchising has happened Stockport Council would like the local population and Councillors to have improved input into the bus routes that are provided.</p> |

| | |
|--|--|
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>The proposed franchising scheme would enable Greater Manchester residents to benefit from any future investment in the bus network. The proposed franchising scheme would enable the stabilisation and improvement of the existing bus network and improve the quality of service and the customer experience and understanding of the bus network.</p> <p>There are concerns about the impact the process will have on the companies involved and the potential for a short-term negative impact on those areas in the later sub-areas of the roll out of the scheme.</p> |
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>Whilst the partnership option would improve the existing customer experience of the bus service in Greater Manchester, it would not provide the flexibility to manage the network to support the wider Greater Manchester Objectives. The economic benefit is also outweighed by the Proposed Franchised Scheme.</p> <p>Stockport Council acknowledges that previous partnership working has provided improvements in the borough on key routes.</p> |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>The Economic Case considers several factors in assessing what scheme would provide the best value for money and would support the wider strategic opportunities of the proposed schemes. The proposed franchise scheme provides the most benefits. It is expected that the cost will be revisited as the scheme develops to enhance the realisation of potential and actual benefits.</p> <p>Stockport Council is conscious that funding the Proposed Franchise Model is somewhat challenging, although we hope the new government in post will now address this through additional funding. This would help ensure the cost is not entirely passed onto residents, as well as ensuring the council retains much needed resource.</p> |

| | |
|---|--|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | Stockport Council supports the strategy and proposed mix of large and small/medium contracts as it provides continuity and depth of experience for managing the larger contracts and economies of scale whilst the use of small/medium sized contracts encourages other operators to develop in this field after bringing innovation to the market. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | These lengths of contract appear suitable providing that the necessary monitoring and related contractual arrangements are in place to enable any in contract issues to be addressed in a robust way. Also, if necessary, we would expect that the lengths of contract appropriate to different types of route would be kept under review. |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | As identified in the response to question 17, Stockport Council is conscious that the Economic Case is challenging because council budgets within Greater Manchester are stretched. The risks around cost inflation and common fares/ticketing offer will need to be managed carefully. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | As Stockport is in the later phases of the roll out of franchising there is concern as to potential impacts on bus companies and their employees before franchising comes into effect in our area. We would like to have a greater understanding of risks and the actions the GMCA could take to guard against these. |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | While ensuring that the necessary depots are in place for the running of larger franchises is important, there is a need to ensure that the acquired depots are not just historically valuable but meet the current needs of the areas being served and that any need or amended usage of locations is not detrimental to local congestion and other land use needs. |

| | |
|---|---|
| <p>Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>While the need to ensure that the fleet meets the emissions and other needs of the GMCA, how does this work with the buses that previously have received or will receive funding for upgrade to a lower emission rating from the GMCA?</p> |
| <p>Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Stockport Council understands the benefits that would be provided by the common ITS and supports the commercial case in this regard. There is also recognition that the franchising model will support Greater Manchester's smart city ambition and the opportunities this will generate.</p> |
| <p>Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Stockport Council understand the benefits of the proposed procurement approach. The involvement of the 10 local authorities in the selection process would be an important part of such procurement.</p> |
| <p>Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?</p> | <p>Stockport Council wish for greater clarification on the likely impact of the proposed franchising scheme on external services entering Stockport borough and Greater Manchester as a whole. Stockport Council want to ensure that existing journeys made by members of the public will still exist after the introduction of the proposed franchising scheme. For instance, will the 199 Buxton to Manchester Airport bus be allowed to enter Greater Manchester once the proposed franchising scheme is in operation? Stockport Council would not want those trips which were made by bus to be made by car, adding to the congestion problem in Stockport borough and leading to worsening levels of air quality. Introducing fewer pick up points in Stockport borough along the 199 route and potentially introducing the need to interchange where previously it wasn't required is not seen as beneficial to residents in the borough. Towns both inside and outside the borough are major employment centres for residents. They also provided educational opportunities. Greater understanding of the impacts of proposed franchising scheme need to be considered, especially if public transport is affected and single operator ticketing cannot be used on services from outside Greater Manchester.</p> |

| | |
|--|--|
| <p>Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?</p> | <p>Stockport Council support the commercial case but would seek to ensure that they were involved in the proposed process as it was carried out and would expect the process to be rigorously monitored and suitable remedial actions to be taken as necessary as the process was rolled out.</p> |
| <p>Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?</p> | <p>Stockport Council recognises the limitations of the partnership options but also notes the lower financial risk that would be incurred should these approaches be taken.</p> |
| <p>Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?</p> | <p>Stockport Council acknowledges the less disruptive nature of these options on the employees involved in the Public Transport System. It would expect that the process of bus reform in any format would seek to protect the employees as they are also members of the Greater Manchester Community.</p> |
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>Stockport Council has some reservations regarding the costs of the transition period and would like some clarity over each local authorities' one-off increase in their statutory contribution.</p> <p>Stockport Council also has concerns over the proposed three-year precept increase for residents living in Stockport borough before they realise the benefits of the new scheme. It is important benefits of franchising reach Stockport at the earliest practicable opportunity.</p> <p>Stockport Council hope that central government may be able to make a greater financial contribution towards the proposed franchising scheme.</p> |

| | |
|---|--|
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | As previously stated, Stockport Council has concerns about the overall effect of the increased spending requirements of the options and how this needs to be balanced with other financial commitments. The Council also has concerns about the time over which Stockport residents are financing the scheme before they see the overall benefits from the improvements. |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | Whilst Stockport Council realises that TfGM would be the main orchestrator of the franchising scheme, we would hope that the Council as well as the local people of Stockport borough would have more input and a greater say into the routing and timetabling of services than currently exists. This could bring back greater local accountability and help decide which routes should be run for the local community. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | As we are in the final stage of roll out, Stockport Council want greater clarity around the proposed mitigation measures proposed in the face of potential loss or reduction of services by current providers and the way in which the changes in ticketing will affect journeys out of sub-area C and the way these will be clearly communicated to the public. |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | The partnership model also places Stockport borough in the final part of the roll out of service improvements and so we would be equally interested in any mitigation of negative effects that would or could be proposed for the borough in the case of a partnership option going forward. |

| | |
|---|---|
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | <p>Stockport Council has concerns over the impact the proposed franchising scheme on cross-boundary services coming in and out of Greater Manchester. This is an especially pertinent issue for residents who rely on buses and travel not just for work but to visit relatives too.</p> <p>Stockport Council would want to ensure that cross-border journeys that can be made now will still be able to be made once the franchising model is in place.</p> <p>Stockport Council would also be interested to hear what plans are in place to reduce congestion on popular services at peak times. This is especially important if the 5.6% uplift in demand is realised.</p> |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | <p>The main concerns of Stockport Council are about the potential negative effects on the trips out of the GMCA area and the potential for them to be negatively affected when they are a key service for residents in the borough and an important way to reduce congestion caused by visitors/commuters into the borough.</p> |
| <p>Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?</p> | <p>Considering some of the potential impacts Stockport Council would like greater understanding as to the level of competition that is likely to be achieved in the larger franchise contracts. There is also some concern on the potential impact on existing employees of the bus companies operating in the area. The Council is aware that on many routes the bus drivers and operators have gained a strong appreciation of local conditions and issues, which assist in the efficient running of the service and would hope this local expertise is captured as part of the change process.</p> |
| <p>Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?</p> | <p>No comment</p> |

| | |
|---|---|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | Not applicable |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | As previously indicated the financial requirements of the scheme and the need to balance it against the financial and resource demands of the Council and GMCAs other financial commitments. The cost of the franchising option is higher than the two partnership options with the risk that the patronage of the buses not going up being financial as well as reputational. The Council would like to understand the procedure for monitoring the impact on the GMCA and the decision points at which remedial steps may be taken to reduce risk. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | <p>What has been done to study the potential negative affect on economic growth for the areas in sub-areas B and C with both the potential for the lack of franchising and the implementation of franchising affecting services.</p> <p>The franchising will not come into place in sub-area C until the Clean Air Plan is expected to have already been in place 3 years. The Council will also have in place many improvements to the Bee Network. The negative effects that could occur due to the wait for franchising may reduce the modal shift that could have been achieved had there not been uncertainty in the bus service.</p> <p>How will the Clean Air Plan bus schemes and the franchising requirements for fleet renewal work and will this lead to the sub-areas A and B benefiting from more clear air funding for buses than sub area C?</p> <p>In partnership options would the Clean Air Plan funding for buses be used as a lever to encourage partnership working?</p> |

| | |
|--|---|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Stockport Council is supportive of the Proposed Franchising Scheme with recognition of the concerns and requests previously identified in the response regarding Council involvement, finance, realising benefits sooner and cross-boundary services. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | No comments |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | While the EqIA identifies no adverse impacts there is a need to insure the changes and the interim stages of the process are clearly communicated to the public and that all bus providers are supportive of the needs of the vulnerable members of society who will be most affected by the changes and most likely to struggle with the different systems in place. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | No further comment |

| | |
|--|---|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | No further comment other than those stated elsewhere. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | <p>Stockport Council wants the benefits of bus franchising to be delivered more rapidly. It is suggested that a different process of roll-out be investigated to enable delivery to be less protracted or for some gains to be put in place earlier for all of Greater Manchester. . However, neither of the above suggestions should take away from our overall desire for the proposed franchising scheme to be implemented across Greater Manchester.</p> <p>Regarding the consultation process generally, Stockport Council wants assurance that TfGM have suitable measures in place to ensure all consultation responses are given due consideration prior to the budget.</p> |

The Office of the Executive Leader, Tameside Metropolitan Borough Council,
Tameside One, Market Place, Ashton-under-Lyne, OL6 6BH

Cllr Brenda Warrington

Executive Leader of the Council

Tel: 0161 342 3016

Email: leader@tameside.gov.uk



Andy Burnham,
Greater Manchester Combined Authority,
Churchgate House,
56 Oxford Street
Manchester M1 6EU

Our Ref: **BW/JR/AB**
Doc Ref: **ABGMCA18122019**
Date: **18th December 2019**

Dear Andy,

Greater Manchester Bus Reform

As you are aware bus services in Greater Manchester and especially in Tameside play a huge role in everyday life: from accessing work, to linking with GP surgeries and hospitals, connecting people to leisure and making life better for all, each and every bus journey is vitally important.

Our bus services operate in a completely deregulated market, where the private operators decide themselves where they run services with profit at the crux of their operations. For the remnants, those that are a social necessity at weekend and outside the peak hours, Transport for Greater Manchester has to pick up the cost of running such services.

In many of our deprived Tameside wards, car ownership levels tend to be very low and for those fortunate enough to own a vehicle, cars often tend to be older and more polluting given the relatively low household incomes in these localities.

Tameside, whilst investing heavily in its own infrastructure including housing and employment provision, recognises the importance of the employment and other economic opportunities offered by the Regional Centre, areas such Trafford Park and the those in and around Manchester Airport. The current bus network, however, is not fit for purpose and only provides limited links to these locations from our borough. Direct cross city bus connections don't exist.

Furthermore, since deregulation the commercial operators operating in the borough have carved the area into two distinct zones. First Group have traditionally run north from Ashton towards Oldham and beyond and Stagecoach has a monopoly on services in the rest of the borough especially to the Regional Centre along the Ashton Old and New Roads. There is no incentive for the bus companies to work with each other, integrate their services or provide common ticketing for a multi operator journey within the current commercial environment. In Tameside this can make public transport by bus extremely expensive for relatively short journeys.

Even though as Greater Manchester we manage to subsidise some bus services, perhaps not as many as we would like, the lack of buses in many locations leave many with little choice but to use a car. For those less well-off this is relatively expensive commitment. Bus isolation also affects the elderly, the vulnerable and those with disabilities.



The ultimate aim of public transport is to provide a seamless service between all types of public transport, to discourage car use, especially with increasing concerns over global warming and increase economic activity for all.

As Leader of Tameside Council, I firmly believe that bus deregulation is not working for Tameside and indeed the whole of Greater Manchester. I feel directly managing our own bus network through a franchising model will help address many of the issues I have mentioned.

We cannot see bus services decline and cars increasingly clog our roads with all the associated negative effects this causes.

We fully support the GMCA in its initiative to promote this model, something Tameside has long called for over many years and we look forward to working with the rest of Greater Manchester in making this happen.

Yours sincerely,



**Councillor Brenda Warrington,
Executive Leader, Tameside MBC.**



Tameside Metropolitan Borough Council (Consultation Response)

| | |
|--|--|
| Organisation Name | Tameside MBC |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | Tameside have no comments on the corrections and changes made to the proposed franchising scheme. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Tameside fully supports the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | <p>At this stage Tameside have no comment on the proposed local services to be franchised. We would, however, be eager to explore further route options to examine the potential for a revised or enhanced route network as the franchising scheme initiative develops further.</p> <p>Furthermore there may be disappointment that the consultation is only about the franchising process itself and does not offer chance for wider consultation on the future bus network at this stage.</p> |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | <p>It is good that Tameside is included within only one of the three sub-areas (Area C) and is not split over more than one sub-area as some of the other Districts are. This will mean that the majority of the Tameside services which operate only within sub-area C will change all at the same time and only a few longer distance services which cross from Sub-Areas A and B will be affected earlier.</p> <p>For the purpose of reference it is not clear where the “boundary” runs between each sub area.</p> |

| | |
|---|--|
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | Tameside have no comment on this issues |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | Tameside have no comment on the proposed 6 March 2026 date that it is currently proposed for the Proposed Franchising Scheme and note the caveat that has been added referring to the progress of the consultation and any subsequent decision-making process. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | The proposed 12 month period between approving the go ahead for franchising (March 2020) and the introduction of sub area A (April 2020) appears to be challenging to achieve. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | This nine month period is sensible especially if the chosen operator has to procure or lease a significant number of new buses, garage facilities if required and the employment of appropriate staff before the start of the local service(s). |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | <p>It is important that a consultation process is held with the organisations representing bus users after the expiry of the first franchises in order to determine what improvements are required to future franchises.</p> <p>Additionally, some form of consultation should be undertaken at regular intervals during the franchise period itself to determine if the individual franchises are working correctly and if improvements are required.</p> |

| | |
|--|--|
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>This seems to be a sensible plan as the franchises are not being offered route by route but as larger networks, which would be difficult for the small and medium sized operators to realistically bid for.</p> <p>It will depend on the size of the smaller franchises being offered as very small operators may only be able to run one or two routes successfully.</p> <p>It is suggested that careful consideration is required for the smaller operator franchises especially given the relatively historic high number of operator failures in this sector of the market.</p> |
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>Given the timescales set out in this consultation document for award and commencement dates of the large franchises this would be a sensible option. It would be difficult for any new large franchise operators to secure depots sites, obtain planning permissions if required, and to fit out the sites in such a short period of time.</p> <p>The ability to use existing operator's depot sites will be difficult as these depots and facilities will be needed by these operators right up to the changeover dates.</p> <p>A further issue will be if all or a large proportion of the new buses needed to operate the franchises are fully electric, the depots will require a substantial electricity supply to enable the buses to be fully charged. This could impact upon depot sites chosen if the local electricity supply is not sufficient and will need substantial infrastructure upgrades to allow this to take place.</p> <p>With GMCA owned depots these would simply be handed over to the next franchisee at the end of each period without the need for operators to look for new depot sites each time.</p> |

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>The Strategic Case sets out some of the factors which have resulted in the decline in the number of passengers.</p> <p>Other factors not mentioned include;-</p> <ul style="list-style-type: none"> • Changes in where people live in Greater Manchester, with the development of lower density residential estates on the urban fringes which are poorly design from a bus access point of view, thereby increasing the reliance on car use; • Changes in employment, with people travelling further and for longer to reach their jobs in relation to their homes. This encourages more reliance on car use; • The decline in town centres which results in fewer journeys being made by buses; • The increase in out of town shopping has resulted in fewer bus journeys being made as many of these sites are located adjacent to the major highway network thereby encouraging car use rather than bus; • Changes in the location of public services, i.e. hospitals, doctors etc. which have tended to be concentrated on fewer larger sites which means for many people journey lengths and times have increased making bus travel less attractive: and • Lack of bus priority measures over much of the highway network means that the severe effects of traffic congestion on the bus journey times have not been reduced; |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|---|---|
| Q13b Why do you say this? | <p>The proposed reforms of the bus market will set out within the Strategic Case will help to address many of the challenges currently faced by the local bus market.</p> <p>The proposals will help to:-</p> <ul style="list-style-type: none"> • increase the number of trips made by public transport per person; • reduce congestion; • introduce more affordable fares and provide multi-modal ticketing; • provide those services which are socially and economically needed but which cannot be provided within the framework of the existing deregulated bus market; • meet the Greater Manchester and wider national environmental policies; and • increase the co-ordination between bus services and other public transport modes. <p>This will enable the wider transport policy objectives set out within the Greater Manchester 2040 Transport Strategy to be met. It will also support the long-term sustainable economic growth and access to opportunity for all.</p> <p>The reform will encourage an increase in bus usage and therefore help in the objective of 50% of all trips being made by Greater Manchester residents to be made by accessible modes.</p> |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | <p>Tameside fully agree with the GMCA's objectives for the future provision of bus services.</p> |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | <p>The Proposed Franchising Scheme will contribute to many of the GMCA's objectives for bus services set out in the Strategic Case. However, a number of these objectives will only be met through the implementation of the 'Phase 2' interventions.</p> |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | <p>The Partnership options will contribute to some of the GMCA's objectives for bus services set out in the Strategic Case and as with the Proposed Franchising Scheme some of these objectives will only be met through the implementation of the 'Phase 2' interventions.</p> <p>A number of these "Phase 2" interventions, such as bus priority measures are implemented with the agreement of the local highway authorities ie Tameside and are not necessarily dependent upon the implementation Bus Franchising.</p> |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>The Proposed Franchising Scheme enjoys the best value for money compared to the other options but conversely has the highest costs, three times higher than the other options. In all cases the Phase 2 interventions will be required to stabilise the market or to slow the future decline further.</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>The packaging strategy for the franchising strategy appears to be a sensible compromise solution.</p> |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>The shorter franchise length for the small franchise contracts and the schools contracts is sensible.</p> |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>The risk allocation as set out in the commercial case is sensible.</p> |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | <p>The issue of employees from a number of different current operators all working on different terms and conditions being transferred to a single new franchise operator will be critical to its success and will need to be handled sensitively to ensure the smooth transfer to new franchising operations</p> |

| | |
|--|---|
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>This is a complex issue as the construction of new depots by the GMCA will require the identification of sites, planning permissions and construction of the depots within what may be a short period of time.</p> <p>In addition, the ability to use existing operator's depot sites may be difficult as these depots and facilities will be still be required by the existing operator's right up to the changeover dates.</p> <p>Further issues will centre on proposed size of any electric bus fleet required to operate the different franchises, as the depots will require a substantial electricity supply to enable charging as note above.</p> <p>Other fuel types including bio-gas will need more specialised fuelling provision</p> <p>For smaller franchises there may be a need for depot sites to possibly have facilities for electric vehicle charging or facilities for different fuels, which could prove difficult for the successful operators of smaller franchises to find appropriate sites.</p> <p>If the GMCA owns the depots then these would simply be handed over to the next franchisee at the end of each franchise without the need for operators to look for new depot sites each time.</p> |
| <p>Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>This would appear to be a sensible solution to this particular problem.</p> |
| <p>Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>This would appear to be a sensible solution to this issue.</p> |
| <p>Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>This would appear to be a sensible solution to this issue.</p> |

| | |
|--|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | This is an important issue which needs to be handled correctly. Many of these services can be currently operating at high frequencies providing important links both in to and out of Greater Manchester. Many of the communities on or near to the boundaries are historically linked to or are serviced by larger centres either within or just outside Greater Manchester, for example Glossop, and these cross boundary services are important to the residents of both Tameside and Glossop. The imposition of significant conditions, such as reduced stopping pattern in Greater Manchester, could have a significant impact upon these services by removing the ability of some people making some journeys. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | Tameside have no comments on this matter. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | The partnership options would appear easier to implement but would not offer the full range of benefits which the document states will come from Franchise Contracts. |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | Tameside have no comment on this issue |

| | |
|--|---|
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>A major concern is income risk mainly through the farebox and whether it will be sufficient to pay for the franchised services. In such instances the Proposed Franchising Scheme could either reduce the size of the operated network and/or increase fares or by allocating more funding to support the services.</p> <p>Should further additional funding be required to continue to support services would this be required from districts through the levy process or elsewhere? This could potentially impact upon other public services which are provided by the Districts.</p> <p>The level of any additional support required will depend upon the level at which the fares are initially set at the start of the franchise process. The lower the fare level the more likely that some form of additional support will be required.</p> <p>Section 4.113 states that fares are forecast to increase at above inflation, at RPI+1.4% per annum. If these fare increases do not happen or are lower, then the need for additional funding support will also be increased.</p> |
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | <p>As with the Proposed Franchise Scheme in the previous question, any additional costs, in this case for managing the partnerships and concessionary reimbursement, would require on-going financial support which could lead to an increase in the District Levy.</p> |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | <p>This approach makes customer engagement much simpler for the general public as there will be only a single point of contact.</p> <p>It should be easy to introduce, manage and improve the franchised services and to quickly learn and implement any lessons as franchised operations are introduced.</p> |
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | <p>Although working to an extremely tight programme, the approach to the transition and implementation of the proposed Franchising Scheme is sensible and would seem to minimise any problems and issues which may possibly arise.</p> |

| | |
|---|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | The approach to the implementation and management of the partnership options is sensible and would seem to minimise any problems and issues which may possibly arise. |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | <p>The Proposed Franchising Scheme would appear to increase passenger numbers in comparison with the do-minimum option but the number of passengers still declines over the period being looked at without any other significant interventions as set out earlier in the document under “Phase 2 Interventions”.</p> <p>In the Tameside area any changes to cross boundary services could have significant impact within Tameside for those services which cross into Derbyshire to serve Glossop.</p> |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | <p>As with the Proposed Franchising Scheme, the introduction of ‘Phase 2’ Interventions would help to increase patronage.</p> <p>A number of these ‘Phase 2 ‘ Interventions, such as bus priority measures are implemented by the local highway authorities ie Tameside, and are not dependent upon the implementation Bus Franchising, so could be implemented whatever of the options are chosen, dependent upon the availability of funding.</p> |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | Tameside have no comment on this issue |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | Tameside have no comment on this issue |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |

| | |
|--|--|
| Q39b If so, please explain what you think those positive or negative impacts would be. | Not applicable |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Tameside have no comment on this issue |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | As set out in this section the implementation of the 'Phase 2' interventions is important to maximise the benefits to wider society, such as improving economic growth and environmental benefits. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Tameside have no comment on this issue |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | For the full benefits for any of the options discussed can only be obtained through the implementation of the 'Phase 2' Interventions. It is suggested that the issue of securing suitable premises for smaller franchise operators in order to encourage them to the market may prove difficult especially for those new to the area |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | Tameside have no comment on this issue |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | Tameside fully support the introduction of the proposed bus franchising initiative |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | It is suggested that there is an examination of individual route provision as part of the franchising process especially those to outlying areas, operate at weekend and evenings and to examine gaps in the current provision |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | No further comment |

| | |
|---|--|
| Organisation Name | Trafford Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | <p>Trafford Council supports the proposal for the Franchising Scheme to apply to the entirety of Greater Manchester. This will ensure a coordinated and consistent bus network across the City Region, and will help to make bus a more attractive sustainable travel mode.</p> <p>Although the franchising scheme applies to Greater Manchester, it is essential that there is coordination with bus routes which cross the GM boundary. This would include bus services between Trafford and Warrington Borough and services between Trafford and Cheshire East Borough. A coordinated approach will improve the connectivity of the network and assist in increasing bus patronage. Where possible, opportunities for integrated ticketing with these services should also be explored.</p> <p>In addition, there is a further opportunity to integrate bus fares across a range of different public transport modes such as Metrolink and rail. This would enable passengers to easily interchange between different modes, improving the usability and attractiveness of the network and developing a proper integrated transport system. The Proposed Franchising Scheme should have a clear objective to increase bus usage across GM through the changes proposed and this should be monitored and reported.</p> |

| | |
|--|--|
| Q3 Do you have any comments on the local services that are proposed to be franchised? | <p>Trafford Council supports the local services which are proposed to be franchised. It is understood that the only routes which will be excluded from franchising are those which are exclusively school services, any services which provide transport for pupils to and/or from schools as well as to the general public will be included in the franchise scheme.</p> <p>In terms of school transport GMCA needs to consider how future routes to/from school will be planned and whether new routes will also form part of the franchising scheme. Trafford Council considers that there is a significant opportunity to improve sustainable transport modes to schools, which will help to reduce the number of private car trips to/from schools. This would assist in easing congestion on the wider highway network as well as improving air quality.</p> |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | <p>Trafford Council supports the phased approach of implementing the Scheme by sub-area. The majority of Trafford is in Sub Area C, although an area in the north of the borough around Trafford Park is in Sub Area A. It will be important that appropriate transitional arrangements are in place to manage connections between the sub areas and ensure there is no worsening of bus service provision during this period.</p> |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | <p>According to the list of excepted services in Appendix 4, the services relevant to Trafford ‘Wythenshawe – Sale-Stretford – Eccles’ and ‘Failsworth – NMGH – Salford – intu Trafford Centre’ will be temporarily excepted from regulation under the Scheme during the transition period. The Council requests clarity on the reasons for why these services are to be temporarily excepted and assurance that any disruption to the service would be minimised.</p> |

| | |
|--|--|
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | <p>Trafford Council has no specific comments on the date for the Proposed Franchising Scheme to be made and recognises that a phased approach is prudent in light of the scale of the Proposed Franchising Scheme. However, consideration must be given to the significant scale of new housing and employment development which is expected to be delivered by March 2023, when the proposed Franchising Scheme will be fully in place.</p> <p>This new development is likely to generate a need for new bus routes and increased frequencies of existing services. In particular, the draft Greater Manchester Spatial Framework (GMSF) proposes sites for significant new housing and employment development, both within the existing urban area and on sites which are currently on the edge of the urban area; these will need to form part of the planning of any future bus network. Trafford has identified two large development sites at New Carrington and Timperley Wedge (a total of 8,500 dwellings and 470,000 sqm of employment floorspace), as well as significant housing and employment growth in the urban area. The timing of the franchise contracts should therefore have regard to the housing and employment growth across Greater Manchester in terms of the likely increase in demand for bus transport, both in terms of the frequency of the services as well as new routes.</p> |
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | <p>Trafford Council recognises the complexity of implementing the Proposed Franchising Scheme.</p> |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | <p>Trafford Council recognises the complexity of implementing the Proposed Franchising Scheme.</p> |

| | |
|--|---|
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>Trafford Council supports the proposals set out in the consultation document in terms of consultation arrangements with organisations representing bus users. This engagement will be important in gauging the success of the Proposed Franchising Scheme.</p> <p>Consideration should also be given to engaging with a wider bus passenger audience on the Proposed Franchising Scheme. This could assist in identifying the key priorities for passengers in terms of investment in the bus network once a franchising scheme is in place. Consideration should also be given to consulting with non-bus users to determine the issues as to why the bus network is not used and to try and address those issues to encourage increased useage.</p> <p>Trafford Council would wish to support the GMCA/TfGM in the consultation process.</p> |
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>Trafford Council supports the opportunity for small and medium operators to access the Proposed Franchising Scheme.</p> |
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>Trafford Council supports the GMCA position on the provision of depot facilities. However, in identifying locations for new depots full regard must be had to the wider impact of a depot facility on the local area in terms of local traffic levels, air quality, noise disturbance etc. In addition, GMCA must work with the relevant local authority at the start of the process in identifying potential depot locations.</p> |

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>Trafford Council agrees with the Strategic Case which clearly sets out the challenges facing the bus market in Greater Manchester and the current, as well as projected, decline in bus patronage.</p> <p>In Trafford there are a number of areas which are currently poorly served by bus in terms of available routes and the frequency of bus services. These include:</p> <ul style="list-style-type: none"> • Partington - currently an infrequent bus service, with particularly limited options in the evening. There are no alternative public transport modes available, meaning that for many the only viable option is private car travel. • Sale West – currently poor, infrequent bus service. The main bus route along Firs Way is perceived to be somewhat disconnected from the residential area. • Partington and Sale West have high levels of deprivation and the current bus services are not adequately supporting access to jobs for local people. • Rural areas of Carrington, Warburton and Dunham Massey have limited and infrequent bus services. <p>Trafford Council would expect the Proposed Franchising Scheme takes these issues into account and GMCA/TfGM works with the Council and local community to implement a fit for purpose bus network to meet local need.</p> <p>In addition, road congestion is a particular issue in some areas of Trafford, such as the A56, which can impact on the reliability and journey times associated with travelling by bus.</p> |
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> <p>Cont...</p> | <p>Route options could also be improved in Trafford and the wider city region, particularly in relation to radial routes around the regional centre which are currently limited. In some cases it is necessary to travel via the regional centre in order to access destinations east/west of Trafford, this is not an attractive journey option and adds considerable time delay and costs to a bus journey. Trafford Council supports the need for more radial routes around Greater Manchester rather than the current hub and spoke model of going through Manchester City Centre.</p> <p>The provision of new routes with higher frequency bus services will help to address many of the issues outlined above. The Proposed Franchising Scheme needs to use the opportunity to deliver a proper integrated bus network with other sustainable travel modes such as Metrolink, which if integrated ticketing can also be provided, may encourage more sustainable multi-modal trips.</p> |

| | |
|--|--|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Trafford Council fully agrees with the conclusion that reforming the bus market is needed in Greater Manchester to make it fit for purpose for the future. This will help to address the current challenges of declining bus passengers, road congestion, increasing fares, a lack of co-ordination of public transport networks and complex ticketing arrangements. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | Trafford Council supports GMCA's objectives for the future provision of bus services. The achievement of these objectives will make bus travel more attractive by providing a more accessible and integrated network. The achievement of the objectives will also help meet social and economic needs by better connecting people to services and employment. This is of particular important to Trafford Council for areas such as Partington, Sale West and rural parts of the borough where connectivity is poor and local residents are disadvantaged by the current service provision. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | <p>Trafford Council agrees with the assessment in the consultation document of how the Proposed Franchising Scheme might contribute towards GMCA's objectives for bus services.</p> <p>The Proposed Franchising Scheme will improve efficiency of the network, simplify fares, improve the customer experience and provide better value for money.</p> <p>Trafford Council believes that the Proposed Franchising Scheme should be used as a mechanism to address clean air and particulates through requiring the move to higher environmental standards for buses including electric powered vehicles.</p> |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Trafford Council believes the Proposed Franchising Scheme is the preferred option. |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>Trafford Council supports the Economic Case for the Proposed Franchising Scheme.</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Trafford Council supports the split between large franchises and small franchises to support small and medium sized operators.</p> |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Trafford Council defers to the analysis detailed in the Assessment.</p> |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Trafford Council defers to the analysis detailed in the Assessment.</p> |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | <p>Trafford Council defers to the analysis detailed in the Assessment and the need to support employees through TUPE arrangements where applicable.</p> |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>See response to Question 11.</p> |

| | |
|--|---|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | Trafford Council defers to the GMCA position in terms of the commercial case for the bus fleet but would reiterate that the Proposed Franchising Scheme provides a unique opportunity to address clean air/particulates issues through using higher environmental standards for buses including electric powered vehicles. The proposal for GMCA to specify emissions standards of vehicles and use of electric power is supported. This will help to reduce air pollution and will contribute towards the implementation of the Greater Manchester Clean Air Plan, improving air quality |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>Trafford Council supports the approach to Intelligent Transport Systems. An integrated system will help to improve the passenger experience by providing a more reliable network as well as integrated, consistent ticketing. This will provide an improved passenger experience and make the bus network a more attractive sustainable travel mode.</p> <p>The Intelligent Transport System could also be utilised in terms of providing real time information to passengers. This could be provided through digital information screens at bus stops, or potentially through a mobile phone app.</p> |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | Trafford Council defers to the analysis detailed in the Assessment and is pleased that the approach has been shaped with operators. |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | Trafford Council considers the continued operation of cross-boundary bus services to be essential. This will ensure continued links between Greater Manchester and neighbouring districts. GMCA working with neighbouring authorities and cross-boundary operators to put in place new ticketing arrangements is supported and opportunities should be sought to integrate ticketing with cross boundary services. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | Trafford Council agrees with the conclusion. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | Trafford Council defers to the analysis detailed in the Assessment. |

| | |
|---|---|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | Trafford Council defers to the analysis detailed in the Assessment. |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Trafford Council defers to the analysis detailed in the Assessment but seeks clarity on the proposed one-off increase in the statutory contribution in 2020/21 of £17.8m and how this would be allocated and funded by each Greater Manchester local authority. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | See above. |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | Trafford Council defers to the analysis detailed in the Assessment. |

| | |
|--|---|
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | <p>Trafford Council agrees with the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA.</p> <p>In the franchising transition period bus journeys between Area A and Area C will be particularly relevant to people who live and/or work in Trafford. Where possible, short-term complexity in terms of fares and ticketing should be minimised and a requirement for customers to purchase additional tickets when travelling between franchised and non-franchised areas should be avoided.</p> <p>Trafford Council welcomes the identification of commercial arrangements to protect routes/services if a current operator reduces services or entirely exits the market during the transition period. The priority should be to keep disruption to passengers to a minimum.</p> <p>Although the franchising transition period is referred to as ‘short-term’, it would span from 2020 -2023. Areas of Trafford would be directly affected in 2021 as part of Sub-Area A and 2023 as part of Sub-Area C. Any permanent disruption during this period should be avoided, this will help to minimise disruption to current passengers who may change their travel behaviours to avoid the network in the event that bus travel is made more difficult/complex during the transition period.</p> |
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | <p>Trafford Council believes that TfGM would be able to manage and implement partnerships on behalf of GMCA.</p> |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | <p>Trafford Council agrees that the Proposed Franchising Scheme would have the positive impacts on passengers through improvements to the network, reduced fares, simplified and interoperable tickets, and improved customer service.</p> |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | <p>Trafford Council supports in principle the Proposed Franchising Scheme model.</p> |

| | |
|--|---|
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | Trafford Council defers to the analysis in the Assessment. |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | Trafford Council defers to the analysis in the Assessment. |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Trafford Council defers to the analysis in the Assessment. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | Trafford Council agrees that the Proposed Franchising Model will benefit and have a positive effect on economic growth and environmental considerations such as clean air. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>Trafford Council supports the Proposed Bus Franchising Scheme for GM. The information set out in the consultation documents demonstrates that bus franchising provides the greatest benefits and will have a positive impact on the bus network.</p> <p>However, it must be recognised that the future success of the bus network is dependent on other issues (outside of the bus service operations) being addressed to deliver a successful bus network and to reverse the projected decline of bus passengers. This includes securing new infrastructure which can help improve the reliability of bus services and reduce journey times, such as Priority Bus measures, Bus Rapid Transit (BRT) routes and initiatives to reduce congestion on the highway network.</p> <p>Linkages to new development will also be important and large development schemes could also help to deliver bus infrastructure improvements. Linkages to the Greater Manchester Spatial Framework and individual district Local Plans will therefore be essential in planning and delivering the future bus network.</p> |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |

| | |
|---|--|
| <p>Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?</p> | <p>The Equality Impact Assessment should consider the impacts on people during the phasing in of the Franchising Scheme factoring in the potential loss or reduction of bus services during this time. This could have a significantly negative effect on people, particularly on specific groups.</p> |
| <p>Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?</p> | <p>Strongly support</p> |
| <p>Q45b Why do you say this?</p> | <p>Trafford Council supports the introduction of the Proposed Franchising Scheme for the reasons identified above.</p> <p>The Proposed Franchising Scheme will provide for a wholesale and fundamental improvement to the current deregulated bus system which is not fit for purpose. It will not only support delivery of GM's Transport Strategy 2040, but also Trafford Council's Vision of 'Working together to build the best future for all our communities / everyone.' Under the Vision, the Scheme helps support the Council's Corporate Priorities of:</p> <ul style="list-style-type: none"> • Health and Wellbeing – Trafford has improved health and wellbeing, and reduced health inequalities. • Successful and Thriving Places – Trafford has successful and thriving town centres and communities. • Children and Young People – All children and young people in Trafford will have a fair start. • Greener and connected – Trafford will maximise its green spaces, transport and digital connectivity. <p>A bus network that is controlled by the GMCA can therefore be shaped to better meet local need, increase bus usage and deliver an integrated and effective service.</p> <p>There are a number of areas in Trafford that are currently poorly served by bus in terms of available routes and the frequency of bus services. These include Partington, Sale West and the rural areas of Carrington, Warburton and Dunham Massey. The Proposed Franchising Scheme does provide the mechanism for addressing these issues and to provide services based on social and economic need which is absent from the current deregulated system.</p> <p>Public transport, including the bus network, will be an integral component of delivering sustainable travel options for new development. Trafford will experience significant residential and employment growth under the Greater Manchester Spatial Framework (GMSF), both in relation to the existing urban area and the proposed allocations at New Carrington and Timperley Wedge. This growth will require higher frequency and improved bus services, and new routes to effectively meet this increase in population and employment. By covering GM and linking into GM's strategic plans and priorities, of which each local authority helps to deliver, the Proposed Franchising Scheme will be able to future proof and accommodate for growth which the current deregulated system does not.</p> <p>Trafford Council believes that the Proposed Franchising Scheme will deliver real benefits by fundamentally changing and improving bus services in GM and the borough. The current deregulated system is not fit for</p> |

| | |
|---|--|
| | <p>purpose and is profit not people centred which results in swathes of communities not well served by bus services. The Proposed Franchising Scheme will provide for an integrated bus network that can properly connect to other public transport provision, deliver simplified and unified ticketing and information, improve standards and set a platform for investment to meet current and future need. It will also play a key role in increasing the use of public transport, reducing congestion and improving air quality.</p> |
| <p>Q45b Why do you say this?</p> <p>Cont...</p> | <p>Trafford Council believes that the Proposed Franchising Scheme will deliver real benefits by fundamentally changing and improving bus services in GM and the borough. The current deregulated system is not fit for purpose and is profit not people centred which results in swathes of communities not well served by bus services. The Proposed Franchising Scheme will provide for an integrated bus network that can properly connect to other public transport provision, deliver simplified and unified ticketing and information, improve standards and set a platform for investment to meet current and future need. It will also play a key role in increasing the use of public transport, reducing congestion and improving air quality.</p> |

| | |
|---|--|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|--|
| Organisation Name | Warrington Borough Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Warrington Borough Council would be interested in how the Proposed Franchising Scheme applying to the entirety of GM may impact on neighbouring local authorities. Whilst it is noted that cross boundary services are not in the list of proposed franchised routes (Annex 1) what impact is envisaged on commercial services that enter GM, specifically in terms of a GM only ticketing model? Is this expected to have an impact on said commercial service viability? |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | At the point where initially excepted services, such as cross boundary commercial services, are considered for inclusion it would be essential for the neighbouring Local Transport Authority (LTA) as well as the operator to be consulted on how this could be achieved to minimise adverse impacts on the wider (commercial) network in that LTA. |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Intermediate consultations with neighbouring LTA's and other interested parties during the life of franchise durations, in order to inform subsequent franchise agreements, would be considered of value. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | |
| Q13b Why do you say this? | |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | Warrington Borough Council would welcome the stated objectives to enhance the attractiveness of bus services towards improving their patronage, particularly if the benefits were cascaded / extended to cross boundary services. The proposal to award permits for the delivery of (some) cross-boundary services would benefit from elaboration, in particular how the neighbouring authority may be involved. |

| | |
|--|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|---|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | The plans to enhance the operational fleet in terms of emissions allied to the CAZ is to be commended, care to ensure that such plans do not negatively impact on the availability of, in particular cross boundary, local bus services would be welcomed. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | (By extension to part of the response to Q2 above) Where current commercial cross-boundary services do not go in to Manchester City Centre but extend to other centres, such as Leigh and Altrincham, the value of serving such GM destinations on their commercial viability, as well as the wider social dividend, should be acknowledged. If significant restrictions / requirements were imposed on commercial services that spent only a token proportion of their time in GM this could have region-wide implications on social inclusion and access to services. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|--|--|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|--|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | |
| Q45b Why do you say this? | |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |

| | |
|--|--|
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | This is a Warrington Borough Council officer response to the consultation which has been approved by our Cabinet Member for Highways, Transportation and Public Realm. |

Mr Eamonn Boylan
Chief Executive
Greater Manchester Combined Authority and Transport for Greater
Manchester
Churchgate House
56 Oxford Street
Manchester
M1 6EU

7 January 2020

Dear Mr Boylan

Consultation response - Doing Buses Differently

Thank you for the opportunity to respond to your *Doing Buses Differently* consultation.

Bus travel across both our regions is vital in underpinning our economic, inclusive and green growth objectives. Both of our regions have targets to increase bus patronage including through a much improved passenger experience. As you know we have established a West Yorkshire Bus Alliance and through this we are working with operators on shorter term benefits for passengers. We are very interested in your proposals for franchising and are keen to learn from your experiences in reviewing the options. Thank you for your ongoing offer of working together.

West Yorkshire Combined Authority understands that the preferred approach is to franchise the bus operations across the Greater Manchester geography taking a phased approach across three sub-areas. Ownership of depots would come under Greater Manchester Combined Authority whilst the provision of buses would remain a franchisee's responsibility. Franchising would see services and frequencies determined by Greater Manchester Combined Authority and operated under local service contracts awarded to bus operators by Transport for Greater Manchester, on behalf of Greater Manchester Combined Authority. Circumstances allowing, the first franchise contracts would be awarded in April 2021, with the operation of franchised services commencing in January 2022.

On reviewing the consultation documents, our response focuses on three key areas, which have strategic importance to West Yorkshire, these are:

1. Implications for cross boundary services and ticketing arrangements
2. Operating Standards for Vehicles

3. Transitional arrangements and their implications for West Yorkshire

Implications for Cross Boundary Services and Ticketing Arrangements

We acknowledge that the impact on cross boundary services has been considered. The West Yorkshire Combined Authority has the following cross boundary services, which take customers into Greater Manchester:

- 589 Todmorden – Littleborough Rochdale
- X58 Halifax – Sowerby Bridge – Ripponden- Littleborough- Rochdale
- 84 Huddersfield – Marsden- Oldham- Manchester (Sundays)
- 185 Huddersfield – Marsden- Oldham

West Yorkshire Combined Authority would welcome further conversations with Transport for Greater Manchester on the likely impact that a franchised operation would have on cross-boundary services. As issuing a permit requires a two-stage test, then a level of risk is presented to any service. It would be useful to understand what involvement neighbouring authorities can have in the introduction of a permit scheme, especially in terms of services that are not directly funded by transport authorities. The principles we would look to establish include:

- Ensuring that these cross boundary services are maintained and others are not prevented from being established (Q15 and 26).
- A collaborative approach to marketing and cross boundary ticketing and for the 'GM ticketing add-on' to be considered alongside other existing multi-operator products.
- Greater interoperability to support the overarching transport strategy objectives to enhance connectivity and creating a more integrated public transport system (Q26).

A common Integrated Ticketing System would be a practical step to achieving cross boundary integration of ticketing, for example utilising the Transport for the North approach to fare capping, open data and disruption messaging across the region (Q24). However, if Greater Manchester choose a system that is not compatible regionally or even cross boundary, then this may take collaborative opportunities away (Q26).

Integration of systems and collaborative working for areas, such as real time, where West Yorkshire Combined Authority is already operating on a Yorkshire-wide basis would provide an opportunity for better integration (Q46B).

Equally, adopting national standards, such as TransXchange and SIRI will enable easier communication with neighbouring authorities and non-franchise operators running into the Greater Manchester area. Limiting integration could pose some risks for cross boundary services and integration into the wider regional network. The importance of integrating systems across boundaries

will enable a more integrated network and may impact on the social and economic objectives of the network (Q15 and Q46B).

West Yorkshire Combined Authority would also welcome a further conversation regarding information and marketing. Bus operators in West Yorkshire are increasingly leading on customer marketing and information, therefore, the impact on customers travelling into West Yorkshire needs to be understood (Q26).

Operating Standards for Vehicles

Recent discussions with operators indicate that the manufacturing lead time for new buses is currently nine months. It is likely that increased demand for zero-emission buses could extend the nine-month timescale (Q7 and Q8). The consultation pledges to introduce a zero-emission bus fleet by 2024. It is important to engage operators with the Clean Air Plan in advance of franchising to ensure the fleet commitments are attainable within the given nine-month period between contract award and implementation. The structure of the proposed franchised scheme allows for the implementation of a zero-emission bus fleet to be phased up to 2024. The final phase of franchising will see the introduction of services on Saturday 23rd December 2023. If there is any delay to introducing franchising this may impact on the ability to reach a zero-emission bus fleet by 2024 (Q15 and Q23).

Whilst Greater Manchester Combined Authority can specify fleet standards, funding opportunities need to be available to support the delivery of the Clean Air Plan (Q15 and Q23).

Transitional arrangements and their implications for West Yorkshire

The introduction of franchising may cause short term complexity for customers, especially when travelling across boundaries. This is clearly something that you want to mitigate and so the West Yorkshire Combined Authority would welcome a discussion and agreement to:

- Ensure a clear plan to mitigate and manage this is put in place to minimise disruption; and
- share data and monitor performance, especially during the early days of implementation. This will ensure that impact of franchising on passenger movements, especially cross-boundary movements, can be monitored and responded to where required.

Finally, in the event that the West Yorkshire Combined Authority were to adopt franchising powers, co-operation with Transport for Greater Manchester would be sought to ensure that the abutting franchising and statutory ticketing schemes were complimentary and did not place barriers to the development of further cross boundary travel in the future.

We look forward to hearing how your proposals progress and welcome opportunities to progress our common objective over increasing bus patronage.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'BSM', with a long horizontal line extending from the bottom of the signature.

Ben Still

Managing Director, West Yorkshire Combined Authority

Ben.Still@westyorks-ca.gov.uk

| | |
|--|---|
| Organisation Name | Wigan Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | If the proposed franchising scheme is to be introduced, it should apply to the entirety of Greater Manchester |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | <p>The purpose of the proposed franchising scheme is to secure significant improvements to the local bus service network. While integrated ticketing and fares and possibly an improvement in the quality of buses would provide significant improvements, the opportunity would be somewhat reduced if a strategic review of the local bus service network is not undertaken and an improved network is not implemented at the earliest opportunity.</p> <p>It is hoped that, once the proposed franchising scheme is made, there will be an opportunity to make positive changes to the network and TfGM is asked to engage effectively with Wigan Council on these matters and opportunities, as they affect this borough.</p> |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Wigan is in Sub-Area A, the first area to be subject to franchising. This is welcomed in principle. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | Services that provide transport for pupils to and/or from schools in Greater Manchester which do not serve the general public are excepted from regulation under the proposed franchising scheme. This is an appropriate exemption. |

| | |
|---|--|
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | A decision on the proposed franchising scheme is currently proposed to be made on Friday 6 March 2020, although it is noted that this may change depending on the progress of the consultation and any subsequent decision-making process. The time between the end of the consultation and 6 March is extremely short but if proper consideration can be given to all consultation responses in that time, it is supported. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | Services would become operational nine months from the day the franchise contracts are entered into. These seem to be appropriate timescales, in particular the nine months period for implementation, as long as the time periods are maintained between these dates and the date for making the franchise scheme if there is any delay. However, the middle of Winter is not a good time for a new franchising system to become operational, as the transition could be badly affected by adverse weather conditions, so these timeframes may need to be reviewed. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | <p>It is a requirement of the Act to consult bus users, but no such group or groups exist yet. This will need to be resolved.</p> <p>It is imperative that Wigan Council is engaged on a regular basis on how well the proposed franchising scheme is progressing. Ward Members should also be involved as they will have a good feel for bus service issues within their Wards, a situation replicated throughout GM.</p> |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | There are a number of smaller companies operating bus services in Wigan Borough and it seems entirely appropriate to allow them the opportunity to maintain their businesses, albeit in a significantly different context. It is highly likely that new, higher quality, low emissions buses would need to be purchased and they would need support in making that transition if, indeed, the buses are not in public ownership through the Proposed Franchising Scheme. |

| | |
|--|---|
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>In principle this would seem to be appropriate as the provision of a depot facility within any given service area would need to be a constant and not subject to the vagaries of which company or not was awarded a subsequent franchise. Details of where these would need to be have been provided as part of this consultation, including whether depots would be needed in Wigan Borough.</p> |
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>External factors such as increased car ownership, congestion, the success of Metrolink and the rise of hail and ride services such as Uber have contributed to the decline in bus patronage over many years.</p> <p>The limited nature of competition in the current bus services market has led to increased fares and a lack of integration of fares and services.</p> <p>Reductions in public funding have also led to cuts in non-commercial services that meet social needs, including access to work.</p> <p>Another fundamental issue is congestion on the road network and the delivery of bus priority measures on the road network. This will not be addressed by bus service franchising.</p> <p>However, the introduction of integrated ticketing and services, reduced fares and better-quality buses in the local bus market has the potential to improve bus patronage, and subsequently reduce car ownership and congestion in Greater Manchester.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |
| <p>Q13b Why do you say this?</p> | <p>The Proposed Franchising Scheme has the potential for an integrated ticketing system amongst franchise providers, lower fares for passengers and an integrated strategic network to meet the needs of the people of Wigan Borough.</p> |

| | |
|--|--|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | <p>These objectives are suitably ambitious and a question remains at present as to whether it is feasible to enhance the network, simplify and integrate fares and improve the customer experience whilst ensuring value for money for public investment.</p> |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | <p>On the basis that the existing bus services in Wigan are proposed to be franchised, further information is required on when it is anticipated that the existing network will be changed to improve integration with other services and the rail network, as well as improving access to employment sites.</p> <p>It is anticipated that comprehensive (and real time) information about bus services will be provided, as well as ticketing through a single website and mobile application (an 'app'). Providing up to date route and timetable information to people without access to the internet should also be considered, including real-time information at bus stops.</p> <p>Bus services would be run with a view to being net revenue neutral – not generating a surplus over time but reinvesting any funds available or reducing fares. Therefore, all of the income for the bus services – from fare paying passengers and from taxpayers – would be used to provide the best service possible.</p> |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>Of the three options considered it is noted that the proposed franchising scheme offers significantly the most economic value, but the two partnership options have better cost-benefit ratios as they have significantly lower costs.</p> <p>It is also noted that patronage across the bus network is forecast to continue to decline in all scenarios but far less under the proposed franchising scheme. Furthermore, it is considered that the forecast for the proposed franchising scheme is conservative to avoid overstating the benefits as part of this consultation.</p> |

| | |
|---|--|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | It is not clear how the GMCA intends to monitor operational performance and service quality. This information should be shared with the relevant districts on a regular basis. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | It is imperative that the simple fare structure and integrated ticketing benefits of the proposed franchising scheme is incorporated into cross-boundary services. It is understood that this is what is proposed with a requirement for cross-boundary services to meet minimum service requirements in order to operate within GM. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |

| | |
|---|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | <p>The fare predictions are based on the proposed franchising scheme performing as expected. In the event that patronage is lower than expected, it would be reasonable to assume that a greater proportion of passengers would experience fare increases.</p> <p>However, the relationship of Wigan Council to this, particularly when making key decisions about bus services that affect the people of Wigan Borough is not clear. A key commitment to engaging the councils should be incorporated in the proposed franchising scheme.</p> |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |

| | |
|--|---|
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | In principle the proposed franchising scheme has the potential to benefit every person that lives and works in Wigan Borough. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |
| Q48 Finally, do you have any other comments you want to make? | |



Response from Bus Users to the Greater Manchester Bus Consultation January 2020

The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

Bus patronage is in decline and the withdrawal of operators has not helped that situation. This is happening across the country, however, and is not specific to Manchester so in itself, it does not make the case for franchising. In fact, in areas such as the West Midlands and Sheffield where there are no franchising schemes, there has been a rise in bus patronage.

Disappointingly, the Greater Manchester scheme includes no aim to increase passenger or journey numbers and, in fact, specifically states that this will not be addressed by the project. This seems a wasted opportunity which would not justify the enormous expenditure that has been incurred to date and is planned to continue.

The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

The challenges facing the local bus market, as elsewhere in the country, seem largely to be as a result of traffic congestion and a lack of priority and infrastructure for buses and bus passengers. The proposals do not address these issues in any way, other than providing bus depots, but refer to 'other initiatives' which are not spelled out. Without these problems tackled head on, no new scheme will make bus travel more efficient or attractive, nor will it make interchanges between different modes of travel simpler, and the whole network more accessible.

There are a number of suppositions and suggestions underpinning the proposals which have not been challenged, some of which are below:

Only a franchising scheme can provide multi-operator ticketing. This is untrue. The recent strategy document of the operator group, CPT, promises contactless, multi-operator, price-capped ticketing by 2022 in all urban areas, which would bring this in far more quickly than the proposal suggests would be the case for a franchising scheme. Indeed, there are already multi-operator tickets available within the Greater Manchester area, although these are not as convenient as they could become.

Franchising would remove the profit from private operators. This is also untrue. No private bus operator will bid for a contract under any scheme if there is no profit margin. The only way to have a profit-free network would be to introduce a municipal bus company, an option which is no longer available in England, following the Bus Services Act 2017.

Fares would be more affordable under a franchising scheme. The proposal suggests that fare prices would rise by the rate of inflation plus 1.4% per annum. Given that the Government's projected rate of inflation is around 3% for the next couple of years, that would result in substantial rises in fares across the network. This RPI increase would likely be reflected in price rises by private operators if no scheme was introduced, but history suggests that fare rises are carefully managed by bus operators to avoid losing ridership. In London - the model that most franchise supporters look to as exemplary - bus fare prices have been frozen for several years to keep people riding, and yet the network still has a major deficit which is borne by the local taxpayer.

There is scant attention paid to the environmental/air quality implications of the plan. Without the kinds of initiatives planned by York and Bristol, or an Ultra-Low Emission Zone or Congestion Charging aimed at removing or reducing private cars from the centre(s), substantial modal shift from cars to public transport will not be feasible in the short or medium term.

In addition, investment in vehicles to keep the fleet green will be substantial and ongoing and this is glossed over in the plan. Again, CPT members have already committed to buy only ultra-low and zero emission buses from 2025 and the scheme adopted in Greater Manchester would need to set aside funds to do the same. As each vehicle costs around £300k, this is no small commitment.

There are allusions to a Phase 2 which would address some of these issues, but there is no timescale for this, nor is there any mention of budget being set aside. The franchises will not be fully operational until 2024 assuming, of course, that everything goes completely to plan, on time, and on budget. There will be two opportunities for the public to voice their views in mayoral elections in that time, so there is a risk that the vision of the current Mayor could be overturned before the scheme fully comes to fruition. If an Enhanced Partnership were to be chosen, there would be 2-3 years of planned improvements to show for a much lower investment.

The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- offer a 'high' ratio of benefit to the cost to GMCA, one which is broadly comparable with the partnership options,
- provide the most economic value (Net Present Value), and
- create the best platform from which further economic value could be delivered.

Do you have any comments on this?

The economic case is not comprehensible for the average reader. The economic case as provided is using a basis which, while accepted by economists and academics, is not intuitive or 'real world' and is therefore unhelpful for the purpose of consultation with the public.

What is clear is that there would be substantial costs associated with developing this scheme and the outcomes would provide limited benefits. Given that local government has had enormous cuts in income over the past decade, a large increase in expenditure for no apparent increase in passenger numbers seems imprudent.

There is also no exit plan outlined as to what will happen if the proposed scheme is not successful, nor is there any suggestion of how routes will be procured if bids are not forthcoming on sections of the network. There is therefore a risk that more funds would be required to subsidise more services, which is not included in the economic cases.

Clearly a lot of new jobs would be created within the local authority which could have some benefit to the city, but it is likely that many of those would be filled by people currently working for private operators so there may be a much smaller net benefit. Their futures would also need to be considered in any exit plan.

The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

There is a suggestion in the proposal that a one-off tax may need to be levied to introduce the scheme. However, there seems to be no mention that this is likely to be ongoing, which seems disingenuous. The amount of reinvestment required on an ongoing basis to keep vehicles and maintenance skills up-to-date will easily swallow up any surplus made, as London's experience can show, and a London-style precept for taxpayers to keep buses running may not be popular.

Just because a plan can be developed to make the scheme affordable does not mean it should go ahead when there are viable and prudent alternatives which would provide the same benefits without the same strain on the public purse and the unnecessary risk involved.

Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

The Assessment seems to have started with the aim of finding the benefits of the franchise proposal rather than being a forensic analysis of each option (and any others operating elsewhere).

The timeline to implementation of a franchising scheme seems excessively long, in comparison to other options.

The scheme is intended to be introduced in phases across the network over a period of many years. This seems set to cause immense confusion and disruption to the travelling public, as they attempt to understand whether their new, multi-operator ticket covers their whole journey, or if they need several to complete their planned journeys.

Looking at Enhanced Partnership Schemes elsewhere, it would appear that all the required benefits could be achieved by that model without the same risks, and still allowing for local authority control of the network. It would also allow for the aim of increasing bus ridership to be included and addressed strategically.

The 'Ambitious Partnership' outlined in this proposal does not seem ambitious at all, in our view. We would recommend to you the model developed in the West Midlands, which has similar aims over a wide area with different authorities needing to work together. This model allows all the issues which could cause friction to be discussed and agreed before the Scheme is published. It also ensures that passenger concerns are part of the planning process, rather than an afterthought.

A far more ambitious Enhanced Partnership Scheme could be up and running within 18 months in Greater Manchester, as most of the discussions have already been held. The benefits that could accrue from such a scheme would allow the funds set aside for franchising to be used to subsidise additional services and infrastructure to make buses the fastest, cleanest and most accessible way of travelling around Greater Manchester.

We were particularly concerned to note that accessibility issues do not seem to have taken any central role in the scheme. Buses are of critical importance to many people with disabilities and to those with limited means. The scheme could include measures to support travel training, companion passes, free travel for apprentices and a host of other options which would make the bus a real option for many people who are currently experiencing barriers to travel.

To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

Our aim is to see the best outcomes for passengers - the people we represent. This is the first time their views have been given an opportunity to be put forward, but the process has a flavour of being *a fait accompli*.

We applaud any consultation process, but we would prefer a consultation at a much earlier stage in the planning before the preferred option has already been approved by the various authorities and a budget set. By consulting at this late stage, it feels rather like a tick-box exercise which can have no real impact.

The proposed franchised scheme should produce some limited benefits for passengers but these could have been so much greater if meaningful consultation had been done at an earlier stage. Focusing on unified branding but not on customer service, does seem to be targeting the wrong outcomes.

We know that passengers want frequency, reliability, punctuality, affordability, accessibility, ease of information and ticketing, and excellent customer service. These schemes will not provide many of these as the focus simply does not appear to be on the needs of passengers.

Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

A detailed passenger and potential passenger consultation to identify the specific needs of local people.

Ongoing involvement of passenger representatives.

A detailed plan for how the congestion and air quality issues are to be addressed

A detailed plan for increasing public transport numbers and reducing private car use in urban centres across the GM region.

If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

Bus Users simply wants the best services possible, based on what passengers tell us. Passengers generally neither know nor care what the ownership and control structures are, as long as they get the services they need. We would support a scheme that provides a rounded picture of improvement for all those who need or want to use a bus.

Finally, do you have any other comments you want to make?

We have said, from the outset, that we would welcome the chance to use our knowledge and understanding of bus passengers, to make this the best possible scheme for the people of Greater Manchester.

To follow up or to ask further questions, please contact:

Claire Walters, Chief Executive, Bus Users
claire.walters@bususers.org

Bus Users UK
Victoria Charity Centre
11 Belgrave Road
London SW1V 1RB

Tel: 03000 111 0001
enquiries@bususers.org
www.bususers.org

Peak District National Park Authority

Tel: 01629 816200

E-mail: customer.service@peakdistrict.gov.uk

Web: www.peakdistrict.gov.uk

Aldern House . Baslow Road . Bakewell . Derbyshire . DE45 1AE



Eamonn Boylan
Chief Executive
Greater Manchester Combined Authority
and Transport for Greater Manchester
Churchgate House
56 Oxford Street
Manchester
M1 6EU

Your ref:

Our ref: TN/A88

Date: 8th January 2020

Dear Mr Boylan

Re: Doing buses differently – Consultation on a Proposed Franchising Scheme for Greater Manchester

Thank you for your letter of October 2019 addressed to Sarah Fowler, the Chief Executive of the Peak District National Park Authority, regarding the Consultation on a Proposed Franchising Scheme for Greater Manchester.

The Peak District National Park Authority is grateful for the opportunity provided by Greater Manchester Combined Authority to be able to provide comment on the Proposed Franchising Scheme.

This response to the consultation is comprised of two parts; the first of these provides some background on the Peak District National Park and its relationship to Greater Manchester. The second part of the response provides comment on the proposed scheme.

The Peak District National Park Authority's response to the Consultation on a Proposed Franchising Scheme for Greater Manchester forms an appendix to this letter. If you require any further information about any of the points raised within this response, then please contact me directly.

Yours sincerely

Tim Nicholson
Transport Policy Planner

Member of National Parks UK

Holder of Council of Europe Diploma



Chief Executive: Sarah Fowler
Chair: Andrew McCloy Deputy Chair: David Chapman
Working together for the Peak District National Park:

• To speak up for and care for the Peak District National Park for all to enjoy forever •

Information we hold may be disclosed under the Freedom of Information Act and the Environmental Information Regulations. Our Privacy Notice tells you about how we use, manage and store your personal information in line with the General Data Protection Regulation and DPA 2018. The Notice is published on our website or you can obtain a copy on request

Doing buses differently – Consultation on a Proposed Franchising Scheme for Greater Manchester – A response on behalf of the Peak District National Park Authority

1) Background information on the Peak District National Park and it's aspirations for public transport

The Peak District National Park was designated in 1951 and is the oldest of the British National Parks. The Peak District National Park Authority has two statutory purposes as set out in the National Parks and Access to the Countryside Act (1949) and restated within Section 61 of the Environment Act (1995). These purposes are: -

- i) To conserve and enhance the natural beauty, wildlife and cultural heritage of the national park, and
- ii) To promote opportunities for the understanding and enjoyment of the special qualities of the national park.

The two purposes have equal weight, except in cases where there is conflict between them. Should this occur, then the Act directs National Park Authorities to give priority to the first purpose. Section 62 of the Environment Act (1995) also places a statutory duty on national park authorities that they should seek to foster the economic and social well-being of communities within the national park in pursuance of National Park purposes.

In addition to the purposes and duty of national park authorities, Section 62 of the Act places a statutory duty on other relevant authorities to have regard to national park purposes. Part of the National Park falls within the Oldham Metropolitan Borough boundary. The National Park also shares a boundary with both Stockport and Tameside. Therefore, Greater Manchester Combined Authority is a relevant authority in relation to this statutory Duty.

The Peak District National Park is located in the centre of England. It contains land that falls within nine constituent borough, district or city council boundaries. Irrespective of other local authority boundaries, the Peak District National Park Authority is the Planning Authority for all land contained within the National Park.

In terms of responsibility, Greater Manchester Combined Authority is the transport authority for that part of the National Park that falls within the Oldham Metropolitan Borough Council boundary. Five other transport authorities share responsibility for public transport to, from and within the National Park.

Just over 3,000 hectares of the National Park lies within the Greater Manchester Combined Authority boundary (approximately 2% of the total area of the National Park). Conversely, more than one-fifth of the area of Oldham (22%) lies within the Peak District National Park boundary.

Visitor origins

The Peak District National Park is one of the most visited of the United Kingdom's National Parks, with approximately 13 million visits lasting three hours or more per annum. However, it has been estimated that there are an equal number of visits to the National Park of less than three hours duration. The Peak District National Park attracts visitors from across the United Kingdom. However, the Park's position at the heart of England and surrounded by conurbations means that it is easily accessible to a large local catchment. Based on the

2011 Census, approximately 16 million people live within a one-hour drive of the National Park's boundary.

The National Park Authority undertakes visitor surveys in relation to its second statutory purpose. It also gathers visitor information to inform policy development. In 2016, a series of Recreation Hub Visitor Surveys were undertaken at key locations for visitors across the National Park. These surveys focussed on locations used for recreational visits. The purpose of the surveys was to inform the development of a Recreation Hubs Supplementary Planning Document. The information collected, included home postcode, length of stay, activities undertaken and mode of travel.

The surveys offer a qualitative snapshot of use of particular recreation sites and do not necessarily provide a statistically accurate representation of the geographic visitor profile of the National Park. However, interview subjects were selected at random, and the figures are suggestive of a high proportion of visits to the National Park from residents of Greater Manchester (16% of the total number of survey participants); particularly Tameside, Stockport and the City of Manchester.

There were four locations where the proportion of survey participants from Greater Manchester numbered more than 20%. These were Dovestone (78%), Goyt Valley (23%), Longdendale (42%) and Macclesfield Forest (24%). At both Dovestone and Longdendale, the majority of those interviewed were from Greater Manchester. Of these four locations, none is directly accessible by public transport.

The local National Park

For residents of Greater Manchester, particularly Oldham, Stockport and Tameside, the Peak District is their local National Park. Close proximity to a National Park is known to attract students and new businesses to the area. The Peak District offers a range of activities to residents of Greater Manchester that enhances their health and well-being. Physical activities such as walking, cycling and climbing are proven to improve cardiovascular health. Whereas interaction with nature is known to enhance well-being, relieving stress and anxiety.

The ease of access to the National Park means that residents of Greater Manchester have a local outlet for outdoor enjoyment, within one of the nation's most spectacular landscapes. By contrast, Greater Manchester offers a range of employment opportunities and access to jobs and services for a large proportion of the National Park's population.

Economic value of the visitor economy

The Peak District National Park has seen an increase in the value of its visitor economy over recent years of approximately 42% between 2009 and 2017. This has equated to a 12% increase in real terms, when linked to inflation. Overall, the economic value of tourism to the Peak District National Park area is approximately £644 million per annum of direct and indirect spend.

Visitor surveys undertaken by the National Park Authority provide snapshot insights to visitor spend across a range of categories, and in relation to visits to specific areas. Data from the Recreation Hub Visitor Surveys (2016) indicated that those interviewed spent an average of £37 per person as part of their visit. However, opportunities to spend at each location were variable. Some sites included cycle hire facilities, cafés and pay & display car parks. Other locations were more low-key with free parking, fewer facilities and limited opportunities to spend money. For those sites listed above where interview respondents from Greater

Manchester comprised 20% or more of the sample, the average spend as part of the day out varied between £2 (Dovestone) and £31 (Goyt Valley).

Modes of transport

The close proximity of the National Park to surrounding urban areas means that it is very popular with day visitors in particular. The majority of day visitors arrive by private car or van. The Peak District National Park Visitor Survey 2014/15 found that 83% of respondents had arrived at the place of their interview by private car. In the case of the Recreation Hub Visitor Surveys (2016), 81% of all those interviewed arrived at the location where they were interviewed by private car, whilst only 2.1% arrived by service bus.

Over recent years, there has been a decline in the number of bus services providing access to and from the National Park, particularly at weekends. The budgetary incentives behind the reduction in local authority subsidised bus services is understood. However, it does mean that many of the more popular visitor destinations within the National Park currently have either limited or no public transport access to them.

Visitor pressure

The popularity of the National Park means that for most summer weekends and on sunny, dry weekend days throughout the year, the number of visitors outstrips capacity at the most popular destinations. Whilst the number of individual visitors may detract from the overall experience in some locations, in most cases it is the number of cars that is the biggest problem. When parking capacity is met, the temptation is for drivers to look for alternative places to park, rather than travelling to a less busy destination; Dovestone is one such location. This can lead to damage to roadside verges, obstruction of footways and gateways, and in the worst cases dangerous conditions for other road users and pedestrians. There are some locations within the National Park, where parking constitutes a civil or legal offence. It is not unusual for parking to overspill into these areas on busy weekend days.

The high levels of visitor pressure are not exclusive to those locations that do not have good public transport connections. However, the lack of availability of public transport reduces the opportunity for visitors to access some busy locations other than by private car or van.

The benefits of delivering additional public transport access from the Greater Manchester to popular visitor destinations within the Peak District

It is acknowledged that for many visitors to the Peak District from Greater Manchester, the private car offers the only convenient means of accessing the National Park. In other cases, the car may be preferred where alternative options already exist. For example, the Hope Valley is already well linked to Manchester by rail. Even so, the car parks of popular destinations such as Hathersage, Castleton and Edale are often full to capacity on summer weekend days. However, for some locations, the lack of an alternative means of transport to the private car either wholly restricts access or does not allow modal choice for visitors.

For the National Park and its resident's, visitor destinations that are mainly or wholly car based bring issues associated with concentrations of traffic such as of airborne pollution, noise pollution and severance. In some cases, the levels of traffic and or inappropriate parking restrict access for landowners and emergency vehicles. For the visitors themselves, the lengthy queues of traffic and the difficulties in parking at some locations, can turn what should be a pleasant day out into a stressful experience.

Where public transport offers an alternative means of access, it can reduce the pressure at busy locations by freeing up both road and parking capacity, with subsequent benefits to both visitors to, and residents of the National Park.

For Greater Manchester, there are other benefits associated with providing additional bus services to access the National Park. One of the main benefits is providing a means of visiting the National Park and enjoying its health and well-being benefits, for those residents of Greater Manchester who do not have access to a car or alternative means of transport. These can include the elderly or infirm, or those on low incomes. In these cases, the savings resulting from the health benefits of outdoor recreation may outweigh the cost of providing the bus service to access them.

It should also be recognised, that bus services providing visitor access to the National Park also provides access for National Park residents to travel to the regional centres of Greater Manchester. These residents rely on Greater Manchester to access jobs and services. They are often dependent on the private car to do so. The approach overall could help to reduce the number of vehicles driving into already congested urban areas.

Perhaps of greater importance is the opportunity to encourage car-using residents of Greater Manchester to try out the alternatives to visit the National Park, and indeed elsewhere in their day-to-day lives. The impact of tailpipe emissions on public health is well documented, particularly in the case of the young, the elderly, and those with existing health conditions.

When visitors to the National Park from Greater Manchester drive into the Peak District, a proportion of that journey is made within existing Air Quality Management Areas. Encouraging modal shift could reduce the impact of these journeys on air quality within Greater Manchester, whilst still enabling access to area's local National Park. As described earlier, the potential to encourage public transport journeys into Greater Manchester by National Park residents would also help to reduce tailpipe emissions within those areas with existing air quality issues.

Case studies

Whilst there has been a general decline in bus services aimed at the leisure market over recent years, some have bucked the trend. Two examples of this are provided below as case studies.

218 Peak Line Service – the 218 Peak Line service is operated by TM Travel and provides access to Chatsworth and Bakewell from Sheffield City Centre. The service has been operating under the Peak Line name since 2015. The service comprised the consolidation of two previously underperforming services, and was initially part-funded by local authority subsidy. In the subsequent years, the service has become commercial, and has proved very popular with students from the Sheffield Universities for visits to Chatsworth and the wider area.

Hope Valley Explorer – a new seasonal visitor service operated by Stagecoach South Yorkshire. The Hope Valley Explorer ran for 42 consecutive days during the 2019 school summer holidays. This is a hop-on, hop-off service linking Edale, Castleton, the Hope Valley and the Upper Derwent Valley, calling at Hope Valley rail stations. Initial feeder journeys provide access from Chesterfield and Dronfield. The service incorporates an on-board commentary at key points, and users of the service had opportunities to access promotional discounts at a cycle hire centre and café along the route.

Stagecoach successfully tendered for the service, with the Peak District National Park Authority providing a kick-start subsidy for a three-year contract period, until 2021. The aim is to develop and sustain a visitor 'experience' that offers a unique range of car free opportunities in this highly popular area. During the first season of operation, the service carried approximately 2,500 passengers or the equivalent of 59 passengers per day. The Hope Valley Explorer has been well received by the public, offering learning opportunities for similar leisure bus services in the future. In further developing the Hope Valley Explorer (and any future leisure bus services) the Peak District National Park Authority would welcome the opportunity to work with the Greater Manchester Combined Authority to allow greater sustainable access to the National Park.

Concluding remarks

Over recent years, there has been a decline in the provision of public transport access to popular visitor destinations within the Peak District National Park. This lack of alternative means of transport to access some popular areas has led to issues in managing visitor traffic and parking. Inappropriate parking causes damage to the special qualities of the National Park. It also leads to obstruction, which negatively impacts on amenity, road safety and access for emergency vehicles.

The provision of public transport access can bring positive benefits to the National Park, its residents and visitors. It offers opportunities to the residents of Greater Manchester who do not have access to a car to enjoy the health and well-being benefits of a visit to the National Park.

Whilst benefiting the National Park, additional public transport access would also have a positive effect on air quality within Greater Manchester. This is achieved by encouraging access to and from the National Park and the Greater Manchester to be made by public transport rather the private car. In targeting journeys made by visitors to the National Park and residents of the National Park, there is an opportunity to engage with and influence modal shift by two audiences.

This approach could build on the benefits of encouraging more public transport use in and around Greater Manchester. Familiarity with public transport use for everyday journeys could be extended to leisure travel in the Peak District. However, the converse is also true. When someone tries a new or unfamiliar mode of transport as part of a leisure experience and has an enjoyable time, they may also be predisposed to try out that mode as part of their day-to-day travel. There is a real opportunity to encourage modal shift to public transport for a range of journeys, if the bus services exist and perform reliably.

The National Park Authority believes that there is a market amongst the residents of Greater Manchester for bus travel to and from the Peak District. We also believe that the overall environmental benefits of delivering such services offer value for money when compared to the cost of delivering them.

Our ask is that Greater Manchester Combined Authority invests in providing bus services that enable its residents to access the Peak District National Park in a way that is good for both the National Park and Greater Manchester. We would welcome the opportunity to work with Greater Manchester Combined Authority to identify potential routes and destinations for such services, and to build on the success of services such as the Peak Line and Hope Valley Explorer bus services.

2) Specific comments on the Proposed Franchising Scheme for Greater Manchester

The comments provided within this section relate specifically to the potential benefits or impact of the proposed franchising scheme on the residents of, and the visitors to the Peak District National Park.

Within Greater Manchester

As referenced above, within Section 1, just over 3,000 hectares of the National Park lies within the Greater Manchester Combined Authority boundary (approximately 2% of the total area of the National Park). Conversely, more than one-fifth of the area of Oldham (22%) lies within the Peak District National Park boundary.

The area of the National Park that falls within Oldham is centred on Saddleworth Parish and includes the recreation hub site of Dovestone Reservoir. Dovestone is a very popular destination for residents of Greater Manchester, and particularly those of Tameside and Oldham. The site cannot be accessed directly by public transport, and the findings of the Recreation Hubs Survey undertaken by the Peak District National Park Authority indicated that 95% of visitors arrived by private motor vehicle.

Whilst recognising the constraints of public sector funding, the National Park Authority would welcome consideration by the Greater Manchester Combined Authority in the provision of a weekend bus service providing access to Dovestone. This could be as part of the enhancement of the route network for either a franchised or a partnership approach to delivery. There is an option to market such as service as a visitor experience through working with United Utilities and the RSPB. Such an approach could encourage sustainable access to Dovestone, through a simple extension of the existing service to Greenfield.

Cross-boundary services

The Peak District National Park Authority recognises the desire from the Greater Manchester Combined Authority to provide the best possible public transport service within Greater Manchester area. We also understand the requirement to ensure that any cross-boundary services do not have a negative impact on the financial security of those services operating within the proposed franchised area.

However, we are concerned to ensure that existing cross-boundary services continue to operate effectively. This is particularly important where the loss of such services could generate additional car journeys to and from the National Park; and on cross-Park routes. Such additional journeys would result in negative impacts on the National Park and on communities within the Greater Manchester Combined Authority area. Such impacts include on air quality, noise pollution, road safety and severance. There is also the potential climate change impact of additional car-borne journeys. The National Park Authority supports the commitment from the Greater Manchester Combined Authority to seek ways to ensure that cross-boundary services are maintained if the franchise proposal goes ahead.

As described in Section 1 of this response, the Peak District National Park Authority is keen to encourage sustainable access to the National Park from its surrounding catchment area. At present public transport access from Greater Manchester is quite limited, whilst the desire from Greater Manchester's residents to access the Peak District is high. Many undoubted health benefits can be derived from accessing the National Park. However, car-borne

journeys to access the National Park can result in environmental impacts to the both Greater Manchester and the National Park and its communities. Therefore, we would wish to see the Greater Manchester Combined Authority give some priority to working with its neighbouring transport authorities to support better public transport access to and from Greater Manchester and the Peak District National Park. Such services would benefit the residents of both Greater Manchester and the Peak District National Park.

Ticketing

In the event of the franchising scheme taking place, the Greater Manchester Authority has suggested a forward thinking approach to ticketing across the franchise area, which is supported by the Peak District National Park Authority. However, as with cross-boundary journeys, it is important that the ticketing scheme does not act as a disincentive to cross-boundary travellers. The current fare structure on rail services into the Greater Manchester area leads to rail-heading and unnecessary car journeys being made in order to save money on rail fares and parking. It is important that this is not the case for cross-boundary bus services.

The National Park Authority would welcome an approach whereby the bus offers a competitive option for cross-boundary travel between Greater Manchester and the National Park. The suggested option of add-on ticketing offers a potential means of ensuring that the car is not the first choice of travel for those for which it is available. It is also important that those without an alternative means of transport are not prevented from making journeys by bus solely on the basis of cost.

In summary

The Peak District National Park Authority would welcome the opportunity to work with Greater Manchester Combined Authority and other partners to improve public transport access and marketing between the Peak District National Parks and Greater Manchester.

Stockport UNISON (Local Government) branch welcomes the opportunity to comment on proposals for re-regulation of Greater Manchester's bus service. For information, our branch is one of an increasing number to have appointed, over recent years, an Environmental Officer and we have a team of Environmental Representatives who meet regularly to consider and assist in developing policies and practices with an environmental/social justice focus.

In considering the proposals for GM 'Doing Buses Differently' the following comments are offered:

- The Climate Emergency necessitates that urgent action in respect of cutting carbon emissions arising from travel is needed if catastrophic damage to the planet is to be avoided
- Dangerous and illegal levels of air pollution in our towns and cities are primarily as a result of excess/congested traffic conditions
- The establishment of a fully integrated, effective, efficient, reliable, equitable and 'green' public transport system for Greater Manchester is arguably long overdue.

Taking the above points into account, we believe that far more ambitious targets to resolve the above challenges are required:

- The timescale for rolling out the scheme needs to be far more ambitious;
- The scheme should facilitate a zero-emission (green hydrogen powered) fleet. Merely reducing emissions is not enough. Alternative technologies are available and will be needed to meet GM's 2038 zero carbon target.

Bus travel is recognised as being a critical part of any comprehensive public transport network and the introduction of safe, accessible interchanges between individual bus services and, of course, metrolink and rail services must be a key consideration. The provision of real-time information and measures to improve (actual/perceived) personal safety (more inspectors on routes, CCTV surveillance etc) will be essential in order to gain/improve public confidence in the system.

Additional supporting projects need to be fast-tracked to allow 'quick wins' to be gained and demonstrated. The 'Integrate' project of the late 1990s sought to address the imbalance between bus and car travel, particularly journey times, on a number of corridors in Greater Manchester. Space for buses – which effectively secures much better use of highway space - will need to be made if modal switch (from car to bus) is to be realised. Additional Park & Ride sites alongside main and mini public transport interchanges, bus only lanes/roads and bus priority measures need to be introduced. It will be imperative to ensure that any spare highway capacity arising as a result of modal switch is not immediately taken up by induced/re-routing general traffic and all opportunities to utilise/redistribute highway space to improve conditions for walk and cycle trips (for example MCF/Bee network links) should be closely explored.

In relation to costs and funding, it is noted that Luxembourg is set to become the first country to introduce 'zero – fare' public transport from March 2020, with Germany looking to follow suit. Has this option been considered? We believe it should be. Funding mechanisms should surely include an escalated levy on high emission road vehicles with a frequent flyer tax introduced at Manchester Airport. We note that in respect of the current proposed scheme, the average cost to each GM household may only be around £5 per annum. We believe that with climate change now being realised, and conditions worsening for the most vulnerable communities, public support for speedy, real and radical change has now gained substantial traction. To this end, we believe that the public would willingly pay an additional premium to enable a zero-fare public transport to be realised – provided, of course, that the system was sufficiently safe, efficient and fully integrated. A zero-fare system also has the benefit of reducing dwell time at bus stops caused by passengers purchasing tickets on board.

It is not apparent that any allowance has been made for the financial savings that would accrue to both the public and private purses generally as a result of:

- increased levels of active travel across the region;
- reduced sickness absence as a result of improved fitness (mental and physical);
- reduced costs to the NHS associated with treating illnesses arising from lack of activity or poor air quality.

Opportunities to secure additional funding through company sponsorship should also be explored, particularly amongst the conurbation's larger employers, who would undoubtedly benefit as traffic congestion is reduced by more efficient use of highway space. There may be scope to enable the re-introduction of 'works buses' in some areas if particular services are primarily serving major employment sites.

We would ask that, in determining route coverage, a comprehensive review of all past and present routes is undertaken. The importance of achieving the highest possible level of community and business engagement cannot be under stated. The provision of new or amended routes and services will likely be required in time as public attitudes towards travel, air quality and traffic congestion change further and there is increased public awareness of the links that these have to the Climate Crisis and health. It is essential that the five-year environmental plan for Greater Manchester is further publicised, that the carbon budget figure provided by the Tyndall Centre is further shared and explained to residents and businesses, and that the role that buses must play in allowing us all to move away from the car-centric lifestyles that we have become accustomed to is highlighted. We look forward to seeing a truly green and socially/environmentally just City Region being realised in the near future.

Finally, as trade-unionists, we would stress the importance of protecting jobs, salaries and (divested) pensions and trust that relevant trade unions be provided with seats at the table to enable these issues to be addressed.

Regards

Mary

Mary Clarke
Steward & Environmental Officer
UNISON (Stockport LG Branch)
Affiliated to Friends of the Earth

Doing Buses Differently: Greater Manchester Bus Consultation

Response from Transport Focus

Introduction

Transport Focus is the independent consumer watchdog promoting the interests of bus, coach and tram passengers across England, outside London; rail passengers throughout Great Britain; and users of the Strategic Road Network in England.

This submission specifically responds to the plans for bus franchising in Greater Manchester and is based around the consultation document short questionnaire. This should not be used to infer views on franchising plans or proposals in other areas.

Response to questions

1 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

2 The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

From Transport Focus's perspective the key challenge is whether the proposal reflects the needs and priorities of both existing and potential passengers. The closer that the specifications and targets reflect people's needs, the better the chance that they will deliver the type of services that people want and value and will draw in new users to grow the market.

Transport Focus's research gives good understanding of the expectations and aspirations of transport users against which the proposal can be reviewed.

Bus passenger priorities for improvement

Passengers across the country were asked to rank a series of possible improvements to their bus service in order of priority. As well as getting the rank order of priorities, the research¹ also gives a sense of relativity – in other words how much more, or less, important is one factor compared to another. The table below shows the relative scores for the top 20 aspects of service and their order of importance nationally. From this we can see that value for money, punctuality and frequency are particularly high priorities.

¹ [Bus passengers have their say: Trust, what to improve and using buses more](#). Transport Focus. March 2016

Passengers in Greater Manchester have similar priorities for core service improvements, however there are also differences. Feeling safer at bus stops ranks higher, as do having a more suitable range of tickets and free wi-fi being more widely available.

Top 20 passenger priorities for improvement – overall total and Greater Manchester

| Attribute | Overall index | Overall Priority | GM Index | GM Priority |
|---|---------------|------------------|----------|-------------|
| Better value for money from bus journeys | 258 | 1 | 269 | 1 |
| More buses arriving on time at your bus stop | 247 | 2 | 233 | 2 |
| More journeys on buses running to time | 228 | 3 | 218 | 3 |
| Buses running more often than they do now | 224 | 4 | 205 | 4 |
| More effort made to tackle any anti-social behaviour | 174 | 5 | 197 | 5 |
| Buses going to more places you want to go | 158 | 6 | 153 | 6 |
| More bus stops with next bus displays | 121 | 7 | 117 | 8 |
| Being given more/better information when delays occur on journeys | 110 | 8 | 111 | 10 |
| Cleaner and better maintained buses | 107 | 9 | 107 | 11 |
| Tickets which better allow travel on all local bus companies | 107 | 10 | 111 | 9 |
| Better security at bus stops so people feel safer waiting for buses | 104 | 11 | 121 | 7 |
| Drivers allowing more time for passengers to get to their seats | 103 | 12 | 91 | 12 |
| Better quality information at bus stops | 87 | 13 | 86 | 13 |
| Drivers showing more consideration to passengers | 86 | 14 | 83 | 15 |
| A smoother ride with less sudden braking or jolting | 86 | 15 | 74 | 18 |
| A more suitable range of tickets for how and when you use buses | 78 | 16 | 83 | 14 |
| More buses having next stop announcements/displays | 74 | 17 | 75 | 17 |
| More personal space on buses (whether seated or standing) | 74 | 18 | 71 | 19 |
| Free wi-fi being more widely available | 72 | 19 | 78 | 16 |
| Seats being more comfortable | 69 | 20 | 65 | 21 |

Note that we are updating these priorities for improvement and will be publishing an updated set during early 2020, across:

- Bus passengers
- Non-users
- Young people (aged 14 to 19)

We will be pleased to discuss this updated set with you, once published. Also to provide advice on variations in emphasis that would be advocated by the refreshed picture.

Bus passenger trust

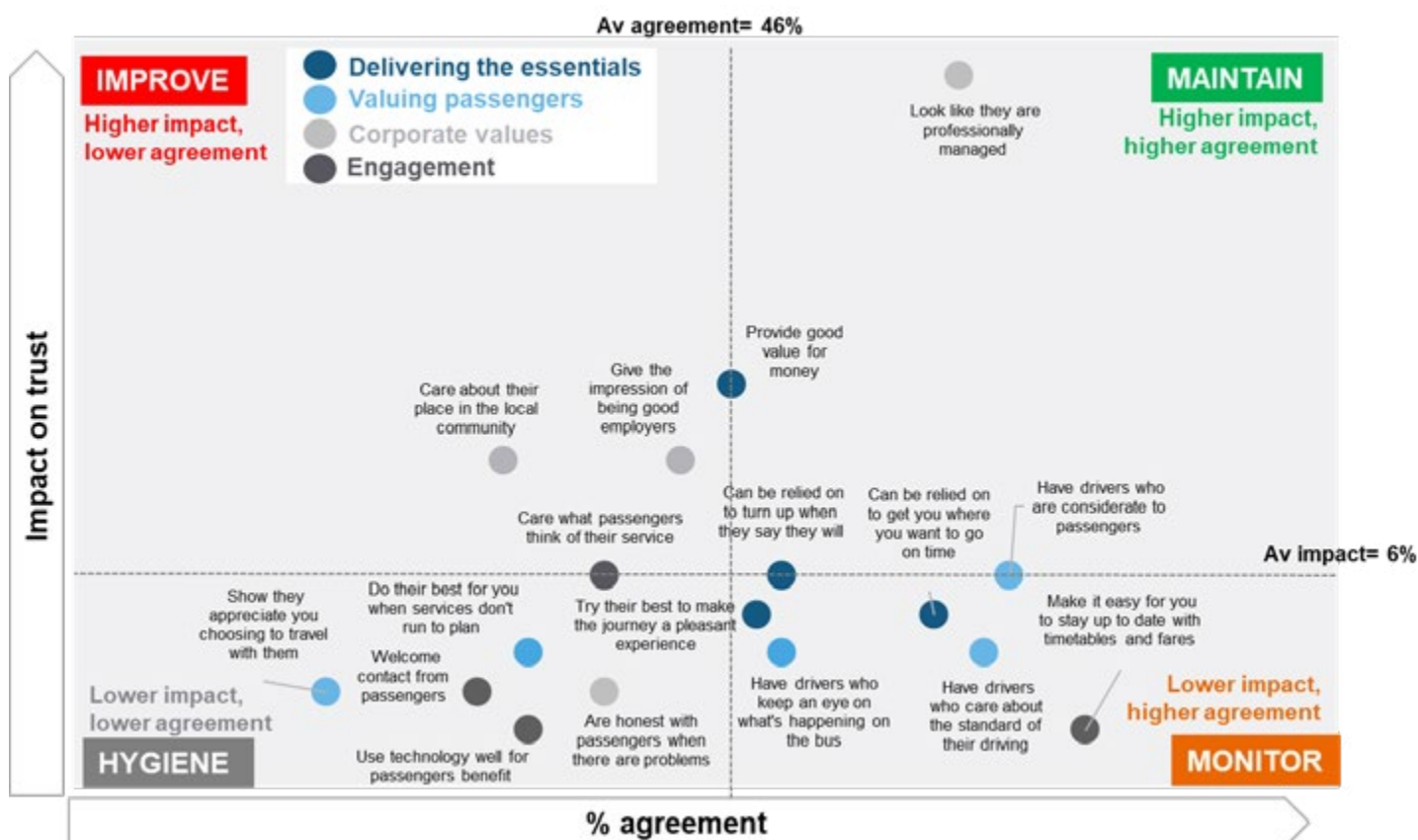
Research² into the levels of trust passengers have with the bus company they mainly use, shows attitudes in Greater Manchester being broadly similar to the overall picture. Overall scores are not particularly high, especially for aspects such as providing value for money, doing the best when things don't run to plan and appreciating passengers. However bus drivers score positively for being considerate. In Greater Manchester, scores are mostly slightly lower. The biggest negative difference is for drivers being considerate and keeping an eye on what's happening. Keeping up to date with timetables and fares has the biggest positive difference.

² See note 1

Levels of passenger trust with the bus company they mainly use

| | Overall | Greater Manchester |
|---|---------|--------------------|
| Delivering the essentials | | |
| Can be relied on to get you where you want to go on time | 56% | 54% |
| Can be relied on to turn up when they say they will | 52% | 48% |
| Try their best to make the journey a pleasant experience | 51% | 47% |
| Provide good value for money | 44% | 46% |
| Identity/ organisation | | |
| Look like they are professionally managed | 57% | 55% |
| Give the impression of being good employers | 42% | 44% |
| Are honest with passengers when there are problems | 44% | 41% |
| Care about their place in the local community | 39% | 37% |
| Valuing passengers | | |
| Have drivers who care about the standard of their driving | 60% | 56% |
| Have drivers who are considerate to passengers | 63% | 57% |
| Have drivers who keep an eye on what's happening on the bus | 56% | 48% |
| Do their best for you when services don't run to plan | 36% | 38% |
| Show they appreciate you choosing to travel with them | 30% | 30% |
| Engagement | | |
| Make it easy for you to stay up to date with timetables and fares | 53% | 60% |
| Care what passengers think of their service | 44% | 41% |
| Use technology well for passengers benefit | 44% | 38% |
| Welcome contact from passengers | 38% | 36% |

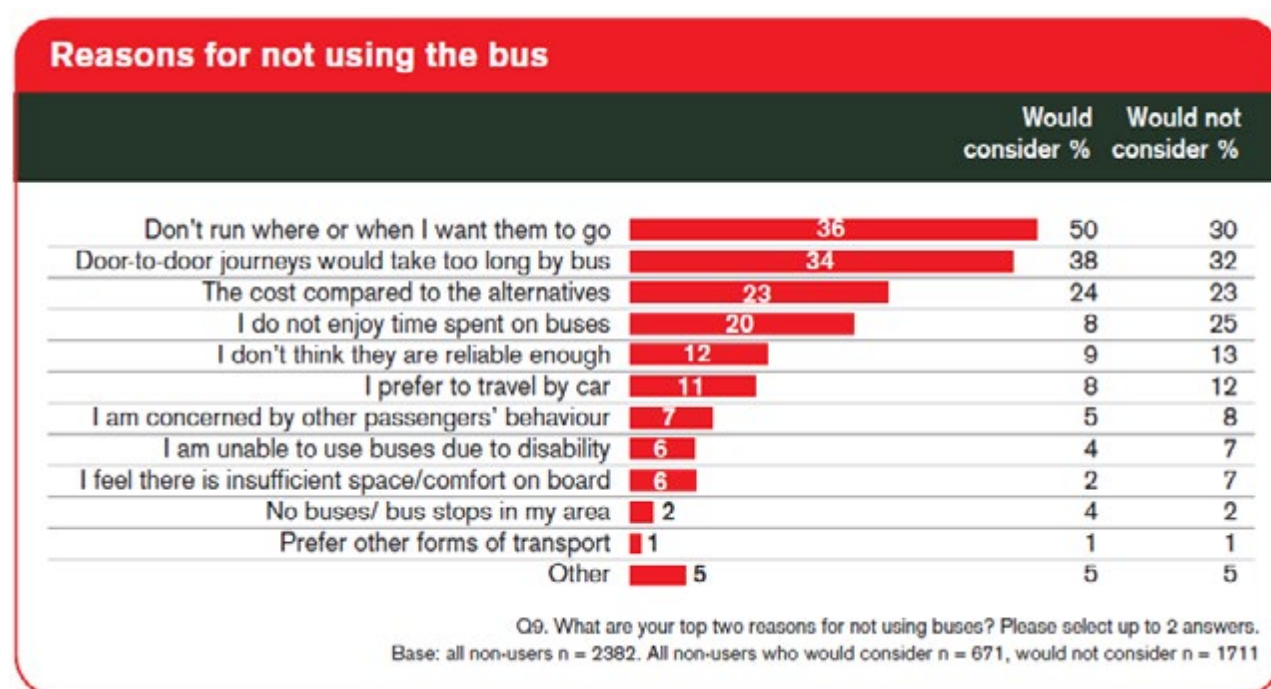
Priority matrix for improving bus company trust in Greater Manchester:



Barriers to using buses more

It is even more important to understand the barriers to making more journeys by bus – what is it that actually prevents people from doing so? Our research³ shows that for infrequent/non-users in general the main reasons were very practical; they don't run where or when people want them to (36 per cent), journeys take too long (34 per cent), and cost (23 per cent).

Those practical reasons assume even more significance for those infrequent/nonusers who would consider using buses more. Exactly half of them put this mainly down to buses not running where and when they wanted and 38 per cent said that door-to-door journeys take too long. They still feature most for infrequent/non-users who were not minded to use bus more, but notably things to do with the 'on-bus experience', although still secondary, do feature more prominently for this group of people.



Network stability

Having standardised change dates throughout the year has provided some approach to containing the level of alterations. However scope still remains for frequent changes to bus services across Greater Manchester – changing routes, times or withdrawing services. Users are faced with constant churn and very little advance information or prompt for when their service is changing.

We also know from the Bus Passenger Survey (BPS)⁴ results that around 40 per cent of passengers in Greater Manchester do not check timetable information, so are potentially caught out when services do change, which together with the major work required to update information at bus stops, are big issues that will require addressing.

³ See note 1

⁴ [Bus Passenger Survey](#). Transport Focus

It is clear from our research that the 'core product' is very important to passengers – the essence being that they have a stable service that they can depend on. This stability takes two forms: the reliability of the actual services themselves and the frequency with which timetables can be chopped and changed.

Bus priority measures will be instrumental in increasing reliability. It will be important, however, that these measures are enforced/'policed', or else the potential benefits to passengers risk being diluted. We would also ask what steps will be taken to co-ordinate feeder routes into the core area to ensure that end-to-end journeys are equally reliable.

In our Bus Service Changes⁵ report we reported on passengers' attitudes to service changes. Two-thirds did not think it acceptable to make changes to bus services more than twice a year and more than six out of ten (62 per cent) wanted to be given at least four weeks' notice of major changes. Our research also showed that the best place to inform passengers of changes is at the bus stop itself: 75 per cent of passengers wanted information at the bus stop, 61 per cent wanted it on board.

Limiting timetable changes to agreed dates and sufficient notice of registration changes are important. So too is restricting the number of times a specific service can be changed in a given period – to avoid the impression of a service constantly being 'tinkered' with – alongside a clear process for consulting with and informing passengers of changes.

We have also reported on the impact on passengers of cuts to rural services. In 'Bus service reductions – the impact on passengers'⁶ we identified four main impacts:

- Passengers could not travel like they used to: they made fewer discretionary trips
- Dependency on others increased: awkwardness to ask for lifts and their travel plans now being contingent on others
- Sometimes the passenger paid instead: passengers bore some of the costs by using taxis or other paid means of transport
- Lack of spontaneity: fewer services on fewer days reduced the opportunity to decide on the day to go out

Our research⁷ shows a desire from passengers that punctuality and reliability figures are made public. It found that passengers should have access to information about the performance of their bus services and to key actions being taken by operators and local authorities to improve this. The research indicates that publishing this information is regarded as right in principle and is good for trust because 'it helps keeps the industry honest'. This was the case even if individuals had little personal appetite in seeking it out – the fact that others are looking at it can often be enough.

Given the importance of punctuality we also conducted further work to build a better understanding about when, where and why buses are delayed and what can be done to help them run on time⁸. Our case studies highlighted the challenge of setting timetables to

⁵ [Bus Service Changes](#). Passenger Focus. September 2010

⁶ [Bus service reductions – the impact on passengers](#) Passenger Focus. September 2012

⁷ [What's the holdup? Exploring bus service punctuality](#). Passenger Focus. December 2014

⁸ [How late is late – What bus passengers think about punctuality and timetables](#). Passenger Focus. January 2014

reflect variable patterns of traffic and patronage and threw up a number of recurrent reasons for delays, including traffic and parking, boarding and alighting, inadequate recovery time between services and perhaps most surprisingly, exiting bus stations. This also highlighted the need for robust and consistent monitoring of services.

Simplified and integrated fares

Better value for money is passengers' highest priority for improvement. It is also linked to getting a punctual, reliable service and a seat in return for payment. Our research⁹ has found that passengers often have poor information on fares and ticketing and types of tickets, often relying on word of mouth or the bus driver. Younger passengers have distinct needs relying heavily on bus travel. They require service flexibility but also resent paying adult fares. Smart ticketing can help with some of these issues. New arrangements should:

- Provide a central source of pre-journey information on fares, ticket types (including smart ticket availability) and bus routes
- Identify specific policies for 16-18 year olds, such as the range of tickets and price.

Our report on bus passenger views on value for money¹⁰ looked in more depth at what had the biggest influence on value for money perception and, importantly, what might help to improve things. The key findings again emphasise the 'core' product. When passengers buy a ticket they expect a punctual, reliable service and a seat in return. Focusing on performance should further improve perceptions of value for money.

Better access to information on fares and ticketing is also essential. Passengers often relied on word of mouth and the bus driver for information on times, routes and fares. All of which begs the question of how much business is lost because potential passengers simply don't know how to use the bus or because people can't find the ideal ticket for their needs. It also found that many passengers didn't realise what ticket types existed, how they could buy them or where they could find out the information they needed. The research found a very strong desire for more centralised sources of information. For example websites, apps and notices on the bus.

Younger passengers also have very distinct needs. They rely on buses, need more flexibility (to balance work, education and seeing friends) and often take journeys spontaneously. They also resent paying adult fares when they are still at school/college or on low (or no) incomes. They want this reflected in the fares that they pay – with adult fares only kicking in from 18 onwards.

There have been considerable developments in the use of smart ticketing. Our research on smart ticketing^{11 12} demonstrates passenger support for new forms of ticketing – in particular in having to avoid carrying the 'exact change' and in reducing the time it takes to pay. It also shows a desire/expectation that smart ticketing facilitates the introduction of new types of tickets – indeed this was felt to be essential to encourage uptake. Will passengers switch from a paper ticket to a plastic version, if the ticket type and cost is the same? We know that one of the key reasons that passengers get a smartcard is that they

⁹ [Bus passenger views on value for money](#). Passenger Focus. October 2013

¹⁰ See note 9

¹¹ [Smart Ticketing: Oxford SmartZone](#). Passenger Focus. September 2013;

¹² [Smart ticketing in Norfolk: what do passengers think?](#) Passenger Focus. March 2015

are able to choose from more flexible types of tickets, which will be better suited to their own travel patterns, so saving money and time. It also stands to reason that facilities and procedures for switching to smart must be easy to use and well explained.

We would also urge caution when it comes to removing a cash option altogether. There are those who will only travel occasionally and who will not 'join' a smartcard scheme - it will be important that this doesn't create a new barrier to travel.

Customer experience

Young people's experience

More young people use the bus than any other single group of passengers. Yet despite the importance of bus to younger people we know from our Bus Passenger Survey (BPS) that they are the least satisfied group of passengers. So, for this important group, there is a clear challenge to Government, bus operators and local authorities to make the bus a better experience.

Our research with young people¹³ shows they are starting to travel to more places independently but have key concerns. Many of these come from lack of confidence or not understanding 'the system' and bring anxieties about 'getting it right'. The report details key points to address:

- Building confidence – making it stress-free and easy to use, teaching the skills they need, empower and support drivers in their role
- Get the basic service right – young people are put off by poor quality. Focus on the core elements of the journey and ensure consistent reliability
- Engage with them through technology – with a centralised source of information and ticketing and details of fares, discounts and passes widely available. Learn from the successes of other industries and sectors
- Simplify fares, make them consistent and reward loyalty – a young people's concession, fare deals that are easy to find, with loyalty rewards, more tailored offerings and targeted communication.

People who have a disability

Our analysis of the Bus Passenger Survey shows that almost a quarter of bus journeys are made by those who have a disability. Although the prevalence of disability increased with age, mental health had a high proportion in middle age and in our work with young people, a fifth said they had a disability, which may be hidden, needing even more support. Those with a disability were generally less satisfied. Key points from their experience:

- Greater dissatisfaction with smoothness of ride and personal safety and security
- More concern about other passengers' behaviour – particularly the younger age groups and in the peak. Those whose disabilities have a higher impact on travel have much higher levels of concern.
- Passengers comments also highlight the importance of: allowing time to get to seat; lowering access ramps; seats for the disabled being taken by others; and the wheelchair/buggy contention.

¹³ [Using the bus: what young people think](#). Transport Focus. February 2018

We are pleased to see many of these many of these conclusions reflected within the consultation. We agree that the evidence base does set out the key challenges from a passenger perspective, in particular:

- The need for a simplified, easy to use fares and ticketing structure, including greater interoperability
- The importance of punctual and reliable services that go where passengers want them to go
- Greater focus on customer service: integrated and consistent journey information, personal security at the stop and on board, and driver attitudes and conduct.

3 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- offer a 'high' ratio of benefit to the cost to GMCA, one which is broadly comparable with the partnership options,
- provide the most economic value (Net Present Value), and
- create the best platform from which further economic value could be delivered.

Do you have any comments on this?

4 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

Any review of the factors affecting bus use will also need to consider potential changes to the way that people want to travel. The rise of on demand services, typically using uber-style apps, presents a new model of demand which, in some areas, offers an alternative to conventional bus services. When looking at changes in bus use it will increasingly be important to determine whether this has been driven by a fall in demand or whether it represents a change in demand (i.e. a shift to new forms of public transport).

5 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

6 To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

To assess this point, we have set out passengers' expectations and aspirations from our research. These will then need to be mapped against measures in the proposed scheme.

Bus Passenger Survey

Transport Focus consults almost 50,000 passengers a year to produce the Bus Passenger Survey¹⁴. This measures passengers' satisfaction with their local bus service for a representative sample of journeys. Passengers are asked to rate their satisfaction with the bus journey they are making, across a wide range of aspects.

¹⁴ See note 4

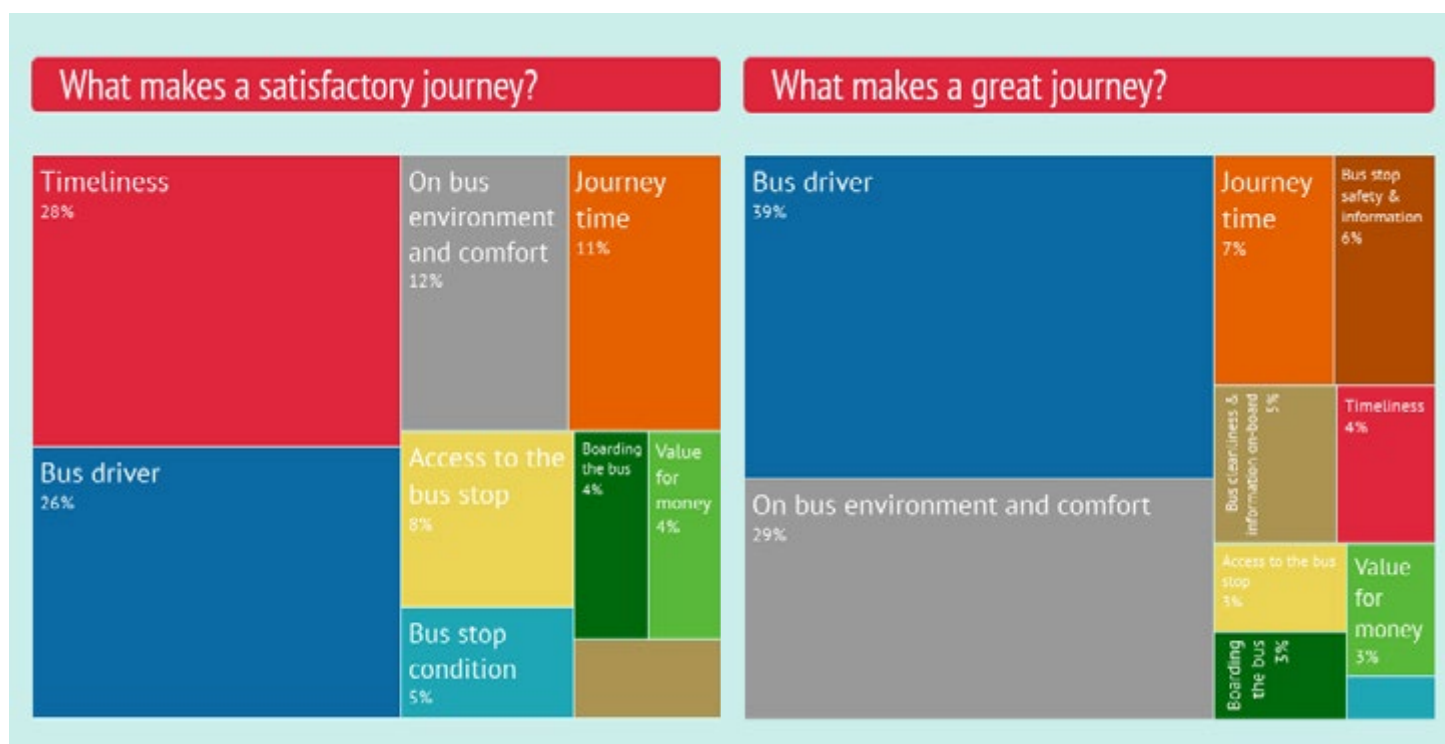
Results in Greater Manchester over the past eight years are in the table below:

| Passenger satisfaction: Greater Manchester | | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 |
|---|---------------------------------------|------|------|------|------|------|------|------|------|
| Journey | Overall satisfaction with the journey | 84 | 84 | 86 | 85 | 82 | 83 | 86 | 87 |
| | Punctuality of the bus | 71 | 70 | 74 | 76 | 71 | 67 | 73 | 70 |
| | Length of time of the journey | - | 82 | 83 | 85 | 81 | 79 | 84 | 83 |
| | Value for money (fare payers) | 60 | 53 | 68 | 73 | 66 | 70 | 75 | 66 |
| Bus stop | Bus stop - overall satisfaction | 72 | 79 | 80 | 81 | 76 | 80 | 82 | 81 |
| | Information at the bus stop | - | 67 | 72 | 72 | 67 | 70 | 75 | 70 |
| | Personal safety at the bus stop | 72 | 71 | 75 | 78 | 75 | 77 | 82 | 76 |
| On-board | Bus driver helpfulness | 67 | 62 | 68 | 73 | 67 | 67 | 73 | 72 |
| | Information inside the bus | 57 | 57 | 61 | 63 | 63 | 62 | 62 | 64 |
| | Comfort of the seats | 74 | 72 | 75 | 77 | 73 | 76 | 82 | 79 |
| | Personal security on the bus | 82 | 81 | 80 | 82 | 79 | 83 | 87 | 84 |

These results show that for key aspects, passenger satisfaction has had a gradual increase. However the 2017 results followed a number of traffic schemes being completed, easing congestion and improving journey speed and punctuality – which had a ‘halo effect’ on satisfaction levels. The most recent results show a slight decline again, due to the effects not being sustained. Key to these effects are passengers’ satisfaction with the core service elements of punctuality, journey time and value for money, which are looked at in more detail below.

Key drivers of satisfaction

Analysis of BPS looks in more depth at the key driving factors behind fare paying passengers’ overall journey satisfaction, which have been grouped into 10 themes based upon a statistical analysis of the responses. Analysis for Greater Manchester is below:



On the left are themes which make the difference between ‘*not satisfied*’ and ‘*satisfied*’ overall – making a journey ‘*satisfactory*’. On the right are themes which make the difference between ‘*fairly*’ and ‘*very*’ satisfied overall – making a ‘*great*’ journey.

This analysis demonstrates that the key factor for a satisfactory journey experience is timeliness – satisfaction with punctuality and waiting time. Whilst the key to a great journey is the bus driver – the greeting, helpfulness, time to get to a seat, driving style and safety.

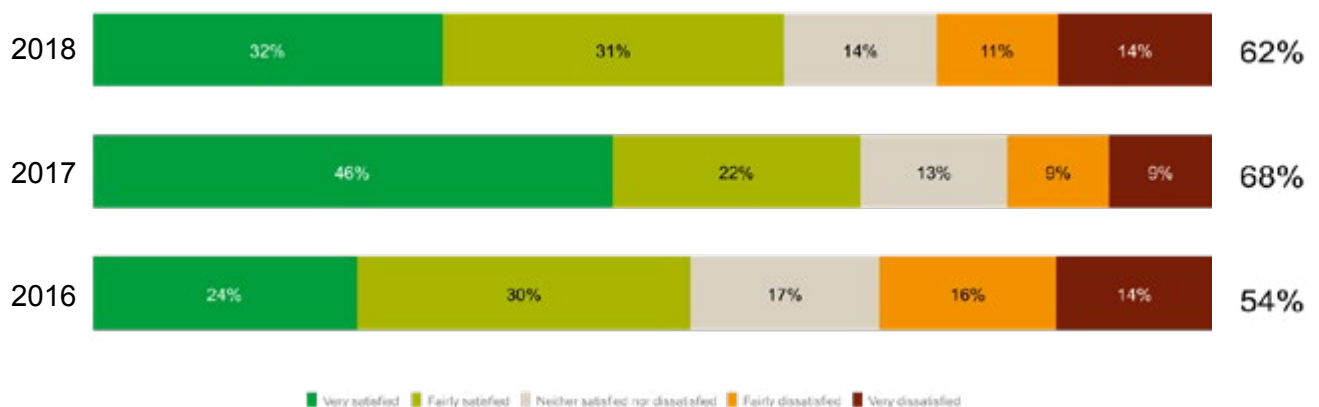
Punctuality and journey time

Buses arriving on time at the stop is the second highest priority for improvement.

Passengers put congestion at the top of the list of factors affecting punctuality and journey time. Nowhere is this more evident than during the weekday peak periods.

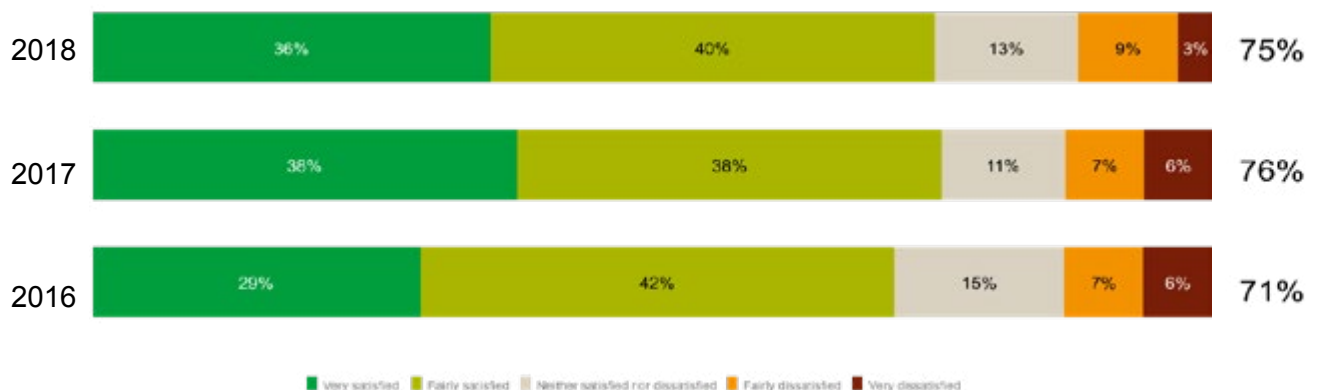
The effect of the 2017 results on punctuality can be seen best in the afternoon peak time. Although satisfaction levels during the peak are lower than the rest of the day, the improvement in congestion levels gave a significant boost to the proportion of passengers who were very satisfied – 46 per cent in 2017, compared with 24 per cent in 2016 and 32 per cent in 2018:

Punctuality comparison – weekday PM peak (15.30-18.29)



For journey time in the same afternoon peak, the proportion of passengers who were very satisfied in 2017 was 38 per cent, compared with 29 per cent in 2016 and 36 per cent in 2018:

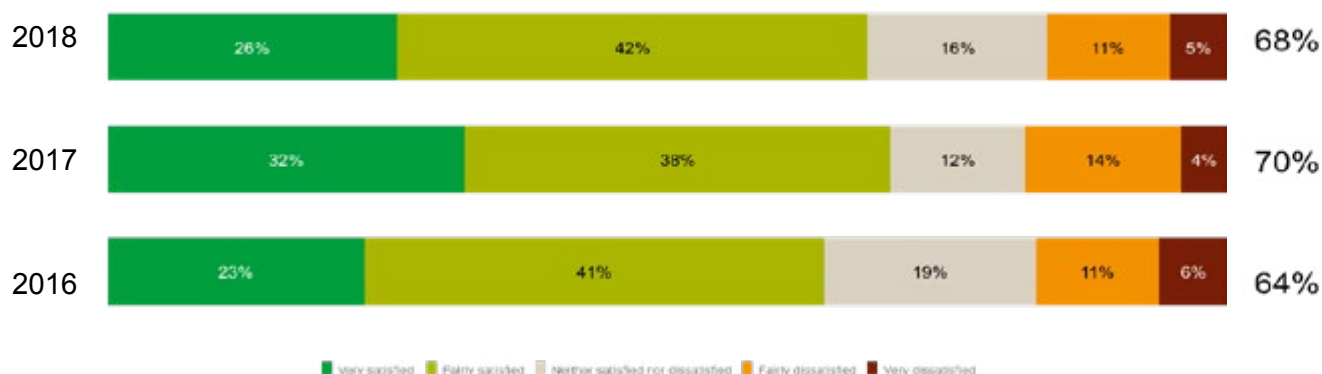
Journey time comparison – weekday PM peak (15.30-18.29)



Value for money

Passengers judge value for money against a range of aspects, especially core service elements, that the service delivers in return for the price of their ticket. The same afternoon peak saw the very satisfied proportion at 32 per cent in 2017, compared with 23 per cent in 2016 and 26 per cent in 2018:

Value for money comparison – weekday PM peak (15.30-18.29)



Transport Focus agrees that the proposed franchising scheme would deliver benefits for passengers although the test will be in assessing the delivery of resulting services.

It would seem to provide additional flexibility when specifying routes and times and through this help address 'gaps' in the network that impact on existing users and act as a barrier to new users.

Franchising would also seem to provide the most flexibility when it comes to providing a simplified and integrated fares and ticketing structure – another key passenger aspiration.

The franchising proposal could also deliver benefits when it comes to customer experience – though we acknowledge that some of these could also be provided through the partnership options. The chief benefit of franchising in this regard would be the opportunity of setting a consistent set of standards across all routes and services. It could also facilitate a more unified real-time passenger information service.

However, it is less clear how proposals will influence the key drivers of satisfaction in tackling punctuality and reliability. People see transport as a public service and an enabler for supporting personal mobility. The scheme needs to include robust measures for providing the reassurance of consistently reliable and punctual journeys across modes and from door to door, to be able to deliver an attractive network that fosters growth and trust.

7 Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

Passenger representation

The proposed scheme draws attention to improved passenger representation being vital. We welcome the commitment to consult organisations representing bus users immediately after the expiry of the first franchise contracts and at 'other appropriate times' to evaluate how well the proposed scheme is working (Q9 in the full consultation). We also welcome the fact that GMCA would report on its response to these consultations – such accountability is important in building trust with users.

Transport users must have a voice that is heard and holds providers to account in a more focused, sustained way. Transport Focus has built an enviable reputation for independent, multi-modal representation, built on top quality insight and policy work which is useful to transport decision makers, together with experience of building alliances in various partnership models with authorities, operators and governments. Key examples are the well-established West Midlands Bus Alliance, chaired by Transport Focus – and the location for our recent *Give Bus a Go* campaign¹⁵. We are also working in close partnership with alliances in Liverpool City Region, West Yorkshire and emerging schemes in South Yorkshire and Cambridgeshire/Peterborough. We would be keen to discuss investment in a 'critical friend' role, to strongly articulate the passenger voice.

Passenger promise

We would also advocate a 'passenger promise' to be put in place, underpinning and explaining the measures and provisions for passengers and including compensation for delays and disruption to journeys.

Operations should also comply with EU Passenger Rights regulations¹⁶:

- Non-discrimination against passengers on the grounds of nationality, disability or reduced mobility
- Compulsory disability awareness training for personnel of carriers and terminal managing bodies (except drivers) who deal directly with the travelling public
- Compensation in respect of damage caused to wheelchairs and other mobility equipment
- Right to travel information throughout a journey and information on passenger rights at designated terminals
- All carriers to have a complaints handling mechanism and passengers able to make complaints.

Bus priority measures

Buses make much more efficient use of the road space and connect people to jobs, customers to businesses, provide access to essential services and reduce barriers that non-car ownership creates. Sensible traffic management focused around providing good facilities to aid people movement, rather than cars, can really help. One double decker bus can take more than 60 cars off the road. Key priority measures, such as bus lanes and traffic light technology, can speed up buses and make them more competitive than the car

¹⁵ [Give Bus a Go](#). Transport Focus. November 2019

¹⁶ EU Bus and Coach Passenger Rights Regulation (EU Reg 181/2011)

as well as improving bus reliability. If designed well, and kept under review as traffic conditions change, they should be part of the solution to congestion, be part of a wider coherent plan and provided with their fair share of funding to improve operational performance but also to help tackle the air quality and congestion challenges facing the Greater Manchester region.

8 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

9 Finally, do you have any other comments you want to make?

The proposed scheme has the potential to improve the bus journey experience, through new arrangements – and hence satisfaction for bus passengers, alongside making the bus network more attractive, driving up demand amongst current non-users. Transport Focus's research can help realise that potential.

In conclusion, we believe that there is much in the proposed scheme that aligns with the needs and aspirations for transport in Greater Manchester. It focuses on many of the outputs that matter to passengers. We would, however like to see more clarity about the key areas of performance; punctuality and reliability.

The acid test for the proposal will be in terms of the benefits it brings to passengers and how it will improve the delivery of services. We would pull together and summarise the points made across our submission in **ten actions to benefit passengers**, set out in Appendix 1, as a checklist for matching against proposed scheme specifications and targets and as the key measure of any successful model for delivery – in the outputs and how they measure up.

We will be pleased to discuss the points raised in our submission in greater detail and to work in partnership to support and underpin passengers' interests.

January 2020

Transport Focus, 7th Floor Piccadilly Gate, Store Street, Manchester, M1 2WD
www.transportfocus.org.uk

Ten actions to benefit passengers

1. Improving punctuality and reliability

Bus passengers rank punctuality and running on time highly as priorities for improvement. Lateness of a bus arriving at a stop to start the journey causes more anxiety than a bus arriving late at the destination¹⁷. Passengers can tolerate the arrival at the bus stop of departure up to five minutes late. After that satisfaction with punctuality decreases markedly, and again after 10 minutes. The new arrangements should:

- Have clear punctuality targets
- Targets for improving average bus journey speeds
- Include a statement on monitoring performance and publishing data.

2. Ensuring frequency and stability of bus times

Alongside punctuality, passengers want to know that the timetable doesn't change too frequently. Our research¹⁸ found that passengers did not think it was acceptable to make changes to services more than twice a year and more than six out of ten wanted to be given at least four weeks' notice of a major change. The new arrangements should ensure:

- There are minimal changes to timetables
- There is a clear process for consulting and informing passengers of changes.

3. Building trust: engagement and consultation

Buses need to run on time, be reliable, deal well with disruption and offer value for money. Our research¹⁹ shows that building a relationship with passengers helps build loyalty and repeated use of services. Passengers should feel that the company really cares about what happens to them, especially during disruption, and is not remote and aloof. Drivers have an important role in showing empathy and care (see 7 below). The new arrangements should require operators to produce a passenger engagement strategy.

4. Monitoring passenger satisfaction to make improvements

It is important for operators and authorities to research (quantitatively and qualitatively) how satisfied passengers are with services both on the bus and at the stop. Transport Focus's Bus Passenger Survey²⁰ provides such an independent assessment which could be used providing vital feedback on critical factors such as punctuality and cleanliness. A similar measure is used in rail to assess the passenger experience during a franchise. New arrangements should establish targets for service quality, how they will be measured and results published.

5. Passenger information in real-time

Real-time information displays are valuable in indicating to passengers when their bus will arrive, so reducing stress and anxiety and enabling them to make alternative plans when things go wrong²¹.

The Bus Services Act will make more data available for public use, so new arrangements should set out, through an action plan, how they can provide real-time customer information – especially at bus stops and through developing apps.

¹⁷ [Bus punctuality and timetables](#). Transport Focus. January 2014,

¹⁸ See note 5

¹⁹ See note 1

²⁰ See note 4

²¹ [Bus passengers' experience of delays and disruption](#). Passenger Focus. April 2013,

6. Improving fares and ticketing

Better value for money is passengers' highest priority for improvement. It is also linked to getting a punctual, reliable service and a seat in return for payment. Our research²² has found that passengers often have poor information on fares and ticketing and types of tickets, often relying on word or mouth or the bus driver. Younger passengers have distinct needs relying heavily on bus travel. They require service flexibility but also resent paying adult fares. Smart ticketing can help with some of these issues and the new arrangements should

- Provide a central source of pre-journey information on fares, ticket types (including smart ticket availability) and bus routes
- Identify specific policies for 16-18 year olds, such as the range of tickets and price.

7. Boosting the role of bus drivers

They are the 'face of the company' providing the main contact with passengers. For a good passenger experience, they should provide a pleasant and professional service whether by providing information on disruption, delays, or ticket types, or settling disputes. Their role is essential. The new arrangements should therefore:

- Set standards of behaviour for drivers
- Provide training courses programmes that include customer service.

8. Customer care and satisfaction

Despite the best intentions, things will go wrong from time to time. An effective complaints system makes it easy for passengers to know who to contact and a range of ways to do so; has efficient handling systems; and uses the resulting data to make improvements²³.

The new arrangements should set out

- Clear complaint handling processes and lines of responsibility
- How contact details will be publicised
- What response times will be and how they will be reported upon
- Clear guidance on where, when and how compensation will be offered.

9. Improving personal security

This features in our research both on the bus and at the stop, particularly for those with disabilities²⁴. The new arrangements should ensure that partners work together to deal with anti-social behaviour and that security is included in design guidelines for buses and stops.

10. Encouraging non and infrequent users

A key aim of the Act is to increase bus use. Our research²⁵ shows why current non-users don't use the bus: poor punctuality, failure to provide services when people want to travel (such as for work or a night out), length of journey and not knowing 'the system'. We found that 28 per cent of non-users would support a bus service. Therefore, operators should produce a strategy for boosting bus use.

²² See note 9

²³ [Handling complaints and appeals from bus passengers](#). Passenger Focus. October 2009,

²⁴ Analysis of bus passenger satisfaction for those who have a disability. Transport Focus. 2016,

²⁵ See note 1



Tel 07807 768124
Email: admin@travelwatch-northwest.org.uk
Website: www.travelwatch-northwest.org.uk
Correspondence address – 11 Harvelin
Park, Todmorden, OL14 6HX

promoting quality public transport.....

Eamonn Boylan,
Chief Executive,
GMCA and Transport for Greater Manchester,
2 Piccadilly Place
Manchester
M1 3BG

6th January 2020

Dear Eamonn,

**Doing buses differently – Consultation on a Proposed
Franchising Scheme for Greater Manchester**

TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing all public transport users in North West England. Thank you for giving us statutory consultee status.

TWNW held a special conference, supported by the bus industry, in October last year to explore the debate about bus service reform in Greater Manchester. The report of this conference is attached as **Appendix A** to this response.

We give below our comments on this consultation.

Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme (PFS) as set out above?

We are happy with this.

Q2 Do you have any comments on the proposal that the PFS should apply to the entirety of Greater Manchester?

We are happy with this.

Q3 Do you have any comments on the local services that are proposed to be franchised?

No comments.

Q4 Do you have any comments on the proposal that the PFS would be split into three sub areas and on the other arrangements proposed for the purposes of transition.

This seems reasonable

Q5 Do you have any comments on the services which have been excepted from regulation under the PFS?

See comments on cross boundary services below.

Q6 Do you have any comments on the date on which the PFS is currently proposed to be made?

No comment.

Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

We accept the need for staging over that period of time.

Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

It seems a long period of time, but we do not have expertise in these matters.

Q9 Do you have any comments on the proposals for how GMCA would consult on how well the PFS is working?

As a statutory consultee to this consultation TWNW would expect to be consulted on how well the scheme is working. Consultation should be wide-ranging but balanced. See also our comments below under Q48.

Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the PFS?

This seems a reasonable way to protect the smaller operators and possibly introduce some elements of sensible competition and efficiencies.

Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the PFS?

There are huge risks with depot construction and management. Construction is expensive and there are major planning issues to overcome (not least environmental). Also, day to day operation requires a great deal of expertise, which is closely linked to the operations from that depot. GMCA involvement

could create major challenges, increase costs and add to the bureaucracy of managing bus services.

Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

The current limited competition system favours profitable trunk routes to and from Manchester and other principal towns, rather than routes that connect communities and suburbs. This disproportionately affects the poor, those who work unsocial hours (e.g. hospital workers, cleaners), and those who live in more socio-economically deprived areas.

Over the last four years Manchester has seen eight million miles of bus routes cut, in part because operators deem them not viable. This is while TfGM spends £27.6 million subsidising routes that are socially essential but are not commercially viable for bus companies.

The decline in bus services throughout the country over the years has been well documented. The reasons are no doubt complex but we would cite the following factors which are pertinent to Greater Manchester -

- Reliability - traffic congestion and the need for bus priority measures,
- The convenience of the car and growth in car ownership together with lack of car restraint in cities like Manchester
- Unfamiliarity with ticket purchasing procedures (pricing, how to pay, etc), journey planning and information. Difficulty of accessing information about fares.
- Customer care perception and in reality - very much down to driver attitude and conduct
- Lack of fares integration and poor modal interchange arrangements.
- In turn this results in an over complex fare structure, which is a disincentive to travel
- Lack of on-bus information systems, not least real time.

Appendix B itemises factors affecting bus travel taken from a TOWNW conference held in February 2019 and a summary of attitudes to bus travel compiled by the Urban Transport Group.

Q13 The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

We agree reform is necessary. It would enable clearer fares, flexible ticketing including multi modal, better integration, etc. But it must be accompanied by vast improvements to infrastructure – bus stations and stops – also information including real time, bus priority measures, better driver awareness training and greater attention to the needs of the mobility impaired in all manifestations – the elderly, the physically and wider disabled, families with children, etc

Specifically, at the bus stop, bus station -

- Accurate, up to date timetable and other information should be displayed in cases at bus stops. Some bus stops, particularly in more rural parts of the county, have no information of bus times displayed at all.
- There should be real time information at ideally all, bus stops and at all bus stations. This must be “real-time”, not timetable times. With GPS now widespread digital real time displays should be mandatory at all locations.
- Full accessibility at all bus stops.

On the bus

- Visual and audible information covering stopping patterns and next stop should be fitted to all new vehicles as standard.

More than 20 different companies operate in Greater Manchester each with their own tickets, which are not accepted by other operators on common sections of route. The larger operators offer area tickets which are priced well below the TfGM “all operator” ticket. There is a need to integrate buses with the tram and train networks to provide fully integrated ticketing using smart cards and consequent faster boarding times as cash handling is reduced or eliminated. Franchising would improve the incentives for TfGM to reduce operating costs by eliminating wasteful competition between operators on popular corridors, and between bus and train/tram.

While franchising in itself would not cut congestion, the major cause of unreliability and extended journey times for buses, it is imperative that it must bring with it the incentive for TfGM to invest in bus priority as it, rather than the operators, would benefit from lower costs and higher revenue. Buses must be given sufficient priority (not just bus lanes, but bus stop clearways which are enforced) and effective enforcement of parking/waiting/loading restrictions so that the buses keep moving.

Q14 Do you have any comments on GMCA’s objectives for the future provision of bus services as set out in the Strategic Case?

Broadly agree with the content. See also response to previous question.

Q15 Do you have any comments on how the PFS might contribute to GMCA’s objectives for bus services as set out in the Strategic Case?

Q16 Do you have any comments on how a partnership option might contribute to GMCA’s objectives for bus services as set out in the Strategic Case?

The case put forward has a strong leaning towards the franchising option which overall seems to secure the maximum network and integrated benefits for passengers. We have always been sceptical about the practical benefits to

passengers of on the road competition especially where some routes are virtually monopolised by single operators.

Q17 The Economic Case concludes that the PFS provides the best value for money compared to the partnership options because it would:

- ***offer a 'high' ratio of benefit to the cost to GMCA, one which is broadly comparable with the partnership options,***
- ***provide the most economic value (Net Present Value), and***
- ***create the best platform from which further economic value could be delivered.***

Do you have any comments on this?

We note the more favourable performance of the PFS largely down to a figure of £299.1 million ascribed to time savings. We do not fully understand how this figure has been arrived at. This is especially the case as without adequate investment in bus infrastructure congestion will continue.

Q18 Do you have any comments on the packaging strategy for franchising contracts under the PFS as set out in the Commercial Case?

We broadly agree with the proposed split of the network as outlined in paragraph 4.75.

Q19 Do you have any comments on the length of franchise contracts under the PFS as set out in the Commercial Case?

This seems reasonable.

Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the PFS as set out in the Commercial Case?

We are content with this.

Q21 Do you have any comments on the potential impact of the PFS on the employees of operators as set out in the Commercial Case?

No comment.

Q22 Do you have any comments on the approach to depots under the PFS as set out in the Commercial Case?

The network depot strategy must be reviewed continuously and adapt to changes in and the evolution of the GMSF.

Q23 Do you have any comments on the approach to fleet under the PFS as set out in the Commercial Case?

We are happy with the proposed arrangements. On the subject of clean air, Manchester has high levels of air pollution. We understand that Manchester

has one of the most polluting bus fleets in Europe, a product of decades of under investment, although there are exceptions. Franchising would allow co-ordinated investment and greater control over bus services, allowing low emission buses to be specified and thus contributing to the Clean Air Plan.

Q24 Do you have any comments on the approach to Intelligent Transport Systems under the PFS as set out in the Commercial Case?

This seems sensible.

Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the PFS as set out in the Commercial Case?

No comment.

Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case?

We have concerns about cross boundary services. These are an important part of the Greater Manchester bus network. The system of service permits proposed appears to be similar to that provided in Greater London. There will be many through bus journeys between points outside Greater Manchester and a myriad of stops within the GM boundary. Careful attention must be given to ensuring that as far as possible such through journeys are not adversely affected by taking out stopping points to avoid revenue abstraction from Greater Manchester franchised services. We note that consultation on the sorts of conditions that might be imposed would take place with operators "after the Proposed Franchising Scheme is introduced." **Passengers should also be consulted.**

Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

A recent conference showed that opposition to franchising among bus operators is by no means universal. Some welcome it, especially those familiar with the London system. We understand that Abellio recently commissioned a survey of Manchester residents which revealed strong support for key features of the franchising proposals. Keolis, which operates Metrolink, has previously said it has big hopes for bus franchising in Britain, with regions now able to emulate the model that has been so successful in London.

Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Cas?

No further comments – see Q 15 and 16 above.

Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

No comment.

Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

We do not profess to hold great expertise on the financial aspects of the proposed franchising scheme. We appreciate the practicability of the case for funding the transition period as outlined. Clearly it would be a great benefit if the indication from the government that it will support the scheme comes to fruition. This would hopefully help to minimise the additional funding required through the council tax/ precept.

Q31 Do you have any comments on the conclusion in the Financial case about the affordability of the partnership options?

We do not comment as it is unclear (to us) to what extent the funding requirements for the partnership options differ from the PFS.

Q32 Do you have any comments on the approach to managing franchised operations under the PFS as set out in the Management case?

Q33 Do you have any comments on the approach to the transition and implementation of the PFS, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management case?

Q34 Do you have any comments on the proposed approach to the implementation of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management case?

We are in broad agreement with the approaches outlined. We comment on relationships with passengers and their representatives below in other comments. We would just say here that in setting up the new structures for managing the new franchise scheme we have a concern that bus operational experience is perhaps somewhat lacking at TfGM and the practices at Transport for London could be looked to as a possible role model.

Q35 Do you have any comments on the impacts of the PFS on passengers, as set out in the sub-section Impacts of the different options?

Q36 Do you have any comments on the impacts of the partnership options on passengers, as set out in the sub-section Impacts of the different options?

We appreciate the risks to services and passengers during implementation of the PFS and trust steps would be taken as intimated to minimise these. Hopefully in the longer term the benefits would outweigh the transitional inconvenience.

Q37 Do you have any comments on the impacts of the PFS on operators, as set out in the sub-section Impacts of the different options?

Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

No comments

Q39 – not applicable.

Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

We fully support the premise that, under the PFS, any surpluses would be reinvested into the bus service to benefit passengers.

As far as the impacts on wider society are concerned, we appreciate the forecast that the PFS would reduce car use and contribute to greater use of sustainable transport, thus benefiting the environment.

Q42 Taking everything into account, the Assessment concludes that the PFS is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

Q43 Do you have any other comments on the Assessment of the PFS?

We appreciate the “better value for money” arguments for the PFS compared with the other options but would not comment in detail.

Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the PFS on persons with protected characteristics. Do you have any comments on this?

We broadly agree. One specific comment – under franchising the opportunity should be taken to address the very real problem of instances of competition to use the limited space on buses for wheelchairs/ prams/ pushchairs, etc.

Another important element is driver awareness and training. Better facilities at bus stops and bus stations for those with physical and sensory impairments are also essential.

Q45 To what extent do you support or oppose the introduction of the PFS? Why do you say this?

Q46 Are there any changes that you think would improve the PFS? Please provide further details as to the changes you think would improve the PFS.

Q47 If you oppose the introduction of the PFS, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

On balance we support the Proposed Franchising Scheme. We do have concerns about the costs involved and trust that the government will honour its pledge on this key consideration.

We would look for franchising to bring the following benefits for passengers -

- Integrated and multi operator ticketing with a simpler and in some cases cheaper fares.
- Bus priority measures to improve journey times
- Ability to cross subsidise to maintain less used but socially essential routes
- A sea change in information provision – real time visual and audible information on buses, real time information at bus stations and stops.
- Improved procedures for passenger input including a properly publicised complaints procedure on buses and elsewhere (see also below).
- Better more easily available advance information about bus fares
- Impartial Information offices at bus stations covering all operators.
- Making it much easier for **all** to travel by bus.

Q48 Finally, do you have any other comments you want to make?

We always advocate passengers' rights and input to the services that they use. There is a need for passenger involvement in the creation and operation of franchised bus services. In our view, there is a particular ongoing requirement for passengers' views on routing, frequency and fares levels to be actively sought when changes are made.

We cannot find any specific reference to passenger representation in the consultation other than in connection with consulting user organisations on how well the franchising scheme is working throughout its life. In this connection there is a requirement to consult organisations "representative of users of local services". As a statutory consultee for this consultation exercise TWNW would, subject to appropriate funding, be well placed to undertake this role on an ongoing basis. Under this regime, TWNW would also be able to

seek passengers' views and contribute to any changes to services, fares etc., as and when they occur.

There is a reference in the Assessment tome (paragraph 7.4.4) to the importance of passengers knowing where they should go for information or to make comments or complaints. Currently complaints procedures regarding buses in Greater Manchester are not well publicised. There should be accessible information for passengers on buses and elsewhere not only how to complain but also how to appeal if the complaint is not dealt with satisfactorily. TWNW would be well placed (again subject to funding) to deal with unresolved complaints about franchised bus services. London TravelWatch performs this role for London's franchised bus services.

The alternative of falling back on BUUK as the Appeals body would be unsatisfactory. BUUK's complaints procedures are limited and attuned to a deregulated rather than franchised operation. ***It is not a statutory body.*** We understand that its terms of reference only permit it to deal with complaints from bus users regarding specific incidents or operational matters such as running to time, charging the correct fare and the behaviour of staff towards passengers. It cannot deal with commercial or operational matters such as the level of fares, the level of service provided, or the routes taken by buses

Whilst these provisions should be realised for the franchising option there is equally a case for improved passenger involvement in all these areas in the partnership options.

Thank you for the opportunity to respond

Yours sincerely,



John Moorhouse
Company Secretary

Winner of CILT award for best practice in passenger transport (2013)

promoting quality public transport.....

THE NORTH WEST BUS DEBATE - CONFERENCE REPORT

Thursday 17th October The Mechanics Conference Centre, Manchester
Conference kindly supported by The Bus Industry

1. Welcome and Introduction

The Chairman, Chris Dale, welcomed delegates to Manchester and expressed thanks for the support of the region's bus industry.

He referred to the recently launched Consultation by the Greater Manchester Combined Authority on bus franchising and looked forward to the various arguments for and against this proposal during the Conference. The debates will inform the TWNW response to the Consultation.

He launched the TWNW Annual Review for 2018 – 2019 and urged all delegates to read it and will welcome any feedback they wish to submit.

Finally, he referred to the Annual General Meeting that took place in advance of the Conference and welcomed the re-election of the Directors.

2. Setting the Scene for Bus Passengers

David Sidebottom, Director, Transport Focus

David Sidebottom began by stating the role of Transport Focus in the bus sector which is to represent passengers as well as addressing non-users.

Transport Focus carries out a regular Bus Passenger Survey with feedback from 43,000 passengers of which 87% express satisfaction. Key issues that are raised are Value for Money, Journey Times, Punctuality and Driver Attitude and Behaviour. The results vary between regions. Additionally, a more focussed survey of 5000 passengers on priorities called for core services, better frequency and a wider choice of destinations. Younger users sought free WiFi and better frequencies. Also 2000 non-users were recently surveyed revealing that 43% would be prepared to use bus services if more destinations were offered and Value for Money could be proved. In a recent Clean Air debate, 57% of users thought that buses play a key role in providing transport solutions.

Some recommended key thoughts for Bus Operators to consider are:

- Measure current and potential Markets and react to them.
- Build Trust and Engagement with customers.

- Adopt Corporate values such as local management, driver empowerment and local control.
- Improve Punctuality and Reliability.
- Monitor satisfaction and react accordingly.
- Work to provide Real Time Information.
- Boost the role of Drivers in Customer Service skills.

Finally, David referred to the “Give Bus a Go” campaign recently launched in the West Midlands. This had reached 2.3 million people and several volunteers have agreed to use bus services rather than their car for a set period and provide feedback.

3. The Franchising Option

Pascale Robinson, Better Buses for Greater Manchester

Pascale said that bus travel accounts for 80% of public transport journeys in Greater Manchester. However, 8 million miles have been cut from network journeys and fares have increased by 50% over the last 5 years. Amongst many issues this has resulted in a decline in opportunities for job seekers, missed hospital appointments and failures to service changing work shift patterns in the employment sector.

The government de-regulated bus services in England (apart from London) in 1986, allowing operators to choose their own routes and set their own fares. Predictably operators have favoured the most profitable routes and ultimately this has led to greater profit driven commercialisation of the industry and has provided shareholders with dividends amounting to £1.49 billion. As 80% of revenue comes from the Public Sector in subsidies the ethics of this need to be questioned.

In London, where services are regulated, journeys have doubled compared with a 40% reduction in Greater Manchester over the same period. In Scotland local authorities have the option to bring buses under their control and deliver a service that is socially rather than profit driven.

Congestion is the primary factor in travel in urban areas and solutions need to be found. In London 64% of journeys are made by public transport compared with only 13% in Greater Manchester. Growth in the economy of areas outside London will only be achieved by finding solutions to traffic congestion and regulated bus services offer a major contribution.

Regulation compels bus companies to run stated services whereas Partnerships do not. Therefore, Regulation offers better value for money to the taxpayer and recent survey has shown that 76% of passengers support public sector control. This will result in affordable fares, Passengers over Profit and user-friendly SMART ticketing.

4. The Partnership Option

Gary Nolan, Chief Executive, OneBus

Gary emphasised that the mission of OneBus is to Improve Bus Services in Greater Manchester. However, the bus industry in the North West needs more funding and support.

The term “subsidy” is a myth, the more apt description being a “payment for passenger carriage”. It is illegal to have agreed standard fares amongst operators. Profit levels of bus companies quoted at £1.95 billion is fake news. In reality bus operators are only achieving a 5.51% profit year on year and this is under threat of reduction. It is also unrealistic to compare Greater Manchester with London, where fares are the most expensive in the world. London buses also receive a subsidy of £1.8 million per day and can operate to a Network.

In Greater Manchester passenger numbers are in decline but 65% of that decline is due to the arrival and continued expansion of Metrolink. Also it was clear that decline had set in before de-regulation as between 1980 and 1985 there had been a reduction from 417 million journeys to 350 million. In 2017 the figure had further reduced to 201 million, but the rate of decline had eased.

The 2017 Bus Services Act provides Mayoral Combined Authorities powers to implement bus franchising. Its process in harmony with bus companies is to set objectives, seek preferred options and implement them. Franchising is a last resort. The Bus Operators prefer Partnerships with agreed commitments, but local authorities must pro-actively address congestion. Operators are prepared to offer:

- Multi Operator and multi travel mode products with a simplified product range.
- Retention of discounts on Single Operator products.
- Guaranteed Evening and Sunday services.
- Next stop AV announcements.
- TravelSafe Partnerships.

The current status of negotiations state that after a full assessment of issues, implementation of the agreed way forward will commence in 2024. It is the view of Operators that Franchising addresses political goals rather than passenger needs and puts taxpayers at risk. It is also felt that the share of public money is imbalanced with only £1 million going to buses whilst Metrolink received £72 million and cycling facilities received £0.5 million. Equally it is surprising that, currently, the report contains no reference to Congestion Relief, Clean Vehicles or Flat Fares.

5. The Transport Authority

Cllr Roger Jones, Vice Chair, Greater Manchester Transport Committee

Cllr Jones welcomed the debate as this is a critical time for the industry and local transport authorities. He felt that bus operators have been in a position of dominance since 1986 but the system needs reform as it is currently not fit for purpose. Since 2009 there had been a reduction of 17% - 38 million journeys.

Bus Operators in the Greater Manchester region receive a subsidy of £27 million per year supporting 20% of the network. A 3-month consultation is now out and this will inform the decisions of TfGM. The authority is doing everything “by the book” with independent auditing. The current options are Do nothing, create a Partnership deal or invoke Local Authority control through Franchising. Responses from all parties are sought and encouraged. If franchising is preferred it will be implemented over a phased period.

He said that the greatest challenge to bus services is traffic congestion but this had not been resolved anywhere in the country. He cited the Leigh Guided busway as a major contribution to the issue as this now carries 50,000 passengers per week operating 18 buses per hour.

6. Buses and Equality

Mark Stone, Solicitor, Equality & Human Rights Commission (E&HRC)

The E&HRC is a Statutory body charged with enforcing the Equality Act 2020. Its role includes:

- Starting Inquiries and recommending Change.
- Investigating Breaches.
- Providing Advice & Guidance, both Statutory & non-Statutory.
- Undertaking Research.
- Liaison with Regulation Inspectors and Ombudsman's office.

The Commission is currently engaged in a legal support project for Transport and a well attended lunchtime fringe event took place. .

7. Questions for the Panel

The morning's speakers formed a Panel session during which several topics were discussed. These included

- Monopolies,
- Demise of printed timetables.
- Park & Ride and real time information.
- Harmful effects of road tyre and brake dust,
- Future of TfGM bus subsidy.
- Future transport provision in the light of new spatial development.
- Standardisation of audible announcements on buses.
- Early morning & late evening buses.

8. The London Model

Tony Francis, Secretary, The Omnibus Society

The Omnibus Society was formed 90 years ago. It has an extensive library of information of bus, coach and tram operations and systems over the years.

London has always had a dominant transport operation. Originating in the 1930's it was designed to be an independent commercial operator. In 2000, Transport for London was formed as an integrated system for all London's transport including buses, Underground, taxis, DLR, River services, trams, walking and cycling. It has responsibility for street design, emissions control, congestion charges and property rentals and creates significant revenue from these operations. 80% of journeys in Greater London are provided by TfL systems. The Bus network is substantial and is styled on a single operator although a variety of supply companies actually operate vehicles.

In finding the best solution for future management of transport it is essential to establish the final aspiration before deciding on the mechanisms to achieve it. Good teamwork is

vital with all stakeholders working in harmony. It also must recognise that commuter patterns are constantly changing with remote working and flexible hours on the increase, together with more work commitments outside the traditional day.

9. The Needs of Disabled People

Kay Fairhurst and others, Salford Disability Forum

Kay said that disabled people are only disabled by the environment in which they live. Many avoid using public transport due to perceived barriers.

Bus drivers are key personnel, being the face of the company to passengers. Good and robust training is vital so many bus companies are placing comprehensive training and refresher courses high on their company agendas. As disabilities vary it is necessary to be aware and able to accommodate the passenger's needs and whilst disabilities are not always apparent, such as in dementia sufferers, comprehensive recognition of the range is required.

Intervention techniques when conflict arises is also important, such as arguments between wheelchair users and those with pushchairs or shopping trolleys etc. This is a frequent issue and whilst intervention training is provided satisfactory results can be limited as there is no legal requirement for priorities, other than to request an area be vacated. Changes in the law may be forthcoming to amend regulation and provide better empowerment for drivers and operators.

At bus stops and bus stations it can be challenging for blind and partially sighted passengers. Consider the difficulty in hailing a bus so independent audits have been undertaken for RNIB and have received a positive reception.

The Greater Manchester Coalition of Disabled People is advising the transport authority on bus design to cater for disabled passengers addressing barriers to inclusion for disabled and able-bodied users. There remains a need for clarity about how to make a complaint with on-board information highly desirable.

10. What does the Passenger want

Claire Walters, Chief Executive, Bus Users UK

Jim Davies, Lancaster Bus Users Group

Claire Walters began by stating that buses are a lifeline to many. Their availability reduces inequality, social exclusion and loneliness and improve health and well-being. Buses contribute £64 million into local economies but in 2017/18, £20 million (45%) of subsidies were withdrawn. The alternative of private transport is often unaffordable and results in "transport poverty" with many communities cut off from bus services and being limited to less travel. It is a false economy. Local Government has failed to address changing social needs and use by young people is also eroding.

Those who rely on buses are the people who really matter. However, a simple "one size fits all" system, such as the London model is not suitable for every area. The only solution is a tailored service to fit local requirements. Reliable and punctual services, affordable fares clean and safe environments and comprehensive accessibility are what

passengers want. Better research is also required with greater dialogue with users and potential users. Local meetings, on street events, addressing local groups and panels and effective use of social media would provide greater outreach for the message. Added to this would be a need to engage with local authorities, community transport groups, planners, care professionals, estate agents and schools. This can create a pathway to a final solution which should be published and adopt feedback.

Change is needed to the legal framework as buses are currently subject to 380 pieces of legislation and this is a disincentive for potential new operators. The Transport Act requires major reform and local authorities should be given a “duty” to organise bus services rather than just a “power” and local partnership working should be a requirement.

Jim Davies stated that a simplified system was needed and one network that is easy to understand is desirable. Passengers do not care who runs buses as long as they are punctual, frequent, comfortable, affordable and provide a comprehensive set of routes serving communities on and off main thoroughfares. Evening and weekend services should also be strengthened. Drivers require better training and bus stops should be more welcoming and accommodating with shelter and seating. A more simplified set of fares usable on any bus is also an asset.

Local Bus User Groups should be encouraged to hold dialogue and engagement with service providers and they, in turn, need to have personnel who understand the market, have a guiding mind and a good oversight of service levels and fare structures.

A simple set of marketing and communication plans should be worked up featuring:

- One system of route numbers.
- Common timetable format.
- Network maps in common format.
- One system of fares and tickets.
- Operators working together under one unifying brand.

A stable set of principles to manage change, a limited number of timetable change dates mirroring those of the railways, effective and penetrating advance publicity and defined dates of timetable periods will also be important.

11. Questions for the Panel

These ranged around the overriding importance of drivers and training and various elements of disability, visible or otherwise and relations with the environment.

12. Date of Next Conference

Thursday 6th February 2020, Lancaster.

Attendance

| Name | | Organisation |
|------|-------|--------------|
| John | Aaron | |

| | | |
|---------|-------------|---|
| Norman | Adams | |
| Mike | Ashton | Lancaster Bus Users Group |
| Terri | Balon | Royal National Institute of Blind People |
| Colin | Barnett | |
| Roger | Barton | Goyt Valley Rail Users Association |
| Chris | Bates | TravelWatch South Central |
| Robin | Bence | |
| Kayley | Bowes | Stagecoach Manchester |
| Rick | Burkiss | Greater Manchester Coalition of Disabled People |
| David | Burton | SE Lancashire Rail Action Partnership |
| David | Butterworth | TravelWatch NorthWest |
| Mike | Cain | |
| Roy | Chapman | TravelWatch NorthWest |
| Stephen | Clarke | Lancaster / Kendal & District Bus Users |
| Judie | Collins | Greater Manchester Older Peoples Network |
| Ian | Conway | Lakes Line Rail Users Group |
| Jon | Croxford | Go North West Limited |
| Steve | Cullen | Blackpool Transport Services Ltd |
| David | Culshaw | TravelWatch NorthWest |
| Chris | Dale | TravelWatch NorthWest |
| Jim | Davies | Lancaster Bus Users Group |
| Sandra | Dutson | |
| David | Evans | Blackpool & Fylde Rail Users Association |
| Kay | Fairhurst | Salford Disability Forum |
| Helen | Farmer | Equality and Human Rights Commission |
| Tony | Fawthrop | Greater Manchester Transport Campaign |
| Tony | Francis | The Omnibus Society |
| Jim | Froggatt | TravelWatch East Midlands |
| Tom | Gibson | Stagecoach Manchester |
| Alan | Goater | Chinley and Buxworth Transport Group |
| Lizzie | Guinness | Equality and Human Rights Commission |
| James | Harkins | All Party Parliamentary Light Rail Group |
| John | Hart | TravelWatch NorthWest |
| Mark | Hodgkiss | Cumbria County Council |
| Roger | Jones | Greater Manchester Transport Committee. |
| Louisa | Kane | Equality and Human Rights Commission |
| Josh | Kay | Salford Disability Forum |
| Colin | Kennington | TravelWatch NorthWest |

| | | |
|-----------|------------|---|
| Fred | Kennington | |
| Geoff | Kerr | |
| Matt | Kitchin | Stagecoach Manchester |
| Dave | Koring | Severn-Dee Travel Ltd |
| Peter | Lamkin | Wrexham- Bidston Rail Users Association |
| Mike | Laycock | Wirral Transport Users Association |
| Zachary | McAskill | Stagecoach Manchester |
| Robert | McCarthy | Stagecoach Manchester |
| Roy | McDonald | Agito Transport Planning |
| Alan | Mayor | Friends of the Settle Carlisle Line |
| Margaret | Mitchell | |
| Matthew | Moll | The TAS partnership |
| John | Moorhouse | TravelWatch NorthWest |
| John | Nicholas | Bus Users UK |
| Gary | Nolan | OneBus |
| John | Owen | TravelWatch NorthWest |
| Gillian | Pearson | Friends of Littleborough station |
| Phil | Pearson | |
| Julian | Peddle | D&G and High Peak Buses |
| Malcolm | Richardson | Blackpool & Fylde Rail Users Association |
| Pascale | Robinson | Better Buses for Greater Manchester |
| Stuart | Roughley | Stagecoach Manchester |
| John | Ryan | Wirral Transport Users Association |
| Michael | Sanderson | Stagecoach Cumbria & North Lancs |
| Andy | Saunders | Manchester Airport |
| Kay | Sharkey | Equality and Human Rights Commission |
| Maurice | Shaw | Equality and Human Rights Commission |
| David | Sidebottom | Transport Focus |
| David | Simper | Blackpool Council |
| Stephen | Slater | |
| Maisie | Smith | Better Buses for Greater Manchester |
| Phil | Smith | |
| Vernon | Smith | Blackpool & Fylde Rail Users Association |
| Mark | Stone | Equality and Human Rights Commission |
| Ian | Stuart | Friends of Altrincham Interchange |
| Ken | Swallow | Chartered Institute of Logistics & Transport (NW) |
| Robert | Talbot | TravelWatch NorthWest |
| Elisabeth | Tasker | Stagecoach Manchester |
| Claire | Walters | Bus Users UK |
| Miriam | Walton | Chinley and Buxworth Transport Group |
| Gillian | Woodford | Stagecoach Manchester |
| Craig | Wright | SE Manchester Community Rail Partnership |
| Tim | Young | TravelWatch NorthWest |
| Tony | Young | TravelWatch NorthWest |

What factors affect present bus patronage and how can it be increased?

TWNW Conference- 7th February 2019 - Bus Workshop Brief

| | |
|--------------------------------------|--|
| Information prior to travel | Websites- national / company specific Journey planners - Google Maps and other mobile apps Phone enquiry Visit to information office Printed timetables Info from another person- word of mouth |
| Buying tickets / affordability | Buying online Buying from the driver Prior knowledge of fares Is exact fare required? Contactless payment Smartcards Fare levels (comparison between urban & rural) Multi-use tickets |
| Bus stop environment and information | Shelter / other waiting areas Toilets Bus running information (realtime) Timetable information at the bus stop How to complain |
| Accessibility | Step free access Wheelchair / pram space (potential for conflict) |
| Bus driver conduct and training | General helpfulness Announcement of stops (maybe automatic) Bus driven carefully and legally Driver waits for passengers to be seated Driver apologises for delay |
| On-bus environment and information | Comfort Audible and visual realtime information Information regarding diversions Route displays General publicity about services How to complain |
| Reliability of services | Information regarding service disruption Problem of traffic congestion Delay caused by road works / route diversions |
| Integration with other modes | Overall journey information Workable connections Ticketing / through fares |

Public Attitudes to Bus Travel

Comments within 'What's Driving Bus Patronage Change' - Urban Transport Group

1. The number of bus journeys taken in Great Britain fell by more than 50 million (a 2% fall) in one year (2017-18). The only increase has been in the south east and south west.
2. A London based survey found that reliability is central to bus user satisfaction.
3. A survey in Edinburgh found that social exchange is a key feature of bus use - but it was admitted that badly behaved passengers can create negative attitudes.
4. The perception of bus travel varies according to age, gender, social class, disability and ethnicity.
5. A DfT report highlights the importance of catering for those with disabilities, allowing access to social networks, employment and education. Disabled pass users have increased by 23% in six years.
6. The decline in available routes (due to funding issues) and the overall reduction in passengers has made bus operations less financially viable in certain areas.
7. There are widespread perceptions around bus travel being for those who are too poor, too young or too old to use alternatives.
8. Car use is viewed as providing quicker door to door journey times, easier than multi-stage journeys and easier carrying equipment. Cars are seen as more reliable and can generate a sense of freedom.
9. Buses are viewed negatively by many, quoting bad driver behaviour, poor driver attitudes, poor quality of some buses, poor reliability and high fares.
10. Some people avoid buses as they feel vulnerable due to the potential for anti-social behaviour.
11. Bus travel is viewed as very expensive in some areas, especially when compared with door-to-door taxi travel when two people travel together. Raising fares to counter falling revenue is unlikely to yield long-term benefits.
12. The lack of fares transparency is viewed as a disincentive to consider bus travel. Operators with high growth, e.g. Reading, have introduced a £2 flat fare (with other short-hop lower flat fares), so the cost is known in advance.
13. Bus use has increased in certain areas of England - due to a) good quality bus services, b) car travel is difficult or unattractive, and c) in dense urban areas where car ownership is low.
14. In urban areas car drivers are prepared to convert to bus use and remain so only as long as the bus service is reliable and cost-effective.
15. The willingness of people to use bus services has been severely constrained as a result of the withdrawal of many LTA sponsored bus routes. Residents of outlying villages can no longer access urban areas for shopping or onward travel so must either rely on their own car (or that of a friend) or stay at home.
16. Despite running through a high car-owning area, the Transdev Service 36 between Leeds, Harrogate and Ripon has generated a significant market share due to the provision of high specification buses with leather seating, WiFi, USB charging, plenty of legroom and active bus-stop information. The Leeds - Harrogate frequency is every 10 minutes, with alternate buses extended to Ripon.
17. In East Lancashire Transdev attract passengers with modern buses with similar features to the No. 36 above and a frequent service along the main urban corridor.

| | |
|--|---|
| Organisation Name | TUC North West |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | It makes sense that the entire area is covered by the proposed scheme, so that residents, visitors and workers can benefit. One of the challenges people face accessing opportunities is how they can physically get there, which can be difficult if travelling across a large area. A joined up approach makes more sense to this, allowing all to benefit from the potential outcomes. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | It would be useful to ensure that the consultation is as wide as possible, factoring in the comments made in 48.8.8 of the Assessment, to ensure as many views are heard as possible. 3.23 of the Consultation could easily be read as just consulting with organisations representing bus users (e.g. passenger focused organisations or bodies) and not wider public and civic organisations that would be more inclusive. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | An important factor would be the location of depots and accessibility for potential workers. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Given the challenges set out, it supports the feedback we have from workers about transport working for them. Accessing opportunities further afield, out of say their local authority area or across GM is not seen as possible. This is for a combination of reasons, including no single source of information, no joined up transport options, cost, availability or timing of services - the 'hassle' perceived or otherwise. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|--|
| Q13b Why do you say this? | Making changes to benefit residents, workers and visitors is imperative if Great Manchester is to continue to grow and to allow all to share in that growth. Allowing the bus market to continue as is, when it is clear it is not working well or for all, is not the inclusive approach that GM champions. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | Whilst the reasons for the length of contracts make sense from a GMCA perspective, consideration of the impact on bus drivers and depot staff on relatively short-term contracts should be factored in. |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | <p>Employees would have concerns about the potential changes that might come about as a result of this. Insecurity, as previously mentioned, would be a problem. As well as providing protections, in relation to pensions, it would be important that there is a statement of intent from GMCA leadership that cost savings from operators who bid for franchises would not come from staffing reductions or worsening terms and conditions. Access to the pension schemes mentioned in the Assessment, including LGPS, would be a positive step for employees.</p> <p>Consultation with trade unions from an early stage would be helpful, to ensure employee voice is heard, but also to help understand the strategic decisions being made that could have an impact on employees. This could be done through the existing Workforce Engagement Board already operational in GM in the first instance, with direct engagement with respective trade unions as appropriate.</p> |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |

| | |
|---|--|
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | The franchise option would have a positive impact on wider society. Aside from the economic and environmental impacts, the sense of 'ownership' with local accountability and decision making on services to benefit the local economy and community could increase patronage. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We would support the Assessment's conclusion. The benefits and opportunities have been made clear, and would deliver a bus service for Greater Manchester that served their interests and needs, belonging to them and decisions made by them. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | A scheme that has a positive impact, such as those outlined, would be welcomed. |

| | |
|--|---|
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | The benefits are clearly set out, and the opportunity to better direct services in the interests of Greater Manchester is not to be missed. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely unlikely |
| Q48 Finally, do you have any other comments you want to make? | <p>Where there have been no specific comments made, or no response provided, this has been because the conclusions reached, supportive of the position to move to a franchise system, are supported us. We believe it is in the best interests of our members, and the wider public and passengers, to move to a system in which there is local accountability of services which serve the region.</p> <p>Franchising will enable decisions make to improve the economy, or make changes, to be supported by the services needed, like transport, that make it inclusive. Currently workers are excluded from opportunities due to the lack of affordable or realistic transport options, and can create divides between parts of Greater Manchester.</p> |

Hello,

I am writing on behalf of the Greater Manchester Transport Branch of UNISON. We are currently recognised by Belle Vue Buses, Stagecoach Manchester, Transport for Greater Manchester, and Transport for the North, and also organise other transport workers across Greater Manchester, mostly in the bus sector.

Andy Burnham is already aware, from discussions with Branch representatives, that we support a move to franchising, and we are pleased to see it has progressed to the consultation stage. Details of the consultation have been shared with members and several, including myself, have submitted their individual responses.

However, as the branch representing the workers who will be most directly affected by this change we are keen to enter into discussions going forward over how they will be implemented. We want to ensure that franchising can deliver quality, reliable bus services across a comprehensive network without causing a race to the bottom on terms and conditions of employment. We are keen to enter into further discussions over how this can be delivered going forward. We note that this is consistent with the response to the consultation from the UNISON North West Regional Office.

Best of luck with the next steps,

Kind Regards,

Tony Short
Membership and Education Officer
UNISON Greater Manchester Transport Branch

Cc
Tony Wilson - Branch Secretary
Tony Thomas - Branch Chair
Vic Walsh - Regional Organiser
Jason Hunter - APF Organiser



Response to 'Doing Buses Differently', the Greater Manchester Bus Consultation

January 2020

UNISON represents over 70,000 workers in Greater Manchester who are employed in the delivery of public services. We cover sectors including local government, health, schools, further education, higher education, the police service, the fire service, the utilities and transport. Our members are employed by many different organisations: public authorities, private companies and community and voluntary sector employers. Over two-thirds of our members are women.

UNISON has members employed by Transport for Greater Manchester and by bus companies. Many of our members use buses to get to work and to get around, and are concerned too about the accessibility of the services that they work in to the public. UNISON members therefore have a strong interest in there being a high quality bus service in GM.

UNISON North West is involved in the 'Better Buses for Greater Manchester' campaign and we are supportive of the GMCA's proposed bus franchising scheme initiative. This response has been developed and discussed with UNISON branches and members across the city region.

We attach our response to the Questionnaire below.

(Question A) The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

The local bus market is failing in terms of quantity and quality of provision.

The consultation document refers to a 17% fall in bus journeys over ten years, and the Better Buses for Greater Manchester (BBGM) has highlighted the loss of eight million miles of bus services since 2010. Buses in GM are not providing the volume of journeys that would help the city-region meet its economic, social and environmental objectives.

We believe the improved opportunity to move around the city region more easily and cheaply will increase opportunities for people to live better lives, will make for a more inclusive community and improve the productivity of our economy. We also note that Greater Manchester has some of the worst air pollution in the UK. Ironically, the worst area for such pollution is the Wilmslow Road corridor, an area with a high amount of operational buses- many of which travel under full capacity. This shows the anarchy and waste of the market. Proper democratic planning of the system could help to overcome this problem.

The bus market does not provide joined-up services that are linked with the rest of the public transport infrastructure – or even across services provided by different bus companies. The services are not good value for money for public authorities or for passengers – with BBGM highlighting recent fare increases.

We believe that the profits extracted by private bus companies are excessive. While the majority of our Transport members in the city region are employed by TfGM rather than the bus companies, we very well understand the concern of bus company workers that a fall in their employer's profits may impact upon their own pay and conditions – as the company attempts to claw back their profit margin. We believe that it will be important for GMCA to seek to prevent this happening. One tool that may be of assistance in preventing such an outcome is the GM Employment Charter which companies receiving public money should be required to meet. Moreover, it may prove possible to promote or require some sectoral norms of employment across GM that are collectively negotiated with trade unions.

The importance of the GMCA ensuring that bus workers are treated fairly is only increased in a context where the Conservative government is planning legislation to attack the ability of public transport workers to take industrial action to defend their pay and conditions.

We strongly believe in public control of the bus network and accept that the franchise model allows for this.

(Question B) The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market.

- **To what extent do you agree or disagree with this?**

X Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

(Question C) Why do you say this?

Franchising is the best available method for the public to take back control of bus services in GM. It is right that such an important service is subject to democratic control rather than left to the anarchy of the market and atomistic decision-making on the basis of profit maximization rather than wider economic, social and environmental benefit.

We should have democratic control of routes, fares and ticketing.

(Question D) The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options,
- provide the most economic value (Net Present Value), and
- create the best platform from which further economic value could be delivered.

Do you have any comments on this?

Currently, public money makes up 40% of bus companies revenue, yet we have no control over fares, the vast majority of routes and timetables. And 10% of that public money is leaked as dividends.

Public control means we take all the fare revenue and give bus companies contracts, halving their profit margins, so that public money is used for buses over shareholders. (Transport for Quality of Life, Building a World-class Bus System for Britain, es.7).

Public control also means that profits from busy routes can be used to pay for socially necessary routes, rather than just bus company profits. Research showed that 95% of people in GM supported the idea of subsidising bus routes which are unprofitable but necessary for the public good. (<https://www.abellio.com/news/people-manchester-we-want-better-bus-service>)

We can finally get a better bus network.

(Question E) The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

We think the outlined costs, with the vast majority coming from local authorities, and a total of £14 council tax increase for the average household spread over 6 years to 2025, are a price worth paying.

These costs will mean we can get a better bus network, run for the public over shareholders, with much better value for the public money we currently give to buses (<http://bit.ly/2oRllkr>)

(Question F) Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

We strongly agree that this would be a major step forward and support this statement.

We strongly believe in public control of the bus network and accept that the franchise model allows for this. The question that flows through this is what does public control look like to the people of Greater Manchester? We believe the management of the franchise should rest with elected politicians, workers who provide the services (through their chosen trade unions) and wider civic society (in order to ensure that the voice of the travelling public is at the heart of decision making. With particular regard to those communities who are highly dependent on safe, accessible and affordable public transport to be fully included in all that our city region has to offer. We believe the franchising option makes this possible whilst the other options fall short in these respects.

(Question G) To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?

X - Strongly support

Tend to support

Neither support nor oppose

Tend to oppose

Strongly oppose

Don't know

(Question H) Why do you say this?

1. The alternative that is on the table, the Voluntary Partnership, leaves all the power in the hands of the bus companies. Changes will only be made to the extent that they deem it in their interests. We need a system that puts the interests of GM's people first.
2. Franchising is the only option that allows cross subsidy from popular/profitable routes to less busy/unprofitable routes.
3. The additional expenditure over that for the Voluntary Partnership is not large: £25M (£122M versus £97M) over the 5 year implementation period. That's just £5M per year, or £500k per council area, or £4.34 per household per year. (source: TfGM Franchising paper, executive summary, page 23).
4. The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefit than from either partnership model.

Buses are hugely important to our lives and we have a huge opportunity to transform them so that they work for us as citizens, over shareholders.

(Question I) Are there any changes that you think would improve the Proposed Franchising Scheme?

Yes

☒ No

Don't Know

| | |
|--|---|
| Organisation Name | Unite the Union |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | The current deregulated system is not working for passengers or the various communities of Greater Manchester. Private bus operators main motive is to make Profit to send back to shareholders. If bus routes are unprofitable they are pulled and communities are left without access to transport services. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Re-regulation will bring back some form of local control and accountability to how where and when services are run. The ability to structure fares that are easy to understand and can be used in a truly integrated way over the whole transport network of Buses, Trams and even Trains. |

| | |
|--|---|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>Whilst Unite is broadly supportive of Franchising we believe That this should not be to the detriment of Bus workers pay, terms and conditions. Unite believes that in order to provide a truly world class integrated transport system you need Well paid well trained professional transport workers.Unite transport workers have produced a miniumum standards document that we believe should be implemented into any Franchising contract.</p> <p>Copy to be sent</p> |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|---|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Buses are Vital to the economic health of Greater Manchester. The ability to move people around quickly and efficiently not only helps the economy but will hopefully attract more passengers thus reducing congestion and pollution. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|--|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Franchising gives more GMCA control of services and ticketing |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | De-Regulation in 1986 was supposed to liberalise the industry and bring about competition was supposed to increase services and passenger numbers and reduce fares. None of those things have happened and we now face a situation that passenger numbers are dropping services are being dramatically reduced with fares rising. this is creating an ever decreasing spiral that if not checked will see more and more communities deprived of access to bus services |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |

| | |
|--|---|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Unite would seek to have protection for Bus workers Pay, Terms and conditions and their pensions. Ideally, the ability for bus workers to rejoin the LGSS or the setting up of a Manchester Bus workers specific Greater Manchester pension that any operator winning a Franchise would have to join and contribute to would be an improvement. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

Hello,

I am writing on behalf of the Retired Members' Section of Wigan Metro UNISON.

The on-line questionnaires are far from straight-forward and many members have informed me that they have found them too complex to complete.

We fully support the ambitions of the Better Buses for Greater Manchester Campaign and at our December meeting, it was agreed that I write to you to express our unanimous opposition to continuing to provide bus services under a partnership arrangement and our total support for franchising future services.

I have attached some information gathered from members earlier last year regarding views on the service currently offered. Our discussions in meetings have convinced us that the concerns illustrated in the attachment can only be overcome by providing future bus services under a franchising arrangement.

Thank you for considering our views.

Regards,

Carol.

Carol Coltman

Secretary Retired Members' Section

Wigan Metro UNISON

RETIRED MEMBERS - SHORT SURVEY - APRIL/MAY 2019 OUR BUSES AND BUS ROUTES AND WHAT WE THINK OF THEM

Preliminary analysis:

220 surveys sent out (as at 9th May) 40% returned

Group 1 - Have OWN transport and USE buses 71%

Of this 71%:

14% use buses 4-7 days a week

73% use buses 1-3 days a week

13% use infrequently

Group 2 - Have NO transport and USE buses 18%

Of this 18%:

78% use buses 4-7 days a week

22% use buses 1-3 days a week

Group 3 - Have OWN transport and DO NOT USE buses 11%

Issues:**Group 1 (own transport and use buses)**

73% of users 1-3 days

- BUT 42% say the services **DO NOT** meet their needs
- AND 58% agree that services **DO MEET** their needs. However, 22% of these members commented on difficulties they know about/have observed for other bus users.

14% of users 4-7 days

- 50% commented on difficulties faced

13% infrequent users

- 43% commented on current difficulties affecting their use

Group 2 (no transport and use buses)

78% of users 4-7 days

- 100% had issues

22% of users 1-3 days

- 100% had issues

Group 3 (own transport do not use buses)

Of this 11%:

44% do not use buses due to their disability and/or lack of available service

Reasons for using bus services:

The majority of retired UNISON members accessing bus services do so for multiple reasons.

In rank order:

1. Shopping
2. Social activities/ meeting friends and family
3. Attending health appointments
4. Other - meetings, church, carer responsibilities, voluntary work, bank, getting out of the house

Concerns cover:

- Needing to take 2 or more buses to reach destination, often tracing a circuitous route taking a long time. Access to hospitals a particular concern and fitting bus times to appointment times
- Inadequate or non existing service to more remote areas of the borough and previous helpful services cut

- More frequently previously well run routes being scaled back
- Even when day-time service is acceptable, poor or non-existent service in evening/weekends
- Buses not turning up, being late or 2 or more buses arriving together
- No 'real time' information at bus stops
- Not all bus stops have a shelter
- Previous helpful services cut
- Bus services not getting close enough to large supermarkets and retail parks
- Having to travel a long distance to shop to just have one journey which stops at reasonable walking distance to the supermarket
- Impact on bus services of new housing developments (buses often full)
- No service at all from TfGM in some areas
- Multiple fares for non-bus pass holders
- Request for extension of bus pass to all those 60+
- Cleanliness/safety of vehicles
- Guided Busway Service generally approved of but distance between bus stops a problem for some and access issues need addressing eg frequent breakdown/lack of repair to in-bus real time information, difficulties for people who are sight-impaired being able to see information, read bus numbers
- Lack of available and easily accessed seating for older/frail/disabled passengers
- Wider independence issues regarding accessing evening events when bus service reduced/ nonexistent, having plans curtailed/cancelled due to non arrival of buses
- environmental issues
- fewer cars on roads

More detail on issues:

Group 3 - Non bus users

'This area is not well served by buses (Kitt Green). You have to walk quite a distance to get a bus and even further to walk home, which is not good if laden with shopping.

If we had a decent bus service I would use it!

'Bus services at present are insufficient to meet the reasonable needs of those without private transport. Typically, these groups include the elderly, disabled, impoverished. Free-market 'partnerships' allow the bus operators to 'cherry pick' the profit-laden services and schedules. We need to regulate (re-regulate) our bus services to reverse the damage done.'

'I find it difficult to walk to bus stops now and it was a privilege to use them. I don't think any service should be cut, but may be improved. I now rely on my car for near enough everything.'

'I don't use buses now due to disability. Too difficult when travelling alone.'

Group 2 - (Rely on buses)

'Sometimes buses are taken off and there are long periods of waiting which is especially difficult for disabled/elderly people. When I was hospitalised recently my wife said that 2 buses failed to appear when she had visited which made her late for an appointment'

'Buses give me independence so there must be no further cuts.'

'Early hospital appointment at Wrightington was difficult as there was no bus to be able to keep my appointment time (from WN6).'

'Since changing bus 613 to once an hour it's always full early in the day and takes too long to get to Wigan. (From New Springs). 614 removed.'

'Shevington buses are very unreliable. Don't know if they will arrive or not especially after 9.30am.'

'There is more property being built in Whelley and New Springs. In a morning the bus is always full. The last bus leaves Wigan at 5.15pm and does not run at all on Sundays.'

'We do not have any service from Greater Manchester (WN7 Leigh) transport only provided by Warrington. No Sunday service. I and many of my fellow bus travellers from this area feel poorly served by GM. I personally have mentioned this issue at various meetings in the past but nothing changes.'

'Since Morrisons in Wigan town centre closed there is no route to a large supermarket (from Kitt Green). No buses run directly to Asda, Tesco or Morrisons at Ince. I'm not very steady on my legs so can't get the bus to any of the big supermarkets because the normal stops are too far away from the shops.'

'Not frequent enough (1&2). Also bus to Boston House (from WN3) not frequent enough - walk to bus stop too far. A bus along Clapgate Lane would be appreciated.'

'Bus 113 no longer operates on Sunday.'

'I have to take 2 buses (from Gidlow Lane) to get to Asda 635 and 641 and 3 buses when I go to Preston Hospital, 635 to Wigan, 113 to Preston, 19 to Preston Hospital.'

Group 1 - (Have own transport and also use buses)

'I hope that when (if) it becomes necessary for me to use the bus service entirely, they will still be available and accessible.'

'Other than the V1 and V2 buses to Manchester (from Tyldesley) the bus services in our area are very limited and it is a lot more difficult to get into Wigan - hence we use the car.'

'One issue with the one-hourly service (Wigan to Wrightington) is that passengers using the 113 for 'say' three quarters of that journey from the bus station means that passengers travelling beyond Standish are left behind at the bus station at busy times as the bus is only carrying short journey passengers.'

'I often use my car as buses are only one per hour.'

'I consider myself lucky that I live near an adequate bus service but am strongly in favour of Regulation - a bus service should serve everybody.'

'Services cut along Tanners Lane to Leigh leaving many people (if they can) a long walk to a bus stop. I have to take more than one bus to get from A-Z.'

'Infrequent service at night - never knowing if it will turn up or even be on time. Real time info required at bus stops. Cleanliness of buses is a cause for concern at times. Are buses inspected for cleanliness at each termini and a cleaner available if needed?'

'Bus ticket fares for multi-operator services often not transferable outside GM area. so more easy tickets between operators/cross boundary would be of assistance.'

'Keep buses clean and safe as I need to feel safe on a bus.'

'Cancelled 32 service to Manchester (from Atherton) so pensioners have to walk a distance to bus stops now and husband has heart failure. V2 is a very good service but bus-stops are too far apart and there is no bus-stop near out home.'

'No evening service and current bus timings not adequate. My 93 year old neighbour relies on the bus to get to and from Standish to Wigan 2 or 3 times a week.'

'There are no convenient buses from Wigan to Morrisons at Ince. Also there are not enough buses running at convenient times eg travelling to Ormskirk to see my family.'

'Shopping at Tesco, Asda or Morrisons is very difficult by bus because of long walks from the bus (Orrell to Wigan) and have to change buses for Tesco or Morrisons. My friend in Standish has elderly neighbours who go all the way to Chorley by bus because the bus stop there is close to the supermarket!'

'I pay to use the buses. I access Arriva buses from Orrell. It is cheaper to go to Chorley on Arriva buses than to go to Higher Ince (Morrisons) because I have to change to Stage Coach bus service and extra cost incurred. Frequency in the Wigan area after 6pm is not sufficient. Also in Wales and Scotland and in the London area people aged 60 and over have a free pass. I had to retire early due to health reasons and a free bus pass would benefit 60 year olds.'

'My grandson who lives with me (Astley) has to pay for a taxi each morning to get him into Leigh to catch a bus into Atherton for work as the buses don't run early enough.'

'If you have an appointment you cannot rely on the bus being on time or sometimes it does not turn up. Buses should revert back to the same company and colour with very simplified methods of ticketing at a reasonable price to get more cars off the road. Ideally TfGM should run the service fully. London can do it, why not us?'

'Although there is a good service during the day, the last bus is 17.30 and hourly until 20.30.'

'I need more than one bus for some appointments. A half hourly service, if the bus is late or occasionally does not arrive, it is too cold in winter and I also cannot stand for very long. Consequently I use the car - but more carbon footprint!'

'Think of the bigger picture with those less able who need buses for multiple reasons but also for social interaction which assists in well being. Reduce the services and increase dependence/reduce independence.'

'There is no service down Park Road in Hindley which makes it difficult for older friends who live there and have no transport.'

NON-STATUTORY**Burnage Academy for Boys**

| | |
|--|---|
| Organisation Name | Burnage Academy for Boys |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <ul style="list-style-type: none"> - The fares are confusing and vary between providers, routes and ticket types. Sometimes ticket fares even vary for the same bus companies, it seems that bus drivers give different prices to go to the same place. - Pupils wearing school uniform have often been denied child tickets and are being charged adult prices. Even pupils Igo passes have been denied child tickets based on bus drivers not trusting that they are carrying them legitimately. - The bus networks do not serve all the areas of Greater Manchester. - Buses are unreliable, do not arrive on time or takes longer than expected en route. - Pupils do not feel safe on buses. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |

| | |
|--|--|
| Q13b Why do you say this? | |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |

| | |
|--|--|
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |

| | |
|--|--|
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | <ul style="list-style-type: none"> - Free travel for under 18's including primary and secondary school pupils. - Cheaper ticket prices than are currently offered. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | <ul style="list-style-type: none"> - Improve trams and trains as well. |

| | |
|--|---|
| Organisation Name | IPPR North |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|--|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>The way that buses work in Greater Manchester, in simple terms, ridiculous. The streets are a free-for-all for bus companies: any company can pick up passengers at any bus stop on any route, and they can charge passengers what they like.</p> <p>In theory, this is supposed to spur competition; in practice, it means passengers suffer. There is little or no competition in most parts of the country as large providers monopolise whole markets. Where there is competition, it is often so intense as to be highly inefficient: half-empty buses clog up the streets and fill the air with their fumes as they jostle for passengers in our busy city centre.</p> <p>What does this mean for passengers? Buses are less frequent and often late, and passengers have to buy a new ticket if part of their journey is with a different operator.</p> <p>There is also a strong relationship with air quality. Millions of people pass through city centres every day, and city-centre living is increasing. But our buses are filling the air we breathe with poisonous emissions, and this appears to be worse in non-franchised markets: recent IPPR North research showed that, in Greater Manchester, over 20% of all buses fall into the most polluting emission standard (Euro 2–3), whereas in London’s franchised market only 12% do. In Greater Manchester, only 10% of buses meet the higher ‘Euro 6’ standards; in London the figure is 37%.</p> <p>But perhaps most significantly, more and more people can’t use the bus at all where the bus companies don’t profit from providing a service. This leaves some people reliant on using a car – an option that is personally expensive for them, but also makes the air quality and congestion problems worse for everyone else. And for people who can’t use a car, the situation is even worse: the lack of bus services leaves many completely isolated – especially people on lower incomes, older people, younger people, and people with disabilities.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|--|---|
| Q13b Why do you say this? | Yes reform is necessary but it must be real reforms - the bus company's partnership proposals are just more of the same, business as usual, and this is totally inadequate for the people of Greater Manchester. Franchising/regulation is, of the options on the table, the only way to change this situation. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | Yes this is completely expected. Franchising is a much better way to run a bus/transport network. The costs are far outweighed by the benefits - especially when the broader, less quantifiable factors are taken into account. And in terms of integrating buses with trains and trams it makes complete sense. Franchising is the only way to get the transport network Greater Manchester needs. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | These proposals are sensible and I support them. Good policies cost money but this is important for Greater Manchester and the benefits far outweigh the costs. I do think central government should fund this as they have underfunded the North for decades. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We fully support bus franchising for sound economic reasons and agree it is the best way to achieve GMCA's objectives |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | This is an important change and one which will benefit Greater Manchester significantly. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Central government should foot the bill for this if possible. |

| | |
|--|--|
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

Statement for the SU Regarding the GM Bus Consultation and the Impact for Medical Students

There are currently approx. 2400 Medical Students within the University of Manchester Division of Medical Education (Manchester Medical School).

In years 1 and 2, students are required to travel to hospitals, community placements and GP placements for Early Clinical Experience Placements. Over years 1 and 2, students will partake in 12 hospital visits and 12 GP visits.

When students progress to years 3, 4 and 5, they are based at one of four Clinical Education Campuses (CECs); MFT- Oxford Road, MFT- Wythenshawe, SRFT (Salford Royal) or LTHT (Preston). Whilst the CEC is their main base, students will spend up to 50% of their time in other settings such as District General Hospitals. These are located in Trafford, Bolton, Oldham, Bury, Rochdale, North Manchester, Wigan, Tameside as well as more distant placements.

A significant proportion of our students do not have access to a car and therefore become very dependent on public transport. Therefore, the implementation of a unified transport pass and policies that span the whole of Greater Manchester would significantly improve the commuting experience for our students. For instance, in their 5th year, students spend 2 days a week in a General Practice setting, 2 days in a Critical Care setting within a hospital and 1 day within their CEC. This can often result in their journeys transcending across the routes of different bus companies. Currently, students often cannot buy weekly or monthly bus passes that allow travel throughout Greater Manchester. We are aware that this causes financial concerns with regards to transport for many students.

In addition, the University of Manchester has a significant proportion of students from Widening Participation (WP) backgrounds and students who 'live at home'. For students who remain living at home, transport to both the University and placement becomes an issue throughout all five years of study. Often, live at home students also come from a WP background, due to initiatives such as the Manchester Access Programme (MAP). We are aware that, University wide, WP students have one of the highest rates of dropping out of study. As a Division we pride ourselves on the high proportion of WP students we hold compared to other Medical Schools and aim to support and encourage these students throughout their journey at University. We welcome your proposals for the implementation of more universal transportation systems across the city. They could have a significant impact on the rate of drop outs from University of Manchester WP students.

It is also of note that while some students are able to apply for an NHS bursary towards travel costs, international students are not eligible for such support. We are aware that this has been putting an additional burden on top of the stress of many hours of travel upon these students.

Furthermore, improvements to the current transport policy could also increase the number of students choosing to stay in the city after graduation. As Foundation doctors (F1s), these individuals will now have to travel to their place of work. With the city of Manchester having

invested into these students throughout their 5 years of study, keeping them local is inarguably a universally important goal. It benefits the University, the City and the wider community.

We would welcome a meeting to specifically look at the aforementioned issues for healthcare students, nurses and other professions allied to Medicine. It would seem pertinent to include representatives from other Greater Manchester Universities; Manchester Metropolitan, Salford & University of Bolton. The healthcare students at these Universities will presumably face similar difficulties. It would also be useful if this consultation would assess the accessibility of the current GM tram system. There is currently no student reduction in fare to travel on the trams. Many of the students would like the opportunity to use the trams more readily throughout the city. For example, the recent roadworks on the M602 resulted in students travelling to Salford and beyond each day spending prolonged periods of time waiting on busses stuck in traffic. If the tram systems in GM were more financially accessible to students, they could have reached their placements on time despite the traffic issues.

We are really engaged and excited by the initiative and are keen to meet with you to work together to support students across the city

| | |
|--|--|
| Organisation Name | Manchester Metropolitan University |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Manchester Metropolitan University supports the application of the Proposed Franchising Scheme to the entirety of Greater Manchester as our staff, students and visitors are located across the region. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | Wherever possible, Manchester Metropolitan University encourages GMCA to ensure that the range of services within the Proposed Franchising Scheme is comprehensive and serves the widest possible spatial area. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Manchester Metropolitan University understands the need for a transition period given the complexities of implementing the Scheme. It appears that many of the services that operate past our campus would fall within the final transition area. On the proviso that the timescales are not extended, and that the Scheme covers all areas of GM by the completion of transition, we are satisfied with the arrangements. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | We encourage this decision to be made as quickly as possible, in line with the statutory requirements. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | This period of time seems reasonable in the circumstances. |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Continual assessment from a qualitative and quantitative point of view is considered best practice, as described in the Assessment document. We would welcome the opportunity to be part of the continuous feedback process as an institution, and through our leading role in the Oxford Road Corridor Sustainable Transport Group. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | The opportunity to access the market will be key to the success of the Scheme. Anything that encourages genuine competition within the Scheme is welcomed. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | This is similar to the operating model used by London Buses (subsidiary of TfL), and would therefore be appropriate. This will help with access to the market for small and medium companies, ensuring genuine market competition. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>The steadily declining patronage figures are indicative of a broken system. At the University, our staff, students, and visitors have regularly reported frustration with:</p> <ul style="list-style-type: none"> complex and expensive fares; a lack of integrated routes and transport modes; and poor levels of customer service. <p>These user considerations sit alongside wider societal issues such as poor air quality in GM, a lack of forward planning and innovation in the bus market, and decreased access to public transport for lower socio-economic areas.</p> <p>Given these serious issues, we agree that the current bus market does not currently perform as it should to support the residents of GM and play a role in economic growth.</p> |

| | |
|--|---|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | <p>Manchester Metropolitan University fully supports the Strategic Case for reforming the bus market, as we believe that the long-term effects of market reform will bring benefits for staff, students, and visitors. It should be noted that the University supports the Proposed Franchising Scheme as Phase 1 of bus market reform, and considers that the measures supporting bus patronage growth (Phase 2) must also be delivered to ensure that the full benefits of the reforms are realised.</p> <p>Reforming the market will support aims such as:</p> <ul style="list-style-type: none"> reducing car journeys within GM (thereby reducing congestion and pollution, whilst increasing service reliability); allow innovation and integration across bus and other transport services; ensure inclusive bus service coverage; increase the quality of service for bus users. <p>Each of these aims aligns with the University's desire for improved bus services in the region.</p> |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | <p>The vision and objectives for future provision of bus services aligns with feedback from passengers at Manchester Metropolitan University.</p> <p>In order to improve integration for journeys, we would encourage the 'Network' objectives to also include: "Increase integration with other modes of transport to support multi-modal trips".</p> <p>On a similar theme, we would encourage an objective within 'Simplified and Integrated Fares' to: "Ensure that smart through-ticketing can be provided for multi-modal trips".</p> |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | <p>It is clear that the Proposed Franchising Scheme would positively contribute to the aligned aims of the University and GMCA to increase the quality of experience of the bus user, as outlined within the objectives.</p> <p>In order to deliver real step change in bus patronage and user experience, GMCA will need to ensure that the Phase 2 interventions are delivered along with the Proposed Franchise Scheme.</p> |

| | |
|--|---|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | The evidence from the Assessment indicates that a Partnership Option would not provide the same level of improvement for passengers as the Proposed Franchising System. Therefore, partnership options will not meet the aligned objectives or deliver the desired improvements. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>It is clear that the wider societal and economic benefits from the Proposed Franchising Scheme hugely outweigh the Do Minimum or Partnership Option. These benefits would support our staff, students and visitors travelling around GM.</p> <p>Although the BCR of the Proposed Franchising Scheme is marginally lower than the alternative options, this is directly attributable to the high cost of implementing franchising. The delivery of the economic and societal improvements is considered worthwhile, despite the higher costs.</p> |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The packaging of the franchise contracts appears to be logical. It is indicated that the large contracts would be awarded around routes and services delivered from specific depots. We would encourage the development of cross-city routes to improve connectivity across Manchester city centre, and these could be fed into the large franchise allocations. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | We are supportive of the length of contracts indicated in order to provide the best value for money. |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | The approach to depots appears logical, as it will encourage fair competition within the Proposed Franchising Scheme. Competition will ensure that best value is achieved for GM, and best services for passengers. |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | We encourage all future fleet specifications ensure that low carbon and zero-tailpipe emission technology is used to the greatest possible extent. This will contribute to the ambitions for zero-carbon Manchester and ensure that the local air quality improves, which also aligns with the University's Environmental Sustainability Strategy. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Any use of ITS to improve the passenger experience is highly encouraged, especially in regard to simplifying tickets and access for our staff, students and visitors. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | Some members of the Manchester Metropolitan University community rely on cross-boundary services to access our campus, and we would encourage GMCA to ensure that the functionality of the cross-boundary services for passengers is improved in line with internal GM bus services, or at worst unaffected, by the Proposed Franchising Scheme. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|--|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | The evidence provided indicates that commercial operators appear unwilling to engage with the most beneficial levels of partnership arrangement, preferring a light-touch approach. Given the scale of change that is required to improve buses in GM, we consider that the partnership options (light touch or ambitious) would not deliver appropriate improvements. Furthermore, the enhanced partnership scheme (EPS), which gives the greatest improvements for the user, will not progress without bus operator support. The operators have indicated that they would not support an EPS and therefore this must be discounted from the GM bus market. |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | Though the cost of implementation for the partnership options is lower than the cost of the Proposed Franchising Scheme, the previously noted lack of benefits for our staff, students and visitors mean that this option is not considered as favourably as franchising. |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | The information presented in the Management Case indicates that in-house management of the Proposed Franchise System would lead to increased integration of systems and information, ultimately resulting in the best possible experience for passengers and is therefore welcomed. |

| | |
|---|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | The benefits of implementing the Proposed Franchising Scheme above the Do Minimum or partnership options are clear. Manchester Metropolitan University welcomes the level of improvement, as it will bring benefits for our staff, students and visitors, as well as the wider GM community. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | As partnership arrangements bring forward sub-optimal improvements in passenger experience when compared with the Proposed Franchising Scheme, Manchester Metropolitan does not support delivery of a partnership arrangement. However, it should be noted that partnership working would be supported in the case that the Proposed Franchising Scheme cannot be delivered as it would provide greater improvements than the Do Minimum scenario. |

| | |
|--|--|
| <p>Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?</p> | <p>The current level of service experienced by our staff, students and visitors across GM is poor. Evidence of this is found through responses to the regular student and survey travel questionnaires.</p> <p>At the same time, bus company profits and the fares charged on buses in GM have increased. It is therefore considered that passengers receive poor value for money within GM, as shown in the Centre for Cities Report “Improving Urban Bus Services”.</p> <p>Under franchising, the current operators may suffer reductions to revenue margins on routes. However, they will be able to competitively tender for routes that provide guaranteed margins. Furthermore, the change to franchising is supported due to the wider benefits for our community. It is expected that any market changes would ensure that employees of the existing bus operators are treated fairly, especially in respect of their pensions, as outlined in the document.</p> |
| <p>Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?</p> | <p>The impact on operators in a partnership arrangement appear to be negligible.</p> |
| <p>Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business?</p> | |
| <p>Q39b If so, please explain what you think those positive or negative impacts would be.</p> | |
| <p>Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?</p> | <p>Providing that the revenue and cost risks are managed effectively, there are no concerns about the impact of the options on GMCA or TfGM.</p> |

| | |
|--|---|
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | The Proposed Franchise Scheme has the greatest societal benefits, which would realise themselves with a more prosperous and environmentally sustainable region. As a result, Manchester Metropolitan University considers that the Proposed Franchise Scheme should be fully supported as it will ensure that GM will benefit the economy and environment to a much greater extent than any of the alternative bus market arrangements. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Following a thorough review of the Assessment and supporting information, Manchester Metropolitan University supports the conclusion that the Proposed Franchising Scheme is the best way to achieve the desired outcomes for bus services in GM. Other bus market reforms would not provide the holistic benefits necessary to improve bus services. We also believe that the Phase 2 improvements should be delivered to ensure that the public bus network in GM is as user friendly and efficient as possible. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | The EIA does not identify any adverse impacts, and identifies likely positive impacts for some protected characteristics. This shows the benefit of the Proposed Franchising Scheme for our students, staff and visitors within these groups, which is welcomed by Manchester Metropolitan University. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|--|
| Q45b Why do you say this? | <p>Manchester Metropolitan University is fully supportive of the Proposed Franchising Scheme. The benefits presented throughout the case show that there would be a real change in bus services in GM through the implementation of franchising, which is not available through other types of bus market reform.</p> <p>We consider that the GMCA objectives for bus travel are closely aligned to the University's desire to see bus services become a crucial part of the future transport mix for our staff, students, visitors and local community. In particular, we believe that franchising is the only opportunity to achieve the GMCA vision to ensure that bus services are considered a worthy modal choice amongst our staff, students and visitors.</p> <p>We strongly encourage the development of Phase 2 of the bus improvement work to ensure that patronage increases are delivered and that buses are a key part of the future transport mix in GM, alongside active travel modes and other forms of public transport.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | As noted, we believe that the Proposed Franchising Scheme in isolation will deliver the best improvements of the options available to GMCA. However, it must be accompanied by further developments of the bus service infrastructure. This will ensure that the bus services in GM work to fulfil the needs of the citizens of the region, and meet the visions for bus services. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | As part of the future ticketing offer, we would encourage TfGM to consider specific ticket options for 18-25 year olds, ensuring that their access to higher and further education is supported. Over 50% of Manchester Metropolitan University students commute from their home address to our campus, and bus journeys form a crucial part of the journey mixture. The cost and complexity of public transport ticketing are often raised by students as a barrier to accessing higher education, particularly amongst students from BAME or lower socio-economic groups. Therefore, we would encourage any efforts to minimise these barriers. |

| | |
|--|---|
| Organisation Name | Redwood School |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |
| Q13b Why do you say this? | Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |

| | |
|--|---|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users</p> |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |

| | |
|---|--|
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |

| | |
|--|--|
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | BUT Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |
| Q48 Finally, do you have any other comments you want to make? | Would have liked to have a link to access the relevant paragraphs without having to either print it out, stand in a library or try to read online it. This will put people off from answering in full or indeed at all. I Travel Train students with special needs who could possibly fill in an easier form and you would possibly get responses from them as service users |

| | |
|--|---|
| Organisation Name | Royal Northern College of Music |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>I am writing on behalf of the Royal Northern College of Music Students' Union.</p> <p>We have a large number of students using buses every day to get in and out of college. It is course with a large number of contact hours, meaning most students will need to be doing this daily and at peak times.</p> <p>The biggest issue tends to be the unreliability, caused by buses arriving significantly later than expected. Also, the large number of routes covered by various companies, means that students can't just hop on the bus soonest to arrive, but instead have to wait for their specific company's bus.</p> <p>Generally, costs can fluctuate significantly between bus companies too, which can be very difficult for students with financial constraints.</p> |

| | |
|--|---|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | <p>By reforming and franchising buses, there would be huge benefit for our students.</p> <ul style="list-style-type: none"> - Greater and easier mobility for our students from home - university. - Cheaper fares (and no need for students to drive in, paying parking fares as well as contributing further to CO2 emissions) - Buses can be integrated into wider transport networks eg. Cycling, trains, trams etc - no more waiting for the 'right' bus, causing unreliability/lateness - Disability access can be improved |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |

| | |
|--|--|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|--|--|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>I agree for the similar reasons as stated above.</p> <ul style="list-style-type: none"> - Cheaper, simpler fares across the board - integrated transport network/ no more waiting for the 'right bus' - Improved accessibility eg disability access - Less need to drive - less congestion, less CO2 emissions etc - Increase in physical activity caused by using buses instead of walking |

| | |
|--|---|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | <p>There are only benefits for students based on the proposed Franchising Scheme:</p> <ul style="list-style-type: none"> - Cheaper, simpler fares across the board - integrated transport network/ no more waiting for the 'right bus' - Improved accessibility eg disability access - Less need to drive - less congestion, less CO2 emissions etc - Increase in physical activity caused by using buses instead of walking, good for mental health |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |

| | |
|---|---|
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>This is really important for our students.</p> <p>Reliable, affordable buses and simpler transport links would make a huge difference, and given the HUGE student population in Greater Manchester, I can say this on behalf of so many more students than just at the RNCM.</p> <p>Given the current Climate Crisis, there is no better time to improve our public transportation, getting cars off of the road and improving our carbon emissions.</p> |
|---|---|

| | |
|--|---|
| Organisation Name | Students of holy cross |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Send double 135 to college and from college alum the mornings and at 3:45 |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Neither agree nor disagree |
| Q13b Why do you say this? | Send double 135 to college and from college alum the mornings and at 3:45 |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|---|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | Send double 135 to college and from college alum the mornings and at 3:45 |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|---|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Send double 135 to college and from college alum the mornings and at 3:45 |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Send double 135 to college and from college alum the mornings and at 3:45 |

| | |
|--|---|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Neither support nor oppose |
| Q45b Why do you say this? | Send double 135 to college and from college alum the mornings and at 3:45 |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Send double 135 to college and from college alum the mornings and at 3:45 |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Neither likely nor unlikely |
| Q48 Finally, do you have any other comments you want to make? | Send double 135 to college and from college alum the mornings and at 3:45 |

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme as set out above?

- No comment.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

- It should envelope the entirety of Greater Manchester, in order to not disadvantage people living in certain areas (who would still have to live with the issues created by the current system), the benefits will show due to the scale of the area.
- Scale brings additional complexities, however the greater the area is applied to the reduced popularity of cross boundary services as bus patronage is concentrated in the centre of Greater Manchester.
- There is little point franchising on a small scale, it will continue to divide people and the movement of people e.g. the way it is divided now between North (First) and South (Stagecoach).
- People would be more likely to travel within the boundaries of the franchise meaning comprehensive coverage of Greater Manchester.
- Greater economies of scale and the opportunity for the whole region to benefit from the integrated system introduced by the proposed franchising scheme which also feeds into wider GM-specific finances/plans/regulations etc.
- From the University's point of view a GM-wide franchise would be preferable as many staff live within GM & it is therefore more simplistic to provide incentives for staff to travel by bus (and reduce scope 3 emissions) when under one system.

Q3. Do you have any comments on the local services that are proposed to be franchised?

- Proposal appears comprehensive and covers the region.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

- Splitting into three sub-areas allows the integration of franchising to be more manageable and allows for a smoother transition via staggering. Lessons can therefore be learned between the introduction of franchising to each of the three sub-areas.
- Our employees would be travelling within all three sub-areas and beyond.
- Effective communication is key to ensure staff and students ensure the process and timings, regarding transitions between sub-areas and services outside sub-areas.
- Organisations require clarity on the applicability of existing season tickets during the transition.

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?

- Understandable that Scholars services are exempt from the franchising plans, exceptions allow for a smoother transition.
- Making exception for scholar services is sensible as they are used at only particular times of the day and do not serve the general public.

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

- No comment.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

- The proposed dates avoid start of term and exams, and provide time for communications and engagement during term time.
- Taking three years to fully franchise after the decision on the scheme seems lengthy, there is risk of losing buy in and support from sub-area A to C. Time to capture data and apply lessons learnt is encouraged, however reducing the time period between B&C seems preferable.

Q8. Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

- No comment.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

- It is important to evaluate customer experiences of a franchising scheme as soon as possible, with bus users contributing directly (not just organisations representing bus users).

Q10. Do you have any comments on GMCA’s plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

- The University supports an inclusive approach to procurement and fairness.
- The restriction on the number of small franchises awarded to a single operator will ensure continuity of service.
- Small operations may need additional support in the transition to a decarbonised fleet. We would request this is provided.

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

- Clarification would be needed to which depots smaller operators can use.

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

- Cost of travel and the inefficiency of changing bus companies to travel to and from the University impacts on patronage, does not support a sustainable solution and encourages bus users to use alternative modes.
- It is clear that there are bus companies that dominate on certain bus routes around the University, with limited competition from other providers.
- The University would support the development of software that increases accessibility to bus travel and enables clarity of fare before journeys.

- Congestion around Manchester and air quality are serious issues.

Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

- We fully agree as the challenges outlined are impacting on bus patronage, staff and student travel and wellbeing. Also, the University has a target to increase commuting by sustainable modes (including buses). The proposal will support increased bus usage.
- Franchising the bus service will support the city’s Zero Carbon by 2038 target.
- Technological developments will be more easily implemented across a franchised service.

Q14. Do you have any comments on GMCA’s objectives for the future provision of bus services as set out in the Strategic Case?

- We agree with the strategic case for the proposed franchising scheme.
- The University would support rapid transition to decarbonisation. It is acknowledged that improving the fleet is not assumed in assessing the scheme – however fleet decarbonisation is a priority for the University.
- An app would be welcomed as this would support staff and student timely travel into the University. It is important that the functionality of the app outperforms existing offers and is accessible by all. The current TfGM offer does not meet this criteria.
- The University would request performance data to track progress against and support promotion of GMCA, MCC and our own sustainability objectives.
- The Partnership option would not resolve existing issues with the network.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA’s objectives for bus services as set out in the Strategic Case?

- A single network, simpler fares system, smart ticketing, the ability to redirect bus services and reinvesting in the system is supported, this is likely to promote and increase bus use and also supports the University’s sustainability objectives.

Q16. Do you have any comments on how a partnership option might contribute to GMCA’s objectives for bus services as set out in the Strategic Case?

- A partnership option does not appear to meet objectives and would be less transparent. This option appears to be ‘business as usual’ with some more loose agreements. GMCA would lack the power to make meaningful changes and will be reliant on the general good will of the operators.
- It is less likely for the partnership option to contribute to objectives given the minimal likelihood of companies working together – states that they have ‘very limited agreement’.
- Individual operators could improve customer service but there would be a need for consistency across all operators.

***Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:**

- Offer a ‘high’ ratio of benefit to the cost to GMCA, which is broadly comparable with the partnership options,
- Provide the most economic value (Net Present Value), and

- **Create the best platform from which further economic value could be delivered. Do you have any comments on this?**
 - Without additional measures, bus patronage is forecast to decline. However, the proposed franchising scheme gives the possibility of addressing the decline and increasing patronage.
 - The enhanced investment required to improve bus services and infrastructure could be supported by the greater net present value of the proposed franchising scheme – up to 3x more than the operator proposed partnerships.
 - Benefit to cost ratio is clearly greater in the franchise option than other partnership options, with benefits to passengers, reducing fares and reducing congestion (which should support better air quality and reduce carbon emissions).
 - GMCA must consider whether loss of profit in rail and private operators will have any adverse effects upon staff and student travel (via these modes) and the employees of these operators.

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

- We support franchise contracts of different sizes to realise the benefits reference in the documentation and to provide opportunities for smaller contractors.

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

- We support the proposed 5 + 2 option. The reduced duration for smaller contracts is also supported.

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?

- Although risks have been identified and allocated, it is not clear what the repercussions would be should the proposed franchising scheme not deliver against objectives and financial targets.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?

- TUPE is an expected in the circumstance and as such is supported.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?

- Opportunity presents to ensure depots are built (where appropriate and absolutely necessary) managed and operated in an environmentally sustainable way to support GMCA’s 5-year ES Plan and carbon target.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?

- Pollution levels are extremely high in Greater Manchester, particularly along the Oxford Road Corridor.

- We support implementation of the best emission standards in the transition to carbon targets and improving air quality, and advocate for the rapid introduction of measures to reduce fleet emissions.
- A sensible balance should be met between removing buses from the road prematurely (before end of service) and replacing the fleet with new technology to lower pollution levels. Retrofitting should therefore be considered too.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?

- An Intelligent Transport Systems (ITS) is supported and would recommend that timescales for the implementation of the ITS is applied to ensure simultaneous uptake of the system.
- It is assumed that the implications for GMCA selecting a single preferred supplier for ITS equipment have been considered and allowance for continual updates to the ITS has been costed and factored into delivery.

Q25. Do you have any comments on GMCA’s approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

- The procurement of proposed franchising scheme contracts seems accessible enough for operators to reasonably make bids with a fair chance of winning in return for a reasonable bid effort, helped by a two stage process.
- Flexibility and negotiations within the procurement process give recognition to it being the first round of the franchising process so therefore there will be lessons to be learned.
- Learning through the procurement process is also supported by ‘tranches’ occurring in turn, allowing operators to learn from each bidding round.
- Working alongside bidders should strengthen and streamline subsequent bids – allowing for reflection and action on both sides moving forwards.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?

- Many University staff, students and visitors cross the GM boundary and should be supported to do so using public transport. We would prefer that limited changes are made and if possible avoided, however it is appreciated that this may be challenging. Therefore, there needs to be a thorough consultation and engagement with bus users on these services and the impacts on their journey considered. Additionally, ticketing arrangements are required to ensure the system remains as integrated as possible with neighbouring authorities – the permits must not be prohibitive.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

- No comment.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

- Monitoring and enforcing performance against measure of success is essential.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

- No comment.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

- It is expected that plans will be in place for mitigating against significant change occurring mid-franchise. This would include the financial implications of low uptake. This is not clear from the documentation.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

- No comment.

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

- There is a clear need and advantage to having centralised responsibilities.
- The University requests opportunities to feed into route appraisals and planning.

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?

- Agreement that TfGM would be able to manage franchised operations. However, we request:-
 - o Little or no additional costs to individuals using the bus network throughout the transition.
 - o Existing annual passes would be honoured.
 - o Timely communication material to be circulated and contact details for specific queries to support the transition.

Q34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

- Agreement that TfGM would be able to manage and implement the partnership. Opportunity with TfGM to provide a centralised influence on network identification and the strategic ambitions of GM.
- The size and scope of potential partnerships and the scale of change to come from these are difficult to assess as this is entirely dependent on the formal agreement of the partnership with operators.

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

- We would seek assurance that risks associated with a change/ withdrawal of service are managed in a timely manner to avoid disruption, inconvenience, uncertainty and a potential shift in mode from bus to car.
- Communication for the affected 25% of users experiencing a change (including fare increase) associated with proposed franchising scheme is essential transition.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

- It is implied that only franchise will see improvements for passengers, however would it not be likely that under other partnership options there would be a service improvement, just less managed and more ad-hoc?
- There is no guarantee for operators to remain in partnerships over the long-term, can it be written into a contract? If so, this could protect passengers from disruption.
- The partnership option does not address GMCA’s strategic objectives for Greater Manchester.

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

- There is a need to appraise the benefit of no on-road competition for example less congestions and delays, better air quality.
- It gives a good foundation to help small and mid-sized operators.

Q38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

- No comment.

Q39. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? If so, please explain what you think those positive or negative impacts would be.

- We do not think it is clear how proposals will impact on our current arrangements as we do not operate our current offer (free intercampus travel for staff and students between set routes).
- Further clarity is requested.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

- We do not want to see a period of disruption and lack of staff to address changes and queries.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

- A franchise model is supported as it has a number of positive impacts, such as:-

- Retaining and attracting staff and students, including providing an improved service to our current and potential 'at home' students.
- Clean air
- Reducing congestion
- Reducing carbon
- Increasing accessibility, including connecting young people/those without cars to Manchester
- Safety, including late night routes
- Early morning routes to support shift work
- Bringing more visitors to our cultural institutions

***Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?**

- We would be in agreement that the proposed franchising scheme is the best way to achieve GMCA's objectives and vision for the GM bus network. It should be recognised that additional activities will be required, such as changes to the road network and large scale awareness raising campaigns for example.

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

- It seems the assessment is well thought through in terms of benefits to the public and the scale of change and impact would be greater under the proposed franchise scheme.
- How is the proposed franchising scheme safeguarded against potential future changes in leadership and administrative model?
- What is the process for monitoring continual improvement and reporting against this?

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

- We support all measures that have a positive impact on persons with protected characteristics. This is aligned strongly with our core goal of social responsibility.

***Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?**

On the whole, we would support the Proposed Franchising Scheme. Reasons for this include:

- Creating a more integrated and sustainable travel system that supports our staff, students and visitors travelling to the University.
- Supporting the transition to a zero carbon region.
- Encouraging the use of public transport and reducing car usage and road congestion Greater Manchester.
- Improving air quality.
- Making Greater Manchester a more attractive place to work and boost employment within the region. These benefits could also be felt at the University of Manchester.

It should be noted we would expect the proposed franchising scheme would not be implemented in isolation. Impacts on other modes of transport need to be taken into consideration.

A fully integrated system (e.g. across buses, metro and trains) would be welcomed.

***Q46. Are there any changes that you think would improve the Proposed Franchising Scheme?
Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.**

- No comment.

***Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?**

- On the whole, we do not oppose the direction of the proposed franchising scheme, however, we understand that there is a risk that, without delivering on shorter travel times and lower costs, members of the public will query the value of the change. Transparency, communications/engagement, monitoring/data and mechanisms to ensure improvements underpin success.

***Q48. Finally, do you have any other comments you want to make?**

- Full transparency on this is required.
- Joined up GMCA wide communications and engagement is imperative as proposed franchising scheme alone will not facilitate increased bus patronage.
- A fully functioning app is key to success.
- Alongside replicating existing services, resources should be identified to create new services (for example east-west services) and integrate with other modes, to reduce journey times and increase connectivity, all of which would have a significant positive impact for all GM residents and workers, including University staff, students and visitors. For example, one of the greatest sources of dissatisfaction for our healthcare students, who travel from placement to placement (particularly medics & nurses) is the cost of travel and the inefficiency of changing bus companies to travel from the University to certain sector hospitals or clinical practice. Measures to address this are welcomed.
- We would like to see strong environmental commitments following implementation of the proposed franchising scheme for example rapid introduction of electric buses and open data.

The centralisation and cross-commissioning of services through the Greater Manchester Health and Social Care Partnership provides improved service efficiencies and supports specialised patient care. However, for patients, healthcare professionals and healthcare students it has provided additional challenges to our ways of working. Amongst adapting to new ways of working, the longstanding issues around travel have been further impacted. Additionally, foundation trust boundaries have been redrawn such as Manchester Foundation Trust. The overall impact for healthcare students has meant increased travel throughout the course and greater variability in the location of placements.

In practical terms this means that students need to travel to a greater number of sites and hospitals, at greater distances, even within the same week. The consequence of this is students utilising services from multiple bus companies even for one trip and because students may have to travel different sites even within the same week or month it is difficult for them to take advantage of savers options such as student, weekly or monthly saver tickets. As a result, travelling to placement, which is an integral part of the course, is very expensive and this alone can be a significant stress and burden to students. This is further impacted for medical students as well as other healthcare students as we receive smaller loans in the clinical years and have short holidays so are not able to work as much and therefore have a lower earning potential.

Example costs:

Background

Altrincham hospital and Manchester Royal Infirmary sit within the same Foundation Trust, Manchester Foundation Trust. This means they share resources including doctors. As a result, medical students may be sent to a mix of learning opportunities across the two sites. This would be a typical travel for a medical student

The route

The quickest route by bus is via the number 245 provided by Arriva North West and number 15 provided by stagecoach.

The cost

| | Daily ticket |
|-------------------|--------------|
| Arriva North West | £4.80 |
| Stagecoach | £4.80 |

The daily cost of travel is therefore £9.60.

However, if there was a unified service the daily cost would be half of this. With one student annual ticket the savings would be even greater.

Public transport is vital for many students. Travel by car is often difficult for students as the cost of running a car as well as insurance on cars for young people often makes it financially unfeasible. Additionally, increase concerns for the environment means travel by car can often feel unjustifiable if public transport is possible. For these reasons affordable and effective public transport is vital for healthcare students.

The proposed franchising option is particularly attractive to students. This would allow students to buy one ticket that they could use for a much greater proportion of placements significantly reducing the cost of travel and fully take advantage of saver options. A unified ticketing services would also support additional specialised ticketing options for healthcare students. This could help further offset the costs that are incurred in our preparation to join the NHS workforce, with a much

greater cost of travel as compared to other students. This may include reduced tickets costs or options for a same-price extended period ticket as we often have longer terms than other students.

Personal testimonials

“I am a final year medical student and moved to Manchester in 2014 from London. As a widening participation student being a cash-strapped student is a very true reality for me. I was particularly surprised when I found that traveling around Manchester by bus was more expensive than travel around London by bus, because of the use of multiple providers. Having had the opportunity to see both systems at work I am enthused to hear that Manchester is moving towards a franchised service. A unified service will be more affordable prices for customers and greater co-ordination of services.”

“I am a final year medical student and moved to Manchester in 2014. A typical day for a medical student includes traveling for 1-2 hours across Manchester to arrive at placement for 8am to scrub in and assist in surgery. After morning surgery I might follow my consultant to their afternoon clinic, squeezing in a lunch or sometimes even eating as we walk across the hospital campus. This will normally end around 5 and I make a return journey home. Arriving around 7pm, and then hopefully fitting in 3 hours of study and practice before bed. Perhaps not a particularly exceptionally long-day for a working person, except the studying at home, but as a student I need to do all of this on a student budget. As a widening participation student perhaps an even smaller student budget than some. For me this means travel costs make a significant dent in my budget and a distant placement means not only more travelling but more expense. To manage my budget on top of full-time placement during the week as a medical student I have worked part-time at the weekend during term. I will face many challenges working in the NHS as a doctor, but a franchised service leading to more affordable day-to-day travel will mean that my training will be made a little bit easier. “

Response

Doing Buses Differently – proposed franchising scheme for Greater Manchester

Introduction

The University of Salford welcomes the opportunity to provide a written response to the consultation on the proposed franchising scheme for the Greater Manchester (GM) bus network. This response complements a submission made by the University of Salford Students' Union (USSU) on behalf of our student body.

The University of Salford is a Higher Education institution in Greater Manchester. With over 20,000 students we are fastest growing university in the North West. Established 50 years ago, but with our roots in the Royal Technical Institute of Salford that was founded in the 19th century, we take an industry-led approach to teaching and research. Our goal is to provide our students with real world experiences that set them up for life and to work with partners to tackle real world social and economic challenges.

About this response

The University of Salford employs over 2,500 people, most of whom live in Greater Manchester, and we have over 20,000 students, with more than half being commuter students. Ensuring our staff and students can travel to our campuses via a sustainable, reliable and cost-effective public transport system, reducing car travel in particular, is a priority for the University.

The University of Salford is well served by public transport, including buses. There are frequent bus services along the Crescent, where our Peel Park campus is located. Regular bus stops are located and circa 1,400 services run a day both ways. The existing services provide a good coverage of local and regional areas, including Manchester city centre, western areas of Salford, Bolton, Leigh and the Trafford Centre. The route is also served by the Bus Rapid Transit Routes between Leigh and Manchester city centre. Frederick Road is also a bus route, with services connecting locally to Charlestown and Lower Broughton. MediaCityUK is connected to the Peel Park and Frederick Road campuses by the 50 bus between East Didsbury and MediaCityUK. Thanks to an agreement with the operator Stagecoach, University staff and students can travel this service for free between Peel Park and MediaCityUK.

This response is based on staff and student use and experience of the bus network in GM and is related to our ambitions for a greener campus, less reliant on car use and with excellent public transport connectivity. We are supportive of the proposed franchise system for the reasons that are explored below.

Background

The University of Salford recently undertook a staff and student travel survey to support the development of a new five-year Sustainable Travel Plan and to inform future decisions around sustainable transport to and from our campuses at Peel Park, Frederick Road and MediaCityUK as part of the 25-year Salford Crescent Masterplan.¹

Staff

The staff travel survey resulted in a very high response rate (25%) providing a statistically significant batch of data that can be considered very representative.

| Mode | 2009 | 2011 | 2014 | 2019 |
|---------------------------------|------|------|------|------|
| Walking | 17% | 6% | 6% | 7% |
| Cycle | 3% | 6% | 12% | 9% |
| Bus | 10% | 9% | 10% | 10% |
| Train | 17% | 20% | 19% | 19% |
| Metrolink | 1% | 2% | 1% | 3% |
| Taxi | 1% | 0% | 0% | 1% |
| Car (alone) | 40% | 47% | 46% | 41% |
| Car Share (own car/driver) | 6% | 5% | 3% | 3% |
| Car Share (other car/passenger) | 3% | 4% | 2% | 1% |
| Other | 1% | 1% | 1% | 5% |
| Response Rate | 19% | 35% | 21% | 25% |
| Combined Car Use | 49% | 56% | 51% | 46% |
| Combined Public Transport Use | 29% | 31% | 30% | 33% |

Table 1: Staff travel

Almost half of staff travel to University by car, with only 10% of commutes being by bus. This figure for bus use has been static for the past decade.

Staff were asked (multiple choice) why they choose the mode of transport they do. For those travelling by car, 57% said that this was because public transport links from where they live are not convenient. For those travelling by public transport, 46% said it was because it was the quickest mode of transport, 40% because they live close to a public transport service and 32% because it is more sustainable than travelling by car.

¹ Salford Crescent Masterplan, <https://www.salfordcrescent.com/>

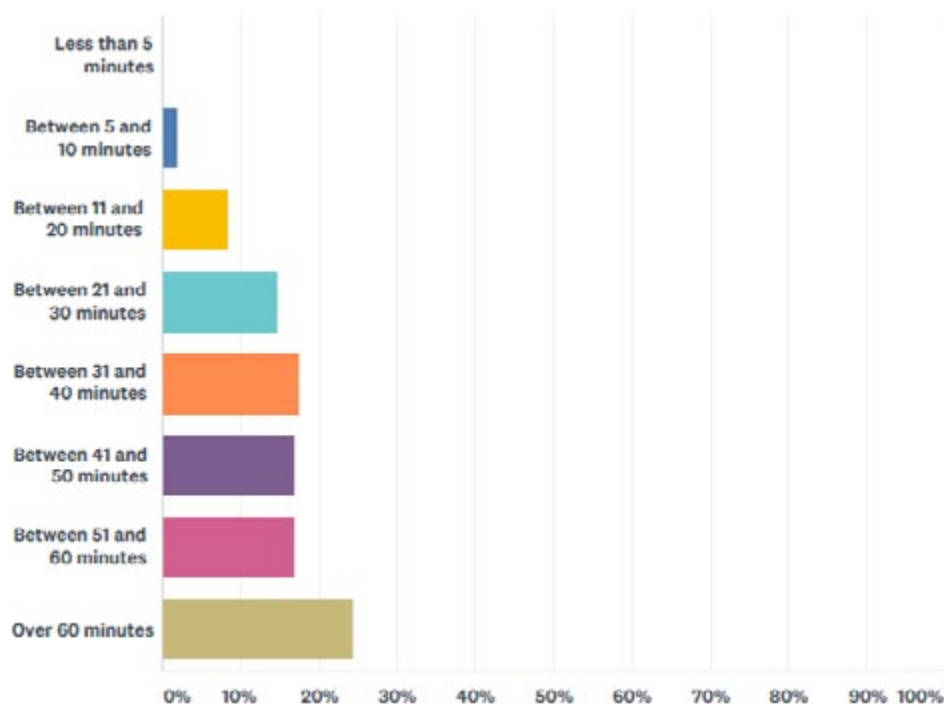


Chart 1: Staff travel to work times (one way)

Students

The student travel survey response was somewhat disappointing (1.3%) and therefore while the data shows that patterns of travel have changed, this should be treated with caution due to the low sample size.

| Mode | 2009 | 2011 | 2014 | 2019 |
|---------------------------------|------|------|------|------|
| Walking | 23% | 28% | 20% | 36% |
| Cycle | 2% | 4% | 5% | 4% |
| Bus | 21% | 27% | 30% | 25% |
| Train | 15% | 18% | 18% | 16% |
| Metrolink | 1% | 2% | 2% | 2% |
| Taxi | 0% | 0% | 0% | 0% |
| Car (alone) | 26% | 16% | 22% | 14% |
| Car Share (own car/driver) | 6% | 1% | 1% | 0% |
| Car Share (other car/passenger) | 6% | 2% | 2% | 0% |
| Other | 1% | 1% | 0% | 3% |
| Response Rate | 4% | 3% | 3% | 1% |
| Combined Car Use | 38% | 19% | 25% | 14% |
| Combined Public Transport Use | 37% | 47% | 50% | 43% |

Table 2: Student travel

The dominant mode of travel for students is non-car (83%), with a quarter of students travelling by bus. This has fluctuated since 2009 but has remained between 20-30%.

While not broken down between bus, train and Metrolink, students who do travel to University by public transport were asked why they choose this mode (multiple choice). Over half said that this was because they do not have access to a car and 43% said that this was because it is the quickest way to travel. 37% of students said that it was because they live close to a public transport service and 27% said that public transport costs less than driving.

It is worth noting that of those students who travel by car, almost 50% said they choose this mode because public transport links are not convenient where they live, and of those that walk or cycle, 38% said it was because it is more sustainable than travelling by car and public transport.

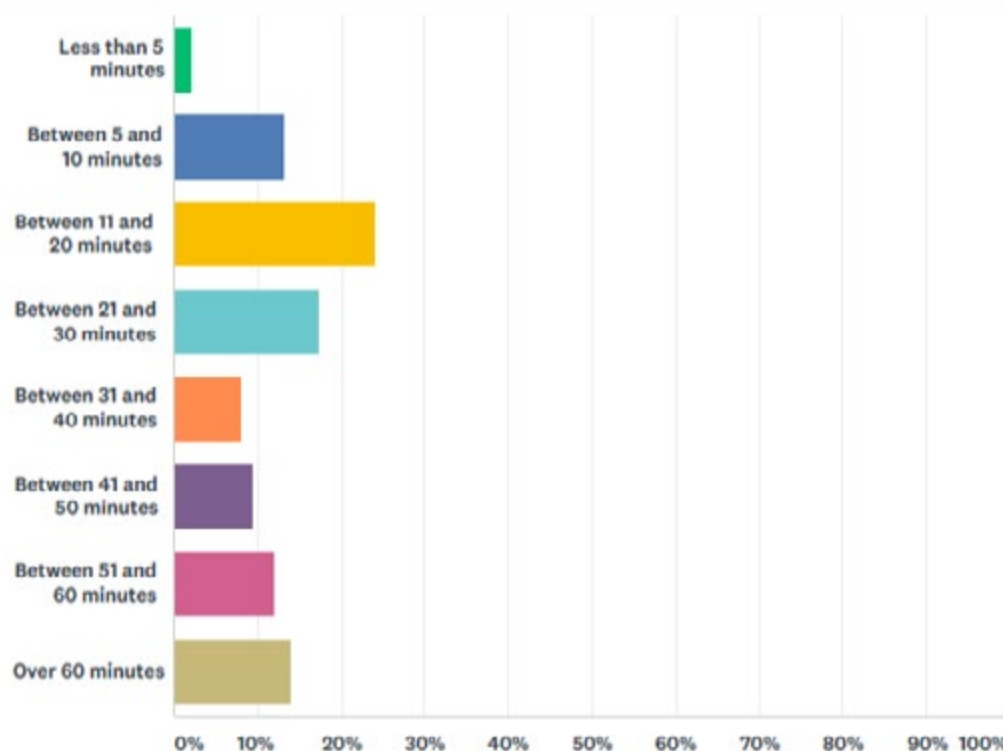


Chart 2: Student travel to campus time (one way)

Response

The University is supportive of the proposed bus franchising model proposed by the GMCA and TfGM. We believe that a franchised system supports TfGM's objectives to deliver a truly integrated public transport system that works for passengers by being reliable, cost effective and easy to use. We have considered a number of issues in formulating this response which are detailed below.

While the University campuses are well served by bus services, but there is low usage of bus transport amongst staff. We are aware that as a University there is more we could do to discourage staff from using their cars and this is very much a focus of the new Sustainable Travel Plan.

However, a high proportion of staff cite poor public transport links where they live as a reason not to take public transport. Most of our staff live in GM, suggesting that the issue is not the connectivity of the campus to the bus network, which is good, but the connectivity of other locations across GM where our staff live.

Moreover, a major issue for staff is the lack of flexibility within the public transport system, notably buses. Weekly and monthly passes can be purchased with varying economies of scale, but the cost of

a day ticket, for instance, is prohibitive for staff that don't want to commit to one mode of travel for a weekly or monthly period.

A London-style 'hopper fare' which allows for one hour of travel for £1.50 or a ticket bundle system whereby users could bulk buy a certain number of trips for a set price to use more flexibly over the course of a month could have a big impact on staff travel patterns. Likewise, integrated ticketing across bus, Metrolink and rail would allow cross mode travel and would be of great benefit to staff and students alike.

Students currently benefit from a System One student discount, but this only applies to students up to the age of 26. The University of Salford has a significant mature student population and studying can be a financial burden to all students, not just those aged 26 and under. Under the franchised system, TfGM would be able to set these student fares and we would call for this discount to be available to all students, not just those under 26.

An issue that impacts on both staff and students is the complexity of ticketing and routes. The bus network is serviced by multiple operators, as the consultation document outlines, which can cause confusion amongst passengers, especially as we have seen recently with the change in operators as First Group has withdrawn from GM.

Our campuses alone are served by five different operators and the cost of travelling from Peel Park to Manchester city centre varies depending on which service the passenger uses. Moreover, when services change operators this can cause financial difficulty for staff and students, but particularly students on placement who need to choose a termly pass that most suits their needs to travel to their location of study or work. There should be parity of and clarity of fares for journeys across the conurbation and this can only be achieved through franchising.

Reliability and capacity issues, whether perceived or actual, are regularly raised by our staff. A publicly run bus network across the conurbation would provide a single point of contact for customer service issue and deliver accountability that is often felt to be lacking with the complex system that is currently in place.

Finally, GM has the highest student population outside of London. London is recognised as having a world-class integrated transport system and while not perfect it has many benefits that are not extended to students in GM, for instance the 'hopper fare' as mentioned above. For students at Salford, such a fare would significantly reduce the cost of travel for students. GM rightly promotes itself nationally and internationally as a leading destination for study and we should aspire to have a leading public transport system that works for students and others across our conurbation.

To conclude, the University is supportive of the proposed franchising scheme's ambition to deliver a truly integrated public transport network for GM whereby the GMCA / TfGM can ensure that buses are run across the conurbation where they need to be to help ensure that everyone in the city region is able to access their place of work or by sustainable, simple and cost effective means.

More information

Charlotte Morris, Public Affairs Manager, University of Salford

c.e.morris@salford.ac.uk

0161 295 5101

| | |
|--|---|
| Organisation Name | Abellio |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | No. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Abellio supports the view that all local bus services operating wholly within Greater Manchester should be included in the Proposed Franchising Scheme. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | Abellio agrees that the services proposed were the correct ones to include as at July 2018. Abellio anticipates that TfGM will update the services to be franchised based on the latest network changes, in order to minimise service changes introduced between 'pre' and 'post' franchising. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Abellio supports the three sub-areas suggested in the consultation paper. However, from the information provided, the way in which the routes and depots would be split in these areas is not clear. Further clarification on this point would, we think, be beneficial. Given the possibility that routes in one area may be run from a depot in another area, we are concerned that during the transition stage this could result in franchised routes potentially running in non-franchised areas. It is not clear at present how this arrangement would be supported. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | Abellio agrees with the approach adopted and supports the licencing arrangements proposed for cross boundary services. |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | No. |

| | |
|--|---|
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | <p>Abellio notes that the proposed dates at which franchise contracts may first be entered into are April 2021 for Sub Area A, March 2022 for Sub Area B and March 2023 for Sub Area C. Abellio believes that these dates will be achievable, provided that GMCA and TfGM are satisfied they can complete the procurement process in a manner which allows effective competition by new market entrants in advance of the identified dates. Clearly, successful and unencumbered acquisition of existing depots by GMCA (should this remain as the prime delivery mechanism) prior to the proposed start dates will be critical to meeting these timescales.</p> |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | <p>Abellio expects that the nine-month period would be sufficient to allow suitable mobilisation of contracts on the basis that depot facilities are provided and diesel or diesel/electric hybrid vehicle technologies are utilised. Under these scenarios, Abellio believes there would be sufficient time to acquire vehicles (should they not be included as part of the Proposed Franchising Scheme) and recruit staff. If new, zero emission, full electric vehicles were to be agreed as part of an award, mobilisation periods may need to be amended in order to facilitate potentially extended vehicle and power delivery time frames.</p> <p>However, should control of a large franchise depot property not be acquired by GMCA, it may be necessary to provide a longer mobilisation period to provide time for alternative depot facilities to be sourced and/or for planning to take place to address this issue. The proposed bidding mechanism through the Invitation to Negotiate process would allow a suitable opportunity to consider and conclude a satisfactory approach.</p> |
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>No.</p> |

| | |
|--|---|
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>Abellio fully supports the GMCA's plans to allow operators of all sizes to be able to be involved in the Proposed Franchising Scheme. This will allow a range of providers to bid for the various contracts, facilitating a more competitive procurement process and therefore the prospect of a better outcome for passengers than would otherwise be the case. Abellio would be interested to understand if GMCA would consider the opportunity for larger operators to partner with other smaller operators to run a wider range of services from strategic depots – an approach that could result in cost efficiencies for the authority.</p> |
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>Abellio is of the firm view that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme, to ensure a level playing field for bidders. This is, we believe, the surest way of delivering a genuinely competitive procurement process and the best outcome for passengers, and avoiding an unfair advantage in the process for incumbent operators.</p> <p>While Abellio recognises that GMCA proposes to achieve its objectives by the time 'steady state' franchising occurs, concern remains that incumbents could still gain material advantage during the transition phase. Addressing this concern may require a short delay in the procurement programme in order to absolutely ensure that incumbent operators do not successfully stonewall TfGM in its stated plans to achieve control of strategic depots through a combination of negotiated depot transfer and CPO (paragraph 26.1.21 of the Assessment). Should this not be achieved and GMCA is consequently forced to alter the commercial model so that strategic depot provision becomes the responsibility of the operator, this will inevitably gift incumbents a very significant competitive advantage. A short delay could also help TfGM ensure that all relevant employment details are provided by incumbent operators for inclusion in the data room.</p> <p>Abellio also recognises that GMCA has identified alternative options for the transition phase, including the possibility of operating from more than one short-term alternative site while the 'steady state' depot is organised.</p> <p>Abellio notes TfGM's conclusion, in the event that it is not possible to transfer all or even some strategic depots during the transitional phase, and depot provision therefore becomes the responsibility of the operators, that "it would be possible to restructure the packaging of the first round so that they are of a smaller scale and size, thus enabling bids from more than one operator". Abellio believes that smaller franchises are less attractive to new market entrants, and that incumbent operators would be given an unfair advantage in these circumstances by virtue of having existing depot locations.</p> <p>Abellio absolutely appreciates the complexity involved in transitioning from the existing arrangement to franchising, but is concerned that if it were not possible for operators to bid on the basis of a strategic depot being available, this could result in an unfair distortion of the desired 'level playing field' and, ultimately, a sub-optimal outcome from the procurement process.</p> |

| | |
|---|---|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>Abellio agrees that the bus market in Greater Manchester has suffered as a result of declining patronage, which is in part due to external factors such as increases in car ownership and increased competition from other modes, as well as changing travel habits. The decline in patronage is also likely to have been contributed to by the current deregulated market, through factors such as increases in fares and lack of co-ordination of services.</p> <p>Abellio believes that far more significant passenger growth will be possible from the Proposed Franchising Scheme through a co-ordinated bus network fully integrated with other modes, operating under a single authority that has the ability to set a single fare structure, mandate vehicle types/technologies to address environmental challenges and customer perception of the product, manage service levels and influence issues such as road congestion. In the longer term, Abellio would like to see the Proposed Franchising Scheme aspire to grow passenger numbers.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |
| <p>Q13b Why do you say this?</p> | <p>While Abellio recognises that GMCA expects it will be able to achieve its objectives by the time 'steady state' franchising occurs, concern exists over the possibility that incumbent operators' could enjoy a material advantage over new entrants during the transition phase. Addressing this concern may require a short delay in the procurement programme in order to absolutely ensure that incumbent operators do not successfully stonewall TfGM in its stated plans to achieve control of strategic depots through a combination of negotiated depot transfer and CPO (paragraph 26.1.21 of the Assessment). Should this not be achieved and GMCA is consequently forced to alter the commercial model so that strategic depot provision becomes the responsibility of the operator, this will inevitably gift incumbents a very significant competitive advantage. A short delay could also help TfGM ensure that all relevant employment details are provided by incumbent operators for inclusion in the data room.</p> <p>Abellio also recognises that GMCA has identified alternative options for the transition phase, including the possibility of operating from more than one short-term alternative site while the 'steady state' depot is organised.</p> |
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>Abellio agrees with GMCA's objectives for the future provision of bus services as set out in the Strategic Case, specifically to improve the network and simplify and integrate fares to deliver better value for money, thereby making the system more affordable and sustainable in the long run.</p> |
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>Abellio agrees that the Proposed Franchising Scheme would allow GMCA to determine the key aspects of the bus service - the routes and frequency of services, fare prices and types, and vehicle specifications as well as customer service standards. As well as allowing the region's bus services to be planned as a single network, improving efficiency and improving integration between modes, the Proposed Franchising Scheme would allow simplification of fares and improvement of the customer experience through elimination of multiple competing brands and identities (a feature of the current deregulated market).</p> |

| | |
|--|---|
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>Abellio believe that a franchised scheme would deliver the greatest benefits. A report published by Centre for Cities in November 2019, entitled "Delivering change - improving urban bus transport", set out clearly that while a partnership option could contribute to some of GMCA's objectives for bus services, franchising offers a greater prospect of meeting those objectives. Under franchising the public will be able to see clear, unified information and branding, and while this model would involve GMCA taking revenue risk, it would give GMCA control of the levers to manage that risk. GMCA would be able to set the specification for the bus network (vehicles, routes, fares and hours of operation), cross-subsidise between different services and be accountable for the service provided (rather than bus service over which it has, at present, limited or no control).</p> |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>Abellio believes that the Assessment of the Economic Case carried out by TfGM is clear and reasonable in terms of the methodology and assumptions used, and that the conclusions of the Economic Case strongly support the introduction of the Proposed Franchising Scheme.</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Abellio has no particular comment on the packaging strategy.</p> <p>Abellio believes it is clear how GMCA would approach the packaging for "steady-state", but think further clarity is required in respect of how services would be packaged in the transition period, in order to avoid potential impacts on employees and operational issues.</p> <p>Abellio understands that the strategic depots identified may operate services which run in different sub-regions and as such, during the transition phase, this could result in a mixture of services being run from any given site. GMCA recognises in the assessment that it would be unsatisfactory for two operators to run from the same depot, and Abellio agrees with this view.</p> <p>A greater understanding of how existing staff would be transitioned to the new operator will be required if a mixed-service scenario prevails for a period. Whilst it may be assumed that all staff in a depot would move over to a new operator under TUPE if all the services they work on or are associated with fall into the identified franchise, it is not clear what would happen if only some of the depot's network were to be contained in the new regime.</p> |

| | |
|---|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>Abellio believes that the length of franchise contracts should be closely linked to GMCA's proposal to provide depots for operators bidding for large franchises. It is Abellio's view, that contracts for a large franchise that run for less than five years would give bidders insufficient time to be able to recover costs.</p> |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>Abellio believes that the proposed allocation of risk is appropriate in order to achieve the submission of bids at the competitive margins indicated in the assessment. The assumptions used are in line with Abellio's expectations.</p> |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | <p>There should be no adverse impact on the employees of operators due to the legal protections in place as a result of the Franchising Scheme and Enhanced Partnership Schemes (Application of TUPE) (England) Regulations 2017.</p> <p>Abellio has managed many transfers of staff, in relation to both its bus and rail operations. Abellio is experienced in ensuring seamless mobilisation of new franchise contracts, and fully recognises the vital importance, as an incoming operator, of employing and retaining sufficient employees to provide the promised service.</p> <p>However, it is clear that full employment details (incl. pay rates, pension arrangements, all terms & conditions of employment etc.) of all staff in scope will be needed in order to avoid inclusion of unnecessary risk premiums that will inevitably flow through if gaps in knowledge exist within this vital cost area.</p> |

| | |
|--|--|
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Abellio is of the firm view that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme, to ensure a level playing field for bidders. Abellio believes this is the surest way of avoiding a situation where incumbent operators have a clear and significant cost advantage (which may, in turn, result in GMCA paying a premium price).</p> <p>While Abellio recognises that GMCA proposes it will be able to achieve its objectives by the time ‘steady state’ franchising occurs, concern remains over the possibility of material advantage being available to incumbents during the transition phase. Addressing this concern may require a short delay in the procurement programme in order to absolutely ensure that incumbent operators do not successfully stonewall TfGM in its stated plans to achieve control of strategic depots through a combination of negotiated depot transfer and CPO (paragraph 26.1.21 of the Assessment). Should this not be achieved and GMCA is consequently forced to alter the commercial model so that strategic depot provision becomes the responsibility of the operator, this will inevitably gift incumbents a very significant competitive advantage. A short delay could also help TfGM ensure that all relevant employment details are provided by incumbent operators for inclusion in the data room.</p> <p>Abellio also recognises that GMCA has identified alternative options for the transition phase, including the possibility of operating from more than one short-term alternative site while the ‘steady state’ depot is organised.</p> <p>Abellio notes TfGM’s conclusion, in the event that it is not possible to transfer all or even some strategic depots during the transitional phase, and depot provision therefore becomes the responsibility of the operators, that “it would be possible to restructure the packaging of the first round so that they are of a smaller scale and size, thus enabling bids from more than one operator”. Abellio believes that smaller franchises are less attractive to new market entrants, and that incumbent operators would be given an unfair advantage in these circumstances by virtue of having existing depot locations.</p> |
|--|--|

| | |
|---|--|
| <p>Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Abellio believes that the RV mechanism is a suitable way to manage the provision of the fleet. Abellio believes that the introduction of the Proposed Franchising Scheme would offer a great opportunity for the City Region to upgrade its fleet to new, low or zero emissions vehicles at minimal cost at the start of the scheme. However, Abellio acknowledges that the current fleet may need to be transferred as part of the scheme. If this is the case, the Proposed Franchising Scheme must provide comprehensive information on vehicle type, condition, maintenance history, warranty arrangements and operating costs of the fleet that non-incumbent operators would be required to take on.</p> <p>Abellio notes that GMCA recognises leased vehicles may play a part in forming the total fleet requirement. Abellio believes that the ability for operators and franchise bidders to include leased vehicles as part of bids is fundamental to lowering barriers for entry to the market. In addition, if GMCA is able to offer guaranteed usage for a minimum of say 10 years on agreements that would potentially transcend a change of lessee, then lease rates would be significantly reduced and the competitive positioned strengthened in comparison to ownership. Even longer guaranteed useful lives would provide further potential benefit.</p> <p>Abellio also believes that the benefits of zero emissions vehicles should be considered as both part of the transition and the steady state, and that options being considered by GMCA for future depot provision should include infrastructure to allow for the use of such vehicles.</p> |
| <p>Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Abellio supports the view that common Intelligent Transport Systems across Greater Manchester would both secure efficiencies and, most crucially, deliver a consistent customer experience.</p> |
| <p>Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Abellio supports the view proposed.</p> |
| <p>Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?</p> | <p>Abellio notes that 24 of the 116 cross boundary services in operation at July 2018 might require some modifications – such as changes to their routes, boarding or alighting points in order to comply with the tests for service permits under the Proposed Franchising Scheme – but that GMCA would seek to maintain those services, working as appropriate with neighbouring authorities to make necessary adjustments.</p> |
| <p>Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?</p> | <p>Abellio believes that GMCA will be able to secure the operation of services under franchise contracts and at a fair and reasonable price, provided it can take the necessary actions to ensure competition for franchises. Abellio recognises, as set out in the assessment accompanying the consultation, that GMCA is already aware that depot sites are one of the most significant potential barriers to entry for operators not currently in the Greater Manchester city region. Other key issues that will have a bearing on securing the operation of services in the most competitive way are, as we have noted in earlier answers, the packaging strategy for large franchises, the minimum size of large franchises, contract mobilisation, availability of extensive historical data if existing</p> |

| | |
|---|---|
| | vehicles are to be taken over and a clear understanding and high level of granularity concerning the terms and conditions of existing employees. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | <p>Abellio understand that use of an EPS may allow GMCA and the operators to be more ambitious in what could be delivered under a partnership. However, Abellio understands that an EPS can only be implemented with significant operator support (which is not currently the case) and a commitment to ongoing close collaboration, and that there is a risk of EPS's failing for reasons outside of the control of the GMCA – such as an operator withdrawing.</p> <p>A VPA does not fundamentally change the existing balance of commercial risk and whilst it would provide a greater level of network integration and other benefits, Abellio does not believe GMCA's objectives for the region's bus services can be delivered as efficiently through partnership as through franchising.</p> |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | Abellio does not believe there would be any major impact on employees from a partnership or the Proposed Franchising Scheme. In both cases, employees would work for private suppliers. Abellio notes that GMCA states that "it is not anticipated that the partnership options would materially affect the employees of operators. This is because the services currently provided by operators would not be expected to change as a direct result of a voluntary partnership agreement". Under a Proposed Franchising Scheme, the GMCA would have greater control over the network, thus having a greater influence on employees – and we note that the assessment suggests that passenger levels will be stronger in a franchise environment, which should be of benefit to employees. |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | In a franchised network, GMCA would have the necessary levers to manage revenue risk and decide on network priorities. Given the proposed balance of commercial risk under this model, the Proposed Franchising Scheme would create a competitive environment for operators and value for GMCA. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | Abellio notes the conclusion of the financial case highlights that, over the appraisal period, the net deficit would be £97.4m (for the Operator Proposed Partnership) or £112.5m (for the Ambitious Partnership) and that neither achieves the position of overall cumulative forecast net surplus which the Proposed Franchising Scheme reaches after the transition period of the first five years. In addition to the other arguments supporting the introduction of the Proposed Franchising Scheme, for example in the Strategic Case, Abellio considers this to be another compelling reason to pursue this course of action. |

| | |
|---|--|
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | Abellio supports the proposed approach. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | Abellio supports the proposed approach. |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | Abellio believes that, if GMCA did decide to pursue a partnership option, the proposed approach for TfGM to implement and manage that option is reasonable. However, Abellio firmly believes that the Proposed Franchising Scheme is a superior option in terms of delivering the objectives GMCA sets out. |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | Abellio believes that the forecast 5.6% uplift in demand over the Do Minimum option is achievable in a franchising environment, given the GMCA's objectives of simplification and improvement in network, fares and customer experience. Abellio notes the expectation that six out of seven passengers will experience fare reductions. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | Abellio agrees that while partnership options could deliver some benefit in terms of passenger generation compared with the Do Minimum, these would be significantly lower than the benefits associated with the Proposed Franchising Scheme (because the network and fare simplification and integration would be less substantial). Furthermore, Abellio believes it is uncertain how quickly the benefits of partnership options could be delivered and whether they could be sustained in the long term. |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | <p>Abellio agrees that, under the Proposed Franchising Scheme, there would be significant impact on incumbent operators as a result of the change in market structure and a possible loss of business if they failed to win a sufficient volume of work in the franchised market. Abellio notes that GMCA is offering to protect incumbent operators against risk of stranded assets, either property or vehicles.</p> <p>Opening up the market through Proposed Franchising Scheme would allow operators currently not present in the Greater Manchester local bus market to bring their knowledge and expertise to the City Region. It would involve rigorous competition between operators, but away from the passenger, through a cost-effective tender process. Furthermore, it would allow operators to make appropriate financial returns. All of this would, Abellio</p> |

| | |
|--|---|
| | believes, be of significant benefit to the GMCA and the travelling public of the region. |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | Abellio agrees that any impact from partnership options is only likely to be material to incumbent operators and, even then, the extent of the impact on those operators would be determined by the scale of commitments contained in the partnership. As the scale of those commitments is within the gift and control of the operators, it is unlikely that they would be significantly disadvantaged. |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | Not applicable |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | The two principle impacts on GMCA outlined in the consultation are the transfer of revenue risk if the Proposed Franchising Scheme is introduced, and the staffing and organisational impact for TfGM in the event of either option, the latter of which is addressed in the Management Case. Abellio believes the Assessment sets out clearly the long-term financial case for GMCA to introduce the Proposed Franchising Scheme, as well as the view that the Proposed Franchising Scheme would, of the various options considered, deliver the most substantial benefits for passengers and be most capable of meeting GMCA's objectives for the future provision of services. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | Abellio agrees that the 'agglomeration benefits', generated through the improved linkage of people with opportunity, are likely to be significantly higher for the Proposed Franchising Scheme compared with the partnership options, and that the environmental benefits of a franchising scheme (e.g. increasing use of sustainable modes, managing emissions from the bus fleet, and increasing public transport access to new areas of employment and housing) are likely to exceed those that any partnership option could deliver. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Abellio agrees with the conclusion that Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services, provided that GMCA is able to achieve successful transition to a steady state bus franchising environment on the basis of genuinely open competition among potential operators, whether an incumbent or new entrant to the Greater Manchester bus market. |

| | |
|--|--|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | No. |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | Abellio agrees with the view expressed in the draft Equality Assessment that the Proposed Franchising Scheme should have a high positive impact on children and young and older people and people with physical and sensory impairments, and a medium positive impact on women, transgender people, lesbians, bisexuals and gay men, people with mental health problems and people from a variety of ethnic backgrounds. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | <p>Abellio strongly supports the introduction of the Proposed Franchising Scheme and is keen to work with GMCA to deliver value to passengers and local taxpayers. Through its significant experience of running London bus services under contract to Transport for London, the benefits that the franchise model delivers to the travelling public in London appear clear to Abellio.</p> <p>As the Centre for Cities report referred to above argued strongly, franchising can achieve a greater range of positive outcomes than partnerships. The ability of a City Region to deliver a truly integrated passenger transport system is, for example, significantly enhanced when bus franchising is adopted. Furthermore, the GMCA assessment suggests that bus franchising provides the best value for wider society; although the transition costs are high, they can be justified over the longer term.</p> <p>Abellio believes that Greater Manchester would benefit greatly from having a similar degree of control over the provision of bus services in the region as Transport for London has over London's bus network – control that is simply not possible in the de-regulated market or through partnership options. Abellio also believes that the people and economy of Greater Manchester would benefit from similarly predictable, affordable and joined up bus services as are available to passengers in London.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |

| | |
|---|---|
| <p>Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.</p> | <p>Abellio's principle concerns in relation to the Proposed Franchising Scheme relate to the transition period, and specifically how TfGM and GMCA can ensure a level playing field at all stages of the process so that potential new market entrants are genuinely able to compete with incumbent operators.</p> <p>The ability of GMCA to provide depot premises for large franchises is central to ensuring effective competition in the procurement process. As Abellio has commented in response to early questions, addressing this concern may require a short delay in the procurement programme in order to absolutely ensure that incumbent operators do not successfully stonewall TfGM in its stated plans to achieve control of strategic depots through a combination of negotiated depot transfer and CPO (paragraph 26.1.21 of the Assessment). Should this not be achieved and GMCA is consequently forced to alter the commercial model so that strategic depot provision becomes the responsibility of the operator, this will inevitably gift incumbents a very significant competitive advantage. A short delay could also help TfGM ensure that all relevant employment details are provided by incumbent operators for inclusion in the data room.</p> <p>Provision of a complete “data room” will also be essential to ensure a level playing field for all bidders.</p> |
| <p>Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?</p> | |
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>The provision of as complete a data room as possible is critical to provide a level playing field for all bidders – potential new market entrants and incumbents alike. Without this, there is, we believe, a risk that the tendering authority will pay a premium to incumbents retaining their business while new market entrants build in unnecessary contingency to mitigate unknown risk.</p> <p>The Assessment comments that operators not currently active in the Greater Manchester market may not be aware of local factors that influence costs. However, we note that the Assessment also asserts that this would not be expected to have a disproportionate impact on the Proposed Franchising Scheme option as many such operators would have experience operating in and adapting to different markets.</p> <p>Abellio is reassured that the Management Case of the Assessment recognises that the quality and availability of data for bidders during the procurement process is a key risk, and that “TfGM would develop data for bidders and provide it to bidders” and “the Franchise Agreement would provide a mechanism to make adjustments/variations where data assumptions need to be adjusted after the procurement process has concluded”.</p> |

Martin Baynham-Knight
Strategy Director, Keolis UK
2 Callaghan Square
Cardiff, CF10 5AZ
8th January 2020

Transport for Greater Manchester,
2 Piccadilly Place,
Manchester, M1 3BG

Response to GMCA Bus Franchising Consultation

Keolis welcomes the opportunity to respond to the market consultation on how buses should be run in Greater Manchester. Through our role delivering the Metrolink contract we have gained valuable insights into transport and wider policy issues in Manchester, and we are delighted to be able to share our views based on both these local insights and our broader global bus and public transport expertise.

As a global passenger transport business and a world leader in bus operations with more than 22 000 buses and coaches in operations, Keolis strongly supports bus franchising and would welcome the London model being extended to Greater Manchester. In fact, we believe that re-regulation, provided the necessary level of investments are made, has the potential to deliver patronage growth; to unlock integrated ticketing, network planning, and marketing; and to overall deliver a more compelling product that will deliver mode shift and help the city achieve wider environmental, social and economic objectives.

Keolis has significant experience working in partnership with municipal authorities and other transport providers to deliver integrated networks in cities like Lyon, Bordeaux and Lille. In Lyon, Keolis has been running the network continuously for 30 years and supported and advised the PTA on its vision and programme delivery of transport integration. Lyon is a world class example of an integrated network where preparation for energy transition is embedded as in 2020, we expect to introduce:

- Electric buses;
- Bio-gas buses; and
- Hydrogen shuttles,

More specifically, Keolis has launched:

- The world's first automated metro network in Lille in 1983.
- The world's first autonomous shuttle service in Lyon and France's first urban cable car in Brest in 2016.
- The world's first autonomous shuttles to travel on the road in real traffic conditions in Las Vegas in 2017.
- One of the largest electric BRT networks in France with 43 vehicles in Amiens in 2019.
- The world's first Hydrogen BRT in the world in Pau in 2019.

Our track record of delivering successful multi-modal networks means we know how to help UK transport authorities access the economic and social benefits of integrated networks. Keolis has transported millions of Britons over the past 25 years. We run some of the country's busiest rail franchises, are its largest light rail operator and bring international expertise from our presence in 16 countries to improve UK transport.

In the following Annex, answers are provided to the specific questions posed in the short questionnaire.

We look forward to working with you to deliver this exciting project.

Annex – Short Questionnaire

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

Headline bus patronage data is insightful. Data from the Department for Transport shows the compound annual growth rate (CAGR) from 2008/09 to 2018/19 for all GB bus services (excluding London) was -1.5%. By comparison London maintained its volume (CAGR of -0.1%) and light rail in England grew 3.7%. By comparison, in the integrated network of Lyon operated by Keolis, the CAGR from 2010 to 2017 was +2.5% for bus journeys, and +7.4% for tram journeys.

The current bus market is not attractive for passengers. Whilst patronage is declining across the UK, it is proving much more resilient in London where it is regulated and investment has been more significant. Having deregulated services operated by various operators results in an uncoordinated network, with a confusing array of ticketing options and actively undermines integration efforts and light rail expansion.

Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

Keolis believes that reforming the bus market is likely to reverse the declining trend observed, and tackle issues caused by the limited competition and the current fragmentation of the bus market. However, more than reform, the local bus market is in essential need of investments. The squeeze on local government funding over the past 9 years has had a very negative impact on the ability of authorities to support the wider provision of bus services in many cities. To maximise the benefits of reformed bus services, these changes need to be underpinned by investment in infrastructure to provide enhanced bus prioritisation and dedicated busway making bus travel an ever more attractive proposition

We welcome the announcement from the Chancellor in September 2019 to commit to a long-term bus strategy and funding settlement with a package worth £220 million. We believe this is vital after decades of under investment in the bus industry.

Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: (1) offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, (2) provide the most economic value (Net Present Value), and (3) create the best platform from which further economic value could be delivered. Do you have any comments on this?

Keolis agrees that based on the analysis presented in the Economic Case, it would seem that the Proposed Franchising Scheme provides the best value for money in absolute terms compared to other options.

However, we note that this is based on assumptions that are difficult to check and validate (e.g. £299m passenger benefits through time savings). We also note that over the appraisal period of 30 years there are likely to be significant changes both to the industry and region that we cannot predict.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

Keolis notes the critical need for further investments, referred to as 'Phase 2 Interventions' in the consultation document, in order to expand and enhance the system and the absence of committed funds as of today.

Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

Keolis believes that investment is necessary to achieve GMCA's objectives to improve bus services, and that reform is likely to help enhance this.

Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

Keolis believes that the Proposed Franchising Scheme is the best way to give TfGM the confidence to invest in an enhanced product offer which will deliver: high level safety culture, reduced congestion, improved journey times, modal shift through network integration, improved performance and standards of customer service, integrated ticketing, reductions in harmful emissions and value for money.

Q46. Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

Keolis strongly supports the current plan that larger franchisees should be provided with depots, but also believes that small franchisees could be provided with a depot or access to a depot wherever possible.

The residual value (RV) mechanism enables operators to justify investments that have a payback period greater than the franchise term. However, if most of the asset's life is beyond the franchise term then there is limited incentive for operators to minimise whole life costs, or to maintain the asset above the minimum requirement – given that the subsequent franchisee is required “to utilise the allocated RV fleet for that franchise purchased at the agreed RV price”.

Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

Not applicable

Q48. Finally, do you have any other comments you want to make?

Keolis believe that re-regulation and investment will unlock the benefits of bus services.

As the operator of the Metrolink network in Manchester, Keolis believes it is well placed to bid for bus franchises. Keolis has significant experience working in partnership with municipal authorities and other transport providers to deliver integrated networks in cities like Lyon, Bordeaux and Lille.

Keolis believes that the suggested timescales are challenging, in particular to signing phase A in 13 months (6/3/20 to 2/4/21) and then to mobilise in 9 months (assuming new buses will be required on day 1). Compressing the timescales in this way could result in lower value for money in the longer term.

We note that the introduction of the Proposed Franchise Scheme alone will not change the declining patronage forecast (as illustrated in the consultation), and that further investment will be required.

We would also strongly recommend:

- A fully populated datasite from the start of the competition;
- Clear bid assumptions (where necessary); and
- Early engagement over the details of the contract prior to the final competition commencing;
- A contract framework with few but well targeted incentives will be most effective in driving operator behaviour; and
- Careful consideration should be given to the right apportionment of risk between Authority and operator. Experience in other markets suggests that transfer of too much risk to the operator will reduce the attractiveness of a contract and increase costs.

| | |
|--|---|
| Organisation Name | RATP Dev |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Franchising seems to be a better framework for a performing bus network. Private operators and the GMCA will still be able to work together to continuously improve the bus network. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | French cities (outside of Paris) are good examples of how bus franchising works. The London bus market is not an example to follow. GMCA would in any case need to choose a radically different model than London. Tender decisions should be made on the basis of quality and price, not only price and geographical areas with multiple routes should be the basis of tenders, not single routes. |

| | |
|--|--|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|---|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Fare integration with the Metrolink network should be established |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|--|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | I agree, it seems to be a good way forward |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | It appears to be a more sustainable way to develop a bus network, increase ridership and footprint of public transport. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Fare integration with Metrolink needs to be ensured Selection of private operators need to be made on the basis of quality and price, not only price Depots/garages and buses would be best procured by GMCA, not be private operators |

| | |
|---|-------------------|
| <p>Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?</p> | <p>Don't know</p> |
| <p>Q48 Finally, do you have any other comments you want to make?</p> | |

Tower Transit

| | |
|--|---|
| Organisation Name | Tower Transit |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | We agree that it would seem clear that franchising in Manchester would produce a more coherent, comprehensive, and coordinated bus service than the current deregulated system |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | <p>it would seem clear that franchising in Manchester could produce a more coherent, comprehensive, and coordinated bus service than the current deregulated system.</p> <p>We believe that private companies have shown that they can often deliver services more effectively and efficiently than the public sector, and therefore have a valuable role in the system. However, clearly the ticketing, marketing, coherence, and design of the network would seem better controlled by the public sector given that their main driver is the general good of the general public, as opposed to a private company which is legally required to have as a key driver what is good for shareholders - for much of the time there is a goal congruence, but there are clearly some areas of divergence - eg non profitable / financially sustainable routes etc.</p> |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | no comments on the consultation document |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|--|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different | |

| | |
|--|--|
| options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>it would seem clear that franchising in Manchester could produce a more coherent, comprehensive, and coordinated bus service than the current deregulated system.</p> <p>We believe that private companies have shown that they can often deliver services more effectively and efficiently than the public sector, and therefore have a valuable role in the system. However, clearly the ticketing, marketing, coherence, and design of the network would seem better controlled by the public sector given that their main driver is the general good of the general public, as opposed to a private company which is legally required to have as a key driver what is good for shareholders - for much of the time there is a goal congruence, but there are clearly some areas of divergence - eg non profitable / financially sustainable routes etc.</p> |

| | |
|--|--|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | <p>Clearly we have a vested interest - ie we are a private operator who could bid for the franchise - we have no current deregulated operation in Manchester, and therefore no business to lose by franchising. However even aside from that subjective viewpoint, we still believe objectively that it would seem clear that franchising in Manchester could produce a more coherent, comprehensive, and coordinated bus service than the current deregulated system.</p> <p>We believe that private companies have shown that they can often deliver services more effectively and efficiently than the public sector, and therefore have a valuable role in the system. However, clearly the ticketing, marketing, coherence, and design of the network would seem better controlled by the public sector given that their main driver is the general good of the general public, as opposed to a private company which is legally required to have as a key driver what is good for shareholders - for much of the time there is a goal congruence, but there are clearly some areas of divergence - eg non profitable / financially sustainable routes etc.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |

**Q48 Finally, do you have any other comments
you want to make?**



Age Friendly Manchester Older People's Board

Chair: Elaine Unegbu

6 January 2020

Re: Response to *Doing Buses Differently*, the proposals to franchise Greater Manchester's bus services.

The Age Friendly Manchester Older People's Board welcomes the Doing Buses Differently proposals for a bus franchising scheme. We agree bus services need reforming, and progressing towards a franchising model would be a better way forward.

For older people, living in an age-friendly city impacts on their:

1. **Mobility** – Being able to move around determines social and civic participation.
2. **Independence** – an age-friendly environment allows older people to engage in meaningful activities outside the home; encouraging social engagement and sense of belonging. Equally, accessibility is vital to enabling older people to self-care.
3. **Health** – movement around a city increases cardiovascular fitness, enhances cognitive function, and acts as a buffer against depression.

The desire to get out and about does not diminish in older age, nor does the variety of activities people like to do outdoors. An accessible, affordable and easy to use age friendly public transport system with universal coverage is critical to enable independence and wellbeing. Buses aren't just a way to access essential services; they are also a mechanism to participate in the life of the city.

Movement between amenities is vital for older people, particularly for accessing health and care services, shopping and socialising. However, mainstream transport planning often doesn't recognise that the travel itself, and the feeling of independence it offers, can be just as important as reaching the destination. Travelling by bus provides opportunity for meaningful social interaction, a sense of visibility in a public space and belonging to the general public. In this respect, the way in which buses can be a sanctuary for many older people should not be overlooked.

Cuts to bus services and poor quality bus services have left many older people living in Manchester feeling abandoned, at risk of social isolation and loneliness. The ability to take part in the life of the city should not hinge on whether an older person can afford a taxi fare, have access to their own car, or depend on hospital transport services.

Local neighbourhoods become ever more crucial as we grow older. At least 80 per cent of the time of those aged 70 and over is spent in the home and the surrounding area. With the substantial growth of single person households over the next decade (especially amongst those aged over 75), neighbourhoods must be a mechanism for empowering older people and ensuring social participation in the broader sense. For this reason, being able to move around the immediate local

area is just as important as from neighbourhood to neighbourhood or neighbourhood to the city-centre. The existing hub and spoke routes only partially serve the needs of older people.

To add to this, there are not enough bus stops close to where people live. The need for a bus stop within 1/4 mile, or 400m, walking distance for an older person is used in a lot of literature. However, certain studies show that 28% of people aged over 60 reported difficulty in walking 1/4 mile, while 17% report an inability to walk 1/4 mile. So for 45% of people, 400m might be too far.

The study also notes how unequal walking capacity is, with income and education being far better predictors of walking capability than age. We suggest transport planning based on the 'Income Deprivation affecting Older People' sub-set of the Indices of Multiple Deprivation. Everyone should live within a 400m radius of a bus stop in the least deprived neighbourhoods, and within a 200m radius in the most deprived - not forgetting the need for door-to-door transport for those with severe limitations.

Ensuring routes run through residential areas, reducing the distance between bus stops, providing walking infrastructure such as benches and pedestrian crossings allowing more time to cross the road would encourage older people to stay active.

We expect a move towards a franchising model will enable Greater Manchester to provide:

- An equal and equitable bus service that serves all of Manchester,
- A green, climate-conscious fleet of buses that encourage people to opt for public transport over personal polluting vehicles,
- Better integration of bus services with other modes of public transport, including bus routes which stop at Metrolink stations,
- Bus drivers who have received age-friendly driver training,
- Real-time audio-visual information on buses and at bus stops,
- Consideration for how older residents who do not use the internet will receive updates on route and timetable changes,
- Bus stops which are comfortable, covered and sheltered from the Manchester weather,
- A commitment to continued engagement and feedback on services with residents of all ages.

I hope our feedback is both informative and constructive. Please do not hesitate to get in touch should you require any more information, or wish to consult further with the Age Friendly Manchester Older People's Board.

Elaine Unegbu

Chair of the Manchester Older People's Board

Contact

Sophie Black

Project Manager, Age-Friendly Manchester

Population Health Team, Manchester City Council

s.black1@manchester.gov.uk | 0161 234 3178 | Level 4, Manchester Town Hall Extension

Bolton CVS

| | |
|--|---|
| Organisation Name | Bolton CVS |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>We are an Community and Voluntary Services infrastructure organisation supporting groups and organisations who regularly work with people who depend and utilise the buses in Bolton and beyond to stay connected and access services and the wider community. We often receive feedback telling us about the negative impact that the poor local transport has on people's ability to access health and social services and to their health and well being.</p> <p>In recognition of this we facilitated an opportunity at The Bolton Hub for people to meet with representatives from GMCA and discuss this consultation. People did express their dissatisfaction with the current services available.</p> <p>As a part of The Ambition for Ageing Programme that Bolton CVS leads , in partnership with Age UK Bolton, we have developed a positive link with First Buses who agreed to adopt and share our Age Friendly Bus Charter with their bus drivers, designed by and for older people to encourage good age friendly practice with customers.</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|--|
| Q13b Why do you say this? | The group representatives who came from a diverse range of groups, many supporting people with protected characteristics, felt strongly that this would support standardisation of the service, in particular around fares, reliability, routes and stops. they felt that it would also enable the service to be held to account more easily and for there to be one main contact point. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under | |

| | |
|---|--|
| franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different | |

| | |
|--|--|
| options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We would agree with this statement. However this alone will not solve the issues, the group representatives felt very strongly that this is an opportunity to co-design services and consult with a wide range of people to ensure that services are fit for purpose. Transport is a major issue that repeated is highlighted which affects the development of age friendly services and young families and poor quality and issues with this form of transport often impacts the most disadvantaged in our communities exacerbating current health inequalities. Localities across GM need to be given equal opportunity to feed in to future proposals and to help shape the future transport. CVS' across GM are well placed to support this engagement and consultation to encourage people to feed in their views at the earliest possible stage. Participants who attended our workshop were disappointed that this initial consultation was not providing an opportunity to begin this process and to discuss current concerns and potential solutions. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | For the reasons already highlighted in this response; Opportunity to influence a better service Greater accountability Development of fit for purpose equitable bus transport Standardisation of services Quality Improvement Value for money |

| | |
|--|--|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | Please could you ensure that communities and residents across GM are kept informed of further developments and progress and continue to be provided with opportunities to engage with the design of future bus transport. Hopefully this opportunity will be fully utilised to radically improve future services so that communities can see a real change for the better. |

Breakthrough UK, The Kevin Hyett Suite,
Abraham Moss Centre, Crescent
Road, Crumpsall, Manchester M8 5UF
Tel: 0161 234 3950
E-mail: admin@breakthrough-uk.co.uk
Website: www.breakthrough-uk.co.uk



Breakthrough UK response to Doing Buses Differently – the proposed franchising scheme for Greater Manchester

January 2020

About Breakthrough UK

Breakthrough UK is a Manchester based disabled people's organisation. We are led by disabled people. We support other disabled people across Greater Manchester to work and live independently, and work to make positive changes at an individual, regional and national level. We provide disabled people with person centred support to develop their independence and gain access to training and employment. We advise employers, policy makers and other organisations to understand and remove barriers that disadvantage disabled people.

We are members of the Greater Manchester Disabled People's Panel and therefore our response repeats the 11 priorities highlighted in that response - submitted by the panel separately.

Franchising scheme proposal

We support the proposal for a franchising scheme under Greater Manchester's control, as in London. The London model also has some good access features which GM should replicate. These are all covered and added to below in the eleven priorities.

Eleven Priorities a GM Bus service needs to provide:

1. Need for audio and visual real time information announcements at stops and on buses.

Integration with a smart phone app with fully accessible features would be good but also it has to work for people who prefer not to use smart phones.

2. Infrastructure design of both buses and bus stops, including signage, colour, display and button locations.

One of the most important things would be extra room for a second wheelchair so no one has to be left behind and people can travel together if they are both using a wheelchair. Buttons on a level wheelchair users can use and signage with clear large fonts and contrast suitable for Visually Impaired and Neuro Diverse people.

3. Bring Ring and Ride into the same service as buses.

It's an anomaly this exists outside of the bus network and expertise from both services could improve each of them.

4. Driver training/disability awareness standardised across whole service, based on social model.

All staff at all levels should undergo disability equality training and the Disabled People's Panel and partner Disabled People's Organisations (DPOs) would be keen to co-design this to ensure it is best practice.

5. Carer/PA pass needed.

Carers/Personal Assistants should get on the bus for free and the person receiving the support should be in control of the respective pass.

6. Travel training and route training should be put into procurement process.

Travel and route training should be offered and accessible and condition of companies who take up a contract. Its standards should be set and approved by the Panel and partner disabled people's organisations (DPOs). Advertising it through respective organisations and on the busses would help people to know about it.

7. Co-ordination across localities so routes crossing authority lines are properly planned.

This would be essential where Ring and Ride was being integrated and to simplify GM wide travel.

8. Safety (including hate crime issues)

People feel safer with a conductor on the bus. Cameras also help to create a safer feeling. There should be leaflets on the busses about hate crime to raise awareness and to give information on how to report a hate crime. The drivers should also be aware and trained about how to deal with safety issues and hate crimes. Culture change through training and public awareness raising campaigns is the long term way to reduce hate crime.

9. Customer services (Complaints system).

A user friendly system that actually changes procedures when obvious problems are identified - this should be valued as feedback. From the disabled people's panel members' experience it is hard to complain and people often do not listen. Most of the times they do not let you know any outcome about the complaint.

10. Ticketing (eg, smart cards, bank cards, and retaining cash options).

Being able to use either your bank card or a card you charge up with cash or form your bank account across all services. One card for all GM travel. However cash options should be retained.

11. The Panel to have representatives on the commissioning board.

To ensure the new bus system is accessible and doing the things we want Greater Manchester Disabled People's Panel need to be at that top table having our voice heard and acted upon.

Contact details

Thank you for the opportunity to respond to this consultation. We would be very happy to expand on any of the points raised and develop this conversation further.

For more information, please contact:

Elaine Astley

Policy and Research Officer, Breakthrough UK

A number of comments have been received from the community and I would like to summarise these here.

There has been a substantial number of comments relating to the form itself, some found it difficult to open and others time consuming and therefore did not complete all of the questions

In relation to bus services, the respondents stated that the services are specific routes especially in areas of disadvantage were not servicing their needs. They stated that the buses were infrequent and did not go directly into the neighbourhoods. This was particularly the case in areas of North Manchester such as Moston. They also found services to be infrequent from their neighbourhood to areas such as the Trafford centre which would often require long bus journeys into the city centre then out again

Some of the respondents particularly spoke of how unfriendly the bus drivers were and did not give them much time to board the buses especially if they were using aids or prams.

Another older lady spoke of the temperature on the buses as she has arthritis and found the long journeys unpleasant.

A number of respondents indicated that they could not depend upon the buses to get them to their destinations as sometimes, the bus would not arrive on time or arrive at all. This had a real impact upon many as they rely on buses for work as many did several jobs during a day.

All respondents that did not have free bus passes talked about the extortionate bus fares in place. Many compared fares to other cities where they have schemes especially for young people and students. One respondent said that he disliked coming back to Manchester as he often felt locked in his neighbourhood because the bus fares were too high for him to travel.

This is an example of a message received from one frustrated respondent who was an elderly lady often trying to access community activities

The 118 119 ,115, 116 81, 112, 114.The 118,119 runs from Piccadilly Rochdale Road by Asda Harpurhey Moston Lane Charleston Road to hospital, 115,116 Charleston Road to NMGH and Middleton, 114 was the 80 bus ran from Middleton to Manchester University withdraw 114 runs Lever Street Arndale, Thompson Street Oldham Road queens Rd, , Monsall Police Station headquarters , 151 and 114 Run Lightbowne Rd Kenyon Lane, Moston Lane towards Greengate Accrington 151 Towards Harpurhey to NMGH Cheetham Hill. New 117 Arndale , Rochdale Rd, Harpurhey Moston rLane , turn nuthurst road by Broadhurst playing field to St Matthews school .There are three bus stops on Lightbowne Rd towards Greengate gardeners arms roundabout M40 0HGShawford Rd left, linford Avenue, Pleasington Drive, barber shop,Chippy, general stores. More than 10 walks inside Pleasington Drive no bus (Moston Mill) Lightbrowne Rd Leyburn Rd , Kirkstone Road , Greengate Roundabout 81 bus Piccadilly Arndale Rochdale Rd Moston Lane greengate roundabout Hollinwood Avenue-to Oldham and 147 to Bury Old Rd , NMGH Heaton Park, Blackley cemetery Victoria Avenue Hollinwood Avenue. Oldham

Overall, the 48 respondents that discussed that reforming the bus service was very welcome. They unanimously stated felt that a franchise would be a good idea as they preferred one provider who would control the services. They stated that it would be easier to hold one organisation to account when things went wrong or services were not catering to their needs.

Two of the respondents were concerned about what would happen if the GM organisation did not listen to the needs of local people and those that used the services due to cuts and if they for example went on strike.

They stated that if the buses were under the control of Greater Manchester then it could possibly mean that other transport services could be more joined up and offer a better coordinated service.

Students that were part of the consultation were keen to have one bus company manage the buses largely because the bus passes that they purchased for the year did not permit use of any company bus to get them to their destination

For feedback on the outcome of the consultation please email: info@cahn.org.uk

| | |
|--|---|
| Organisation Name | Centre for Cities |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>We agree that Greater Manchester's bus market is significantly underperforming compared to a number of other large UK cities. Over the past 30 years, bus journeys in London have doubled, while falling by half in metropolitan areas, including over 40 per cent in Greater Manchester. Within the last decade, bus journeys in Greater Manchester have fallen by 12 per cent. But in London and Nottingham, passenger numbers fell by less than one per cent over the same period and grew by 9 per cent in Edinburgh.</p> <p>All three cities, like Greater Manchester, face serious congestion on their roads and, like Greater Manchester, have increased alternatives to bus travel in recent years – a tram extension in Nottingham and Edinburgh and improvements to the Underground and Overground networks in London. These cities are best-in-class and should be the comparators for performance of a major, congested city with a multi-modal public transport system.</p> <p>On this measure, Greater Manchester's bus market is significantly underperforming, to the detriment of people and businesses of Greater Manchester, their physical health and the environment.</p> |

| | |
|--|---|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | <p>Strongly agree</p> |
| Q13b Why do you say this? | <p>The Strategic Case is correct to say that reforming the bus market is the right thing to do to address the challenges facing the local bus market. The challenges facing the GM bus market are deeply entwined with the structure of the market. Only franchising provides the powers and incentives to overcome or sidestep the challenges facing the current unregulated market. Any form of partnership will fall short of delivering the bus and public transport network that GM needs, because it cannot address these fundamental failings of the existing bus market structure:</p> <p>Higher and more complex fares</p> <p>Only franchising lets the Mayor set fares including subsidising full fares, and eliminates multi-operator tickets. In contrast, under partnership schemes, single-operator and multi-operator tickets persist, and prices can only go as low in price as the least efficient or agreeable operator can bear. Ultimately prices are up to operators, not the Mayor, and public subsidy can only support some concessionary tickets or specific services.</p> <p>An inefficient public transport network</p> <p>Only franchising removes wasteful overcapacity from the network, allowing higher profits – and lower congestion and emissions - on these routes. Excess vehicles can be reallocated to underserved routes. In contrast, partnership schemes cannot limit ‘overbussing’ caused by competition on high demand routes such as Oxford Road: any new operator cannot be prevented from running extra services due to competition law.</p> <p>Only franchising means that buses and Metrolink will no longer compete for passengers but complement each other to improve mobility as part of, TfGM. The business case for Metrolink expansion is stronger under franchising, and weaker under partnership.</p> |

| | |
|---|---|
| <p>Q13b Why do you say this?</p> <p>Continued</p> | <p>Only franchising allows cross-subsidy from profitable services to unprofitable services across the whole of Greater Manchester, thanks to the central collection of fares rather the retention of fares by operators. In contrast, a partnership model would see operators retain fares, stopping profitable services in Trafford supporting less profitable services in Rochdale, for example.</p> <p>Limited competition for passengers</p> <p>Only franchising enables effective competition between operators while bidding for contracts, reducing profit margins without the wasteful elements of competition such as overbussing and complex ticketing. In contrast, all partnership models entrench existing monopolies in operators' territories, weakening the chance of competition, increasing fares and reducing quality for passengers.</p> <p>Congestion</p> <p>Only franchising increases the benefits to Greater Manchester of tackling congestion for buses. A more reliable and rapid bus service will encourage more people to use the bus as well as reduce operating costs. In cities like London, Nottingham and Edinburgh, where the highways authority is directly exposed to passenger revenues and operating costs, the challenge of congestion for buses is not as severe as in Manchester as they have introduced a congestion charge, Workplace Parking Levy and an extensive 'bus ways' network respectively. It is no coincidence that these cities have the most advanced bus priority schemes of any large city.</p> |
| <p>Q13b Why do you say this?</p> <p>Continued</p> | <p>Low levels of public funding</p> <p>Only franchising enables higher levels of public investment in bus services as Greater Manchester can be certain of what it will buy. London's high level of public subsidy for its bus services reflect the Mayor's certainty of what he gets for it. Partnerships schemes cannot offer this.</p> <p>Only franchising will give Greater Manchester control over Bus Service Operators Grant as well as fare revenues and the existing level of support to create a single pot for funding bus services. In contrast, under a partnership scheme these funding streams would remain separate and potentially in conflict with other modes of transport.</p> |

| | |
|--|---|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>Franchising is the best option to create the greatest value to people and businesses in Greater Manchester. The evidence from London, Nottingham and Edinburgh indicate that the exposure to fare revenues creates the long-term incentives to improve the capacity and reliability of the bus network.</p> <p>The Mayor leads on the Greater Manchester Spatial Framework, setting out the strategic supply of housing and commercial land that the city needs to continue to provide the jobs, affordable housing and efficient commutes that support prosperity and a higher quality of life. Certainty, control and coordination of transport, enables a firmer foundation for the private developers who are needed to deliver it. Only franchising allows this to be co-ordinated by the Mayor, and provide clear accountability to private partners to ensure that this is delivered.</p> |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|---|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | <p>The financial case shows that the costs and risks of franchising are low and manageable in comparison to other transport schemes, and the scheme can be achieved without the financial support of national government.</p> <p>While cost neutral over 30 years, any phase 2 improvements, such as a congestion charge or workplace parking levy, would transform the financial case. Nottingham's Workplace Parking Levy raises around £9m a year net, and London's congestion charge £160m net allowing greater investment in lower fares, better services and cleaner vehicles.</p> <p>It should also be clear that depots and vehicles are assets as well as costs. The transition costs will sit on TfGM's balance sheet after purchase.</p> |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |

| | |
|--|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>Franchising is a proven and successful model around the world. The UK is unique in having a free market for bus services outside of London. Moving towards a franchised bus market where the interests of the city and bus operators are aligned is the best option not just to improve bus services, but overall mobility across the city, for business and leisure travel.</p> <p>Franchising is the appropriate response to the market failures in providing bus services by operators and a road network that insulates buses from congestion by cities.</p> |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|--|
| Q45b Why do you say this? | For the detailed reasons set out in our second response. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|---|
| Organisation Name | Dunham Massey, National Trust |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|--|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|---|---|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>Dunham Massey staff, volunteers and visitors could be better served by the bus network and there is dissatisfaction with the current service. The dissatisfaction relates to frequency, buses not interrelated/linked, irregular services, and it is deemed unreliable, especially at peak time of day making it difficult for staff and volunteers to use this service commuting to and from work, if they feel they cannot guarantee it running on time.</p> <p>The 32 nights of the Christmas Lights event, serves 130,000 people. The majority of visitors have no option but to use a car. It would be great to be able to promote and encourage visitors to use public transport instead. However, to do this the services need to be reliable and easy to use.</p> <p>The current bus service that Dunham Massey is serviced by is the Cat 5. Dunham Massey is not listed or located on the map/timetable. Bus services need to be well publicised or people won't use them.</p> <p>Additional infrastructure, such as bus shelters need to be thought about and looked at. Shelter from the rain, wind or sun is important and if people know they will be comfortable waiting for a bus,. this will encourage use. Further, lighting is linked to this, as well as making people feel safe while waiting in the dark.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |
| <p>Q13b Why do you say this?</p> | <p>Inconsistent bus services are currently provided by several different companies. this could be improved by becoming more joined up. Bus services should also dovetail with other public transport offers e.g. trams and trains. This is particularly important for Dunham and the Altrincham Interchange</p> <p>Consistent ticket prices and network wide tickets would be welcomed. Communities around Dunham, especially those which have higher levels of socio-economic deprivation, may not be able to afford multiple tickets for a single journey.</p> |

| | |
|--|--|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | We welcome a scheme that is value for money and therefore can pass benefits onto end users (in Dunham Massey's case our staff, volunteers and visitors). Having affordable and reliable public transport for work and recreation is important. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|-----|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | n/a |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>We would support the scheme if it improves:</p> <ul style="list-style-type: none"> Routes (more connected and joined up services) and are connected and joined up routes Service timetables (better thought through for peak times) and they are reliable and regular. Also protect services that support rural/isolated communities Cost (tickets are value for money) Safety (lighting and other infrastructure is well thought through and ensure the safety of users) |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|--|
| Q45b Why do you say this? | Dunham Massey's staff, volunteers and visitors require better connected services that run on time and are value for money. Public transport is a greener way to travel, but people won't choose buses over car use if the services are not reliable, deemed unsafe (during dark mornings/evenings), expensive and don't take you to where you want to go. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | n/a |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | We will support a scheme that is: Green; Easy to use; Value for money; Flexible; Reliable; Safe. |

Our response to the Great Manchester Combined Authority on a proposed bus franchising scheme ‘Doing Buses Differently’

Consultation details

Title of consultation: Doing Buses Differently. Have your say on how your buses are run

Source of consultation: Greater Manchester Combined Authority (GMCA)

Date we submitted our response: 16 December 2019

For more information please contact

Lizzie Guinness

Equality and Human Rights Commission, Arndale House, Arndale Centre,
Manchester M4 3AQ

0161 8298204

lizzie.guinness@equalityhumanrights.com

Contents

| | |
|--|---|
| Our response to the Great Manchester Combined Authority on a proposed bus franchising scheme 'Doing Buses Differently' | 0 |
| Consultation details | 0 |
| For more information please contact..... | 0 |
| Contents..... | 1 |
| About the Equality and Human Rights Commission..... | 2 |
| Introduction | 3 |
| Summary | 3 |
| Equality and human rights | 5 |
| How the Equality Act 2010 relates to transport..... | 5 |
| How the international human rights framework relates to transport..... | 7 |
| Article 9 - Accessibility | 7 |
| Article 19 - living independently and being included in the community..... | 8 |
| Response to Short Consultation Questions | 8 |

About the Equality and Human Rights Commission

The Equality and Human Rights Commission (the Commission) is a statutory body established under the Equality Act 2006. It operates independently to encourage equality and diversity, eliminate unlawful discrimination, and protect and promote human rights. We are committed to our vision of a modern Britain where everyone is treated with dignity and respect, and we all have an equal chance to succeed.

The Commission enforces equality legislation on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. It encourages compliance with the Human Rights Act 1998 and is accredited at UN level as an 'A status' national human rights institution (NHRI) in recognition of its independence, powers and performance.

The Commission has been given powers by Parliament to advise Government on the equality and human rights implications of laws and proposed laws, and to publish information or provide advice on any matter related to equality, diversity and human rights.

Introduction

Access to accessible, affordable transport underpins individuals' ability to participate in all aspects of social and economic life, and to live independently.

In our 2017 review *Being Disabled in Britain*¹ we noted that disabled people continue to face a number of issues accessing transport services, ranging from the physical design of transport modes and stations to attitudinal and psychological barriers experienced as a result of poor staff training and knowledge.

We made recommendations in our report to the UN Committee on the Rights of Persons with Disabilities in 2017², proposing that the UK and devolved governments ensure that public transport staff are equipped with the skills and knowledge to assist disabled passengers; that buses provide accessible real-time travel information; and ensure that accessibility is built into infrastructure and planning processes. The UN Committee expressed similar concerns and made a number of recommendations along the same lines³.

Our state of the nation report *Is Britain Fairer? 2018*⁴ sets out too how transport services are at risk of becoming increasingly inaccessible to disabled people and older people, particularly because of a lack of proper planning in the design and delivery of transport services. As such, access to transport has been identified as a priority in our Strategic Plan, published in 2019.

Summary

We welcome the reform of Greater Manchester's bus services as an opportunity to strengthen the provision of accessible bus transport in Greater Manchester that will be of benefit to disabled and older people, as well as all passengers.

Whichever model is chosen, following the result of this consultation, we expect

¹ [Being Disabled in Britain, Equality and Human Rights Commission 2017](#)

² [Disability rights in the UK: updated submission to the UN Committee on the Rights of Persons with Disabilities, Equality and Human Rights Commission 2017](#)

³ [General comment No. 5 \(2017\) on living independently and being included in the community, Committee on the Rights of Persons with Disabilities 2017](#)

⁴ [Is Britain Fairer? Equality and Human Rights Commission 2018](#)

TfGM to have due regard to the requirements of the Public Sector Equality Duty in its design and management of bus services, including the setting and monitoring of objectives around accessibility and utilising its procurement powers to ensure that bus operators help deliver the objectives and are held accountable if they fail to do so.

This approach will strengthen GMCA's ability to hold individual bus companies to account on their equality obligations under the 2010 Equality Act and support disabled people in the realisation of their rights to accessible services and to live independently as part of their communities, as set out in Articles 9 and 19 of the UN Convention on the Rights of Persons with Disabilities⁵.

However, we consider that there is insufficient emphasis in the Proposed Franchising Scheme on how TfGM will use the new franchising scheme to advance the vision in the UK Government's Inclusive Transport Strategy of a transport system which offers equal access for disabled passengers by 2030. This contrasts with the inclusive design approach developed by Transport for London and Transport for West Midlands. We have broader concerns that the Greater Manchester Transport Strategy 2040 has not fully embedded inclusive design principles and accessibility in its approach to transport design across the Greater Manchester area and would welcome the opportunity to discuss this further. The Commission can offer guidance on PSED and best practice in how to meet the needs of disabled and older people, as well as share the findings from our legal project on accessible public transport.⁶

We are also concerned at the inaccessibility of the consultation documents for certain groups of disabled people – for example, there is no easy-read version which would enable people with learning disabilities to participate in this consultation. This prevents this group of passengers or potential passengers from being able to have their say.

⁵ [Convention on the Rights of Persons with Disabilities, United Nations](#)

⁶ <https://www.equalityhumanrights.com/en/legal-casework/legal-support-project-help-transport-discrimination-claims>

Equality and human rights

All public authorities in Britain including Greater Manchester Combined Authority have obligations under the Equality Act 2010 and under international human rights law.

Complying with obligations under equality and human rights law is not only a matter of legal compliance; it enables public bodies and service providers to deliver good quality, appropriate and accessible services to all customers.

How the Equality Act 2010 relates to transport

Bus operators and local authorities have specific obligations under the Equality Act 2010.

The Equality Act 2010 protects individuals with protected characteristics, such as disability and age, from discrimination and promotes a fair and more equal society. There are specific provisions which relate to transport service provision for disabled people⁷.

Section 20⁸ of the Act also places a duty on transport service providers to make reasonable adjustments. This applies to the way services are provided, for example, a bus driver telling a visually impaired person when they have reached their stop. It may require a service to be provided in a different way.

The duty to make reasonable adjustments may also include providing auxiliary aids and services, such as hearing loops in bus stations, information in alternative formats, and ramps; these may be reasonable adjustments and, if so, the transport provider must provide them.

In January 2017, the Supreme Court ruled in the *Paulley vs First Bus* case that bus companies must end 'first come, first served' policies, and do more to give priority to wheelchair-users. Bus companies should have clear policies in place

⁷ [Part 12: Disabled Persons - Transport, Equality Act 2010](#)

⁸ [Section 20: Duty to make adjustments, Equality Act 2010](#)

and give training to drivers to remove the barriers wheelchair-users face when using buses.⁹ Despite the outcome of *Paulley v First Bus*, the treatment of disabled passengers in line with their legal obligations remains an issue for bus operators. We would expect that through the reform of Greater Manchester's bus services, the GMCA would ensure that the network complies with the Supreme Court ruling and that staff at all levels of the network understand their legal obligations in relation to accessibility.

Public Sector Equality Duty

In addition, section 149¹⁰ of the Equality Act 2010 requires public authorities and those exercising a public function to comply with a general duty which is supported by specific duties. The 'general equality duty' is the overarching requirement or substance of the duty, and the 'specific duties' are intended to help performance on the general equality duty.¹¹ Taken together these duties are often referred to as the public sector equality duty (PSED).

The general equality duty requires public authorities, in the exercise of their functions, to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

The proposal for reform to bus services, along with the design and implementation of the scheme, is subject to these duties.

⁹ Equality and Human Rights Commission [EHRC]. 2017. *Paulley vs FirstGroup PLC*. [ONLINE]. Available at: <https://www.equalityhumanrights.com/en/legal-casework/paulley-v-firstgroup-plc>

¹⁰ [Section 149: public sector equality duty, Equality Act 2010](#)

¹¹ For more information and guidance on the Public Sector Equality duty please visit: <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

The Equality Act explains that having due regard to the need to advance equality involves having due regard, in particular, to the need to:

- Remove or minimise disadvantages suffered by people due to their protected characteristics.
- Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

It states that meeting different needs involves taking steps to take account of disabled people's disabilities.

How the international human rights framework relates to transport

Accessibility is a precondition for independent living and the full inclusion and participation of disabled people, and to enable them to enjoy all other human rights, including rights to work, rights to education, and rights to leisure and recreation.

There are a number of provisions within international treaties which either relate to, or can be applied to, the topic of transport. These are, in particular, Articles 9 and 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

Article 9 - Accessibility

UNCRPD Article 9¹² requires States Parties to 'take appropriate measures to ensure' disabled people have equal access to 'the physical environment, to transportation, to information and communications...and to other facilities and services open or provided to the public both in urban and rural areas'. This could include ensuring private providers consider accessibility issues, implementing accessibility training, and providing information in accessible formats and assistance when accessing services. As with s.20 of the Equality Act 2010, obligations around accessibility are

¹² [Article 9 – Accessibility, United Nations Convention on the Rights of Persons with Disabilities](#)

anticipatory: that means the state and its agents need to take proactive steps to provide accessible services rather than wait for requests.

Article 19 - living independently and being included in the community.

Although UNCRPD Article 19¹³ on independent living does not explicitly refer to transport, it is clearly of central importance to achieving this right. The UN Committee on the Rights of Persons with Disabilities has made it clear, through its authoritative interpretation of Article 19,¹⁴ that access to transport is a key part of ensuring that disabled people have choice and control over all aspects of their lives in order to enable independent living, and for full and effective inclusion and participation in all areas of life on an equal basis with others. Article 19 says that States Parties 'shall take effective and appropriate measures to facilitate full enjoyment' of this right by disabled people.

Response to Short Consultation Questions

QG: 'To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?'

The Commission welcomes the general objective of reforming bus services in Greater Manchester as we consider that this has the potential to increase the accessibility of bus transport for those with protected characteristics.

QH: Why do you say this?

The Commission believes that spontaneous travel is fundamental to the rights of disabled people in realising their right to independent living, under Art.19 of UNCRPD.

¹³ [Article 19 – Living independently and being included in the community, United Nations Convention on the Rights of Persons with Disabilities](#)

¹⁴ [UNCRPD General Comment No 5 on Living Independently and Being Included in the Community, 2017](#)

In 2014, approximately one in 10 disabled people in the UK had difficulties getting to a rail, bus or coach station or stop, and a similar proportion had difficulties getting on or off these forms of transport (DWP and ODI, 2015). We recommend that you involve disabled and older people and organisations that represent these groups at every stage through design, implementation and monitoring of the new approach chosen as a result of this consultation.

The proposal to introduce integrated ticketing, a unified bus brand and a single, clear point of customer information will assist disabled and older people, particularly those with learning disabilities or people with Alzheimers, to navigate buses in Greater Manchester with more ease. We welcome the proposal for simplified and integrated fares and expect GMCA to maintain its commitment for concessionary fares to older and disabled people.

The proposed changes provide the opportunity for GMCA to embed principles of inclusive design throughout the network, reducing and removing the barriers across the whole journey experience for disabled passengers, including how bus services join up with other modes of transport within Greater Manchester. This would be consistent with the vision in the Department for Transport's Inclusive Transport Strategy of a transport system which offers equal access for disabled passengers by 2030.¹⁵ It would also allow GMCA to demonstrate due regard with its obligation under the PSED to promote equality of opportunity for persons who share protected characteristics. We recommend that GMCA involve groups that represent people with protected characteristics, including older and disabled people's organisations at every stage through the design, implementation and monitoring of the new approach.

According to the Campaign for Better Transport, since 2010, 70% of all local authorities in England have cut, altered or withdrawn 2,000 bus routes. The proposal for the planning of the network to be brought under the Combined Authority's control provides an opportunity for the GMCA to pay due regard to the needs to advance equality of opportunity between different groups by ensuring

¹⁵
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf

that the needs of older and disabled people are taken into account as well as those from all protected characteristics in its planning of bus routes, ensuring that they are more fully able to participate in everyday life.

We welcome the proposal for improvements in driver training and request that GMCA meets its PSED obligations through ensuring that all contracted operators provide regular mandatory high-quality disability accessibility training which focuses on both visible and hidden disabilities. We recommend that this training is extended to those at more senior levels within the organisation, to ensure accessibility and inclusive design principles are embedded as 'business as usual'.

We welcome the proposal of a single point of contact for customers and consistent and comprehensive information provision. We ask that the GMCA makes this information accessible and inclusive, including a clearly publicised complaints mechanism which enables issues of accessibility to be identified, monitored and addressed effectively. We suggest that data is regularly collected via user satisfaction surveys to monitor the accessibility of the bus service.

Service standards must demonstrate clearly how disabled and older passengers accessibility needs will be met. We expect that the local accountability outlined in the consultation document will be designed to ensure that there are straightforward and accessible means of redress for disabled and older passengers who do not receive a reasonable level of accessible service.

QI 'Are there any changes that you think would improve the Proposed Franchising Scheme'

Yes.

QJ. Please provide further details as to the changes you think would improve the Proposed Franchising Scheme

We recommend that GMCA utilise the opportunity of reforms to bus services to embed inclusive design principles across the bus network. This extends to design and maintenance of physical infrastructure (such as bus stops), ticketing, information, journeys and customer service. The involvement of people who share protected characteristics, particularly disabled and older people, in the design, implementation and monitoring of this approach should also be ensured.

We recommend that the proposed performance regime for operators under contract to GMCA is extended to include penalties and incentives to ensure high levels of service and access for disabled people with accessibility requirements, for example, ensuring that audio-visual equipment or ramps are in functioning order. We expect GMCA to use the proposed vehicle specification powers to ensure that bus operators meet at a minimum the legislative accessibility requirements of buses (including the Bus Services Act 2017 and PSVAR) alongside considering more broadly the reasonable adjustments required under the 2010 Equality Act. For example, this would include ensuring audio-visual displays and that there is a joined-up approach to ensure that buses are compatible with accessible bus stations and bus stops. This would enable GMCA to demonstrate that its bus services align with the high standards demonstrated by other combined authorities in England.

Greater Manchester Disabled People's Panel Bus Consultation Response

The Panel has covered the issue extensively including meetings with TfGM, attending presentations by Bus Passenger User Group, the industry One Bus campaign and the Better Buses campaign. After discussion we identified the 11 priority areas we would like to see a bus system provide for disabled people, we also then discussed in light of the options: Franchise or Partnership which model best represents the chance to make these priorities a reality. As such this represents our conclusive, informed, and collective response to the consultation.

1. Need for audio and visual real time information announcements at stops and on buses.

Integration with a smart phone app with fully accessible features would be good but also it has to work for people who prefer not to use smart phones.

2. Infrastructure design of both buses and bus stops, including signage, colour, display and button locations.

One of the most important things would be extra room for a second wheelchair so no one has to be left behind and people can travel together if they are both using a wheelchair. Buttons on a level wheelchair users can use and signage with clear large fonts and contrast suitable for Visually Impaired and Neuro Diverse people.

3. Bring Ring and Ride into the same service as buses.

It's an anomaly this exists outside of the bus network and expertise from both services could improve each of them.

4. Driver training/disability awareness standardised across whole service, based on social model.

All staff at all level should undergo disability awareness training and the Panel and partner Disabled People's Organisations (DPO) would be keen to co-design this to ensure it is best practice.

5. Carer/PA pass needed.

Carers/Personal Assistants should get on the bus for free and the person receiving the support should be in control of the respective pass.

6. Travel training and route training should be put into procurement process.

Travel and route training should be offered and accessible and condition of companies who take up a contract. It's standards should be set and approved by the Panel and partner Disabled People's Organisations (DPOs). Advertising it through respective organisations and on the busses would help people to know about it.

7. Co-ordination across Localities so routes crossing authority lines are properly planned.

This would be essential where Ring and Ride was being integrated and to simplify GM wide travel.

8. Safety (including hate crime issues)

People feel safer with a conductor on the bus. Cameras also help to create a safer feeling. There should be leaflets on the busses about hate crime to raise awareness and to give information on how to report a hate crime. The drivers should also be aware and trained about how to deal with safety issues and hate crimes. Culture change through training and public awareness raising campaigns is the long term way to reduce hate crime.

9. Customer services (Complaints system). A user friendly system that actually changes procedures when obvious problems are identified, this should be valued as feedback. From our members experience it is hard to complain and people often do not listen. Most of the times they do not let you know any outcome about the complaint.

10. Ticketing (eg, smart cards, bank cards, and retaining cash options). Being able to use either your bank card or a card you charge up with cash or from your bank account across all services. One card for all GM travel. However cash options should be retained.

11. The Panel to have representatives on the commissioning board. To ensure the new bus system is accessible and doing the things we want we need to be at that top table having our voice heard and acted upon.

The Panel's Conclusion and decision on Franchise or Partnership

After devoting considerable resources and time to researching and discussing bus services in GM and what we want from them the Panel considered the two models being offered in the consultation.

Given the 11 priorities identified above and the fact that in 33 years the multiple bus companies have not provided a satisfactory service we did not feel Partnership offered many benefits.

The Panel voted in favour of supporting Franchising, as a model with the best potential to meet the needs of Disabled People in Greater Manchester.

Kind Regards

Rick Burgess (He/Him/They)
Greater Manchester Disabled People's Panel (GMDPP)
Outreach and Development Lead
Greater Manchester Coalition of Disabled People (GMCDP)
Unit 4 Windrush Millennium Centre
70 Alexandra Road
Moss Side Manchester
M16 7WD

**Greater Manchester
Disabled People's Panel**





Consultation Response to 'Doing Buses Differently'

Response from Guide Dogs

January 2020

Introduction

- 1) Guide Dogs provides mobility services to increase the independence of people with sight loss in the UK. Alongside our mobility work we campaign to break down physical and legal barriers to enable people with sight loss to live their life on their own terms.
- 2) In Greater Manchester it is estimated that there are 77,100 people living with sight loss,¹ with 17,700 people registered as blind or partially sighted.² Due to a variety of reasons, including an ageing population, the number of people with sight loss in Greater Manchester is predicted to increase by 23% by 2030.³
- 3) The 'Doing Buses Differently' consultation document highlights that the number of bus journeys in Greater Manchester has decreased from 233 million in 2008/9 to 194 million in 2017/18. However, buses remain the most used form of public transport in Greater Manchester. In comparison, in 2017/18 there were only 134.4 million rail journeys across the whole of the North-West.⁴
- 4) People with sight loss are unable to drive and therefore depend on buses and other forms of public transport for their independence. Due to the comprehensive level of local coverage they provide, buses are of particular importance for people with sight loss to maintain their independence and wellbeing, giving them the means to work, socialise and carry out their lives the way they choose.

¹ RNIB, Greater Manchester Statistics on Sight Loss, available at <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics/sight-loss-data-tool>

² Greater Manchester Health and Social Care Partnership, 'Delivering Improved Eye Health Across Greater Manchester' 2017, available at <http://www.gmhsc.org.uk/wp-content/uploads/2018/04/Delivering-Improved-Eye-Health-across-GM-FINAL.pdf>

³ See RNIB report at footnote 1.

⁴ Office for Rail and Road, Regional Rail Usage Statistics, 2019, available at <https://dataportal.orr.gov.uk/statistics/usage/regional-rail-usage/>

- 5) The RNIB estimates that only 27% of people of working age who are registered as blind or partially sighted are employed.⁵ This higher rate of unemployment amongst people with sight loss contributes significantly to the direct and indirect cost of sight loss to Greater Manchester, which the RNIB estimates is around £1bn.⁶ Moreover, a 2013 Department for Work and Pensions survey found amongst claimants of Employment Support Allowance, which was then the primary income replacement benefit for people with a health condition or disability, 30% found transport to be a significant barrier to seeking or finding work.⁷
- 6) Consequently, the benefit of improving the accessibility of buses in Greater Manchester, both to the wellbeing of people with sight loss and to Greater Manchester's economy, cannot be overstated.

The Proposals

- 7) Guide Dogs does not take a view on the merits of a franchising system in principle, as we do not take a position on issues concerning the ownership and control of bus services.
- 8) Nevertheless, Guide Dogs does recognise the potential of local control over standards in making bus services accessible to people with sight loss.
- 9) If franchising is adopted across Greater Manchester, TfGM and the GMCA will need to adopt a standards framework for buses operating under the franchising scheme. To ensure that buses across the city region are accessible the following policies should be adopted as part of such a framework:
 - i. All existing and new buses should have audio-visual (AV) next stop and final-destination announcements.
 - ii. All drivers should receive equality and diversity training.
 - iii. Accessible ticketing should be introduced.

⁵ RNIB, My Voice Survey 2015, available at https://www.rnib.org.uk/sites/default/files/APDF_ENG091523_My%20Voice%20Summary_0.pdf

⁶ See RNIB report at footnote 1.

⁷ This is the average across the WRAG, SG and Assessment Phase groups of ESA. DWP, 'A survey of disabled working age benefit claimants', available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/224543/ihr_16_v2.pdf

Audio-Visual Technology

- 10) Without AV, buses are not accessible to people with sight loss. Instead, passengers with sight loss have to ask bus drivers to tell them when to get off, but a Guide Dogs report showed that 7 in 10 passengers with sight loss have been forgotten by the bus driver, despite having requested that they be notified when reaching their stop.⁸ For a sighted person, missing a stop is an annoyance, for somebody with sight loss it is distressing and potentially dangerous. The fear of this situation puts some people off travelling altogether.
- 11) A Guide Dog owner in the south of England gave one example of their experience on a bus without AV: "On one occasion, the driver forgot my stop and I only realised when a fellow passenger told me several stops later. The driver then stopped to let me off between stops, which meant there was no pavement. It was dark and I am night blind, so I had to grope my way down the grass verge, and I kept stumbling. I couldn't call my husband to pick me up because I had no idea where I was".
- 12) AV has benefits for many bus users, not only people with sight loss. The main beneficiaries of AV systems include:
 - i. People with hearing loss: visual displays are as important as audio announcements, and essential for people with hearing loss.
 - ii. Wheelchair users: wheelchair spaces are often situated behind the driver's cab, with wheelchair users facing backwards, making it hard to see upcoming stops.
 - iii. People with a learning disability and memory loss: the reassurance of AV announcements can make all the difference for people who might otherwise be excluded from using the bus.
- 13) Tourists and infrequent bus users: where buses are fitted with AV, tourists can be confident about the location and destination of any bus they use.

⁸ Guide Dogs, Destination Unknown report, September 2014.

- 14) The Equality Act 2010 places a duty on businesses to make reasonable adjustments to ensure they are accessible to people with disabilities. With such a high proportion of passengers with sight loss reporting being disadvantaged in using buses, there is strong evidence to suggest that many bus operators are not meeting their obligations to make reasonable adjustments through providing adequate passenger information. AV requirements for buses would ensure that bus operators are in line with the Equality Act.
- 15) In relation to audio-visual announcements, we note from the Equality Impact Analysis that TfGM and GMCA are awaiting the Government's proposals for regulations regarding bus standards under the Bus Services Act. Notwithstanding these regulations, there will continue to be scope for audio-visual technology to be mandated at a Greater Manchester level. If the draft regulations are released this year, there will be ample time to determine whether or not Greater Manchester's proposals will conflict with these regulations; and if they are not, then Greater Manchester can lead the way regionally in promoting inclusive bus travel. Moreover, there are benefits relating to enforcement and tighter implementation timescales, which can be achieved through implementing these standards at a regional level both prior to and after any national regulations come into force.

Frontline bus staff training

- 16) TfGM have an opportunity via the franchising model to introduce consistent, high-quality disability equality training for passenger facing staff. Disability equality training focuses on the concept of people being disabled by society's barriers and attitudes. It highlights the role an organisation and individuals play in the removal of those barriers, while also including awareness elements such as customer care, etiquette and appropriate communication. By equipping staff with the information and skills they need to best assist their customers, people with disabilities and accessibility requirements can travel with confidence.
- 17) There is currently a requirement for training in force, however, the Government has not provided either guidance or produced the promised monitoring and enforcement framework.

- 18) In 2011, EU regulations on bus and coach passenger rights established a requirement for all passenger facing bus staff to take disability equality training, to be implemented in March 2013. However, the Government exercised a five year opt-out to push the date of this requirement back to 1 March 2018.
- 19) The DfT announced in 2016 that it would publish guidance specifying standards for training. However, this guidance was not forthcoming, and as a result the requirement for drivers to undertake training came into force in March 2018 with no detailed guidance from the DfT on what this requirement entailed.
- 20) Guide Dogs welcomed the DfT's announcement in the July 2018 Inclusive Transport Strategy that they intended to "By spring 2019, develop a monitoring and enforcement framework for mandatory bus driver disability awareness training, which will include identifying a body to ensure compliance by bus operators with legal requirements". However, as of January 2020 the DfT has not published further information concerning the monitoring and enforcement framework.
- 21) Through franchising, TfGM have an opportunity to ensure that passengers can travel with confidence knowing frontline staff have the training they need.

Conclusion

- 22) Whilst Guide Dogs does not take a formal position on bus franchising in principle, we have highlighted some of the potential benefits to people with sight loss that high standards on buses could bring. Audio-visual technology, mandatory equality and diversity training for drivers and smart ticketing will help people with sight loss to live their life on their own terms. We hope to have further discussions with TfGM and the GMCA as these standards are being developed to allow us to expand on the points we have raised above.

For more information, please contact Adam Marsh Policy and Campaigns Manager (North West) on 0118 983 8261 or adam.marsh@guidedogs.org.uk

Learning, Training & Employment Group

| | |
|--|---|
| Organisation Name | LTE Group |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|--|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|---|---|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>We agree with the strategic case’s analysis of challenges facing the local bus market and want to highlight the following factors in particular:</p> <ul style="list-style-type: none"> • Buses are a vitally important form of public transport in Manchester, particularly for students and adults seeking to retrain / upskill. • Our 2017 travel survey found 65% of students at The Manchester College and UCEN Manchester travelled to/from their studies by bus (equating to more than 7,600 students each day). That number will have increased since the launch of the Our Pass 16-18 free bus scheme in September 2019. (N.B. this doesn’t include our professional students with MOL and apprentices with Total People travelling across Greater Manchester using multiple transport modes.) • However, the volatility in the current system, with routes subject to being withdrawn or changed with just 70 days’ notice, can adversely affect them. Our students need to know they will be able to get to / from college, work placements and their future jobs, without the risk of a service being withdrawn at short notice. • Bus frequency and accessibility varies widely across Greater Manchester, with many areas under-served. It can be very difficult for people who don’t live on main routes to make vital journeys – including trips to college, work, the GP or hospital – by bus. • On many routes, bus fares for short journeys are relatively expensive in comparison with other forms of transport. Prices also vary significantly across the city for journeys of similar distances. • All-day, weekly and monthly tickets are more reasonably priced, but confusing to those who do not use buses regularly and do not understand which tickets are valid on which routes. This is further impacted with bus services being run by different operators at different times of day so users may need a SystemOne pass instead of the daytime operator’s pass. (For example, Arriva North West runs most 245 buses but Diamond runs the off-peak service.) • Traffic congestion has a negative effect on the appeal of bus travel. Whilst this is not the bus operators’ fault, it creates a vicious circle. Longer bus journey times mean those who can will switch from buses to cars, which causes even more congestion and even longer bus journey times. Other anti-congestion measures may also be required to increase the appeal of buses along with other transport options, and persuade drivers out of their cars. |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|--|---|
| Q13b Why do you say this? | We know that accessible and affordable bus networks are key to mobility in all forms – socially, economically and culturally. They enable all our residents to access education, training, employment and other opportunities (e.g. culture and wellbeing). We support any reforms that will improve service frequency, network accessibility, fare prices and integration with other forms of public transport. Further, we agree that the proposed franchising model represents the best option for reforming the bus market. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | We note the Economic Case's conclusions on Phase 1, which assume that passenger numbers reduce less under a franchising model than under Do Minimum or either form of partnership. We also welcome the intention to implement Phase 2 improvements aimed at arresting or even reversing the decline in bus passenger numbers, although these do not yet have committed funding. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Our support for the proposed franchising scheme seeks assurance that the proposed franchising scheme will not affect the long-term viability of the Our Pass 16-18 free bus travel scheme, which has got off to a fantastic start. The scheme is currently a two-year pilot and we would like full assurance that the change in operating model will not adversely affect decisions on the long-term affordability of Our Pass or FE colleges' contributions towards it. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>We agree that the proposed franchising model is the best current option for achieving GMCA's objectives. It gives GMCA overall control of the bus network, including routes and fares, which should mean passengers benefit from better services, clearer timetable information and simpler ticketing. It also offers greater scope for integration with other forms of public transport, especially if proposals for GM Rail also go ahead.</p> <p>A franchise arrangement also offers potential for bus routes to be planned more strategically to improve participation in education, training and other employment-focused activities. Getting to college currently involves multiple bus routes for many of our students. Franchising should enable Greater Manchester bus routes to be planned collaboratively with key strategic partners to improve access to education/training, healthcare, employment and other important life opportunities, based on travel to study and work patterns.</p> <p>Implementing the model will be a challenge, and we note the upfront costs and risks associated with such a major change. It will be important to secure bus operators' cooperation to ensure franchising is rolled out smoothly across each of the three sub-areas and across borders during the three-year transition period. We have worked closely with bus operators in recent years through our support for bus travel for eligible students from low-income families.</p> |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | We agree that bus reform is essential to improve public transport services, help achieve the city region's net zero carbon target by 2038, and enable Greater Manchester's continued economic growth. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | <p>We wholeheartedly endorse the ambition to improve bus services in Greater Manchester. Accessible and affordable buses routes are vitally important, and many local residents rely on them to access education, training and career opportunities, as well as many other aspects of daily life.</p> <p>We agree that franchising appears to be the best option for improving bus services, promoting greater use of Greater Manchester's buses and integrating the bus network with other forms of public transport.</p> <p>There are some risks, as the consultation document highlights. It will be important to ensure smooth transition and that the model remains affordable alongside other public transport commitments. As the largest 16+ college in Greater Manchester, we also have a clear interest in ensuring the ongoing affordability and the long-term viability of Our Pass.</p> |

Dear researcher

Here are our responses:

- Cost of buses prevents people being able to get to LGBT+ youth support venues; This builds on the idea of the cost of being queer research that shows: ***This is one of the many hidden costs of being LGBT+ – where the threat of harassment, bigotry and even violence forces LGBT+ people to spend more in order to protect themselves, this limits their access to the financial security more easily available to their straight counterparts. LGBT+ young people are at times forced to private rides in Taxis as the only way to ensure they get from A to B safely without, being filmed/photographed/laughed at/screamed at/chanted at/physically avoided/physically threatened for being visibly LGBT+***
- Routes are limited to get to LGBT+ youth support across GM
- Bus companies are too varied, with tickets not exchangeable across operators
- YP have both witnessed hate incidents and been victims of such incidents on GM buses
- School buses/School children on buses can be problematic and LGBTphobic
- £10 for our pass is ok, but extend to include under 16's, as LGBT+ youth groups start at 13 years.
- Not pleasant to travel on some buses after 8p.m.; and some buses come into a central place but you have to walk to a more isolated place to get the next bus, this is scary.

-- Thanks

Sally



Sally Carr MBE MEd MA- Operational Director

(BA Hons, Dip.SBM Dip.CBT)

She/Her pronouns

HQ: ***Unit 3, Enterprise House, Manchester
Science Park, Lloyd Street North,
Manchester, M15 6SE***

theprouddtrust.org | Charity number: 1161102



Stockport Youth Partnership
c/o Stockport Council Safeguarding Unit
Sanderling Building
Bird Hall Lane
Stockport
SK3 0RF
Tel: 0161 474 5785
Mob: 07800618706
Email: steve.davies@stockport.gov.uk

19th December 2019

To whom it may concern,

The enclosed picture is of a consultation I carried out with the young people who attend Stockport Youth Council, regarding the proposed Bus Franchising Scheme.

Each post-it note is the response of a young person aged from 11 to 17 and they are all members of Stockport Youth Council (officially called Stockport Youth Partnership).

During the session, I explained how the system works currently and then explained how the proposed franchising system would work. The young people placed a post-it note under their preferred option – on the left (as you look at the picture) are those who want to keep the status quo. On the right are those who supported the introduction of a franchising scheme. As you can see, the group were split 50/50. A caveat is that a number of young people were not present this particular evening.

The young people have been advised that they can go to the GM Consult website to complete the official consultation.

The young people come from all parts of the borough and are diverse in terms of ethnicity, sexuality, additional needs, etc. Two of the young people are Stockport's Members of the UK Youth Parliament and two of the young people are the Stockport Representatives on the Greater Manchester Youth Combined Authority.

I am the Youth Worker who supports this group of young people.

Please feel free to contact me if you require any further information and I hope this small contribution will be of help.

Yours faithfully,

Steve Davies

Young People's Participation Officer, Stockport MBC

- ©2007 by the American Psychological Association
0893-3200/07/\$12.00 DOI: 10.1037/0893-3200.21.1.105
This article is intended solely for the personal use of the individual user and is not to be disseminated broadly.

Engineering interest

Greater Manchester Combined Authority and processing a planning scheme for the whole of Greater Manchester.

This would mean that bus operators would be under Manchester's control and Transport for Greater Manchester (TfGM) would decide which routes to provide – like city bus routes in London and some other major cities throughout the UK. TfGM would set the routes, timetables, tickets and standards, while the operators would run the services.



28th November 2019

The Stroke Association
6th Floor
St James's House
Pendleton Way
Salford
M6 5FW

Phone
0161 742 7482
07893 343003

Fax
0845 1288956

To whom it may Concern:

I have sadly had to send back the Transport booklets uncompleted back to you.

My Stroke Survivors simply could not complete them.

I asked for the accessible version as the full version was 48 pages long which is far too long for them to complete.

Sadly this "accessible" version isn't accessible at all, too many boxes to write in, too wordy, not in plain English, and not in aphasia friendly way at all with tick boxes, pictures etc.

The way that the stroke has affected them they find reading and writing really long sentences too much, plus writing is a major effort for them.

This is really disappointing as they feel discriminated against that as they use public transport but now cannot share their views help make changes.

Together we can conquer stroke

Chief Executive Juliet Bouverie BA Hons (Oxon), DMS

Stroke Association is a Company Limited by Guarantee, registered in England and Wales (No 61274).

Registered office: Stroke Association House, 240 City Road, London EC1V 2PR.

Registered as a Charity in England and Wales (No 211015) and in Scotland (SC037789).

Also registered in Northern Ireland (XT33805) Isle of Man (No 945) and Jersey (NPO 369).

[BACK TO CONTENTS](#)



INVESTORS
IN PEOPLE | Bronze

CUSTOMER
SERVICE
EXCELLENCE



NON-STATUTORY | 706 / 1

This is really disappointing as in the past they have been a lot more
"accessible"

Kind regards

A handwritten signature in black ink, appearing to be 'Helen Gilbertson', with a stylized, cursive script.

Miss Helen Gilbertson

Stroke Association Support Coordinator

0161 742 7482

helen.gilbertson@stroke.org.uk

| | |
|--|---|
| Organisation Name | WHALLEY RANGE COMMUNITY FORUM |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Bus operators are interested to provide services in areas where they would make regular profits only. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Bus operators are not interested in the needs of the people. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | Buses are the most popular means of public transport and the mobility it provided allows access to shopping and businesses. This will enhance the economy. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |

| | |
|---|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|--|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|--|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | I agree. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | Linking buses with other public transport would of great benefit to everyone and will improve the economy. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Buses and other public means of transport must be accessible to all age groups and AGE FRIENDLY. GREATER MANCHESTER IS AN AGE FRIENDLY AUTHORITY. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | I HOPE RESIDENTS IN ALL WARDS WOULD BE GIVEN THE OPPORTUNITY TO DECIDE THE ROUTES THAT WILL BENEFIT THEIR NEIGHBOURHOOD. THANKS. |

| | |
|--|--|
| Organisation Name | Whitemoss Youth/Community centre and the north City Nomads |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>Pricing have got a big part to play as to the reduction of people using the buses.</p> <p>The short distances that people use going from home to the local supermarket from Charlestown North manchester to Asda in Harpurhey .</p> <p>People are getting together more and booking a taxi as it is more convenient and reliable.</p> <p>The service in Charlestown is atrocious and especially for the elderly.</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | AS I believe that local people should have a say as to the service we receive or the opposite the service we DON'T receive |

| | |
|--|--|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | As a local person in North Manchester and have a passion as to how we as a community is served I would be interested in my involvement as to the improvements that could be made especially within North Manchester. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |

| | |
|--|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | By involving local people in this survey should assist you in the forward planning to improve our service which we as consumers should receive. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|---|
| Q45b Why do you say this? | Any thing that could improve the service in North Manchester must be a bonus for the community. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | <p>Anything to improve the service in North Manchester has to be a bonus. We are building lots of new houses around the Charlestown area and we know that the area is a deprived one and North Manchester always seems to miss out in many ways.</p> <p>We lost the 80 Bus service from Charlestown to Middleton.</p> <p>we lost the 88 Bis service within chalestown .</p> <p>We find it difficult to get to north Manchester General Hospital especially at weekends.</p> <p>Could they not look into a circular bus linking up with Asda Harpurhey Tesco on Victria Avenure , the hospital , etc</p> |



HOUSE OF COMMONS

LONDON SW1A 0AA

19 December 2019

To Whom it may concern,

Doing Buses Differently Consultation

I am writing to you in my capacity as Member of Parliament for Manchester Gorton, with respect to the above consultation. I have carefully considered the consultation document, as well as representations made to me by my constituents.

I am pleased to support the proposed bus franchising scheme.

My constituency contains some of the most deprived communities in Greater Manchester and for many of my constituents' buses are an essential life-line. They have been failed by the current arrangements and the proposed franchising scheme offers opportunity for a fairer system to be put in place. Currently my constituents are not only faced with a complicated and expensive ticketing system, but a system based on commercial competition that has left them with a network without a strategic plan, without integration with other modes of transport, and buses that do not take them where they need to go.

In my constituency, we have been left with a network that prioritises 'profitable' routes into town, whilst quieter yet essential routes have suffered – I would challenge anyone who thinks the current system is fit-for-purpose to travel from Whalley Range to Abbey Hey by bus in under an hour. On top of this, the complete lack of Metrolink services in my constituency has also put my constituents at a huge disadvantage, when their bus routes are cut, they are simply left with no other public regular transport alternative.

I do not believe that the operator proposed partnership, or indeed the so-called ambitious partnership, could address these problems effectively. Only the proposed bus franchising scheme can offer the opportunities for strategic planning, improved customer experience, investment and value-for-money that can deliver the bus network that my constituents need and deserve.

Yours faithfully,

Afzal Khan MP

Labour Member of Parliament for Manchester, Gorton

Afzal Khan MP

House of Commons | London | SW1A 0AA | 0207 219 3570
BMHC | College Road | Manchester | M16 8BP | 0161 226 5546
afzal.khan.mp@parliament.uk | @Afzal4Gorton



BARBARA KEELEY MP

Labour Member of Parliament for Worsley and Eccles South

First Floor
37 Manchester Road
Walkden
M28 3NS

Tel: 0161 799 4159
Fax: 0161 799 5829
www.barbarakeeley.co.uk

Andy Burnham
Mayor of Greater Manchester
Churchgate House
56 Oxford Street
Manchester
M1 6EU

7th January 2020

Dear Andy

As the Member of Parliament for Worsley and Eccles South, which lies in the city of Salford, I am writing to respond to the consultation on 'Doing Buses Differently', the bus franchising scheme proposed by the Greater Manchester Combined Authority for the whole of Greater Manchester.

I support the re-regulation of buses in Greater Manchester. Thousands of people in my constituency rely on public transport to travel. I believe that people deserve an affordable, reliable, accessible, safe and green bus service, but that is not what bus users are currently getting in Worsley and Eccles South.

I believe that a properly funded re-regulation of the bus system would provide an opportunity for bus travel to improve across the whole of Greater Manchester, including Salford.

I would like to add the following comments to the short survey of questions listed in the consultation.

1. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

I receive many complaints from constituents about bus services. These are complaints are about buses being late, buses that are not accessible and bus services that are being cut. In the past year my constituents have lost two vital services with the 100 bus in Eccles being routed away from Peel Green and the 34 and X34 in Worsley being routed away from Worsley Road. These changes have caused hundreds of people, including many older people, to experience travel difficulties and there is no longer a direct bus link from Worsley Road to central Manchester.

I believe that my constituents deserve a bus service that is reliable, punctual, has frequent services on routes that help to connect people to all town and city hubs and which provides value for money.

2. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?

When I have raised the issue of bus services being cut I have been told by Transport for Greater Manchester that these are "commercial decisions" taken by the bus companies

themselves. This means that people in Worsley and Eccles South are paying the price of private bus companies focusing on profit instead of providing a meaningful service to bus users. Re-regulation of bus services would make sure that decisions are taken in the interests of people rather than profit. It would also mean that we can have a greater focus on the social and economic purpose of bus services which can cater for the social or business needs of an area better.

The 'Our Network' proposed franchise could also provide benefits such as integrated ticketing for all local transport and affordable fares to encourage greater usage.

3. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

I agree that the proposed franchising scheme presents an exciting opportunity to improve bus services across Greater Manchester.

In order to tackle rising rates of air pollution it is vital that Greater Manchester increases the number of bus passengers and makes bus travel a viable alternative to car use. It must, therefore, present a more attractive and sustainable choice than the current bus service does at present.

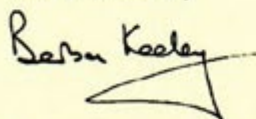
It is also important that as the proposed re-regulated bus fleet is modernised, that buses have modern, high quality engines which will emit reduced levels of Carbon Dioxide and other harmful emissions. There should be a focus on electric buses in the future.

Bus passengers want a more reliable service, frequent services going to more places, simpler fares that are better value for money and more useful information about bus services. I would also like to see an emphasis on personal safety when using buses (both at bus stops and while on the bus itself) so that we can encourage more people to switch from car journeys to bus journeys. This is particularly important to women and those who travel after dark.

4. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

I support the bus franchising scheme in its aims to revolutionise the bus service in Greater Manchester. However, this scheme must be funded properly to achieve the bus transport system that Greater Manchester needs. I hope that a regulated bus scheme in Greater Manchester would increase passenger numbers, decrease road congestion and improve the air quality across the city region.

Yours sincerely



Barbara Keeley MP
Member of Parliament for Worsley & Eccles South

Better Buses - response to consultation from Chorlton Park ward councillors

Dear Kate Brown,

I am writing on behalf of all three councillors from Chorlton Park ward, Manchester.

Bus service losses are a major concern for our residents and the need for a vastly improved bus service is something that is regularly raised with us by them. We therefore wish to express our absolute support for the city region's buses to be returned to democratic control through franchising and we would like to see this happen as quickly as possible. It is time that the needs of passengers were put above the desire of bus companies to maximise profits, often with the help of public subsidy.

In this city we urgently need vastly improved, more regular, cleaner and greener buses that take people on the journeys they need, not just into and out of the city centre but around the city too and into other nearby centres including district centres. In parts of our ward, Chorlton Park, over recent years the bus services have been progressively withdrawn. As bus companies are free to choose how they operate, so-called unprofitable routes have been withdrawn if no public subsidy is forthcoming.

Workers with early starts or late finishes have lost their link to work and either pay more, use complicated links or have changed jobs. Residents who relied on the bus to get directly to Withington hospital for out - patient appointments now face a taxi fare, unreliable Ring and Ride or an ambulance. Access to affordable shopping centres has also been lost. People can't use the bus to go out in the evenings and are excluded from the city's cultural offer unless they walk long distances to the tram. Many of our residents routinely have long walks to infrequent and expensive bus services, including of course, those who have difficulties with their mobility. This has led to increased isolation, and has necessitated people having to purchase cars when really this should not be at all necessary in a modern European city of this size and population density, when we all know that to improve air quality and reduce carbon, which is an urgent imperative, we need fewer cars on the roads and fewer car journeys.

Insult has been added to injury by the sight of numerous 'out-of-service' buses driving up and down Barlow Moor Road, areas no longer properly serviced, with 'We love Manchester' emblazoned on the front.

The Mersey Bank, Barlow Moor and Arrowfield estates have all been particularly badly affected. Indeed so incensed have some of our most isolated communities been at the withdrawal of services that they organised campaigns, which we supported, to challenge those decisions. Unfortunately despite all the campaigning and the clear justice of their case we were never successful except in the smallest ways, as the bottom line for the bus companies is their profits. The social impact of these service losses is not factored in to their business model.

People have also been adversely affected by ticketing policies and find that their return tickets are not always valid because the return journey is with another bus company. This is simply ridiculous. Tickets need to be transferable and cheap. It cannot be right that it is possible to travel, for one hour on a bus in London for £1.50 and yet in Manchester, where average wages are far lower, adult fares start at over £2 for a short journey. This does not encourage bus use. We need far better value ticket prices. We also require incentives for people to use the bus for any journey that they can, to keep cars off the roads to reduce our air pollution. Congestion is a huge problem in the city and a vastly improved, green affordable bus service is one of the most important solutions to this. But currently although there may be good rates for people who use the bus daily, those who take a one-off journey or who take different journeys on different days, find themselves financially heavily penalised. This needs to end.

It has been extremely frustrating over the last five years as elected representatives to have been completely unable to save such essential services for our residents, knowing the range of unacceptable consequences that follow. We need bus services to come under democratic control, so that buses provide a service for the people and the city and are answerable to the people through the exercise of democracy. Buses must no longer be run for profit. They are an essential service for our communities, to enable people to access work, education, culture and community. The benefits for the community of providing this will be repaid with improved health, sense of community, access to culture, productivity and through better air and reduced congestion and reduced carbon.

Finally we would like to put in a plea for our new bus services to be provided at the lowest possible cost. This is needed to enable us all to reduce cars use and it is a vital and urgent element of the city and the city region's response to the climate emergency.

Councillor Mandie Shilton Godwin
Councillor Joanna Midgley
Councillor Dave Rawson
19 December 2019



Andy Burnham
Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M1 6EU



Paul Dennett
City Mayor

City Mayor's Office, Salford City Hall,
Chorley Road, Swinton, Salford M27 5DA



Phone: 0161 793 3442



Email : citymayor@salford.gov.uk



Web : www.salford.gov.uk

26th November 2019

Dear Andy,

Greater Manchester Bus Reform

Buses are a vital mode of transport for Greater Manchester and the evidence shows that they account for 75% of all public transport trips undertaken by our residents and visitors. In Salford we welcome the recent focus on buses and the implementation of the Bus Services Act 2017, although it is disappointing that the Act does not allow for publicly owned bus companies. As the workhorse of the public transport network we understand how important buses are in connecting our communities to economic growth opportunities, in a city where 40% of our households do not have access to a car the link between an effective and connected public transport and accessing employment opportunities is key.

We have seen how successful buses can be in connecting residents to key employment, health and leisure opportunities through the Leigh / Salford / Manchester Busway and the hugely successful Vantage Service which carries around 60,000 passengers per week. Given the right infrastructure, promotion and management, the decline in bus usage across Greater Manchester that we have seen in recent years could be reversed, and the successes we have seen in Vantage could be replicated more widely. This would benefit all commuters by tackling congestion, improving air quality and reducing carbon, which are 3 key issues for Salford and Greater Manchester.

Through the Mayors Challenge Fund programme Salford is working to deliver an ambitious £60 million package of walking and cycling improvements to connect our communities and transport interchanges sustainably. Salford is at the heart of the proposed Greater Manchester Clean Air Zone, which would cover 500 square miles and include a population of almost 3 million people, making it the largest outside London. The City of Salford is also central to the city region target to become carbon neutral by 2038. An integrated transport network is key to achieving the aims of these 3 key strands.

Salford City Council recognises the limitations of our existing bus provision, which has been brought about by the existing commercial arrangements. The existing situation where multiple operators compete for business is detrimental to the passenger experience. This focus on

commercial routing results in a dominance of services on key radial corridors leading to poor north / south connectivity across the city of Salford leaving some of our most important sites such as Salford Royal Hospital and MediaCityUK poorly served from many areas. This situation is common despite the fact that TfGM subsidises approximately 20% of the network that commercial operators deem unviable.

I believe that the franchised model for buses presented by TfGM offers the best opportunity to make a real change in improving connectivity across Greater Manchester. By co-ordinating the bus network we can integrate buses into the wider public transport offer and achieve a true multi modal network with cross ticketing, something that has not been possible to date. Taking a lead from London where bus use doubled between 1986 and 2018, a radical change is needed to halt Greater Manchester's decline in bus use, which has fallen by 45% since 1986. I believe the alternative option of a Partnership would not be able to deliver an integrated solution and be unable to realise the full range of benefits to the public.

Salford has long supported an alternative approach to bus services and since 2015 has worked with residents and businesses via an independent bus consultant to identify a new network of services and routes, building on the existing network to fully connect all areas of the city. Our Bus Network Review will be invaluable in planning a future GM network and we hope to work closely with TfGM to incorporate these plans into the future bus network.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'P. Dennett', with a stylized flourish at the end.

Paul Dennett
City Mayor of Salford

Bus service consultation in Greater Manchester

As Councillors for the North Ward of Stalybridge (Tameside **MB**C), we welcome the opportunity this consultation offers to comment upon the future operation of bus services in Greater Manchester particularly as it affects communities in Stalybridge, Heyrod and Carrbrook. Our comments below are based upon the experiences either of those people who have contacted us during the past year, or of those who have attended public meetings on this issue. This included public meetings in Heyrod and Ridge Hill in July and St. George's Church in November. Also attached are petitions signed by local people attending these meetings or within the Ridgehill and Yeyrod areas. Their views reflect the impact that the poor level of bus services have had upon their everyday lives.

Planning routes and services to meet local need

Most people want regular services which are reliable, affordable, and not subject to constant route changes without notice. In essence, this means having a service which meets the needs of, and can be influenced by, local communities directly or through their elected representatives. They want an end to the lottery of routes and services being determined by a private operator, changes made without prior notice, or consultation with local communities. Most people have expressed the wish that this ad hoc system be replaced by a network of planned routes and services which enable local people to get to work, school or college on time, visit the doctor or hospital, or socialise with friends. For older people, those people with disabilities and young people without access to private transport, this is crucial—an essential part of preventing people becoming isolated, earning a living or taking advantage of education or training opportunities.

The integration of bus and other public transport facilities

Most people want one body to be able to set priorities for a future bus service network, plan and amend routes, set service levels, control fares and where necessary spend public money to support the bus network. Many parents and young people, for instance, have spoken to us about the benefits of the young persons' pass centrally planned across Greater Manchester which has enabled many young people to access college and social activities; but at the same time complained about random reductions to services, imposed by private operators, which prevent travel during evenings or weekends.

As part of the Town Challenge Consultation, people in Stalybridge wanted to see the integration of transport facilities, so that people can interchange easily between bus, rail and tram; at the same time, releasing underused facilities to encourage regeneration. The creation of one body would assist this process. In Stalybridge, this would mean plans for bus and Metro link facilities being focussed around the railway station encouraging greater use of public transport, but also enabling the land occupied by the bus station, currently underused and considered an eye sore in the town, to be released as part of the wider regeneration objectives identified as crucial for the town's future.

Fair Fares

Many people raised issues relating to the fare structure and their affordability. People want fares which they can afford and a ticketing structure they can understand. The current system often means that tickets are not transferable between companies, do not cover whole routes—and if a change of bus is necessary, operated by a different bus company— can mean incurring additional expense. Most people wanted one body to implement a coherent ticketing and fares structure across all forms of public transport across Greater Manchester.

Clean accessible buses for all

Looking to the future, other people have stressed the important role a comprehensive, planned network of bus routes and services can play to reduce co2 emissions and contribute to climate change; whilst others raised issues about making buses more accessible to disabled and elderly people and parents with prams and pushchairs.

Bus services which support local communities

The unplanned reductions in routes and services has affected all of Greater Manchester but has had a disproportionate impact upon poorer communities and isolated villages. This has been the case in Ridge Hill to the North of Stalybridge Centre, and the villages of Heyrod, Millbrook and Carrbrook.

The following examples from the consultations and representations made to local Councillors illustrate the points made above:-

Ridge Hill

Ridge Hill comprises a number of housing estates to the North of Stalybridge Town Centre. It is one of the most deprived areas in Tameside with few facilities, higher than average unemployment and lower than average incomes, low levels of car ownership, where issues of isolation affect elderly people and some parents with young children. Health outcomes are poor and the frequency of mental health referrals are above average.

Bus routes 387 and 389 have been shortened and services reduced. Some bus stops have been taken out of use— for instance Church Walk and St. George's Street. This has meant older people having to walk up steep inclines to use bus services for their weekly shop and effectively cutting half of the estates off from a bus route. Reductions to the 387 service have meant that people have not been able to get to Tameside Hospital for appointments without using taxis and incurring additional expense. Other people have been regularly delayed getting to work or unable to make connections with other bus services to other parts of Greater Manchester.

Millbrook, Heyrod and Carrbrook

People in outlying communities have been some of the worst affected by reductions to routes and service frequencies. For example, reductions to evening and weekend services have left Heyrod isolated after 6.30pm and residents in Carrbrook without a service to Mossley at weekends. It means, for example, one local elderly resident of Carrbrook, now having to pay for a taxi if he wishes to socialise with his relatives in Mossley on Sundays.

There have also been instances in Carrbrook village, when the newly installed stop has been missed by a regular service or passengers told that they could not enter the bus because of some ambiguous service requirement. Where and who to complain to about this type of service lapse is unclear with the current operational arrangements. Any new franchising arrangement needs to clarify where representations from local communities can be made.

Another gentleman from Millbrook, who works in Reddish, e-mailed us to say that although his journey can be no more than 6 miles, he has to take 3 buses in the morning and 4 buses in the evening on his way back from work making a 3 hour daily return trip. Sometimes either because his buses are late or do not turn up at all, an hour can be added to his journey. He calculated that over a week, this cost him £150 in additional child-care costs.

It is clear from our discussions that most people do not want this continual decline in our bus services. For various reasons—affordability, reliability, regular services, or the need for buses in the evenings or weekends—people want change. They want a comprehensive service without private companies determining who should get buses and when. For this reason, we support a franchising scheme for buses across Greater Manchester.

Councillors Adrian Pearce, Jan Jackson and Sam Gosling
(Stalybridge North Ward—Tameside Metropolitan Borough Council)

CAUTION: EXTERNAL

Dear bus consultation team

Please find below my response to the current consultation on the proposed bus franchising system.

Best regards

Councillor Charlotte Morris
Labour Member for Elton

The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

I am in agreement with the Strategic Case and its assessment of the challenges facing the local bus market. At a time when we should be encouraging greater use of public transport in our towns and cities, Greater Manchester's opaque, expensive and poor performing bus network is a major blocker to achieving the sustainable transport future that Bury and Greater Manchester aspires to.

I would point to the following issues to reinforce this point:

- Fares are too expensive. In Bury, if two people are travelling, say from Bury interchange to Brandlesholme, it is far cheaper to get a private hire taxi than take the bus. There should be a real incentive for people to take public transport and I would support a London-style 'hopper fare' or something similar to prevent passengers from paying several pounds for a five to ten minute bus ride, thereby encouraging them to take lower cost, cleaner and greener transport options.
- Ticketing is too complex. While my ward is relatively well served by bus to and from the town centre of Bury, with two operators -Diamond and Rosso - this luxury does not extend to wider in Bury, neighbouring boroughs and GM as a whole. As noted in the consultation document, there are 150 types of ticket, this level of complexity can mean passengers buying the wrong tickets and ending up out of pocket when new tickets for different services have to be bought or just simply not taking the bus full stop.
- Services are too unreliable. There is little real time information from operators, buses are frequently late or cancelled completely with passengers unaware and there is little accountability for this as the number and variance of operators makes a single point of contact for customer services difficult.

Beyond this, the system is not working in the interested of passengers as a whole. In GM, we have lost 8 million miles of bus services since 2010, which is 11% of the service, despite fares rising two years in a row. The North West's bus network has shrunk more than any other region, while bus company shareholders have received an average of £18.4 million in dividend pay outs for the past 10 years.

The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

I agree wholeheartedly with this statement. The bus market is not working at present, serving profit over passengers. TfGM currently has its hands tied to deal with any of the issues I outlined in response to the previous question without taking control of the buses. Our buses should be taken out of private hands and into public control.

The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- Offer a 'high' ratio of benefit to the cost to GMCA, one which is broadly comparable with the partnership options,
- Provide the most economic value (Net Present Value), and
- Create the best platform from which further economic value could be delivered.

Do you have any comments on this?

I support the Economic Case outlined in the consultation document. Of course, the move to a franchised system would cost the GMCA / TfGM money, but the benefits far outweigh the costs. I appreciate that the partnership or do nothing options offer better cost benefit ratios, marginally, because of the high cost to the GMCA / TfGM of taking full control of the bus network, but there are wider positive consequences.

To name a few,: passengers would benefit from fare improvements, putting money directly in their pockets. The wider economy would benefit from improvements to the efficiency of the public transport system. The environment would benefit from an improvement in bus patronage and less reliance on car use.

Public money already makes up 40% of bus companies' revenue, yet passengers have no say over fares, routes or timetables. I do not believe we should be subsidising 'unprofitable' routes while bus companies make significant profit elsewhere on the network. Franchising would enable TfGM / GMCA to put money back into socially necessary routes rather than just seeing profit go into the hands of bus companies.

The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

I strongly believe that the Mayor, the GMCA, TfGM and the 10 local authorities should be lobbying Government hard for additional funding for the franchised system. Residents in local authorities across GM, including Bury, have already seen an increase in the social care precept and the Mayoral precept. Local government has been starved of funding, with Bury Council having faced cuts of £100m since 2010, and it is high time the Government put its money where it's mouth is when it comes to the north and towns like Bury.

I appreciate that some funding will have to come locally, from either the Mayor precept or the local authority levy, and on average this would be a total of £14 on council tax over six years for the average household, but with Government promising investment in the north of England and looking to tear up the Treasury Green Book to enable this fairer investment, we should look to national Government first.

The Conservative manifesto promises bus, tram and train services "as good as London's" and the Prime Minister has previously indicated his support for a 'London-style' bus network for GM. It is no

use making promises that are not backed up with the resources to deliver. With a Budget set for March, this franchised system should be top of the Government's priority list.

Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

I completely agree with this. Without public control over our buses, we will continue to suffer from a chaotic, expensive, opaque and unaccountable bus network in GM. Metrolink is the jewel in the crown of our public transport system, but many residents, in particular those in areas like Elton in Bury, rely on buses alone or to join up with other elements of the public transport network. The Mayor and TfGM's ambitions for Our Network simply cannot be achieved without a franchised system.

I have been particularly disappointed to see the response of bus operators to this proposal. They argue that they want to make improvements but that the GMCA has cut money to fill gaps in services - this is a result of Government cuts. They say that residents will bear the brunt of the cost through increased taxes - but this is only if Government refuses to provide the appropriate funding. Building up a £100m war chest to make the legal case against franchising and advertise against the proposals demonstrates that they want the status quo because it benefits them. Perhaps that £100m could be better spent on improving our services and perhaps the bus operators could work with the GMCA, TfGM and residents to help get a bus network that works for us all.

To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

Fully support for all the reasons already outlined. The other options, partnership or do nothing, simply leaves the power in the hands of bus companies.

Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

N/A.

If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

N/A.

Finally, do you have any other comments you want to make?

N/A.

I am emailing regarding the above consultation. I will provide a formal response to the questionnaire in due course, however I wanted to highlight concerns raised by a number of people.

The concerns relate to the format of the documents. In order to participate properly in the consultation, members of the public have a choice between: a 140-page consultation document; a 600-page assessment; a number of other lengthy supporting documents; and a small leaflet.

Apart from the leaflet, which is very brief, you have to wade through very long and very heavily worded documents. These appear to have been written to satisfy the needs of planners and lawyers, but not those of the average person who uses a bus. That person is not going to have time to engage with and comprehend these documents.

In particular, the section explaining how franchising in GM would be split into three areas is worded unclearly. Also, the map in Annex 5 on Page 138 of the consultation document needs to be much more clearly marked. It would not be clear to a lot of people, from looking at this map, which area they (or their service) would fall into.

I am concerned that a lot of my residents - indeed an awful lot of people who use buses - will be deterred from engaging with this consultation. I personally support bus franchising, but a low public response will not help the cause.

Please consider issuing a more accessible version of the consultation document, which is more detailed than the leaflet, but easier to engage with than the consultation and assessment documents.

Many thanks and kind regards.

Chris

--

Councillor Chris Wills
Labour & Co-operative Member, Withington Ward
Lead Member for LGBT+ Men

I have been a Councillor for Woodhouse Park ward since 2002.

In recent years there has been a reduction in bus services serving my constituents. Although the Airport line of Metrolink is welcome, less mobile residents are often too distant from the tram stops to walk easily to them, and people need reliable public transport to travel to areas not served by Metrolink. Yet bus operators have used the arrival of Metrolink as an excuse to reduce their services.

Services are worse in the evenings and at weekends. The fares are expensive.

I support the franchising option as this is the best way on offer under the legislation to reintroduce public control of the bus network.

Franchising would help my constituents due to a better ability to influence bus routes and frequency. It would be easier to make the fares affordable, and to have consistent pricing including simpler and flat fares. The bus service would be more reliable.

Yours sincerely

Councillor Eddy Newman
Labour Councillor for Woodhouse Park
Manchester City Council

Dear Sir/Madam,

Thanks for considering this response to the Consultation on whether to bring buses into public control in Greater Manchester.

I am responding on behalf of my ward colleague, Cllr Sharif Mahamed, as we both represent Moss Side.

What you think of buses currently running in your ward:

We are in an unusual position of having frequent buses, but that are very difficult to take to anywhere other than the city centre.

There is a poor service in the evenings and at weekends, and especially for anywhere that is not into the city.

We are also struggling with the effects of poor bus service on the rest of the city, as people use Moss Side for commuter parking.

The buses are late and unreliable, to the extent there is no point trying to catch the 111 is you have to be somewhere on time.

Tickets are expensive, especially compared to incomes in Moss Side.

We have almost no other operators other than Stagecoach as other routes have been cut.

Your reason for supporting publicly controlled buses:

We believe it will provide a better service for everyone, not just in my ward, and that this will allieviate some of the parking pressure we face. This is as well as being of general benefit to others.

We will have better chances of integrating to other public transport, such as the tram.

The ability to set fares and routes will help with accountability.

We can bring in environmentally friendly buses, and provide a more consistent service for everyone.

We can provide ore clarity over what public investment is delivering.

What residents want and need from buses moving forward:

Residents need affordable buses with integrated ticketing and service. Manchester is lagging behind other world class cities in this respect.

The ability to influence bus routes and frequency of service, so that buses are better used as a daily commuter transport. This will also be achieved with an integrated service with other modes of transport that publicly controlled buses can deliver.

Given that Moss Side has some of the most polluted roads in the city, we certainly need better newer buses that are accessible, cleaner and greener.

Public ownership will provide better concessions for residents, which will be of huge benefit.

We believe public ownership will provide better value for money for passengers, and better employment conditions for employees of bus services.

A more stable system that residents can rely on being there in the future.

On behalf of Cllr Sharif Mahamed, as Moss Side Councillors we support better, publicly controlled buses and understand, and are hopeful, that Greater Manchester has the potential to set a precedent across the UK.

Regards,

Emily Rowles

Labour Member for Moss Side

Dear Sir/Madam,

I am emailing my response to the GM Bus consultation. I strongly support a franchising scheme, under GM control, for the following reasons:

- the routes would be able to meet the needs of the people of GM; to connect them to employment/retail/health/leisure and social activities
- be able to plan a network that integrates buses with the rest of the transport system, to meet the future needs of the city region
- be in control of timetables to suit the communities that the buses serve
- improved standard of buses across GM
- a less complex and more simplified ticket system
- affordable fares offering best value
- better travel information.

In conclusion; this would be an integrated bus network not based on profit, which would achieve a better customer experience all round.

Kind regards,
Cllr Gina Reynolds
Salford City Council

Cllr Marcus Johns

DEANSGATE LABOUR & CO-OPERATIVE COUNCILLOR

REPRESENTING OUR COMMUNITY

✉ cllr.m.johns@manchester.gov.uk 📞 0796 629 5866 🐦 @CllrMarcus



Members' Services Office,
Town Hall Extension
PO Box 532
Manchester
M60 2LA

8th January 2020

Greater Manchester Consultation on a Proposed Bus Franchising Scheme

Our bus network is not working: bus use is falling, many communities are cut off from the bus network, and we are failing to see the modal shift to public transport we need to see in order to combat the climate emergency, poor air quality, and congestion. I strongly support the current proposal which the Combined Authority has proposed as the best option within the limits of existing legislation. Whilst I do believe that we should set our sights on the public ownership of public transport in Greater Manchester—and pursue this once the franchise scheme has been successful—we should implement the proposed bus franchising scheme as soon as possible to deliver better buses for people in Greater Manchester.

The fragmented network in Greater Manchester is unhelpful for people trying to go about their lives with over 150 fares providing a confusing and expensive barrier to use. In addition, sustained fare increases over a number of years have worsened this already raw deal. The withdrawal of routes and services at little notice damages the credibility of bus travel and reduces our ability to encourage modal shift. The fall in bus use that these problems causes creates a negative feedback loop: more people turn to cars, more car journeys increase congestion and delays, so the bus network becomes less reliable and people become less likely to travel by bus. This trend must be reversed. Only an integrated network can break this, simplifying fares and reconnecting communities.

In Manchester City Centre, there are clear examples of the failure of the existing model, such as competing bus services causing congestion and pollution along Oxford Road and Portland Street. This is a consequence of a lack of co-ordination between operators and an oversupply of some services. There is also confusion for visitors and residents alike trying to use our buses—for example different operators and tickets for the same routes leaving Piccadilly Gardens

leave visitors confused and attempting to get on buses with the wrong tickets. This is a key failure of the current system which would be corrected under the proposed franchising scheme.

Since the division of GM Buses North and GM Buses South in 1993, people in our city and our city region have suffered from this same geographic divide in the bus network. For city centre residents, like some doctors, who work in different parts of our city region—North and South—the alternative to a car is to pay for double the cost (needing two tickets for different providers) or purchasing an expensive System One alternative to make these journeys by bus. This is an entirely unnecessary and unhelpful additional cost for people which the proposed franchising scheme would ultimately end. This fragmented system around our city centre is frustrating for residents and runs counter to our strategic goals. Building an inclusive economy requires many things, and one of those is connecting communities to opportunities by providing affordable, reliable public transport. This stark geographic divide is a barrier to this. The proposed franchising scheme, once fully implemented, will help reconnect communities into a single city region network from which all can benefit.

The city centre is home to a number of multi-modal interchanges like Piccadilly Gardens or Shudehill, which should be crucial nodes in a coherent transport network in Greater Manchester. However, they do not work well enough because of the different operators, different fare structures, and lack of affordable options to regularly travel across modes including Metrolink, rail, and bus. One measure of a successful future for Greater Manchester's transport network will be the ease and affordability of travelling across our city region regardless of which public transport mode. We are not there yet, but it is clear that the proposed franchising scheme is a key part of our work to get there.

The 2040 Greater Manchester Transport Strategy and the emerging City Centre Transport Strategy demonstrate a strategic ambition around the need to reduce journeys by car in Greater Manchester, and particularly into the city centre at peak times. Improving bus travel and making it more attractive to residents, as the proposed franchising scheme would, is a key tool in meeting that goal.

The proposed franchising scheme is a much-needed tool to help address the climate emergency, not least by encouraging travellers out of cars and onto public transport. Moreover, our city region has been burdened with older, dirtier

buses and some of the worst air quality in Manchester City Centre is related to the bus network—such as in Piccadilly Gardens. It is welcome that the proposed scheme would allow Greater Manchester to set high standards for the buses that would serve the network under the proposed franchising scheme and tackle this problem.

There is currently very little public accountability over the bus network—and residents are left at the whim of private operators seeking to maximise profits. Elected representatives have little say and little sway to influence these operators when representing the interests, concerns, and complaints of our residents. Most people already think Councils, Transport for Greater Manchester, and the Mayor have more control over buses than we actually do. The proposed franchising scheme addresses this lack of accountability and control, giving residents a say in how the transport network should serve them and their interests. Additionally, it provides more clarity for the public over what public investment is delivering and the ability to marry up infrastructural investment with service design as is appropriate for a modern transport network.

Finally, whilst there is a higher cost associated with the proposed franchising scheme, the benefits are far superior to any alternative proposals and the funding proposals are appropriate, affordable, and proportionate. It is welcome that the proposed franchising scheme provides the most economic value and offers a high cost benefit ratio. The proposed franchising scheme would unlock the opportunity for Greater Manchester to pursue ways to arrest the decline in ridership forecast for the future through the proposals for Phase 2 interventions—and so the economic and broader public benefits are likely to be higher than the assessment suggests.

Overall, I strongly support the introduction of the proposed franchising scheme—for better, publicly controlled buses. I believe it will bring clear benefits to the residents I represent in Manchester City Centre, to our whole city, and to the wider city region, setting a national precedent.

Yours sincerely,

Marcus Johns

Labour Councillor for Deansgate Ward

CAUTION: EXTERNAL

Dear Sir/Madam

I support TfGM's proposed franchising scheme for buses for the following reasons:

- 1) The opportunity for improved connectivity throughout the GM region with links between communities prioritised above profit. This would also help those who work in areas not currently linked to bus routes.
- 2) It would allow more control over timetables and fairer ticket pricing.
- 3) Provide improved integration between buses and the wider public transport network.
- 4) Provide a better standard of buses and improved service timetable reliability giving a better overall passenger experience. This has been done in London and led to bus usage doubling since 1986 whereas in the same period bus passenger rates have fallen by 45% in Greater Manchester. I believe this is largely due to the defranchising of buses that took place that year.

A well organised franchising scheme would be an exciting opportunity to revitalise the current bus network and could lead to a considerable improvement in the way buses are run and lead to a marked increase in bus patronage. This would make an obvious positive impact on traffic congestion and pollution issues.

Best regards

Neil
Cllr Neil Reynolds
Claremont Ward Councillor

Wilmslow Roa

The buses that run in my ward especially on wilmslow Road are shocking, they are late/unreliable and prices keep changing, my daughter works at the airport, and many a time found herself stranded because they have taken the bus service off.

The different operators is ridiculous you buy a ticket on one bus but can't use it on another, makes no sense to me what's so ever, most of the drivers are not helpful, the pollution from the buses when your stood at the bus stop is disgusting.

Stockport Road Services

The services that run down Stockport Road, the buses seem to change bus prices when they feel like it you could be paying £2.00 one minute and £2.30 coming back.

We want simple prices Environmentally friendly buses, and clean buses, along with helpful drivers.

The residents in my ward want better newer buses that are accessible, for the elderly or infirm and the young people.

I support better, publicly controlled buses and I understand that Greater Manchester has the potential to set a precedent across the Uk.

Kind regards
Cllr Tina Hewitson

To whom it may concern,

Greater Manchester Bus Consultation Response

I am writing in response to the consultation on how buses should be run in Greater Manchester and whether a proposed franchising scheme should be introduced. It is clear that we need a change in the way our buses are run. The current system does not work for passengers and has done very little to increase the usage of public transport. Many Oldham and Saddleworth residents have told me fares are too high (in particular single tickets), routes don't meet their needs and on too many occasions are late or do not turn up without any explanation as to why. This is leading to real world consequences, making people late for work, school, doctor and hospital appointments. It's simply not good enough and my constituents deserve better. It's time we put them first, something that has been lacking under the current de-regulated system.

In Autumn last year numerous constituents contacted me, concerned about changes to the First Bus timetable in Oldham East and Saddleworth. As a result of these changes many parts of my constituency, communities suffered significant cuts to vital services. The cut to the 81 service meant a large area of Derker was left without a First bus service during the day, losing a vital link to Oldham and beyond. Residents now have to catch either the 410 or 411 service operated by Manchester Community Transport, which is only an hourly service. Thankfully local Councillors secured a change to the route ensuring the 410 & 411 served top Derker which will only be served by the 81 in the early morning and late evening. However this happens too many times and there is little accountability for these major losses.

The frequency of the 180 service was cut in half leaving residents in Greenfield with an hourly service. This cut service no longer operates on Sundays or Bank holidays and will terminate at Oldham meaning residents lose a bus link to Manchester. The Principal of Oldham Sixth Form College wrote to me with his concerns stating the changes "will undoubtedly have a negative impact on attendance, punctuality, engagement and achievement."

Constituents living in Sholver no longer have a direct route to Manchester during the day, the 83 will only serve Sholver after 18:30. The replacement bus for the Oldham to Sholver portion of the route, the 82, is less frequent. The replacement for the 81A, the 80, no longer allow residents from Holts direct access to Manchester either. I am also disappointed that lesser served parts of my constituency, such as Diggle which only has an hourly service, has not seen an increase in the frequency of their services. These cuts to services come at a time when we should be encouraging more people to travel by bus to cut down on carbon emissions and protect our planet. Under the current system there is a lack of accountability as services are cut and local leaders are able to do very little to halt these changes.

Therefore I support the option to pursue the franchising option which would allow the bus network to be controlled in Greater Manchester as many buses are in other major cities around the world including London. We need to address this key regional imbalance and ensure routes, timetables, tickets and standards are set by the Greater Manchester Combined Authority and not individual bus companies who cream off the profitable routes and allow too many communities to languish without a functioning bus route. A de-regulated system has not created competition instead it has allowed private monopolies to be created with 3 or 4 companies retaining the largest number of operations across Greater Manchester. There is also an urgent need to reform the current complex and expensive ticket system and ensure we have an integrated public transport system, something which I know is a key priority for the Greater Manchester Mayor, Andy Burnham

The strategic case for change is now clear. I support the proposals as set out by the GMCA.

Yours Sincerely,

Debbie Abrahams MP
Member of Parliament for Oldham East and Saddleworth



House of Commons
London
SW1A 0AA

Office: 0207 219 1041

Lord Chambers
9 Church Lane
Oldham
OL1 3AN

Office: 0161 624 4248

Email: abrahamsd@parliament.uk

Website: www.debbieabrahams.org.uk

Twitter: [Debbie_abrahams](https://twitter.com/Debbie_abrahams)

Elected Representatives for Mossley

| | |
|--|---|
| Organisation Name | Elected Representatives for Mossley |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |

| | |
|---|--|
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|--|---|
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | The current bus service is not performing well at all with complaints of late service and missed service. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | As before |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--------------|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>Agree</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |

| | |
|---|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| <p>Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?</p> | |
| <p>Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?</p> | |
| <p>Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?</p> | |
| <p>Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?</p> | |

| | |
|--|--------------|
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>Agree</p> |
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | |
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | |

| | |
|--|--|
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | |
| <p>Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?</p> | |

| | |
|---|--|
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Agree |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | The service needs to be back in public hands |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |

| | |
|---|---|
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>Having familiarised myself with the consultation document, I have listed some of the main points below, which are to be viewed under the collective of Tameside's Place and External Relations Scrutiny Panel.</p> <p>That Tameside becomes part of a simplified integrated public transport system for Greater Manchester which concentrates more on the needs of an individual journey rather than the service operator or transport type.</p> <p>Current challenges suggest that Tameside, as part of a Greater Manchester public transport network, is in need of a renewed and regulated bus network that becomes increasingly fit for purpose, accessible, reliable, affordable and customer focused.</p> <p>There is a future requirement to ensure income generated from financially sustainable parts of the network are used to support expansion into areas of need where a bus service would be essential for social reasons, but not necessarily profitable.</p> <p>Residents continue to face significant challenges associated with the complexity of routes, multiple operators and a geographical separation of services between national bus operators.</p> <p>Local topography can present a number of challenges for residents, with a need to develop sustainable connections to people living in semi-rural communities.</p> <p>There is a possible requirement to ensure a community needs assessment is undertaken for each authority area, with support of targeted engagement to draw insight from the voluntary and community sector and to inform a review of all bus routes.</p> <p>That the general affordability of bus travel is reviewed as part of the ongoing consultation, with a view to bring a more consistent approach to pricing that can be easily interpreted by residents and visitors to the region.</p> <p>That regulating the bus network in Greater Manchester can further support the work to improve air quality by better meeting the expectations of the public and creating a more consistent offer that can be considered as a genuine alternative to car use.</p> |
|---|---|



HOUSE OF COMMONS
LONDON SW1A 0AA



7th January 2020

Dear Sir/Madam,

I am writing in response to the consultation on the GMCA's proposed franchising scheme for Greater Manchester bus services.

Firstly, I strongly endorse the introduction of an improved payment and ticketing system. The current ticketing system is a key issue. It is inconvenient and confusing due to the lack of integration on pricing and ticketing across the network. Ideally, fares across all modes of public transport should be integrated such that customers can seamlessly transfer between bus and rail with a fare system that is clear and convenient. A ticketless system involving contactless card payment, similar to that in London, would be preferable. I think that current customers would benefit, and indeed new users be incentivised to use the service, should the ticketing system be made much simpler to use.

Secondly the service should be responsive to local needs. Each area of Greater Manchester has its own transport mix and it is vital that decision-makers determining where to provide services are able to take into account each area's specific needs. Buses can provide a lifeline to more vulnerable members of our communities and prevent areas from becoming isolated. This should always be an important factor in the decision making-process alongside economic considerations.

Whether the franchising system is adopted or not, it is essential that proper consultation should take place regarding route changes and where problems arise, they should be addressed promptly. The structure though is less important than its responsiveness to public demand and the efficiency of service provision.

Yours sincerely,

SIR GRAHAM BRADY MP

I am responding to the '[Doing Buses Differently - proposed franchising scheme for Greater Manchester](#)' consultation.

When the Conservative Secretary of State for Transport proposed in a White Paper in 1984 the deregulation of buses, he claimed that this would lead "to new and better services and that" "more people would travel" and further "bus operators will look keenly to see where and when people want to travel. If one operator fails to provide a service that is wanted, another will".

The reality over the last third of a century in Greater Manchester couldn't have been further removed from the Conservative Minister's assertions.

Initially, on-road competition led to 'bus-jams' extra congestion and increased pollution. This eventually settled down to major bus companies operating quasi-monopolies where bus routes were cherry-picked and bus fares increased excessively. (A study by the Unite union has shown that there is a rough correlation between the more than £2 billion annual bus subsidy and the bus companies' profits). In Greater Manchester over the period of deregulation, bus fares have gone up by more than the rate of inflation, passenger use has declined along with bus mileage and bus routes.

By comparison, London which benefits from a franchising system, has seen a doubling of passengers (the period after 1998 is not comparable to Greater Manchester because of extra subsidy in London but the period between 1985 and 1998 can be compared because everything else stayed the same. Bus passenger numbers in London remain static but declined precipitately in Greater Manchester).

It is vital that the public takes control of bus fares and bus routes if passenger numbers are to be increased, air pollution and congestion reduced.

Only a franchising system can do this, so I would urge that the bus system be reregulated in Greater Manchester.

Yours sincerely

Graham Stringer MP

JEFF SMITH MP



HOUSE OF COMMONS

LONDON SW1A 0AA

January 2020

I write in response to the consultation on the proposed bus franchising scheme in Greater Manchester.

After considering the proposals put forward by the Greater Manchester Combined Authority, I am pleased to express my support for the franchising scheme.

Three out of every four journeys made by public transport in Greater Manchester are made by bus, but under the current system, bus companies largely set their own routes, timetables, ticket prices and standards based on commercial considerations. Over time, this has led to a sub-standard service for many bus users which could be improved by a franchise system that would allow the following improvements:

Improved route management

My constituency is one of the more fortunate in Greater Manchester when it comes to being served by bus routes, with the Oxford Road corridor sometimes referred to as the busiest bus route in Europe. But while this route is highly profitable for operators due to its proximity to the universities, other services across south Manchester that are essential to local communities but are less profitable for bus companies are less well served. These include services to large housing estates and east-west connectivity across the area. The situation is even less acceptable for more outlying areas of Greater Manchester, where the services are limited.

I believe that a franchised system would give GMCA/TfGM the ability to franchise bus routes that better serve local communities, with a greater emphasis on community need rather than chasing the most profitable routes. It would allow better interconnectivity between bus routes as well as with other transport routes.

Integrated ticketing

At present, the limited power that Greater Manchester has over the bus network means that bus companies operate individual systems that rarely work in partnership with each other or the wider transport network. There is limited integration between buses and Greater Manchester's Metrolink or rail systems, meaning that travelcards cannot be used across all forms of transport and there is no realistic prospect of an Oyster card style system for commuters. A franchised system could mean that travellers can purchase universal tickets

WORKING FOR MANCHESTER WITHINGTON

Constituency Office, Unit 1, Withington Fire Station,

505 - 507 Wilmslow Road, Withington, Manchester, M20 4AW



that offer travel on other modes of transport, making their journey simpler and with the added benefits such as smart charging. Bus fares under the current system often do not offer value for money and are complex with over 150 different types of ticket across networks. A franchised system could lead to a simpler and more competitively priced ticketing system for bus users.

A better co-ordinated network

Travel information for passengers could be improved and Greater Manchester would be able to deliver a long-term transport strategy that incorporates all methods of transport in the region. Minimum standards for bus times, reliability and punctuality could improve the service for passengers and go some way to boosting public confidence in the bus system, therefore driving increased use of the network.

Importantly, franchising would allow for co-ordination with planning and regeneration across the region to ensure that any new developments are properly served by public transport. I believe a franchise system allows for better long term planning and can facilitate access to public sector funding streams.

Improved minimum standards

Under a franchised system GMCA would be able to set minimum standards for vehicle emissions and encourage operators to transition to electric buses. At a time when Greater Manchester has outlined plans to rapidly reduce the region's carbon emissions, it can no longer be acceptable for bus companies to use vehicles which contribute to these emissions and poor standards of air quality.

I have noted the comments of bus operators in support of a partnership system, but believe the best prospect of being assured of the improvements outlined above is through a franchise system which allows improved co-ordination across the network.

For these reasons I support the proposals as set out by GMCA.

Yours sincerely,

Jeff Smith MP



HOUSE OF COMMONS
LONDON SW1A 0AA

Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M1 6EU

3 January 2020

Ref: JM26808

Greater Manchester Bus Consultation- Response

I am writing in response to the consultation on Greater Manchester's Proposed Franchising Scheme. I believe the current proposal put forward by the Greater Manchester Combined Authority is a step in the right direction, but I remain committed to the belief that our buses – along with the rest of our public transport network – should be publicly owned.

In the past I have not hidden away from the fact that I believe there have been missed opportunities to create better bus service provision in Greater Manchester. As recently as February of this year I wrote to the Mayor of Greater Manchester Andy Burnham arguing that Greater Manchester should at the very least explore the opportunity to buy-out First Bus GM in order to attempt to repair the damage that privatisation has caused to public transport in our city-region.

Whatever follows must allow us to rebalance the north of the conurbation to the price, frequency and availability to those offered in the south, though I accept large parts of the whole of Greater Manchester receive a less than satisfactory service.

As the GMCA and TfGM are proposing to pursue the franchising option, the proposal put forward at this time does satisfy me in that I believe it would provide a better deal for both those who use our buses in Greater Manchester and the tax-payers. The ability to divert profits from profitable bus routes to subsidise those which are not commercially viable, yet still vitally important, is in my mind reason enough to press ahead with this proposal. It cannot be right that operators can swamp busier routes to maximise profit but then expect subsidy for other routes without a more balanced and equal investment.

Recently, in Royton, in my constituency, First Bus have altered the services that they offer. In a letter to me First Bus outline that they have removed the number 24 bus completely as the service was not commercially viable. Public transport exists to perform a vital public service, research has shown that 95% of people in Greater Manchester support the idea of subsidising unprofitable bus routes in order to provide a good public service.

Serving the Communities of Chadderton, Royton and Oldham

Constituency Office Address: Textile House, 108 Union Street, Oldham OL1 1DU

Constituency Office: 0161 652 8485 Westminster Office: 020 7219 6039

Twitter: @jimfromoldham Website: www.jimmcmahon.co.uk

I am the Member of Parliament for the Stalybridge and Hyde constituency. Please note my answers to the consultation as outlined below:

Response to the Assessment's summary of the problems currently facing GM's bus market.

I believe this is an accurate assessment. Bus use has declined significantly in my constituency since deregulation. It is viewed as expensive, unreliable, and not comprehensive enough for local travel needs. There is little coordination with other public transport infrastructure. Return tickets bought from one provider are not eligible for travel on a different one.

My constituents tell me they want smart integrated ticketing and flat fares, covering bus, rail and tram services. They also want to see a significant increase in services between the major orbital towns around the centre of Manchester.

To what extent do you agree that reforming the bus market is the right thing to do to address these challenges.

I strongly agree it is the right thing to do, because no other reform will address the problems described above.

Response to the Assessment's Economic case for Proposed Franchising Scheme (PFS)

I believe this shows there to be considerable benefits available to GM if we proceed with the PFS.

Response to the Assessment's Financial case for PFS

As above I believe the benefits of the PFS show that the short-term investment required would generate a significant return for the conurbation as a whole.

Response to the Assessment's findings that PFS is best way to achieve the improvements to the bus service that GMCA hope to achieve.

I support this conclusion. I do not believe any other model will allow us to introduce the services and integrated ticketing systems that the public are asking for.

To what extent do you support the PFS?

I strongly agree with it.

Are there any amendments you would like to see to the PFS and what the inclusion of these amendments increase your support for the scheme overall?

No

With best wishes

Jonathan Reynolds MP

Hyde Town Hall

Hyde
SK14 1AL
Tel: 0161 367 8077

Kind regards

Jim McMahon

Jim McMahon OBE MP
Member of Parliament
Oldham West & Royton



Response to 'Doing Buses Differently' Consultation from Kate Green, Member of Parliament for Stretford and Urmston

19 December 2019

This brief submission responds to a number of specific questions in the consultation document, based on my perception of the impact on and priorities for my constituency. Unfortunately, due to the dissolution of Parliament, it has not been possible in the time available for me to engage fully with my constituents in preparing this response. I am however aware that direct consultation with the public and stakeholder groups is also taking place. In considering the responses to the consultation, I urge due weight is given to the views of all sections of the community, and especially those most affected and the most marginalised.

The strategic case for the proposed franchising scheme (questions 12, 13, 14, 15, 45)

I am broadly supportive of the strategic case, and the objectives for future provision of bus services. My constituents have long suffered from a fragmented, expensive and unpredictable pattern of provision. Incoherent, non interchangeable and costly ticketing and fare structures among different service providers, incoherent timetabling between different service providers, the lack of connectivity to other modes of transport (including walking and cycling, light and heavy rail), lack of awareness among service providers of spatial and economic regeneration plans, and a lack of responsiveness to the most marginalised communities, have inhibited employment opportunities, harmed local leisure and retail economies, and damaged the environment by duplicating provision in some areas while overall disincentivising bus use. Franchising offers the opportunity to address these challenges systematically, holistically and cost-effectively.

Should the proposals apply to the entirety of Greater Manchester, with the scheme split into sub-areas (questions 2 and 4)

I agree that the scheme must apply to the whole of Greater Manchester. This will contribute to the optimisation of other GM strategies, for example in relation to

health and wellbeing, economic growth, and air quality. I understand the arguments for a 3-stage approach, but would urge that those residents living in the second and final sub areas are not disadvantaged during the earlier stages. Interim compensatory arrangements (for example in relation to fares) would be desirable in those areas which come later in the scheme.

Which local services are to be franchised (question 2)

I draw attention to the need to ensure community transport provision is protected and aligned with the franchising strategy.

Equality impact of the proposals (questions 44 and 24)

Franchising and the use of Intelligent Transport Systems have the potential to improve equality outcomes. The document identifies some of the benefits in terms of access to information, simplification of services, improved disability accessibility, and improved passenger safety and confidence which will be important for different equality groups. I am surprised at the absence of systems to ensure regular checks on the equality impact on different equality groups, and would urge ongoing monitoring of this, including through the use of passenger feedback and engagement with stakeholder and representative bodies.

Conclusion (question 45)

I give my full support to the intention to pursue a franchising model, and look forward to continuing engagement in how it can be implemented to maximise the benefits for my constituents.

Dear Sir/Madam,

Re: Doing Buses Differently; Proposed Franchising Scheme consultation

I am writing on behalf of Whalley Range Councillors, in response to Doing Buses Differently, the proposal to franchise Greater Manchester's bus services.

Bus services are essential from connecting people to jobs, friends and life opportunities, to linking them with essential services like GPs, hospitals and libraries, to freeing up road space and cleaning up the air that we breathe.

Whalley Range, Manchester and Greater Manchester residents need vastly improved services in our area. Public transport is raised regularly at our surgeries, local community events and other forums and communication with Whalley Range residents, community groups, schools, businesses and places of worship in the ward.

Recent bus service losses in parts of the ward such as the 85A via Withington Road, and historic losses such as for example the 16 service are a major concern for our residents and have a negative impact in our communities, from social isolation to forcing people in their cars as there is no alternative option for people to get where they want to go.

We have previously supported a local campaign led by the Whalley Rangers, a local community group in response to evidence of need in the area and the loss of another bus service to get Stagecoach to trial a bus service that goes through Whalley Range's main shopping area - the 85A service. This saw a tremendous amount of effort being put by passionate local volunteers that care for where they live and want our area to thrive. A ward wide campaign was run, jumping every hoop Stagecoach has asked which eventually resulted in the provision of a service on a trial basis, only for it to be withdrawn a few months after as the route was deemed 'uncommercial' leaving people angry, disappointed and isolated. Age Friendly Whalley Range & Chorlton is another local group that has campaigned for better bus services in our area, particularly to our local hospital - Central Manchester Foundation Trust (MRI).

More recently another service was recently introduced without any consultation with local residents, never mind with local members, without any promotion of the service to local residents that might have used it, only for it to be deemed again not profit making, so that was withdrawn too.

Cuts in the frequency of services as well as the absence of services in the evenings and weekends is another problem for our residents. For residents who are working early start or late finish shift work or residents who want to enjoy Manchester's night time economy the only available option is a taxi or the use of their own vehicle. Residents who relied on bus to get into MRI, Withington hospital for out-patient appointments are left to their own devices to pay for taxi or use a very unreliable ring and ride service and in many cases an ambulance.

The above mean that many of our residents have long walks to bus stops to catch expensive, unreliable buses that don't always directly take them where they want to go. Buses also don't link with the two metrolink stations adjacent to the ward. Furthermore, due to the absence of integrated ticketing, residents are faced with different fares and companies due to uncoordinated ticketing policies by different operators because it appears customer experience travelling in our city is of no concern for the operator.

Moreover and of particular concern to our residents is the state of the bus fleet in the City. Our Whalley Range residents are taking action on climate change and for a city that has ambitious targets and is leading the way in becoming carbon neutral, having also recently declared a climate emergency our residents expect and demand profit making businesses subsidized by the public purse as well as everyone else in the city to play their part in tackling this challenge. Our residents want no less than a zero carbon emissions fleet, cleaner buses that are not running empty in some of the city's busier corridors when communities that don't have access to private vehicles are left with no option to invest in a vehicle in order to go about their daily lives.

As elected representatives, it has been frustrating to have been feeling powerless and completely unable to influence, be listened to or even have a say on bus services in the city and/or our ward, especially when the consequences of unaffordable, unreliable, dirty and expensive bus services are laid bare in our interactions with residents of all ages and ethnic backgrounds.

I am therefore writing to express our support for the buses to return to democratic control through a franchising model.

Thank you for considering our response to the Consultation.

Cllr Angeliki Stogia
Cllr Mary Watson
Cllr Aftab Razaq

| | |
|--|---|
| Organisation Name | Altrincham Business Improvement District |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|--|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>The Altrincham Business Improvement District (BID) strongly agrees that the local bus market serving Altrincham town centre is not performing as well as it should</p> <p>Transport difficulties can harm local economies and businesses in a number of ways. Congestion and local traffic problems can add to business costs, impede or even block new developments and put off customers, clients and visitors. Local firms may also experience a shortage of labour because of poor transport access. For unemployed people, transport issues may be a key barrier to getting into the labour market.</p> <p>The importance of transport to the BID is reflected in the fact that we have a representative from TfGM on our board. Please note that for obvious reasons our TfGM representative has had no involvement with our response to this consultation</p> <p>As you may be aware, considerable effort and investment has been put into the regeneration of Altrincham in recent years. The town is now nationally recognised as a model for high street regeneration and increasing footfall and continues to develop</p> <p>Altrincham is fortunate in having a new improved transport interchange. However the range, reliability and connectivity of bus services to and from the town centre does not reflect its increasing popularity as a place to live, work, visit and invest in</p> <p>The inadequacy of the bus services has resulted in a vastly increased number of cars in the town centre. This has created problems with parking, severe congestion on key corridors and a poor environment due to increased carbon emissions.</p> <p>Improving bus services would make a significant contribution to creating places where people really want to be. Places that are accessible, attractive and safe.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|--|--|
| Q13b Why do you say this? | <p>The success of Metrolink has clearly demonstrated that if public transport is good quality and reliable then people will use it. Our bus services should better meet the needs and aspirations of potential users. This is particularly important in towns like Altrincham where there is a thriving, growing evening economy. Evening and weekend provision of bus services is frankly woeful</p> <p>Getting transport planning right will lead to healthier, happier and more economically productive places - where people have a genuine choice about how they get there and back</p> |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |

| | |
|---|--|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|---|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | We are disappointed that Altrincham is in Sub-Area C which will be the last to become operational from March 2023. There is an urgent need to address bus services in and around Altrincham now. Another 3 years without improvement could have drastic effects on the viability of the town centre |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |

| | |
|---|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | See comments above |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | For all the reasons given in response to the earlier questions |

| | |
|--|---|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | <p>RESEARCH /ANALYSIS OF SERVICES</p> <p>The services listed in Annex1 appear to be the existing bus services. We would hope and expect that a programme of research / analysis is being undertaken to identify if the existing services, routes, frequencies etc meet current and future needs. The transfer of responsibility for Greater Manchester bus services can only be successful operationally and financially if the services provided are what is required - this also needs continuous assessment to meet changing needs</p> <p>PROMOTIONAL SUPPORT</p> <p>A professional programme of high quality, innovative promotional activities must accompany the franchising scheme. It will be crucial to change the image of bus travel, which currently is viewed as an unattractive transport option. Similarly much more information on services needs to be made easily available to users</p> <p>SHUTTLE BUSES</p> <p>Consideration should be given to the introduction of shuttle bus services such as those operated in Manchester City centre. That kind of very regular, circular, hop on-hop off service would be ideal to access Altrincham town centre and other key destinations around the centre. The BID would be interested in looking into this option with TfGM as soon as possible</p> <p>LINKS TO NEW DEVELOPMENTS</p> <p>Th next few years should see a real increase in new housing and mixed use developments. It is vital that that connections to high quality public transport are integral to any such developments. The lack of this in recent times has offered residents / workers little choice but to rely on the car, thus increasing congestion and environmental problems</p> |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |

Q48 Finally, do you have any other comments you want to make?

Dear Sir or Madam

I write for, and on behalf of the Barlow Hall Neighbourhood Group. This is a Residents Association of those living on the Barlow Hall Estate, in Chorlton. Our area of interest is part of the Chorlton Park Ward, and we are serviced by the Metrolink line between the city centre and Manchester Airport, and also by Bus routes 23, 25, on the main roads at the edge of our area of interest, and 84A and 85A, that have part of their route on the Barlow Hall Estate.

We have been following with interest the changes in public transport, and have campaigned for a better service. A few years ago when the old Bus service number 84 was withdrawn and its replacement had a poor frequency, an early end to service, and then a poor identification of the buses on the 85 route that serviced the extension of the 85 route beyond Chorlton Bus Station to Arrofield Road, via Hardy Lane. More recently we were involved in the consultation about the changes to what was the bus route 276 that has now become 84A between the Mersey Bank Estate, and Daveyhulme / Trafford General Hospital, that goes through the heart of the Barlow Hall Estate along Darley Avenue and Hardy Lane.

We as a committee, are keen to see a more robust accountability in the local area, and greater consultation as changes to services are made to the frequency and destination of bus services in our area.

We, therefore, endorse the proposal to have franchised services that we believe will require certain standards of buses and enhanced onboard experience for the passenger, agreed on frequencies based on local experience that are easy to remember, and most importantly an introduction over time of integrated and seamless ticketing for all public transport in the Greater Manchester area, of which Bus Services area a major part.

Regards

Captain Philip Gay CA
Chair
Barlow Hall Neighbourhood Group.

| | |
|--|---|
| Organisation Name | Chorlton Voice |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>Our members have been reporting for a number of years that buses are unreliable, costly and irritatingly change routes. Different bus companies with different ticketing arrangements are confusing and add to costs. This means people of all ages, school children, college students, people in work or travelling with young children, older people, all find it difficult to plan, to be punctual and to get where they wish to go. Routes to hospitals are bad and across the city are terrible. The only option for many people is to travel by car which they would rather not do.</p> <p>So yes, we agree that the local bus market is not working well.</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | The bus companies have had long enough to develop a network that serves the interests of passengers and they have not done so. Reform is needed |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | The assessment is thorough and we agree that Franchising would provide the best value for money compared to partnership. Bus companies have had long enough to work in partnership and have not put passengers ahead of profits. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|--|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | We accept the analysis of the implementation of a fully franchised system. Our members consider the cost of NOT introducing a franchise scheme would be too high. So we support franchising. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We agree with the proposed franchising proposal. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | This seems the most cost effective way to ensure the buses deliver a network and a service that meets the needs of the population of Greater Manchester and that stands a chance of getting a reduction in car use. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | We would hope that the franchising scheme would lead, in time, to a fully publically owned bus network. We would also expect to see a passenger stakeholder group operating alongside TfGM |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |

| | |
|---|--|
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>Please be in no doubt that we strongly support the proposal for franchising the buses. Public transport is the best way to reduce vehicular traffic for cleaner air and carbon emission reductions. We do not think the buses have demonstrated good stewardship over their passengers and the environment and expect that with franchising more buses can be made greener, more quickly, as well as service improvements made.</p> |
|---|--|



CTA's response to the GMCA's Doing Buses Differently consultation

About the Community Transport Association

This response is submitted by the Community Transport Association (CTA), a national charity working with thousands of other charities and community groups across the UK that all provide and support local transport services that fulfil a social purpose and community benefit.

One of our activities is to contribute to the formation of public policy where community-led solutions within transport can improve access and inclusion. Central to this is showing how better outcomes are achieved for people and communities when they have access to community transport.

Around 30 per cent of CTA's 1,300 plus members are charities whose main work is the provision of community transport and they would typically use this label to describe their work. This form of community transport helps to address the quality, affordability and accessibility of transport options for people who cannot drive and don't have access to conventional public transport, especially in rural areas. It also recognises that some needs are best met through communities doing things for themselves.

This is about providing flexible and accessible community-led solutions in response to unmet local transport needs, and often represents the only means of transport for many vulnerable and isolated people. Significant user groups are older people and disabled people.

High levels of volunteer involvement, the ability to attract charitable funds, accessible vehicles and a not-for-profit business model, all mean community transport is often a more reliable and resilient way of meeting a greater range of transport needs, especially for our more isolated and vulnerable citizens.

The other 70 per cent of CTA's members are charities, community groups and other not-for-profits who use the same permit regime to run transport to support their main charitable activities, such as scout groups, Age UK or RVS branches.

Introduction

The CTA welcomes the opportunity to respond to GMCA's consultation on buses. Since the deregulation of buses, the community transport sector have been an active and vital, albeit under-recognised, arm of the bus network. The CTA and its members have long observed how the bus market is largely operated in response to failure – where the market has failed to provide socially necessary services, the local authority steps in to subsidise; where the local authority fails to subsidise a route, community transport steps in to meet demand.

Moreover, the proliferation of bus companies in Greater Manchester and the lack of unified ticketing and information makes navigating the network confusing, and leaves users out of pocket and disillusioned with a network where private companies prioritise profits over need. As the consultation document points out, there are more than 150 different types of bus ticket – this is simply unsustainable and demonstrative of a system that does not work in the interests of its passengers. Steadily falling custom for buses substantiate this view.

Where transport needs are unmet, community transport steps in. This occurs when 'unprofitable' services are reduced, withdrawn or altered, leaving communities either without service altogether or with limited services that do not meet needs (for example, services that do not start early enough for people to get to work or college, or services that do not end late enough for people to get home after an evening shift); or when the commercial services that are available are inaccessible particularly to those with mobility issues or due to cost.

The CTA believe that there must be a better way of integrating both profitable services, delivered by the market, and socially necessary services, delivered by local authorities and community transport operators, that can improve efficiency and increase resilience across the bus system.

Questions about the Proposed Franchising Scheme

CTA welcome the Proposed Franchising Scheme for several key reasons. Firstly, we support the Strategic Case's conclusion that reforming the bus market is the best way to address challenges facing the local bus market. Much of GMCA's Vision for the future of the bus market aligns with CTA's Vision, including integrated services across buses and other modes of transport, integrated ticketing, increased network efficiency and improved user experience. We believe that greater authority for GMCA to make and be accountable for key decisions about network, fares and standards is the best way to achieve long term stability for the network, and we would therefore support the Proposed Franchising Scheme over the Do Minimum and partnership options, especially in light of operators' willingness only to engage in a comparatively limited Voluntary Partnership Agreement.

Secondly, **CTA welcome the GMCA's plans for allowing small and medium sized operators to be involved** in the PFS by introducing a range of measures that remove barriers to entry. As supporters of transport localism, we believe that local communities are best placed to understand their local priorities, resources and needs, and are hence best able to address the

challenges they face in their own local area, and support all measures that enable smaller operators to participate.

Further to this, we note that the Assessment states that the **GMCA may consider extending the consultation on the proposals to wider stakeholders, including bus passengers and representatives of disabled people, and we would strongly welcome that extension.**

Community transport operators provide accessible and inclusive transport solutions to those who are excluded from accessing conventional transport, owing to mobility restrictions or geography. As such, they offer a unique insight into the lives of vulnerable people, so it is vital that they are consulted with to ensure that their needs will be met, and to **make sure that the future franchising environment is one that enables community transport provision to flourish.**

The CTA recently launched our **People Powered Transport project**, which sets out four key ideas to enabling communities to work together to shape and create their own transport solutions, with access and inclusion built in from the start.

This project was founded on CTA's observation that many of the conversations about transport innovations overlook the role and contributions of the voluntary sector, especially those working with people who currently face barriers to being fully able to access today's passenger transport. We believe that there needs to be a more human voice in these conversations and our project aims to help guide policy makers to implement policies which prioritise greater accessibility and inclusivity. We have introduced these policy pairings to show how we want the future of transport to look and to show how communities and the CT sector can provide solutions to some of the problems that we face in transport today.

We hope that the principles encapsulated in this project can be incorporated into any changes implemented following the conclusion of GMCA's consultation. To find out more, please see attached document entitled 'People Powered Transport'.

Alongside this, we further note that the consultation document states that GMCA 'would set appropriate requirements and simplify the procurement process to reflect the size and scale of these franchises to avoid creating barriers to entry.' As part of this process, we would **encourage GMCA to incorporate social value metrics into contracts** and ensure that these metrics have a high rating to ensure that wider social benefits are adequately taken into account when services are procured. CTA recently launched a project and preliminary report exploring the current commissioning landscape and barriers to entry for smaller operators, and discussing how commissioning can be more inclusive of smaller operators. You may find our report, entitled '**Commissioning for the Community**' attached to this submission.

Thirdly, we support the proposal to allow the continuation of services running from a not-yet franchised area into a franchised area to ensure minimal disruption for passengers.

Questions about the assessment

14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

CTA supports the objectives set out by GMCA in the Strategic Case, however would add that 'increasing accessibility' is added to the objective of improving customer experience. Many vulnerable users are excluded from the transport network owing to poor accessibility on vehicles, or poorly integrated routes which make multi-modal journeys impossible for those with mobility restrictions. Community transport vehicles are often wheelchair accessible, with rear passenger lifts and convertible spaces, while drivers and passenger assistants are professionally trained to assist passengers with mobility issues to ensure that transport is truly inclusive of all.

Where commercial services cannot provide this level of mobility assistance, we would recommend GMCA consider integrating community transport services into franchise arrangements.

18. Do you have any comments on the packaging strategy for franchising contracts under the PFS, as set out in the Commercial Case?

The Commercial Case sets out how the GM bus network would be split, and CTA would ask for greater clarity on how section 22 services would fit within this arrangement.

23. Do you have any comments on the approach to fleet under the PFS, as set out in the Commercial Case?

CTA support the approach to fleet under the PFS, but would like to draw GMCA's attention to some of the challenges faced by the community transport sector in relation to emissions standards and electric vehicles.

Firstly, where vehicles are required to be electric, **GMCA must ensure that there is appropriate infrastructure, such as charging facilities, available in areas which are currently poorly connected to the transport network and which therefore have not attracted private investment for the installation of necessary facilities.** Demand for community transport is highest in the areas where traditional private and public transport has the least reach and those community transport operators must not be unduly penalised and less able to compete for contracts owing to their operating in a rural area.

Secondly, **support should be made available to ensure that the costs of purchasing an electric fleet are not prohibitive for operators.** The small-scale nature of many community transport operations means that vehicles tend to be older and it is difficult for operators to accumulate the necessary capital to buy new vehicles, retrofit appropriate engines, or absorb running costs in the same way that a larger commercial operator working at scale would be able to. The amount and types of income that can be generated by community transport is further limited by the regulatory requirement that community transport operators cannot make a profit. A new standard minibus can cost upwards of £40,000 – a figure that would be especially difficult for smaller organisations reliant on voluntary

funds to raise. Compounding these issues, any new specifications are likely to devalue vehicles that do not currently use Euro 6 engines, preventing organisations from trading in older vehicles to raise funds or in part-exchange for new vehicles.

If the financial costs for upgrading vehicles are unsustainable, community transport operators may be unable to participate in the procurement process, leaving those with the greatest need, who are reliant on CT services due to mobility issues, without access to transport and subsequently vital services. In the long term, this is likely to add to loneliness and isolation, with a knock-on effect on health and social care services, to the detriment of the Proposed Franchising Scheme's vision of improving customer experience and its allocation of a high positive rating for users with protected characteristics in its Equality Impact Assessment.

CTA believes that clean air is an important issue facing our communities in Greater Manchester. We support steps to improve air quality across the county and acknowledge that vehicle emissions contribute to poor air quality. However, we believe that **GMCA should be mindful of the social impact that proposed changes will have on vulnerable passengers.**

24. Do you have any comments on the approach to Intelligent Transport Systems under the PFS, as set out in the Commercial Case?

CTA support the approach to Intelligent Transport Systems as set out in the Commercial Case. Consistency across services is vital to creating an accessible and more easily understandable bus network.

28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

It is disappointing that the operators within OneBus ruled out the use of an EPS, as we are concerned about the lower incentive for operators to comply with required standards under VPAs. While operators have indicated agreement to financial penalties, it is stated that these will be 'limited' and the scale, extent and timing has not been made clear, which raises questions about how far operators are willing to adhere to 'agreed' standards and whether the costs for implementing new standards would outweigh the financial penalties for failure to do so, leaving operators preferring to pay the cost of a fine.

35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

CTA believe that, though there may be short-term disruption to the network over the five-year transition period to the franchising scheme, the long-term impacts on passengers by way of improvements to the network are overwhelmingly positive. We support a future with reduced fares, simplified and interoperable tickets, and also improved customer service.

However, CTA do have some concerns about the transition period between which Greater Manchester will move from a deregulated bus market to a fully franchised system, and the risk that operators stop investing in services and relocate good vehicles to other areas in anticipation of not being able to win a franchise. This would most negatively impact passengers; it would be useful to know what actions will be taken to mitigate this risk.

Final Questions

45. *To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

See answer to questions on Proposed Franchising Scheme

46. *Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

The Proposed Franchising Scheme could be improved by increasing the accessibility of the consultation documents. Although there is the option of a short questionnaire and the inclusion of an introduction, executive summary and assessment, this still constitutes 31 pages, which is unrealistic to expect the average bus user to engage with. As such, responses will likely be weighted towards stakeholders and experts whose views may not be fully representative of users' experiences and wishes. It would be useful to have a shorter and more engaging summary to improve user responses.

48. *Finally, do you have any other comments you want to make?

It is CTA's understanding that when the GMCA agreed its devolution deal with Government that it also undertook control of some health budgets. If this is indeed the case, we would encourage GMCA to exert pressure over health to develop co-ordinated approaches to non-emergency patient transport.

If you would like to discuss this submission in greater detail or have any further questions, please do not hesitate to contact our Policy Executive, Suzanne Lau, at suzanne@ctauk.org.



community transport
association

Commissioning for the Community

Exploring how to cultivate better social outcomes through community transport

November 2019

Commissioning for the Community

A Preliminary Report

Executive Summary

All too often, the transformative benefits that community transport brings to communities across the UK are overlooked.

The CTA believes that a key reason behind such an omission lies in a poorly structured commissioning environment and pressures on the resources of local commissioners, which have pushed them to prioritise the price of a service over wider social and economic outcomes for the communities they serve.

As such, the CTA is excited to launch a new project exploring how commissioning practices can be changed to address this issue.

This preliminary report sets out our ambitions and invites all interested parties to contribute to the conversation on how we can achieve a future where the vibrant work of community transport

and the social value that it creates, both locally and nationally, is best recognised and rewarded.

This paper is a call to action for those who commission, those who provide commissioned services and those who are interested in commissioning to, firstly, contribute your views on some key questions set out at the end of this report; and, secondly, to share any good practice in the commissioning arena that you have effected or know has been effective, whether that is in transport or in another publicly commissioned sphere.

We hope that, in laying out the background of commissioning for community transport as it stands now, as well sharing as some initial thoughts on improving social value in commissioning, we can help spark or fan the flames of some valuable discussion.

Contents

| | |
|--|--------|
| Introduction: Community Transport and Commissioning | Page 3 |
| The Commissioning Environment for Community Transport Today | Page 4 |
| Social Commissioning and Community Transport | Page 6 |
| Ideas for Social Value Commissioning in Practice | Page 8 |
| Lines of Enquiry | Page 9 |

About the Community Transport Association

In all parts of the UK, on every day of the year, thousands of community transport staff and volunteers are helping people to stay independent, participate in their communities and to access vital services and employment.

Community transport is about providing flexible and accessible community-led solutions in response to unmet local transport needs, and often represents the only means of transport for many vulnerable and isolated people. These are older people who have limited mobility and can't leave the house by themselves, people with disabilities who lack the accessible transport they need to make it into town, children and young people who struggle to get to school or access employment, and many others. They live across the UK, in rural and urban areas, and are our friends, our family and our neighbours.

Using everything from minibuses to mopeds, typical services include voluntary car schemes, community bus services, school transport, hospital transport, dial a ride, wheels to work and group hire services. Most are demand responsive, taking people from door to door, with a growing number of scheduled services along fixed routes where conventional bus services are not available.

As community transport is always run for a social purpose and community benefit, never for a profit, it is often the most reliable, resilient and accessible way of ensuring that the broadest range of transport needs can be met.

The Community Transport Association (CTA) is the national membership body that represents and supports providers of community transport across the UK. Our vision is of a world where people can shape and create their own accessible and inclusive transport solutions and our mission is to achieve this through championing accessible and inclusive transport, connecting people and ideas and by strengthening our members and raising standards.

We do this through contributing to the formation of public policy that affects our members and our sector. We show how better outcomes are achieved for people and communities when they have access to accessible and inclusive transport. We create partnerships with like-minded organisations across all sectors. We manage a national programme of quality assured education and training. We provide comprehensive advice and guidance to those delivering community transport and we take every opportunity to champion the vital and indispensable work that our members do.



Introduction

Commissioning and Community Transport

Visit any city, town, or village, and you will find people who are reliant on community transport to get to where they need to be. These are older people whose health and independence are maintained through community groups with a minibus, school children whose local scheme enables them to learn every day, and people living in a rural area whose car club keeps them connected to their community.

A cursory glance of the news in recent weeks brings you a number of community transport stories where it's clear that the work of our sector provides a social and economic benefit beyond transport.

- In Matlock, following a fundraiser, a local resident said "For some people who rely on the community transport service, their driver might be the only person they see in a week."¹
- In Blaenau Gwent, "Community transport is the key to joining up the mainstream transport links."²
- A typical headline from Lancashire reads "A disabled pensioner has said she feels at a loose end after a charitable taxi service stopped taking her to her fortnightly social events."³

This work is often carried out for free, outside of the formal commissioning sphere, and frequently without any impact on other services. Community transport goes where the market is not viable, it travels to places commercial services cannot make economical and it takes passengers to places they otherwise could not get to.

Alongside this informal, loose, but invaluable network, exists the work that community transport operators undertake through contracts obtained through a commissioning process. They do this work under Section 19 Permits, which allow for door-to-door services, as well as under Section 22 Permits which allow for flexible bus routes, and, on occasion under Operator Licenses, which are more widely used in the commercial sector.

This work often provides additional social benefits beyond what is stipulated in a contract and can be carried out to support other services which would

not otherwise be financially viable.

Voluntary organisations touch the lives of 90% of UK households each year.⁴ It is therefore our view that a strong voluntary sector is key to a strong society and to achieving the aims of the Government, whether that is better integrated transport in the Industrial Strategy,⁵ building an economy which can reach 'every corner of the United Kingdom' as laid out in the recent Queen's Speech,⁶ or making the increase in local authorities' adult social care budget go further.⁷

To achieve these ambitions, we need a commissioning environment which is stable, universally understandable, responsive to local needs and which recognises the unique benefits that the voluntary sector can bring to the provision of services.

This paper invites partners to discuss how we can do better for our communities by getting the best out of community transport through better commissioning.

The purpose of this report

The purpose of this report is to set in motion a series of conversations with members and partners that are interested and involved in the commissioning of community transport. We hope this will lead to the development of a new framework for commissioning community transport in a way which best recognises its social value as well as the intrinsic value of CT services which are designed and delivered in a caring way. In turn, this will bring greater social and economic benefits to our communities and support the sustainability of these unique community assets.

To achieve this ambition, this report examines the current commissioning environment for community transport, paying particular attention to how commissioning has changed over time across the UK. Building from there, we explore the current position and possibilities for a greater emphasis on social value considerations in commissioning and offer some new ways of thinking about social value commissioning.

We have concluded this report with a set of key questions which we would love to hear your views on. You may wish to refer to these questions on page 9 while you read to better understand the aims of this paper.

The Commissioning Environment for Community Transport Today

Good commissioning practices give us transparent and rule-governed processes for assessing local markets and defining the terms by which service providers can participate in them. These require a commissioner to have assessed needs, designed a suitable service to meet them before finding and engaging with providers for the service.

In transport, this requires a local commissioner to balance the competing needs of budgetary constraints with local transport requirements. Commissioners are bound by contract and competition law, EU regulations, local authority policies, transport legislation and a requirement to consider social value – a process which the CTA recognises can place considerable pressures on local authorities and other public commissioners to wrestle with a number of competing demands.

Over the last few years, a debate has opened over the terms upon which community transport operators can tender for contracts with public bodies using Section 19 Permits and Section 22 Permits. You can read our full thoughts on this issue on the CTA's website.⁸

Most local authorities have continued to commission from community transport operators whilst this debate has ensued, although a small number have changed their practices despite advice from the Department for Transport not to do so. Fundamentally, we believe that, however the challenges over Permit usage conclude, there has to be a commissioning environment which better accounts for social value and recognises the unique work of community transport operators.

Many CTA members would argue that local authorities use competitive procurement processes where it is not necessary to do so. Similarly, it is our view that awarding a contract through competition, with price as the main or only consideration, does not get the best outcome for the commissioner or client and can leave providers in a precarious existence.

We also believe it is not necessary to commission every service in the same way and it is clear that some community transport operators feel unduly



penalised in the commissioning process because they are not a commercial company.

CTA considers that establishing clear pathways to continue commissioning services from Permit holders will help uphold the confidence of commissioners who want to continue using the excellent services provided by community transport operators. This will also help our members to make their case when submitting bids for tender, especially during a time of uncertainty. With the right commissioning environment, community transport operators and commercial bus companies can compliment each other to ensure that passengers receive the appropriate and best service.

How are community transport services commissioned?

There are two main ways in which community transport services are commissioned. Community transport operators are either invited to bid for contracts to provide a specified service or provided with direct grants from public bodies to run a service, usually a flexible bus route.

Community transport operators, on occasion, receive other forms of grant funding. This includes the Bus Service Operators Grant (a fuel subsidy), monies from fundraising and specific government funding such as the Community Minibus Fund.

The House of Commons Library provides a fuller overview of the funding received by community transport operators.⁹

Allied to this arrangement, the use of local authority run services has receded over recent years coupled with a reduction in the overall amount of available subsidies.¹⁰ In turn, this has meant more contracts, more pressure on services and more gaps filled by community transport providers.

Preliminary Report: Commissioning for the Community

Which services are delivered by community transport operators?

Community transport operators provide a range of services which are commissioned by local authorities and other public commissioners. We know a significant proportion of community transport operators have competitively tendered for contracts in the past and these were predominantly commissioned by local authorities. These services include adult social care transport, home to school transport and public transport via section 22 services.

We also know that many of CTA's members are providing journeys into health service settings, with only a small proportion receiving any reward and recognition from health service commissioners. We welcomed the announcement of a review of patient transport in October 2019 from NHS England which may provide a means of addressing this disparity.

Furthermore, there is a difference in approach across public bodies and local geographies. For example, CTA's research into health transport¹¹ demonstrated that some community transport operators were providing transport to hospitals to fill in the gaps for commercial operators who were undertaking the same trips under contract at commercial rates. Our members would contend that there is a balance to be struck between over-commissioning and structured remuneration for vital work.

How do they differ across locations?

The kinds of community transport services that are commissioned vary according to rurality and to national jurisdictions. Section 22 services are more predominant in rural areas where public transport provision is significantly lacking and demand for transport comes from all sections of the community. Meanwhile, in urban areas, services are more likely to be tailored towards people who cannot access public transport even if it is available.

In England and Wales, services are more likely to be contracted, whereas services in Scotland are more likely to be grant-funded. This is because competition for services differs in Scotland, such as for island transport.

It should be noted that the use of contracts to this level is unusual by international comparison and it

has been noted that the high use of contracts has limited the Government's ability to achieve stated policy aims. The UK Government's Foresight Future of Mobility project notes:

"[There] is only limited scope for local authorities to steer what they want to achieve through the bus network except through partnership with the private sector operators. In some places (e.g. Reading and Brighton) this has worked well and in others the relationship has been more fractious both between operators and between operators and local authorities. Compared with the position in most European cities, the inability to set fares, routes and frequencies is seen to be a weak governance position."¹²

In Northern Ireland, 13 organisations that have community transport as their primary purpose are commissioned to provide services, with funding allocated annually to these 13 groups. This arrangement creates some uncertainty in the sector as other charities and community groups that provide community transport in Northern Ireland have no access to funding to commission services through the Department for Infrastructure or District Councils. Moreover, funding is often not set aside for transport provision in community plans.

Change over time

Commissioning practices have changed over time owing to funding and an overall shift towards the marketisation of community services. This has meant, firstly, that commissioning has moved away from grant-funding towards contracting for community transport services – a policy that central Government has actively advocated.

"It has been widely recognised that community transport brings great social and economic benefits to the passengers and communities it serves. We believe it is important that local authorities and other public bodies explore how they commission for social value."

Secondly, funding for transport, and particularly community transport, has been reduced or cut completely. Research by the Campaign for Better Transport released in 2018 found that, since 2010/11, supported bus budgets for local authorities in England and Wales have been cut by a net figure of £172 million and £10 million, respectively.¹³

Navigating changes

Many of the services run by community transport operators are not commissioned at all. In the face of public spending cuts and, unable to rely on grant funding, community transport operators have become more dynamic in their efforts to sustain lifeline services.

Methods to raise funds have included increasing the cost of passenger fares, bidding for services that public bodies have decided to put out to tender, and cross-subsidising services in more creative ways – for example, using funds from local authority contracts and section 22 services or charitable trading to support more costly door-to-door specialised transport. Inevitably, some community transport providers working in some of the most transport poor areas have been unable to withstand cuts to resources and have been forced to close down.

Challenges

In summary, the current commissioning environment, as outlined above, leaves community transport operators unable to provide the maximum benefits to their communities and service users for three main reasons:

- Over-contracting has caused complexity, bureaucracy and cost, which community transport operators struggle to navigate owing to limited resources and capacity.
- The ongoing dispute about how Permit legislation ought to apply means that there is little stability in how community transport operators may operate when tendering, or not, for contracts.
- There has been a cumulative reduction in local authority funding without a corresponding level of innovation in commissioning practices to enable community groups to work in a changed context.



Social Commissioning and Community Transport

What is Social Value in Commissioning?

It has been widely recognised that community transport brings great social and economic benefits to the passengers and communities it serves. Therefore, in acknowledging the situation as laid out above, we believe it is important that local authorities and other public bodies explore how they commission for social value.

The National Council for Voluntary Organisations in England explores the idea of social value, beginning with the legal obligations of public bodies, which state that in accordance with the Public Services (Social Value) Act:

“Agencies must consider social value in advance of procurement to allow for social value to be incorporated into the process. They are required to consider the social value of public services (rather than goods or works) on contracts above EU procurement thresholds.”

They go on to define social value, saying:

“Social value is the term used to describe the additional value created in the delivery of a service contract which has a wider community or public benefit. This extends beyond the social value delivered as part of the primary contract activity.”¹⁴

Providing social value sits at the heart of every community transport operator. This includes serving communities beyond the reach of other services, reducing car use through the provision of communal transport, supporting local business through day trips, expanding the reach of

Preliminary Report: Commissioning for the Community

medical services, or the more intangible benefit of passengers saying they feel more attached to the place they live when they are supported by members of their own community.

Challenges and Opportunities for Social Commissioning

The value delivered by community transport has been proven time and time again. A recent study conducted by Devon County Council published in January 2019, found that for every £1 that they invested in Ring & Ride services, £7.46 was spent on the local economy, with community transport service users spending an estimated £3.46 million in Devon high streets during 2018.¹⁵

We know that community transport is not primarily about creating economic value and users frequently describe how transformative community transport has been for their health and wellbeing. Not only does community transport provide accessible and inclusive transport that enables users to reach everyday necessary services, but the journeys themselves are considered important social settings where passengers make friends, chat about their lives and share the news.

It's not just community transport operators themselves who see the benefits of their work. Indeed, the County Councils Network said in 2018, "Community transport helps prevent earlier and a greater number of adult social care and public health interventions, which would come at a great social and financial cost".¹⁶

If the commissioning environment does not take account of these wider benefits, it will, by design, be prohibitive of smaller companies and voluntary organisations which are best able to deliver social value to their local communities. Often, commissioners are asking volunteers to

engage with contract specifications which are highly detailed with complex evidence requirements that smaller organisations do not have the resources to provide.

It is our experience that commissioning decisions tend to be weighted to reducing the financial cost of the contract rather than maximising positive outcomes for the public.

Recent reports also highlight where social commissioning is not being used to its full potential:

- The House of Commons Public Administration and Constitutional Affairs Committee highlights that the government are often encouraging the privatisation of services without fully understanding the risk of doing so.¹⁷
- Social Value UK reports that commissioning for social value requires buy-in for all parties within the commissioning life-cycle. Our members would argue that they can articulate social value well but that commissioners are not always engaged in the ethos of social value.¹⁸
- The 2015 review into the Social Value Act highlights that there is a need to both consistently define social value and apply it to commissioning practice.¹⁹

We believe addressing some of these issues could have a hugely beneficial impact on the commissioning landscape.

The Political Landscape

The Public Services (Social Value) Act comes amidst a range of other legislative measures which should allow commissioners to consider issues of quality, not just economy.

In England, the Localism Act 2011 helps empower communities to set up and run services and take ownership of community buildings, while the Bus Services Act 2017 equips local authorities (outside of London) with greater powers to plan and run transport in partnership or franchising arrangements with bus operators.

Similar provisions are likely to be coming into place according to the proposed powers of the Transport (Scotland) Bill and the Welsh Government's Improving Public Transport White Paper.

Similarly in Wales, the Social Services and Wellbeing (Wales) Act 2014 emphasises putting an individual and their needs at the centre of care, supporting



people to achieve their own wellbeing, promoting the use of preventative approaches within the community, and stronger partnership across organisations.

And the Wellbeing of Future Generations (Wales) Act 2015 requires public bodies to think about the long-term impact of their decisions on people and communities to prevent persistent problems such as poverty, health inequalities and climate change.

Meanwhile in Scotland, social value is considered to be part of a broader social agenda in keeping with the Scottish Government's Inclusive Growth Strategy, with the Procurement Reform (Scotland) Act 2014, an equivalent of England's Social Value Act, placing an obligation on public sector bodies to deliver and report on social value in the public sector.

On top of this, 'Community Benefits Clauses' have been part of procurement policy and practice in Scotland since 2008 and are covered by clauses within contracts which emphasise benefits such as local buying, training and apprenticeships, educational opportunities, and more.

In Northern Ireland, there is an overall need to review the current commissioning practice to allow for current funding to be better spent. Efficiencies could be made through merging schemes and greater certainty could be delivered by introducing multi-year grants.

Ideas for Social Value Commissioning in Practice

This paper has so far defined the current state of commissioning and looked at commissioning for social value as a way to better recognise the benefits community transport can bring to the sector.

There are a number of suggestions for improving social value commissioning. Some follow a legal approach and focus on strengthening the Social Value Act by making social value mandatory and increasing its weighting in contracts.

Other approaches focus on the devolution of power, either by handing powers of commissioning to local and regional authorities who are better able to engage with smaller and local voluntary

organisations and oversee the implementation of contracts. Some suggest going even further by handing authority and funding directly to community groups to change the entire culture of engagement.

Further solutions propose increasing partnership work between smaller local organisations and larger commercial organisations so that local knowledge and expertise can be coupled with commercial resources and expertise to achieve financial and social aims. Again, it would be necessary to recognise this within contract frameworks.

These solutions need to be carefully considered and we would not advocate a system which would place undue financial strain on local authorities which are already working within significant budgetary constraints. In particular, it would be necessary to consider how any reallocation of funding and powers could ensure equity between urban and rural areas, recognising the distinct needs of each.

It is also necessary to consider how equity can be built into any new commissioning processes and powers without replicating existing social and geographical disparities in terms of access to resources, services, and employment.

We believe social value has many of the solutions to the question of how commissioning can better serve our communities and get better value for the public purse. From the literature and our reading, there are a number of areas which we think deserve further thought:

- Greater weighting of social value metrics in commissioning.
- A commissioning approach which looks at the wider economic landscape, not just single contracts.
- A greater commitment to the sharing of best practice in social value commissioning.
- The facilitation of local authority and community transport commissioning discussions to look at the barriers faced by both parties.
- Clearer guidance to local authorities on which services can remain out of scope for contracts.

Preliminary Report: Commissioning for the Community

- A local funding settlement which recognises the economic benefits that well-resourced transport links bring to local economies.
- A clear commitment from local authorities that social value has to go beyond the employees of a service to beneficiaries within a community, particularly those facing acute social disadvantage.
- The greater use of co-production - a practice in the delivery of public services in which citizens are involved in the creation of public policies and services. It is a value-driven approach built on the principle that those who are affected by a service are best placed to help design it.
- The greater devolution of powers to local authorities to develop bespoke commissioning arrangements in a post-EU legislative settlement.
- The NHS England review of Non-Emergency Patient Transport to specifically consider how transport can lead to improved health outcomes, including the role of community transport in social prescribing.

Lines of Enquiry

Alongside these policy ideas we would like to engage partners in some questions for further discussion:

1. How can the intrinsic value of the way services are delivered by community transport operators be best expressed?
2. How can services be commissioned in a way that recognises and values the distinctiveness of community transport services and the unique social value they deliver?
3. How can social value be better recognised so that operators providing a public benefit stand out when services are being commissioned?
4. In what way can transport services be commissioned, designed and delivered to reduce the reliance on procurement through tendering?
5. What future role is there for grant-making and other forms of financial support for community transport that doesn't require competitive tendering or other competition-based procurement?
6. What is the role of co-production in the future development of services and how they are funded and delivered?
7. What role should local authorities and other public commissioners' frameworks play in creating a more level playing field between different types of operators?
8. If the UK leaves the jurisdiction of the EU and is no longer subject to European law, what challenges or opportunities will that present for the regulatory framework for commissioning?
9. What additional devolved powers would local authorities require to establish a more dynamic commissioning environment?

Work with us

As experts in the field with in-depth experiences or interest in delivering transport or commissioning services, we'd love to hear any thoughts or experiences from you that relate to these lines of enquiry. Come speak to us at CT '19 or email your thoughts into hello@cta.uk.org. If you wish to speak in greater detail, please do arrange a meeting with our Policy Executive, Suzanne Lau.

Endnotes

- 1 Peak District village remade from cake to help rural transport charity
<https://www.matlockmercury.co.uk/news/people/peak-district-village-remade-from-cake-to-help-rural-transport-charity-1-10056134>
- 2 Poor transport blamed for business closures and school overcrowding in Blaenau Gwent
<https://www.southwalesargus.co.uk/news/17970433.poor-transport-blamed-business-closures-school-overcrowding-blaenau-gwent/>
- 3 Disabled pensioner feels trapped in her home after charity taxi service cancels service
<https://www.lep.co.uk/news/politics/disabled-pensioner-feels-trapped-in-her-home-after-charity-taxi-service-cancels-service-blaming-council-funding-cuts-1-10038146>
- 4 NCVO, UK Civil Society Almanac 2019 Executive Summary
<https://data.ncvo.org.uk/executive-summary/#the-reach-and-impact-of-voluntary-organisations-is-wide-ranging>
- 5 Industrial Strategy, Building a Britain fit for the Future, p.49
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf
- 6 Queen's Speech 2019
<https://www.gov.uk/government/speeches/queens-speech-2019>
- 7 Local government finance settlement 2020-21 proposals unveiled following biggest funding increase in almost a decade
<https://www.gov.uk/government/news/local-government-finance-settlement-2020-21-proposals-unveiled-following-biggest-funding-increase-in-almost-a-decade>
- 8 CTA's Response to the Department for Transport's Consultation
<https://ctauk.org/dft-consultation-response/>
- 9 House of Commons Library, Community Transport
<https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7426>
- 10 LGA: Nearly half of all bus routes under threat because of funding cuts to local government
<https://www.local.gov.uk/about/news/lga-nearly-half-all-bus-routes-under-threat-because-funding-cuts-local-government>
- 11 Innovations in Health Transport
<https://ctauk.org/wp-content/uploads/2018/03/Innovations-in-Health-Transport.pdf>
- 12 Governance of UK Transport Infrastructure, Government Office for Science
assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780871/governance.pdf
- 13 Buses in Crisis: a report on bus funding across England and Wales 2010-2018
<https://bettertransport.org.uk/sites/default/files/research-files/19.04.12.bic-2018.pdf>
- 14 Social value in commissioning and procurement — NCVO Knowhow
<https://knowhow.ncvo.org.uk/funding/commissioning/procurement/importance-of-social-value-to-commissioning-and-procurement>
- 15 Community Transport Passengers Support Local High Streets
<https://www.devonnewscentre.info/community-transport-passengers-support-local-high-streets/>
- 16 County Councils Network Consultation response to section 19 and 22 permits consultation (download)
<https://www.countycouncilsnetwork.org.uk/download/1535/>
- 17 After Carillion: Public sector outsourcing and contracting
<https://publications.parliament.uk/pa/cm201719/cmselect/cmpubadm/748/748.pdf>
- 18 Communities Count, Social Enterprise UK
https://www.socialenterprise.org.uk/wp-content/uploads/2019/05/communities_count_final_report.pdf
- 19 Social Value Act Review, Cabinet Office
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/403748/Social_Value_Act_review_report_150212.pdf



community transport
association

ctauk.org 

hello@ctauk.org 

@CTAUK1 

find our offices across the UK
at ctauk.org/contact-us 

People Powered Transport

The idea that communities can work together to shape and create their own transport solutions, with access and inclusion built in from the start, is central to our purpose and our work as a movement. Through our People Powered Transport initiative, we will raise the volume on your contribution to creating more connected communities and your ideas for what needs to change so you can make an even bigger difference for the people and places you serve. The campaign is based on our four People Powered Transport ideas...



Accessible and Inclusive

Transport can give us a feeling of freedom and independence to have the life that we wish for, but success is all too often measured solely in economic terms. We want access and inclusion placed at the heart of transport innovation, which will lead to healthier, happier and more resilient communities.



Localised and Personalised

We will speak up for the everyday journeys people want to make. We want more powers and resources for local leaders to create the kind of networks their residents want, with communities having more opportunities to have a go as well as have a say.



Connected and Collaborative

More integrated and demand-responsive local transport networks will lead to positive benefits for people, places and our planet. We want to see more collaboration in the commissioning and provision of publicly funded services with a bigger role for community-based, not-for-profit services.



Sustainable and Resilient

Community transport's way of working means we make public money go further and boost the economic wellbeing of local communities. There needs to be a relentless focus on creating social value through our transport network and more investment in the services which deliver this.

Get Involved

We want our members to feel empowered to play their part in pushing for more connected and collaborative communities across the UK. To get us started, we'd love to hear your initial thoughts on this campaign and how you would like to be involved:



What needs to change to enable community transport to thrive?

How would you like to be involved in the campaign?

Thank you for sharing your thoughts! Your ideas will become part of our 'campaign for a connected community' which will call for changes that enable community transport to thrive and benefit the passengers who rely on your services. Remember to drop your card off at the CTA stand on day two of CT '19.

Your name:

Your email address:



Hi

I represent a smart mobility company from Bristol which supports Manchester's decision to franchise. As the consultation docs say, bus usage is dropping year on year around the country as existing "competitive" bus networks based on hub-and-spoke models increasingly fail to deliver the everyday journeys people want or need to make.

We have tools which could be of great use to Manchester. Our vision tool shows the journeys people are making and how well served they are by public transport, indicating where provision could be better. And our design tool uses demographics and behaviour modelling to determine which route options, direct or indirect, or what infrastructure, e.g. mobility hubs, deliver the greatest impact per pound spent.

We'd be very happy to come and demonstrate - please invite us!

David

Dr David Stewart
CEO, Esoterix

Web: www.esoterix.co.uk

| | |
|--|---|
| Organisation Name | Friends of Patricroft Station |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>One of the main problems is the lack of integrated fares and services. Bus services do not appear to attempt to connect with rail services which makes onward travel from one mode to another difficult. This is less of a problem for tram connections as their services are quite frequent.</p> <p>Also, bus fares in Greater Manchester are high compared with other areas.</p> <p>Technological improvements can make a difference, e.g. the V1, V2 services are very popular with passengers.</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | The current system of several firms competing for passengers is clearly inefficient. The effect is that passengers receive an unreliable service and eventually give up travelling by bus. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|--|---|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | Providing good value for money results in an improved service for passengers. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|--|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | The assessment clearly shows that the franchising scheme would be affordable. There is good reason why it should go ahead. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | If the result is that GM would have reliable and affordable bus services, GMCA's objectives will be achieved. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | We think it will lead to better bus services as part of an integrated public transport system. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Emphasise the need for integrated fares and services, both with other modes of transport and with other bus services. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | It can't come soon enough! |



Only one major bus route currently serves Walkden Station directly, the half-hourly 68 service between Farnworth and the Trafford Centre.

An Optare Solo of Diamond Buses is pictured at Walkden station en route to the Trafford Centre on Saturday, 4th January 2020

Doing Buses Differently: The future of bus services in Greater Manchester

**A response to the GMCA Consultation
from Friends of Walkden Station
January 2020**



Foreword

Friends of Walkden Station (FOWS) are an award winning community voluntary group established to make practical environmental improvements to the station and lobby constructively and effectively for improved facilities and rail services. We are pleased to respond to GMCA's consultation process with regard to the proposed introduction of a Bus Franchising Scheme.

Our proposals for bus also feature in our responses to recent consultations regarding the Transport for Greater Manchester 2040 Strategy and delivery plan, and the Salford Local Plan, all of which are carefully aligned to the objectives of the Greater Manchester Spatial Framework. The relevant documents can be found at our website as follows:-

Response to Greater Manchester Transport Strategy 2040 Draft Delivery Plan (2020-2025)

http://walkdenstation.org.uk/documents/GMTS_2040_FoWS_Consultation_Response_Mar_2019.pdf

Response to Salford Draft Local Plan

http://walkdenstation.org.uk/documents/Salford_Draft_Local_Plan_Consultation_Response_Mar_2019.pdf

Response to DfT Community Rail Consultation

http://walkdenstation.org.uk/documents/Response_to_DfT_Community_Rail_Consultation_NW_Manchester_Alliance.pdf

Executive Summary

FOWS, as a Community Rail group, are mainly focused on developing and improving rail services in our area. However, we recognise rail is just one element of an integrated transport network, and the interaction of bus and rail services has a crucial role to play. With this in mind, our response is focused on how the following elements of the network could be improved under the Proposed Franchising Scheme:-

Greater integration between bus and rail, by way of improved services, ticketing and information provision, and infrastructure.

An increased role for bus in connecting specific employment, education and leisure facilities with rail, to enable much improved connectivity and to encourage modal shift.

It should be noted that as our focus is mainly on the above elements of the role of bus in our transport network, we have not set out to respond specifically to either the full or short versions of the consultation questionnaire. Nevertheless, we believe that improved integration of bus and rail should be a key output from the Proposed Franchising Scheme, and therefore trust that our response will provide a useful contribution to this important debate.

Introduction

An integrated transport system for Greater Manchester is what we all aspire to, and this will need vision, investment and perseverance. All residents and businesses need a clean, integrated and reliable transport system, and for this to become a reality, it is essential that each transport mode is designed to connect as seamlessly as possible with each other.

Bus faces particular challenges, in that historically its attraction as a transport mode has been limited with bus being seen as a “last resort” option for many people, and not as an aspirational form of travel. By contrast, rail and Metrolink do not suffer from these historic problems to the same extent, and therefore a culture change is needed for bus to be widely considered as a transport mode that people will choose to use. This is important not just to arrest the long term decline of bus usage, but also because bus is a key component of many existing and potential multi-modal public transport journeys, including rail-based ones.

As we move towards a future network geared around Mobility as a Service, bus (both in traditional and in more demand responsive forms) must be a key part of the solution.

A new future for Bus

Greater Manchester is targeting an increase in journeys made by public transport, by bicycle or on foot to 50% of all journeys by 2040. The Proposed Franchising Scheme offers an excellent opportunity to optimise the bus network so that its key objective is to maximise public transport usage (both in terms of complete journeys by bus and multi-modal journeys of which bus is one element).

Uniform branding

Uniform branding of buses is one element of making the system more intuitive for passengers, but it will only produce marginal benefits unless the network is optimised to maximise its reach and its connectivity. Network integration, smart ticketing, and a fare structure that offers simplicity of use and good value for money are key, along with punctuality and reliability. A complete overhaul of the current network to reduce duplication and increase journey opportunities should be made in conjunction with the launch of a uniform brand for buses.

The London model

It is unsurprising that comparisons will be made between the Proposed Franchising Scheme and the existing franchised bus network in London. However, Greater Manchester and London have different demographics, transport priorities and networks, and the London bus system is not perfect. London has a uniform livery and brand – but this has global recognition (the iconic red London bus). Most buses in London lack detailed route information, such as on destination blinds and lack of route branding on the vehicles. Printed information is very limited, and while the exclusive provision of online information and cashless fare structures may suit the London market, in Greater Manchester care needs to be taken that some of the less favourable elements of the London system are not replicated. A single source of travel information needs to be more widely accessible than just online, and importantly, timetable and fare information should include multi-modal journeys, not just those made only by bus. The main passenger benefits of the London system include fare capping and the comprehensive network of local routes in suburban areas that connect with transport nodes. A busy rail station such as Walkden would be well served by local buses if it was in London.

One of the key differences between London and Greater Manchester is that access to central London by car is actively discouraged, by infrastructure, congestion charging and lack of parking. If car use is not actively discouraged in our regional centre then it will be difficult to arrest the decline in bus journeys, even if the benefits that the Proposed Franchising Scheme offers are fully delivered. The economic case for the Proposed Franchising Scheme (p.21) includes quicker journeys by bus, and this requires buses to be

prioritised over general traffic, or modal shift will not happen. This is not just required on key corridors into city centres but also around transport nodes such as railway stations.

In summary, a new future for Bus will require a radical overhaul of the current system and will require more than just greater local regulation and control if its potential is to be fully realised. The ambition must be to reverse the long term decline in bus use (e.g. Brighton and Oxford), not just to reduce it.

Integration and Connectivity

FOWS's principal aspiration for the Proposed Franchising Scheme is to deliver greatly improved bus connectivity to Walkden Station.

At present, although the town of Walkden is relatively well served by buses, only two routes serve the station itself. One of these (route 68) is half hourly during daytimes. The other route (VH2) is a local circular service provided with developer funding. This is wholly inadequate, as any destinations not served directly by these two routes require either a long and uphill walk in order to reach the town centre (where most buses are located), or the use of a car or taxi. This is not consistent with the aim of increasing public transport usage.

It is clear that radical change is needed, and that under the present deregulated system commercial bus operators do not regard this connectivity as important or commercially attractive to them. This results in a largely *competitive* rather than *complementary* market for bus and rail – both modes compete directly for journeys between Walkden and Salford/Manchester rather than working together to encourage modal shift from car. The Proposed Franchising Scheme needs to take this into account, in order to align bus with rail so that they complement each other. We note that the scale of changes that could be made to the current bus network are greater under the Proposed Franchising scheme than under the current system or possible Partnership options (p.25), and hence if GMCA do proceed with the Scheme, we would expect improvements to be delivered quickly, given the scale of gaps in service provision at present. This includes evening and Sunday journeys, not just more routes.

In many cases, a public transport journey which is unattractive by using a combination of buses could become competitive with the car if there is seamless connectivity between rail and bus. Journeys to destinations within the catchment area of Walkden station could become more attractive by public transport if the final destination is easily accessible by bus (for example, by rail from Wigan), provided that such journeys can be made using one cost effective multi-modal ticket.

In terms of the economic case for the Proposed Franchising Scheme, better integration of bus and rail will produce better economic, environmental and social benefits by encouraging modal shift, thus representing increased value for money (para 4.44). This works both ways, so a more integrated bus network will feed additional passengers onto rail services, benefiting rail operators and providing a stimulus for increased investment in local rail, hence we would not agree with para 4.52 in assuming that negative benefits for both would accrue from the Proposed Franchising Scheme as applied to bus services in Walkden, assuming that the Scheme is correctly delivered.

Bus is currently the best mode to provide the “last mile” connectivity into rail and the use of smart card technology with through fare capability between modes would allow passengers to take a bus to connect with the train without worrying about being overcharged or needing to make multiple fare transactions. Full accessibility of the rail network (with step free access wherever possible) will make these journey possibilities open to all.

Use of future new technologies could see automated “last mile” shuttle services replace bus for short connecting journeys to stations. This element of Mobility as a Service could prove very popular. Cycling will of course always be a sustainable alternative.

Case Study – the RHS Garden Bridgewater

Bus travel enables people to access a range of educational, leisure and health services. These trips are particularly important for supporting social inclusion (page 40, para 4.12 (i))

FOWS has been working closely with TfGM for some time with the aim of establishing a direct bus link between Walkden Station and the new RHS Garden Bridgewater development near Worsley. This will be a major new tourist attraction for the area when it opens in summer 2020, and also provides local employment opportunities. Visitor numbers are expected to reach half a million per year within a few years of opening, with an aspiration for up to 10% of visitors to arrive by public transport. Visitors are expected to originate from a wide geographical area and - bearing in mind the likely demographic of visitors - it can be expected that rail would be a more realistic public transport mode than the limited local bus services that pass close to the site. Walkden station is the natural railhead, especially given its regular direct services to Leeds and the Calder Valley as well as Wigan, Manchester and East Lancashire. However, there are currently no bus services to link Walkden Station with the RHS site.

TfGM have approached local operators with regard to the possibility of establishing bus services, or amending existing services, to provide the required link. However, to date no agreement has been reached with the operators to do so. The current deregulated system does not compel operators to provide a commercial service and hence a subsidised link may have to be established, otherwise no service would be provided at all, which would be unacceptable. This would then necessitate subsidy to be found from limited budgets. Partnership options would not address this – there could be no compulsion to do so even under an Ambitious Partnership. The Proposed Franchising Scheme is therefore a possible solution to this and other similar gaps in service.

Under current proposals, the Proposed Franchising Scheme will be introduced first in Sub-Area A during 2021. Walkden and the RHS Garden are both within this area, therefore if a Mayoral decision to proceed with the Proposed Franchising Scheme is taken in March 2020, the cost of providing an initial subsidised service for a period of around a year should be fairly modest, as the service can become part of a franchised bus network by summer 2021.

Phase 2 Interventions

Further enhancements to bus services and infrastructure are more likely to take place following the establishment of the Proposed Franchising Scheme (para 4.36). This is of great interest to FOWS, as we have for some time promoted the benefits of a “Walkden Hub” multi-modal interchange, to be located adjacent to Walkden Station. This would provide an interchange between rail, bus and active travel modes (and possibly rapid transit options in the long term future). The Walkden Hub would build on existing planned investment in the Salford Bolton Network Improvements project, the significant investment in improved cycle routes and also provide better links with the Vantage bus rapid transit system.

Franchises, Operators and Fleet

One of the benefits of the Proposed Franchising Scheme is to provide sufficient flexibility to respond to changing demands (para 4.71). In order to realise maximum benefits from franchising, both new and existing operators should be encouraged not only to compete effectively for franchises but also to have an input into service design through constructive engagement. This is important for niche routes where specific local knowledge could help to identify challenges and opportunities. The RHS development mentioned

above is one example. The consideration of small and medium operators for operation of such routes under the Proposed Franchising Scheme is therefore welcomed.

New entrants to the bus market in Greater Manchester would be welcomed where such operators can demonstrate good track records in operating high quality services and stimulating passenger growth elsewhere (para 4.72). Much of the current fleet across Greater Manchester is ageing, with many vehicles nearing the end of their economic life cycles by the time that new contracts are in place throughout Greater Manchester under the Proposed Franchising Scheme. The Scheme therefore presents an opportunity for fleet replacement to benefit from the latest emissions technologies, and franchise durations of five to seven years may lead to increased use of leasing (as has happened to some extent in London), which may make it easier to benefit from new technologies when franchises come up for renewal. This will also help to facilitate the introduction of Clean Air Zones and/or future Ultra Low Emission Zones (para 4.89 and 4.90).

Continuation and further development of cross-boundary services is important (para 4.185). Options for through ticketing of bus services across boundaries should be extended to multi-modal tickets so that, for example, rail journeys from outside the GM boundary can be completed by bus without the need for separate tickets.

In addition, the Proposed Franchising Scheme could consider the establishment of more direct and orbital links (restoring links such as those once provided by now lost services 22, 400 and 500, the latter once provided a direct link between Walkden and Manchester Airport), with infrastructure improvements included to combat the effects of traffic congestion.

Community Engagement

As a Community Rail group, FOWS benefits from close working links with TfGM, Salford City Council and rail operators. Under the Proposed Franchising Scheme, Greater Manchester's bus network will enjoy much greater accountability to local people. As such, an opportunity exists to replicate some of community rail's successes in engaging more closely with local communities in the design and promotion of their local bus services. FOWS would be keen to be involved in discussions regarding future bus service developments in Walkden where this could benefit integration with rail services, thus providing better outcomes for rail and bus passengers, the community and the environment.

Examples of local involvement could also include discounts for bus and rail passengers to local attractions (such as the RHS development) and local businesses. Such promotions could act as a further incentive to consider public transport over car as the preferred mode of travel.

Conclusions

Public transport must provide an attractive option to encourage people to choose it as their preferred mode of travel, especially over the private car. In order to facilitate this, we must be ambitious, and use every tool at our disposal to make this a reality. This includes being prepared to make possibly controversial decisions in favour of bus and other sustainable modes when allocating road space, making multi-modal journeys as seamless as possible, and treating public transport investment as a top priority, especially considering the rapidly growing concerns about our climate.

In particular, public transport must be cost competitive with car, and penalties such as afternoon peak fares should not be applied to local rail or bus services. Young people are now becoming increasingly keen to use sustainable transport modes, and less inclined to default to cars at the earliest opportunity. This requires urgent action to improve bus and rail services so that they can be relied upon to the extent that a car is not deemed necessary for as many people as possible.

Network integration and the integration of fares and ticketing are key components of GMCA's Vision for Bus. They are also key elements of FOWS's vision for the future of public transport in Walkden and across Greater Manchester. The Proposed Franchising Scheme could help to deliver this Vision, and therefore under the proviso that it is delivered in a way that realises the benefits that we have described in our response in an effective and punctual way, we are minded to support GMCA's view that this is the right way forward for our bus services.

Andy Barlow (Report Author)

January 2020

[e-mail: friends@walkdenstation.org.uk](mailto:friends@walkdenstation.org.uk)

| | |
|--|---|
| Organisation Name | GMCVO |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>agree it is not performing well</p> <p>VCSE orgs tell us that for many people without other options, buses are inaccessible and/or unaffordable; for many people they don't go where they need to go, with particular problems travelling across the city region and locally within towns and neighbourhoods; some people are also intimidated by the complexity of the system, finding they have the 'wrong ticket'</p> <p>there is a major equalities issue here for people who are living in poverty, people facing social isolation, people getting to work</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|---|
| Q13b Why do you say this? | the system needs to be redesigned strategically to meet the needs of the people who use it and be equitable across all places and communities - unless this is done through franchising it is unlikely to be possible it works extremely well in London - it can certainly work here |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | agreed - the case is made convincingly in the document |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | agreed - see above |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | the poor quality of public transport especially the buses is really affecting the lives of people in GM - their ability to get to work, participate in physical activities, educational and cultural offers, social life, medical appointments..... it is a major drag on the functionality of our towns and neighbourhoods, and presumably a major drag on the productivity of our economy |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | we realise there will be some resistance to implementation in GM/c, but from everything we hear, the VCSE sector is likely to be solidly behind the proposals - happy to be further involved in the development of the franchises; also strongly recommend the involvement of the VCSE sector as well as the public in co-design - collectively it is reaching the people most affected by the current system and most likely to benefit from a good franchise model |

| | |
|--|---|
| Organisation Name | Heald Green Ratepayers Association |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |
| Q13b Why do you say this? | All areas need an adequate and reliable bus service. At present, some areas are neglected, leaving residents at a disadvantage concerning a choice to use public transport. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|--|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Bus services must be reliable and reasonably frequent if residents are to use it in preference to cars. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | Residents of Heald Green have seen the removal of several bus routes, leaving travel north or south on a bus impossible. The train covers these routes to some extent but there is very limited parking at HG station and many residents cannot walk the distance, which may be 1.5 miles to the train. A bus along Wilmslow Rd has served the area previously but is now to be removed entirely. Not satisfactory! Back to using cars along congested roads to drive towards Manchester or Wilmslow directions. |

Living Streets Response to Doing Buses Differently consultation

As the UK charity for everyday walking, Living Streets works to ensure that our streets and local areas enable everyone to get around safely and easily. For longer journeys, it is crucial that public transport is reliable, attractive and accessible, so that people want to and are able to travel sustainably to their destinations. We support GMCA's proposal for a bus franchising scheme, which would ensure that buses become a viable travel option for everyone across Greater Manchester.

We also wish to draw your attention to the reports from our recent Bus Connectivity Project in Scotland (<https://www.livingstreets.org.uk/about-us/our-work-in-action/bus-stop-connectivity>), which provide a wealth of information and advice, informed by our research and engagement with local communities. We would also be very happy to discuss ways in which we could support a similar piece of work in Greater Manchester.

Kind regards,
Jenny Wiles (on behalf of Living Streets)

Jenny Wiles
Regional Director (North)

4th Floor, MEA House, Ellison Place, Newcastle upon Tyne NE1 8XS
T. 0191 447 8765 www.livingstreets.org.uk @livingstreets



We are Living Streets, the charity for everyday walking. Our mission is to achieve a better walking environment and inspire people to walk more.



Manchester Friends of the Earth
Green Fish Resource Centre
46-50 Oldham Street
Manchester
M4 1LE

7th January 2020

Re: Doing Buses Differently consultation.¹

Thank you for the opportunity to respond to the 'Doing Buses Differently' consultation. Please see below for the response from Manchester Friends of the Earth.

Manchester Friends of the Earth is an award-winning environmental campaign group, raising awareness and lobbying for policy changes at a local, regional, national and international level.²

Manchester Friends of the Earth's vision is that Greater Manchester is a thriving, zero-carbon and zero-waste region, with happy, healthy, actively engaged, Carbon Literate citizens. People live in warm homes, with jobs and services nearby, and most of us choose to get around on foot, bicycle or the region's affordable, integrated public transport system.

Manchester Friends of the Earth supports a publicly controlled bus network because the bus system is simply not working well for people in Greater Manchester. Buses are expensive and serve fewer people and fewer routes than in other parts of the country – especially London - where they are managed differently. Yet, bus company shareholders continue to receive substantial dividend payments. Public transport should be a public good - owned and managed for the collective benefit.

Three times more journeys are by bus than train and they are the main means of transport for the car-less quarter of the population. What we are seeing instead is bus fares rising 75% over the last 15 years, and over 3,300 services reduced or removed since 2010 in England and Wales.

In February 2019, Friends of the Earth, along with researchers at the think-tank Transport for Quality of Life released new research: *Transforming public transport: Regulation, spending and free buses for the under 30s*³.

¹ <https://greatermanchester-ca.gov.uk/what-we-do/transport/doing-buses-differently-consultation-on-proposed-franchising-scheme/>

² The group consists entirely of volunteers, and its campaigns are funded by membership fees and individual donations. Up-to-date information is available on the group's website: www.manchesterfoe.org.uk. Manchester Friends of the Earth is a Licensed Local Group of Friends of the Earth, England, Wales and Northern Ireland. www.foe.co.uk

³ <https://policy.friendsoftheearth.uk/sites/files/policy/documents/2019-02/free-buses-under-30s.pdf>

The findings highlighted that for climate change reasons at least a 20% reduction in car journeys is necessary by 2030, even with a faster switch to electric cars and a more rapid decarbonisation of the electricity grid. This reduction requires a radical re-imagining of transport which would also realise the numerous other benefits of traffic reduction, for example to public health.

Please note we have not answered every question in the formal consultation document and have also included broader comments relating to public transport, climate change emissions and environmental concerns.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester

Manchester Friends of the Earth agrees that the scheme should cover the whole Greater Manchester area.

However, given that many people travel across the Greater Manchester boundaries from/to other local authority areas it would make more sense if bus regulation was applied at a national level, although we understand that this is outside of the scope of the current consultation.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

Manchester Friends of the Earth believes that the implementation timetable is too slow. As currently proposed, it will be late 2023, four years from now, before the franchise arrangements will operate in Area C.

We believe that people in Greater Manchester should not have to wait that long for a properly planned public bus service. We urge the Greater Manchester Combined Authority (GMCA) to introduce the proposed changes with a common date. Whilst this may require an increase in 'upfront' expenditure, it will also result in the benefits being realised earlier.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

Manchester Friends of the Earth believes that a strong passenger and citizen voice is vital to developing a better public transport service in Greater Manchester.

Current and potential bus passengers should not have to wait until after the first transitional franchises have expired before having opportunities to be consulted.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

Manchester Friends of the Earth support the proposals to allow small and medium sized operators to be involved in the proposed bus franchising scheme.

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

Manchester Friends of the Earth supports a publicly controlled bus network because:

- the bus system is simply not working well for people in Greater Manchester. Buses are expensive and serve fewer people and fewer routes than in other parts of the country – especially London - where they are managed differently. Yet, bus company shareholders continue to receive substantial dividend payments. Public transport should be a public good - owned and managed for the collective benefit.
- the Local Government Association showed recently that bus journeys had fallen by 300 million in five years and that 69% of residents think local councils should be the main decision-makers on bus services.⁴
- people in Greater Manchester need a better bus network to enable them to take part in society: to get to work, the hospital, shops, public services and visit friends and family.

We strongly support the franchising scheme, which means public control of our buses.

Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market.

To what extent do you agree or disagree with this?

Manchester Friends of the Earth strongly agrees with this because:

- we support taking control of our bus network, to give local authorities control of our bus routes, fares, and ticketing, so that the network as a whole can join up to make an integrated bus network that is more accountable to our community. Currently, the system appears to work for bus operators rather than bus passengers.

⁴ <https://www.local.gov.uk/about/news/bus-journeys-fall-more-300-million-five-years>

- we need a public transport system that has buses which are clean and green and accessible.
- we support region-wide standards of pay, conditions and pensions for drivers to be negotiated with Unions representing drivers, which represent over 8,000 workers in the region, so that drivers are respected for their hard work.⁵

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

Manchester Friends of the Earth welcomes the GMCA's objectives so far as they go. However, in the context of the air pollution, congestion, sustainable transport and climate change challenges facing the city we would argue that the GMCA's objectives are not sufficiently ambitious. Greater Manchester needs to achieve a significant modal shift from private motor vehicle use to active travel and public transport.

Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

Offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, provide the most economic value (Net Present Value), and create the best platform from which further economic value could be delivered. Do you have any comments on this?

Currently, public money makes up 40% of bus company revenue, yet we have no control over fares, the vast majority of routes and timetables. And 10% of that public money is leaked as dividends.

Public control means we take all the fare revenue and give bus companies contracts, halving their profit margins, so that public money is used for buses over shareholders.⁶

Public control also means that profits from busy routes can be used to pay for socially necessary routes, rather than simply adding to company profits. Research showed that

⁵ See Deregulation in Britain resulted in a 'race to the bottom' (Transport for Quality of Life, Building a World-class Bus System for Britain, es.5 https://www.transportforqualityoflife.com/u/files/160120_Building_a_world-class_bus_system_for_Britain_FINAL1.pdf

⁶ See Transport for Quality of Life, Building a World-class Bus System for Britain, es.7 https://www.transportforqualityoflife.com/u/files/160120_Building_a_world-class_bus_system_for_Britain_FINAL1.pdf

95% of people in GM supported the idea of subsidising bus routes which are unprofitable but necessary for the public good.⁷

Manchester Friends of the Earth believes that this will deliver a better bus network.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

Manchester Friends of the Earth believes that the outlined costs, with the vast majority coming from local authorities, and a total of £14 council tax increase for the average household spread over 6 years to 2025, represent a good investment – particularly when considering the urgent need to tackle the impact and costs from the transport sector on public health and climate change emissions.⁸ The proposed costs will help deliver a better bus network with much better value for the public money.⁹

Q44. GMCA's draft Equality Impact Assessment identifies the potential of the Proposed Franchising Scheme on persons with protected impact characteristics. Do you have any comments on it?

Manchester Friends of the Earth agrees with the Equality Impact Assessment which indicates that older and/or disabled people, many of whom also have physical and/or sensory impairments, will benefit from bringing the buses back into public control through franchising

An infrequent and fragmented bus service often results in many older and/or disabled people finding it difficult (or impossible) to visit friends and family, go shopping, get to work or attend cultural events, leading to a situation where they can become isolated in their homes, lonely and with deteriorating physical and psychological well-being.

Public control of the bus service, via bus franchising, could improve the bus network in terms of frequency, reliability and safety, which will benefit all – young or old.

⁷ <https://www.abellio.com/news/people-manchester-we-want-better-bus-service>

⁸ See A net zero carbon budget for the whole transport sector <https://policy.friendsoftheearth.uk/insight/net-zero-carbon-budget-whole-transport-sector> A new analysis shows that the DfT's continued failure to curb emissions will lead to the UK breaching existing carbon budgets over the next decade, even before budgets are tightened on the pathway to net zero. Radical action to cut emissions from road transport and aviation over the next decade and beyond are needed. This will require DfT to constrain demand for road and air travel.

⁹ https://issuu.com/greatermcr/docs/greater_manchester_proposed_bus_franchising_scheme/18

Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

Manchester Friends of the Earth strongly supports the introduction of the Proposed Franchising Scheme.

Bus franchising is the only option that allows cross subsidy from popular/profitable routes to support less busy/unprofitable routes. The alternative, Voluntary Partnership, leaves such key decisions with bus companies. Changes will only be made to the extent that they deem it in their interests. Greater Manchester need a public transport system that can put the needs and interests of GM's people first.

The additional expenditure over that for the Voluntary Partnership is not large: £25 million (£122 million compared to £97 million) over the five-year implementation period. This represents £5 million per year, or £500k per council area, or £4.34 per household per year.¹⁰

The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefit than from either partnership model. Buses are hugely important to our lives and we have a huge opportunity to transform them so that they work for us as citizens.

Manchester Friends of the Earth
7th January 2020

¹⁰ source: TfGM Franchising paper, executive summary, page 23

| | |
|--|---|
| Organisation Name | Manchester Local Care Organisation |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|----------------|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|---|--|
| <p>Q13b Why do you say this?</p> | <p>Good Afternoon,</p> <p>This is an official response to the GM bus consultation on behalf of the Manchester Local Care Organisation – an integrated care organisation comprised of NHS and local authority staff delivering health and social care services in Manchester.</p> <p>We would like to advocate for the inclusion of a simplified and consistent approach to staff discounts under any new arrangements emerging from the consultation. The current offer includes considerable variation between the different providers, both in terms of the type and nature of discount offered as well as arrangements to secure the discount on behalf of staff. The current arrangements necessitate a significant administrative burden on our staff and we would strongly advocate for and support a streamlined and simplified process.</p> <p>We would also be interested in being involved in exploring what offers potential providers may be able to make available to support our employees to travel to work. Our current offer to staff around travel discounts is an important part of a suite of initiatives that help us to recruit those that are furthest from the labour market. The financial burden of travel can impact significantly on people’s work choices and our commitment to recruiting local people is particularly focused on those living in our more deprived communities. We would strongly advocate that this forms a mandatory part of any future tendering/franchising process, possibly covered under their contribution to social value.</p> <p>We support the franchising model, or any model of delivery, that will enhance and increase bus services into a greater number of communities across Manchester and Greater Manchester that are currently underserved by transport options. This relates to the point above about making employment accessible to everyone living in our communities.</p> |
|---|--|

| | |
|--|---|
| <p>Q13b Why do you say this?</p> <p>Continued</p> | <p>We also support route planning that encompasses a greater understanding of where people need to travel to, and why, rather than traditional routes that simply serve the main employment hubs like central Manchester. We support the use of robust equality impact assessments on route planning/times of services that include consideration for and emphasis on the needs of the unpaid workforce in our communities. Unpaid carers and people providing childcare contribute an invaluable complementary service to the formal paid work that we provide and their needs are often neglected when planning transport options. We also advocate for transport options that support flexible working arrangements as this means a greater number of people travelling to and from work according to non-traditional working schedules.</p> <p>Please do not hesitate to contact any of the people below should you require any additional information.</p> <p>Jon Lenney</p> |
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | |
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | |
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | |

| | |
|--|--|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |

| | |
|--|--|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|--|---|
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>Good Afternoon,</p> <p>This is an official response to the GM bus consultation on behalf of the Manchester Local Care Organisation – an integrated care organisation comprised of NHS and local authority staff delivering health and social care services in Manchester.</p> <p>We would like to advocate for the inclusion of a simplified and consistent approach to staff discounts under any new arrangements emerging from the consultation. The current offer includes considerable variation between the different providers, both in terms of the type and nature of discount offered as well as arrangements to secure the discount on behalf of staff. The current arrangements necessitate a significant administrative burden on our staff and we would strongly advocate for and support a streamlined and simplified process.</p> |
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | |
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | |
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|---|---|
| <p>Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?</p> | <p>We support the franchising model, or any model of delivery, that will enhance and increase bus services into a greater number of communities across Manchester and Greater Manchester that are currently underserved by transport options. This relates to the point above about making employment accessible to everyone living in our communities.</p> <p>We also support route planning that encompasses a greater understanding of where people need to travel to, and why, rather than traditional routes that simply serve the main employment hubs like central Manchester. We support the use of robust equality impact assessments on route planning/times of services that include consideration for and emphasis on the needs of the unpaid workforce in our communities. Unpaid carers and people providing childcare contribute an invaluable complementary service to the formal paid work that we provide and their needs are often neglected when planning transport options. We also advocate for transport options that support flexible working arrangements as this means a greater number of people travelling to and from work according to non-traditional working schedules.</p> |
| <p>Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme?</p> | |
| <p>Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?</p> | |
| <p>Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?</p> | <p>Strongly support</p> |

| | |
|--|--|
| <p>Q45b Why do you say this?</p> | <p>Good Afternoon,</p> <p>This is an official response to the GM bus consultation on behalf of the Manchester Local Care Organisation – an integrated care organisation comprised of NHS and local authority staff delivering health and social care services in Manchester.</p> <p>We would like to advocate for the inclusion of a simplified and consistent approach to staff discounts under any new arrangements emerging from the consultation. The current offer includes considerable variation between the different providers, both in terms of the type and nature of discount offered as well as arrangements to secure the discount on behalf of staff. The current arrangements necessitate a significant administrative burden on our staff and we would strongly advocate for and support a streamlined and simplified process.</p> <p>We would also be interested in being involved in exploring what offers potential providers may be able to make available to support our employees to travel to work. Our current offer to staff around travel discounts is an important part of a suite of initiatives that help us to recruit those that are furthest from the labour market. The financial burden of travel can impact significantly on people’s work choices and our commitment to recruiting local people is particularly focused on those living in our more deprived communities. We would strongly advocate that this forms a mandatory part of any future tendering/franchising process, possibly covered under their contribution to social value.</p> <p>We support the franchising model, or any model of delivery, that will enhance and increase bus services into a greater number of communities across Manchester and Greater Manchester that are currently underserved by transport options. This relates to the point above about making employment accessible to everyone living in our communities.</p> |
| <p>Q46a Are there any changes that you think would improve the Proposed Franchising Scheme?</p> | <p>Yes</p> |

| | |
|--|--|
| <p>Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.</p> | <p>Good Afternoon,</p> <p>This is an official response to the GM bus consultation on behalf of the Manchester Local Care Organisation – an integrated care organisation comprised of NHS and local authority staff delivering health and social care services in Manchester.</p> <p>We would like to advocate for the inclusion of a simplified and consistent approach to staff discounts under any new arrangements emerging from the consultation. The current offer includes considerable variation between the different providers, both in terms of the type and nature of discount offered as well as arrangements to secure the discount on behalf of staff. The current arrangements necessitate a significant administrative burden on our staff and we would strongly advocate for and support a streamlined and simplified process.</p> <p>We would also be interested in being involved in exploring what offers potential providers may be able to make available to support our employees to travel to work. Our current offer to staff around travel discounts is an important part of a suite of initiatives that help us to recruit those that are furthest from the labour market. The financial burden of travel can impact significantly on people’s work choices and our commitment to recruiting local people is particularly focused on those living in our more deprived communities. We would strongly advocate that this forms a mandatory part of any future tendering/franchising process, possibly covered under their contribution to social value.</p> <p>We support the franchising model, or any model of delivery, that will enhance and increase bus services into a greater number of communities across Manchester and Greater Manchester that are currently underserved by transport options. This relates to the point above about making employment accessible to everyone living in our communities.</p> |
|--|--|

| | |
|---|---|
| <p>Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.</p> <p>Continued</p> | <p>We also support route planning that encompasses a greater understanding of where people need to travel to, and why, rather than traditional routes that simply serve the main employment hubs like central Manchester. We support the use of robust equality impact assessments on route planning/times of services that include consideration for and emphasis on the needs of the unpaid workforce in our communities. Unpaid carers and people providing childcare contribute an invaluable complementary service to the formal paid work that we provide and their needs are often neglected when planning transport options. We also advocate for transport options that support flexible working arrangements as this means a greater number of people travelling to and from work according to non-traditional working schedules.</p> |
| <p>Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?</p> | <p>Don't know</p> |
| <p>Q48 Finally, do you have any other comments you want to make?</p> | |

| | |
|--|---|
| Organisation Name | Northern Neighbourhood Forum, M22 |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Profit seems to be the main concern to bus companies. Price - timetable - reliability - standards. One ticket for greater Manchester IE bus - tram - train. Limited buses in areas so poor service. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Based on a vote of members present. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | Value for money. Disabled people able to get to places IE hospitals - work etc. Value for money. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|---|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Go ahead. Allowing passengers to use buses. All bus stops to have light up signs, places for bikes - prams, wheelchairs on buses and trams. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--------------|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | It's needed. |

| | |
|--|--|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | |
| Q45b Why do you say this? | |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|--|
| Organisation Name | Oxford Road Corridor |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | No comment. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | Oxford Road Corridor supports the application of the Proposed Franchising Scheme to the entirety of Greater Manchester as a large proportion of employees, students and visitors to the Oxford Road Corridor area are located across the city region. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | Wherever possible, Oxford Road Corridor encourages GMCA to ensure that the range of services within the Proposed Franchising Scheme is comprehensive and serves the widest possible spatial area. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Oxford Road Corridor understands the need for a transition period given the complexities of implementing the Scheme. It appears that many of the services that operate in our area would fall within the final transition area. On the proviso that the timescales are not extended, and recognising that the Oxford Road Corridor is well served for buses, albeit in a confusing and fragmented way, we are willing to support the proposed transition arrangements. We would however request that TfGM continue to consider how the transition can happen in a way that minimises disruption and meets the indicative timescales. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | We encourage this decision to be made as quickly as possible, in line with the statutory requirements. |

| | |
|---|---|
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | This period of time seems reasonable in the circumstances. |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Continual assessment from a qualitative and quantitative point of view is considered best practice, as described in the Assessment document. We would welcome the opportunity to be part of the continuous feedback process through the Oxford Road Corridor Sustainable Transport Group. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | The opportunity to access the market will be key to the success of the Scheme. Anything that encourages genuine competition within the Scheme is welcomed. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | This is similar to the operating model used by London Buses (subsidiary of TfL), and would therefore be appropriate. This will help with access to the market for small and medium companies, ensuring genuine market competition. |

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>Bus services are vitally important to the overall success of the city region. They are the most frequently used mode of public transport for city residents, and the bus network has an important role to play in creating a more inclusive, sustainable and economically successful area.</p> <p>The steadily declining patronage figures are indicative of a broken system. We recognise that Oxford Road in itself is well served, however this part of Manchester attracts people from across the region, whether that is to work, study, visit cultural facilities or the hospital. In order for the regional model to function effectively we need a bus (and transport) network that is fairer and more comprehensive.</p> <p>Our partner organisations have regularly reported frustration with:</p> <ul style="list-style-type: none"> complex and expensive fares; increased journey times (mainly due to congestion); a lack of integrated routes and transport modes; and poor levels of customer service. <p>These user considerations sit alongside wider societal issues such as poor air quality in GM, a lack of forward planning and innovation in the bus market, and decreased access to public transport for lower socio-economic areas.</p> <p>Given these serious issues, we agree that the current bus market does not currently perform as it should to support the residents of GM and could play a bigger role in driving economic growth.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |
| <p>Q13b Why do you say this?</p> | <p>As set out in our answer to Q12 the current deregulated system has failed to deliver the quality and consistency of service the region aspires. Oxford Road Corridor fully supports the Strategic Case for reforming the bus market, as we believe that the long-term effects of market reform will bring benefits for staff, students, and visitors. It should be noted that we also consider Phase 2 of the proposals to be important if we are to realise the full benefits of a reformed network.</p> |

| | |
|--|---|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | We fully support the vision and objectives set out in the consultation document. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | It is clear that the Proposed Franchising Scheme would positively contribute to GMCA's objectives as set out in the consultation document. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | The evidence from the Assessment indicates that a Partnership Option would not provide the same level of improvement for passengers as the Proposed Franchising System. Therefore, partnership options will not meet the aligned objectives or deliver the desired improvements. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>It is clear that the wider societal and economic benefits from the Proposed Franchising Scheme hugely outweigh the Do Minimum or Partnership Option.</p> <p>Although the BCR of the Proposed Franchising Scheme is marginally lower than the alternative options, this is directly attributable to the initial cost of implementing franchising.</p> <p>A franchised system will also allow greater transparency and single point of accountability.</p> |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The packaging of the franchise contracts appears to be logical. It is indicated that the large contracts would be awarded around routes and services delivered from specific depots. We would encourage the development of cross-city routes to improve connectivity across Manchester city centre, and these could be fed into the large franchise allocations. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | We are supportive of the length of contracts indicated in order to provide the best value for money |

| | |
|--|--|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Any use of ITS to improve the passenger experience is highly encouraged. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | Oxford Road Corridor is a key driver of the regional centre, and we recognise that visitors, staff and students rely on cross- boundary services to access the area. We would encourage GMCA to ensure that the functionality of the cross-boundary services for passengers is improved in line with internal GM bus services, or at worst unaffected, by the Proposed Franchising Scheme. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|---|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | The evidence provided indicates that commercial operators appear unwilling to engage with the most beneficial levels of partnership arrangement, preferring a light- touch approach. Given the scale of change that is required to improve buses in GM, we consider that the partnership options (light touch or ambitious) would not deliver appropriate improvements. Furthermore, the enhanced partnership scheme (EPS), which gives the greatest improvements for the user, will not progress without bus operator support. The operators have indicated that they would not support an EPS and therefore rules out even the best case partnership model. |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | It is important that the GM authorities work together with GMCA to ensure that a reasonable funding strategy is developed and there is continued transparency on the financial implications of the proposed scheme. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | Though the cost of implementation for the partnership options is lower than the cost of the Proposed Franchising Scheme, the previously noted lack of benefits for our workers, students and visitors mean that this option is not considered as favourably as franchising. |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | The information presented in the Management Case indicates that in-house management of the Proposed Franchise System would lead to increased integration of systems and information, ultimately resulting in the best possible experience for passengers and is therefore welcomed. |

| | |
|---|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | We fully understand the complexity in implementing the proposed franchising scheme, and recognise that there will be challenging transition points in the process. We would urge TfGM to continue to consider how this transition can be mitigated to ensure minimum disruption. But we fundamentally believe that the long-term benefits will outweigh short-term disruption. |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | The benefits of implementing the Proposed Franchising Scheme above the Do Minimum or partnership options are clear. Oxford Road Corridor welcomes the level of improvement, as it will bring benefits to employees, students and visitors, as well as the wider GM community. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | Not applicable. |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Providing that the revenue and cost risks are managed effectively, there are no concerns about the impact of the options on GMCA or TfGM. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | The Proposed Franchise Scheme has the greatest societal benefits, which would realise themselves with a more prosperous and environmentally sustainable region. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Oxford Road Corridor supports the conclusion that the proposed franchising scheme is the best way to achieve the desired outcome of better bus services within GM. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|--|
| Q45b Why do you say this? | Oxford Road Corridor is fully supportive of the Proposed Franchising Scheme. The benefits presented throughout the case show that there would be a positive change in bus services in GM through the implementation of franchising, which is not available through other types of bus market reform. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | We strongly encourage the development of Phase 2 of the bus improvement work to ensure that patronage increases are delivered and that buses are a key part of the future transport mix in GM, alongside active travel modes and other forms of public transport. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|---|
| Organisation Name | Sale moor community |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Stagecoach and arriva own the roads round Manchester so whats the point |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Sale moor we have 1 bus on Norris road thats it and after 1800 1 a hour its not fair |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | No point arriva and stagecoach go northwest own the roads round Manchester |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|--|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Good luck to all this it still be the same |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|--|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | It will never happen and if it does stagecoach arriva etc will just run new companies of the road by putting more of there buses on same route just like it did with finglands |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | Its about time as arriva stagecoach etc own Manchester buses. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | This will never happen |

| | |
|--|---|
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | More bus services on Norris road M332UN. WE ONLY HAVE 1 ARRIVA AND IN NIGHT 1 A HOUR ITS NOT ON . WE WANT MORE SERVICES |

THE BISHOP OF MANCHESTER



9th October 2019

The Rt Revd Dr David Walker

Miriam Amies
Stakeholder Engagement Officer
Corporate Affairs
Transport for Greater Manchester
2 Piccadilly Place
Manchester
M1 3BG

Dear Miriam,

I am writing with regard to the bus conversation around Transport for Greater Manchester.

I'm very keen to see a franchising system for buses in Greater Manchester. I do believe this would have a number of very significant advantages.

Under franchising I believe that bus timetables could better be organised around the wider needs of the community, not simply when it is most profitable for the companies to run services. As Bishop of Manchester I'm particularly concerned about the relative paucity of services on Sunday mornings. Many members of the congregations I serve are elderly and either no longer able to drive, or would be better advised to use public transport (for their own safety and that of other road users). I'd hope that any franchising system would look to ensuring improved levels of service, especially on Sunday mornings at the times when people are seeking to reach their church services.

I'm also concerned that on many routes services thin out quite early in the evening, making it very difficult for people to attend evening events away from their own homes and immediate communities. This has the effect of forcing older people into their homes in the evening and thus limiting the potential for intergenerational activities.

I would hope that a franchising system would make it possible to have a ticketing system much more similar to that that operates in London where, for example, it's possible to change bus while making a longer journey without having to buy a fresh ticket. It should also be possible to better co-ordinate fares across the entire local public transport network (including trams and trains). Making public transport easier to access and to use has a vital contribution to make to the important plan of making Manchester a carbon neutral city by 2038.

Finally, in terms of public transport, I'd hope it is possible to get some clean air proposals for Manchester that do not penalise bus services. It seems ridiculous that a diesel bus (and I hope we can move to hybrids and electric buses within a foreseeable timescale) which can carry up to 100 passengers around Greater Manchester, could be penalised when the same number of people all making separate journeys in private cars would not. We really must not put in any systems that penalise the use of public transport and favour the private motor vehicle at this time.

I do hope these comments are of assistance in helping us produce a robust, affordable public transport system across Greater Manchester that better serves the needs of all the people of the area.

Yours ever,

A handwritten signature in black ink, appearing to read 'David Mandel'. The signature is fluid and cursive, with a large initial 'D' and 'M'.

cc The Revd Canon Steve Williams

Tottington District Civic Society

Re. Doing Buses Differently

I note you are interested in comments being sent to you about 'Doing Buses Differently'.

I have answered and submitted a questionnaire on behalf of myself. The following is on behalf of Tottington District Civic Society of which I am Chair. We thought you may be interested in knowing about the lack of public transport in one of the most northerly parts of Greater Manchester.

Most large residential areas in the north of Bury have excellent bus services but the large village of Greenmount is cut off from neighbouring places.

We have repeatedly tried to get the Red 4, Ramsbottom to Bury route (you have a photo of this bus on page 17 of your document) to do a short diversion through Greenmount, which would also be beneficial to them, as it would not be the exact same route from Bury to Ramsbottom as the 472/474 bus, but instead they are abandoning the Red 4 bus on 26th January 2020. A short diversion through Greenmount would reinstate a link with Ramsbottom as well as Brandlesholme. (There must be other places in Greater Manchester with the same problem.

The following explains why it doesn't make sense not to have a regular route through Greenmount and why buses in Greater Manchester should be run differently.

GREENMOUNT VILLAGE COMMUNITY

FACTS

Public transport is now the worst it has ever been.

No direct service to Bury as bus goes via Walshaw and is only every hour.

No service to Bury before 9.43am or after 16.43pm.

Last bus back from Bury to Greenmount after 17.09pm.

No wonder most people travel by car adding to so much congestion on roads into Bury and Manchester as well as being bad for the environment. (Some people even drive to nearest regular bus stops, leave their car there all day, causing parking problems for others.)

Why a regular bus service should go through Greenmount.

- **There are 1300 homes in Greenmount.**
- **A Medical centre, with 10500 patients. The Medical Centre has only a very small car park. Patients come from far and wide and with such a poor bus service and no service from Ramsbottom or Brandlesholme they have to come in cars or taxis blocking Greenmount roads and streets.**
- **A large Community Centre with over 800 people a week doing weekly activities.**

- The highly popular **Kirklees Valley Local Nature Reserve** starts in **Greenmount** opposite The Medical Centre, from where the Kirklees Trails goes straight down through the Nature Reserve to Bury on what was the old railway track. This could be used by many more people if there was a good bus service.
- **2 Primary schools**
- **A Pre School and A Nursery**
- **A Church**
- **A Community Cricket Club open every day**
- **A Golf Club**
- **A Steak House.**
- **Village Café**

Walk leaders from Greenmount Village Walking Group do 50 guided walks a year for Bury Council, including walks for Transport for Greater Manchester 'Walk with Us' as these walks start at 8.40am there are no buses to get people to the start.

Only with a regular 15 minute bus service will we ever get people to leave their cars at home and travel by bus.

| | |
|--|---|
| Organisation Name | Transition Buxton |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | It is essential that it does to provide the overarching planning essential to promote public transport within a "travel to work zone". Ideally (but I suspect not possible) it should include places that "look to Manchester", such as areas of the high Peak (Buxton and Glossop) |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | The widest range of services should be included as this provides the greatest opportunity for integrated provision |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | It is crucial that there is a seamless integration of services from outside the region into the area. AS previously stated ideally these services would be included in the planning to ensure this |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | It cannot come too soon |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | I understand that there has to be phasing because of the resources needed to implement the changes, but the sooner we have a planned service, the sooner we can reduce car dependency and carbon emissions |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | Too long - climate change emergency requires much faster responses to these changes |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | That is for them to say |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | Clearly appropriate infrastructure for an expanded public transport service will be necessary. It would be better for companies to work collaboratively with GMCA on this rather than left to splintered individualism |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | It is not performing well because services are too expensive, too infrequent, routes are too complicated and hence slow (because of trying to make a cut service maintain access to communities). climate change emergency requires us to reduce car dependency. This will only happen through the provision of cheap, frequent, fast public transport - it must be subsidised at first to establish it - it may well pay later as people make the change. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Because only through a planned comprehensive service can we get people out of their cars and make the carbon savings that we must |

| | |
|---|---|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | These services have to subsidised to make the bus travel attractive compared to car ownership - yes long term they may be financially viable but the provision has to be made first |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Single ticketing, planned provision will make an enormous contribution to the objectives. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | If this assists in developing the infrastructure then it is a good idea |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | The provision of integrated public transport is too important to address the climate change emergency to stand or fall on any economic case. It must be subsidised initially at least to kick start the modal shift that is essential |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | It seems a sensible approach |

| | |
|---|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>It would be crucial that 5 years does not freeze the system. There should be the ability to review during contracts to increase service frequency, start and end times of services and improvements to routes (railways have historically coped with time table changes twice a year during franchises). Something similar should be possible with buses so that there can be continued service improvements during a franchise (to take advantage of new bus lanes etc)</p> <p>The franchises should have built into them continuous expectation of carbon reduction through investment in the fleet, improvements to infrastructure (new bus lanes etc)</p> <p>They must have clear mechanisms for enforcing performance standards and easily changing franchise operator where these are not met</p> |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>seems appropriate - the financial risk must be held centrally to allow for subsidy</p> <p>there must be clear mechanisms for assessing operating costs so that operators cannot demand unreasonable profits and running costs</p> |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | <p>There should be a committed that throughout the service the "real living wage" will be paid as a minimum to all employees</p> |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>seems appropriate</p> |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>There should be a requirement in all franchise agreements for a continued reduction in carbon emissions by the fleet</p> |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>This is crucial. easily averrable information about service provision at bus stops/on phones etc and a single ticketing system (to include bus transfer) is crucial in encouraging modal shift</p> |

| | |
|---|---|
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | It is crucial that such services are planned and included in the provision planning to avoid duplication and waste. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | Planned service cannot come soon enough |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | Modal shift is too important for any individual commercial interest to take precedence |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Whilst I accept that there are financial difficulties, these changes are too important to be limited by financial considerations. We need modal shift now, the climate emergency will not wait. This must happen with subsidy without delay. We would not question the expense in a war situation and that is the level of emergency we have. |

| | |
|---|--|
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | Please see my answer to the previous question |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | The model appears to be appropriate. However, what is more important is the spirit as well as the legals. The system must be flexible and easy to adapt. It s crucial that improvements can be made during franchises and non/inadequate performance swiftly dealt with. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | Given that this should lead to improved provision, more frequent services, integrated fares, I do not think the passenger has any interest in the mechanisms but only the outcomes. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | Again the passenger wants to see the benefits and is not concerned about the mechanisms that produce them |

| | |
|--|--|
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | Operators must fit with the system not the system to operators |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | Wider society will benefit from the modal shift and decline in pollution. This cannot come fast enough |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | A planned service with single operating methodology is long overdue. Bus services have been destroyed by deregulation. Modal shift to public transport is essential to address climate change. So if this delivers improved planned services, it has to be the way forward |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | Long overdue as a way of delivering bus services (including integration with trains and trams) |

| | |
|--|---|
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | These proposals will begin to redress imbalances within our society. They will provide particular benefit to the carless, poorer income households, women |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | Long overdue to begin to restore vital bus services as a public service. Begin to address the modal shift from cars to public transport reducing emissions, reducing pollution. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | In summary, these changes need to be made as fast as possible, even ahead of the proposed schedule. for benefits across society and to help address the climate emergency |

Walk Ride Heatons

| | |
|--|--|
| Organisation Name | Walk Ride Heatons |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|--|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|---|---|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>The bus market is not working well for residents of Greater Manchester: we have lost 8 million miles of bus services since 2010, which is 11% of the service, despite fares increasing two years in a row. (http://bit.ly/2OXm5R0) The North West's bus network has shrunk more than any other region.</p> <p>Meanwhile, bus company shareholders in the North West have received an average £18.4 million in dividend payouts a year for the past ten years. (http://bit.ly/2VX9e2P)</p> <p>We strongly support the franchising scheme, which means public control of our buses. The Local Government Association showed recently that 69% of residents think local councils should be the main decision-makers on bus services. (http://bit.ly/31fmK2E)</p> <p>People in Greater Manchester need a better bus network to take part in society: to get to work, the hospital, shops, public services, and to visit loved ones. Improving our bus networks will help to get people out of cars.</p> <p>More people using buses, and fewer people making car journeys would make public transport more attractive to use, as well as making active transport such as walking or riding a bicycle a more pleasant and healthy experience for everyone; as such Walk Ride Heaton supports franchising of buses in Greater Manchester.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |
| <p>Q13b Why do you say this?</p> | <p>Walk Ride Heaton supports taking control of our bus network, to give local authorities control of our bus routes, fares, and ticketing, so that the network as a whole can join up to make an integrated bus network that is both more accountable to our community, and more accessible. We need buses that are clean and green and accessible, in order to make active transport more pleasant for people in Greater Manchester.</p> |

| | |
|--|--|
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>Walk Ride Heatons believes that, based on paragraphs 4.23 to 4.37 of the Consultation Document, a Franchise option would be the most ambitious plan, and the most beneficial to the aims of Walk Ride Heatons. The objectives set out for a franchised model, particularly in paragraph 4.30(i), that any improvements that come from "the network [being] planned as a single network, improving efficiency and integration" is of greatest relevance to Walk Ride Heatons. This aim dovetails neatly with the corollary section of the Made to Move report. This report details the benefits of integration in great detail: "Walking and cycling are the natural partners to public transport. These combination journeys can reduce people's reliance on driving. But we must aim for seamless integration between these modes, which means designing transport hubs that prioritise walking and cycling for passengers. Alongside this, smart ticketing, reduced fares for young people and improved bus services will encourage people to make the change."</p> <p>Walk Ride Heatons believes that franchising buses, and radically improving the bus network in Manchester, would have amplifying benefits for the Bee Network more widely, and locally in the Heatons, reducing the amount of vehicle traffic on the roads, and normalising more active modes of transport.</p> |
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | |
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | |

| | |
|--|--|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>Currently, public money makes up 40% of bus companies revenue, yet we have no control over fares, the vast majority of routes and timetables. And 10% of that public money is leaked as dividends. Public control means we take all the fare revenue and give bus companies contracts, halving their profit margins, so that public money is used for buses over shareholders. (Transport for Quality of Life, Building a World-class Bus System for Britain, es.7).</p> <p>Public control also means that profits from busy routes can be used to pay for socially necessary routes, rather than just bus company profits. Research showed that 95% of people in GM supported the idea of subsidising bus routes which are unprofitable but necessary for the public good. (https://www.abellio.com/news/people-manchester-we-want-better-bus-service)</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |

| | |
|---|---|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | Improvements made to buses to help make our air more breathable would naturally be beneficial. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | We think the outlined costs, with the vast majority coming from local authorities, and a total of £14 council tax increase for the average household spread over 6 years to 2025, are a price worth paying. These costs will mean we can get a better bus network, run for the public over shareholders, with much better value for the public money we currently give to buses (http://bit.ly/2oRllkr), such as improved cycle networks, and more liveable neighbourhoods. |

| | |
|---|--|
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | Don't know |
| Q39b If so, please explain what you think those positive or negative impacts would be. | Not applicable |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | <p>Walk Ride Heatons notes that paragraph 4.211 states that: "the Proposed Franchising Scheme is forecast to increase patronage and reduce the use of car, and therefore would be expected to contribute most strongly to the use of sustainable transport."</p> <p>We note that this stronger contribution to the use of sustainable transport would be of benefit to all modes of active transport. We note also that, while there is some commitment to fleet replacement in the Proposed Partnership Scheme, this is not significantly different to typical rolling stock replacement, and would not have the guarantee of improved, less polluting engines that come with the Proposed Franchise Scheme.</p> <p>As such, we believe that this shows the added benefits of the Proposed Franchising Scheme.</p> |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Walk Ride Heatons agrees with this conclusion, and supports Franchising as an improvement on the current set-up for Bus Transport in Greater Manchester. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |

| | |
|--|--|
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | <ol style="list-style-type: none"> 1. A well-connected bus network provides an important complement to a well-connected cycle network, and vice versa. 2. Franchising is the only option that allows cross subsidy from popular/profitable routes to less busy/unprofitable routes. 3. The additional expenditure over that for the Voluntary Partnership is not large: £25M (£122M vs £97M) over the 5 year implementation period. That's just £5M per year, or £500k per council area, or £4.34 per household per year. (source: TfGM Franchising paper, executive summary, page 23). 4. The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefit than from either partnership model. <p>Buses are hugely important to our lives and we have a huge opportunity to transform them so that they work for us as citizens.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|--|
| Organisation Name | WalkRide Greater Manchester |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | The sooner the better. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | Agree with the approach. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>We at WalkRide GM support a better, publicly controlled bus network, because:</p> <p>The bus market is not working well for residents of Greater Manchester. Having lost 8 million miles of bus services since 2010 (i.e. 11% of the service), we have a patchy system of bus services, where the interest of shareholders trumps that of passengers.</p> <p>We strongly support the proposed franchising scheme, because this will allow public control of our buses. We are not alone; 69% of residents think local councils should be the main decision-makers on bus services, according to a poll commissioned by the LGA this year.</p> <p>A better bus network will help everyone to take part in society - to get to work, the hospital, shops, public services and visit loved ones. For vulnerable groups, it will reduce the risk of social isolation.</p> <p>A comprehensive, reliable and affordable system of bus services will be needed if we are to make the massive shift from reliance on the private car to greener and more efficient ways of getting around.</p> |

| | |
|--|--|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | <p>The free market in bus services has failed us. We need buses that are clean, green and accessible; bus companies have not delivered on any front. We support region-wide standards of pay, conditions and pensions for drivers to be negotiated with unions representing drivers, so that drivers are respected for their hard work.</p> <p>Studies have shown that, "Deregulation in Britain resulted in a race to the bottom" (https://bit.ly/33Tb0VR, page 5)</p> <p>Taking back control of the bus network will give local authorities control over bus routes, fares, and ticketing, so that the network as a whole can join up to make an integrated bus network with contractors more accountable to our community. Currently, this system favours bus company shareholders. Based on the experience of the regulated system in London, in comparison with the rest of the country, Greater Manchester's decline in bus usage could be reversed, facilitating the Greater Manchester councils' aim of increasing walking, cycling and public transport journeys by 1 million per day by 2040.</p> |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>Under the franchising scheme, fare revenue goes to the public authority which then uses it to fund agreed contracts for service. TfGM would take on the risk, but by paying a fixed contract fee, there would be no leakage of excess profits, while still allowing operators to make a fair return, as they do in London. Public control also means that profits from busy routes can be used to pay for socially necessary routes. Research from bus company Abellio showed that 95% of people in GM supported the idea of subsidising bus routes which are unprofitable but necessary for the public good (https://www.abellio.com/news/people-manchester-we-want-better-bus-service).</p> <p>The franchising arrangements give the opportunity for proper strategic planning of the network as part of the wider public transport system that includes Metrolink and regional rail. This will prevent duplication while ensuring that gaps in coverage can be addressed.</p> <p>The bias towards the larger and more costly bus operators that is inherent even in the Enhanced Partnership model will be prevented (https://bit.ly/378IL8N, pages 26-27)</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|--|---|
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>We believe that the outlined costs are a price worth paying. We also note that central government has indicated that it is willing to pay these costs.</p> <p>This investment will mean we can achieve a better bus network, run for the public, with much better value for the public money we currently give to buses.</p> |
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | |
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | |
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | |

| | |
|--|--------------------------------|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We agree with this conclusion. |

| | |
|--|---|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | <p>The Equality Impact Assessment carried out as part of the proposals for the franchising scheme makes it clear that older and/or disabled people, many of whom also have physical and/or sensory impairments, will benefit from bringing the buses back into public control through franchising, and we agree with this. Public control of the buses should mean that there is better access to hospitals and other health facilities such as GP surgeries - at the moment, many older and/or disabled people have to travel to these facilities via private taxi firms - at great expense.</p> <p>Furthermore, the fragmented nature of the bus network at the moment means that it is difficult for many older and/or disabled people to travel to see friends, go shopping, get to work or attend cultural events, leading to a situation where they become isolated in their homes, lonely and with deteriorating physical and psychological well-being. It is only through franchise arrangements that the network of bus routes, their frequency, and safety for older travellers can be reliably improved with consequent improvement in well-being.</p> |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|---|
| Q45b Why do you say this? | <p>1. The alternative that is on the table (i.e. the bus companies' preferred Voluntary Partnership) leaves all the power in the bus companies' hands. Changes will only be made to the extent that they deem it in their interests. We need a system that puts the interests of Greater Manchester's people first.</p> <p>2. Franchising is the only option available that allows cross-subsidy from popular/profitable routes to less busy/unprofitable routes.</p> <p>3. The additional transitional expenditure over that for the Voluntary Partnership is not large - £25 million (i.e. £122m vs £97m) over the five-year implementation period. That's just £5 million per year, or £500,000 per council area, or £4.34 per household per year. As noted above, it is possible that even this small sum will be met by central government.</p> <p>4. The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefits than from either partnership model.</p> <p>Buses are hugely important to Greater Manchester citizens' lives and we at WalkRide GM are really pleased we have the opportunity to transform them so that they work for us all, as citizens, over shareholders, and enable a wider transport network that reduces reliance upon the private car.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

Dear Sir/Madam,

I am writing on behalf of the Whalley Range Climate Action Group, which is a group of local residents taking action on climate change in the area of Whalley Range in Manchester. Our group works to support local people and organisations to take individual and/or collective action in the area on the climate change emergency to act for change and to campaign for the Government and the council to act urgently.

Bus services and the need for vastly improved services in our area and in Manchester is something that is regularly raised in our group. We therefore wish to express our support for the buses to return to democratic control through a franchising model and we would like to see this happen as soon as it is possible.

We need cleaner and greener buses. The current bus fleet in its majority is old dirty diesel buses that are polluting our air and our streets. We need zero carbon vehicles which are more reliable, frequent and accessible.

We need buses that take people where they want to go. Currently buses go in and out of the city concentrating on the so called profitable transport routes, unless subsidised by the public purse. Many people in Whalley Range cannot get to their nearest bus, and have to take more than one to get to essential services such as Manchester Royal Infirmary. We need services to go around the city and services that link with other nearby district centres, hospitals, GPs and places where people work, play and want to go.

Buses are a crucial part of our transport system. Currently buses don't link up with other public transport modes, making it inconvenient and expensive to travel to different places from Whalley Range and to use different modes of transport for return journeys. We need an integrated bus franchising model that links with other means, which helps people switch to public transport making it a natural choice for travelling from Whalley Range around the conurbation and further afield.

In addition we need a ticketing system which is less confusing for people to use, and cheaper tickets too. There is currently a range of tickets with many tickets valid for a specific bus company and people are unable to make use of multi-journey tickets or tickets which link up with other modes. Furthermore, tickets are often expensive making travel for families and trips that mean changing bus companies and different public transport modes prohibitively expensive.

Innovation and use of shared and on demand services is something that our group is also keen to see, to facilitate travel within our area and to link with buses going further afield. There is hardly any innovation in the current system.

Often passengers, particularly people who are not fluent users of technology have to rely on outdated information to make their trips which undermines confidence and usage in public transport.

Our group wants people to have the real choice to leave their vehicles at home, want to see a reduction in the number of vehicles on our roads and their toxic emissions. We are in support of a franchising scheme that will make bus travel a natural choice for people so we all enjoy cleaner, greener and healthier neighbourhoods. People who use and work on the buses know best what type of services we need, so we call on TfGM to establish robust citizen and worker involvement in service development and delivery to secure maximum citizen influence over our bus services.

Thank you for considering our response to the Consultation on whether to bring buses into public control in Greater Manchester.

| | |
|--|---|
| Organisation Name | Withington Civic Society |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Yes. We agree. The present system has led to fragmentation, examples of which relate to ticket prices and availability of buses on certain routes. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | To reduce fragmentation of the market; to improve ticketing; and to improve the availability of bus services throughout the region |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|--|----------|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | We agree |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|---------------------------|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | We accept GMCA's analysis |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We agree |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | It will help to achieve an integrated and efficient bus service throughout the region |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|--|
| Organisation Name | Manchester University NHS Foundation Trust |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | We agree that buses should be franchised across Greater Manchester. We have a large staff base travelling from all over Greater Manchester and beyond and this presents significant challenges with explaining routes, ticketing, and discounts, particularly as many of our staff have to cross sub-area boundaries to get to our Hospital sites. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | All proposed routes taken to our main Hospital sites are due to be franchised. If any routes to this service fall under the multi-franchise route which sees multiple franchised services run at different times of day with different frequencies or stopping points, we ask that these routes have easy user indicators (i.e bus number and the A/B). We would not want any transitions to affect how our staff, patient or visitors travel to our Hospital sites. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | MFT welcomes the sub-areas and is pleased that franchising will take place in areas least served by public transport first. Again, as question 3 indicates, we would not want any of the transitioning routes to be put in place that adversely affect how our staff, patient, and visitors get to our sites. |

| | |
|--|---|
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | <p>There are currently two services that stop on our sites and are marked with + in Annex 1. These include: Current GoNorth West Service 18 Service to the Manchester Royal Infirmary. First V1 / V2 Service from Leigh and Atherton to Manchester Royal Infirmary</p> <p>The proposed document means that these services will operate without a franchise contract or service permit in Sub Area C until the franchising begins in 2023.</p> <p>These are already heavily utilised services to our Oxford Road Campus and MFT are concerned that without a contract or service permit until the proposed franchising in April 2023 operators will use the most polluting vehicles until the Clean Air Zone comes into force.</p> <p>Without the franchising, we are concerned that this extra charge will then be passed onto our staff, patients, and visitors where there are limited alternative public transport provisions in the areas that it serves.</p> |
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | |
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | |
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>Due to our geographical locations, many of our staff, patients and visitors use a variety of modes (i.e. bus and Metrolink) to access our sites. We believe therefore the consultations should be expanded beyond bus users and look at how it integrates with other transport modes, including active travel. Having space for bikes on buses (similarly to Metrolink) would encourage multi-modal travel and thereby increase patronage.</p> |
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | |

| | |
|--|---|
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | |
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>We undertake annual staff travel surveys and over the past few years, bus use has declined whereas other modes (Metrolink, train and active travel) have either stayed the same or have increased. The main reasons for this decline are:</p> <ul style="list-style-type: none"> Expensive fares Increased journey time (mainly due to congestion) No direct bus services Lack of integrated routes and limited multi-operator tickets Lack of flexibility <p>These considerations are echoed across all Hospital sites at MFT. However, the ‘no direct bus services’ are mainly linked to our Hospital sites that are based within more suburban areas (i.e. Wythenshawe and Trafford General Hospitals) where bus routes have steadily declined over the past few years. This, in comparison to our Oxford Road Campus, where there is an oversaturation of bus routes, particularly from the south of Manchester towards Didsbury, means that we agree that the current bus market does not perform adequately.</p> <p>There are challenges faced by the bus market that are not directly attributable to the current bus market. These include:</p> <ul style="list-style-type: none"> Increase in car ownership Congestion Changing the nature of travel demand |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Tend to agree</p> |

| | |
|--|--|
| <p>Q13b Why do you say this?</p> | <p>Manchester University NHS Foundation Trust supports the reform of the bus market; however, as outlined in Q12, there are a number of key contributory factors that have been listed within the strategic case which will not improve as a result of bus franchising.</p> <p>Congestion is listed as one of the reasons why bus uses have declined, mainly as a result of the increase in private vehicles. GMCA's decision to not include private vehicles within other key strategic proposals like the Clean Air Zone directly contradicts this statement and will not be resolved through bus franchising.</p> <p>We are fortunate to have sites that are located alongside quality bus corridors, such as Oxford Road, which have been introduced outside of bus franchising. We have seen investment in new technologies such as contactless and real-time bus information which was introduced at least 18 months before Metrolink.</p> |
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>We agree with these objectives but given that the majority of journeys undertaken by public transport in Greater Manchester are by bus, a specific vision for the bus network and strategy would be welcome.</p> <p>Whilst we welcome the inclusion of the reduction of harmful emissions, only CO2 has been explicitly included. Some of the most harmful air pollutants – including nitrogen oxides (NOX) and particulate matter (PM) – come from on-road vehicles, including cars, lorries, and buses. The type of fuel used is not specified in the vision – which is also detrimental to health. The majority of buses in Manchester are old diesel vehicles which are 20 x more harmful than their electric counterparts.</p> <p>We would also welcome some amendments to the current objectives to address the increase in multi-modal and flexible journey patterns.</p> |

| | |
|--|--|
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>The proposed franchising scheme would directly contribute to the GMCA's objectives for bus services, particularly around the network vision and simplified fares.</p> <p>However; under the current franchising proposal, there is no financial investment or plans to improve the quality and standard of the fleet until phase 2 (5 years after franchising), which contradicts the air quality objectives set by the GMCA.</p> <p>The document assumes that the funding for this can be achieved through imposing penalties on operators for reliability and punctuality. It will be very difficult for franchised buses to improve this if there are no measures in place to reduce congestion (i.e. CAZ for private vehicles).</p> |
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>We agree that the partnership option would not provide the same level of improvement for passengers as the proposed franchising system for ticketing, customer experience, and value for money.</p> <p>We do, however; believe that the partnership option will improve local air quality sooner than the franchising option – having already committed to 150 electric buses by 2020, thereby assisting in the delivery of the 2040 Transport Strategy.</p> |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>The franchising scheme provides the best value for money and directs the benefits of this to GMCA, rather than private operators, plus gives a better opportunity for the economic value to be released locally.</p> <p>We understand that although the NPV of the proposed franchising scheme is lower than the alternative options, this is due to the initial costs of implementing a franchising system. However, this economic cost is overlooked given the wider societal benefits that the franchising scheme will bring, particularly in low socio-economic areas.</p> |

| | |
|---|--|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | We agree that the packaging strategy outlined is the most sensible option for the proposed franchising scheme. As one of the largest employers in the region however, we would like some assurance that there will be no service disparity between the large franchising contracts and the smaller franchising schemes. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | We support the 5-year contracts for large franchising schemes and 3 years for smaller franchising schemes. We do, however; need to ensure that these contracts allow the franchisees enough time to invest in modern and low emissions vehicles to adhere to the GMCA strategy. |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>We welcome any improvements to the bus fleet within Greater Manchester, although we feel that these provisions should be included within phase 1 of the franchising scheme and not 5 years later in phase two. The decision goes against the ambitious plans laid out in the zero-carbon Manchester Strategy.</p> <p>Although there is mention of the bus upgrades within the economic case, it has not been fully costed and the funding stream suggested (i.e. through the Clean Air Fund), may fall short.</p> |

| | |
|--|---|
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | We welcome the approach to intelligent transport systems under the proposed franchising scheme. We would further encourage a 'next stop' to be featured on our buses, similar to Metrolink, to improve access to our sites by patients and visitors, who at present, may not know the correct bus stop to get off at. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | <p>We have staff, patients and visitors relying on cross-boundary services to access our Hospital sites and unlike buses, our hospitals do not have any regional boundaries.</p> <p>We would encourage GMCA to ensure these services are aligned to ensure a smooth transition between two neighbouring transport authorities. We strongly advise that access to vital services (i.e. Hospitals) is included within the statutory tests to ensure there is adequate public transport provision for those accessing our sites.</p> |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | <p>As indicated in previous questions, bus use to our sites has rapidly declined over the past few years, with complicated ticketing, an increase in prices, lack of services and journey length comprising a leading factor in this decline.</p> <p>Given that the commercial operators are unwilling to engage with a simplified ticket approach, which can be used on any bus or network, the partnership options would not deliver the appropriate improvements required to improve the patronage of bus use across Greater Manchester.</p> |

| | |
|---|---|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | The cost of implementing the partnership option is lower than the cost of implementing the proposed franchising scheme. Despite the cost savings, we feel that the current partnership proposals do not deliver more than the franchising scheme. However, if an agreement over simplified ticketing across all bus networks was proposed we would welcome a partnership option as it would give the same, or more, benefits to franchising with lower costs. |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | We would like some reassurance from the GMCA that the short-term negative effects of the proposed franchising scheme will be adequately communicated in advance. These include confusion for passengers travelling between franchised and non-franchised zones. Given that our Hospitals are all in zone C (the last zonal location) there will be confusion for a number of years until the entire network is franchised. We would, therefore, argue that this is not a short-term effect and more needs to be done by the GMCA to ensure patronage does not decline further during this period. |

| | |
|---|---|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | <p>MFT agrees that the benefits of the franchising scheme outweigh any of the other proposed options and provides real, long – term benefit to our staff, patients and visitors – particularly for simplifying fares.</p> <p>Although the document indicates that on the whole there would be no fare increases, with a few being raised by a maximum of 10p per trip, this excludes our most popular tickets which are weekly, monthly and annual. A cost implication for all tickets, not just single trips would be welcome.</p> <p>In addition, there is also a clear need to tackle congestion at the same time as the proposed franchising scheme to ensure the scheme is successful – but these plans are yet to be announced.</p> |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | MFT fully supports the implementation of a bus franchising scheme but we would also welcome a proposed partnership agreement if some of the issues regarding multi-operator ticketing were resolved. |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | We would welcome more environmental improvements through the operation of a more modern, lower emissions and carbon bus fleet before Phase Two is implemented. The effects of poor air quality are apparent now and we feel this should be included as a priority for phase 1, not in 5 years' time. MFT agree that bus franchising alone is not enough to achieve the 50-50 modal split targets for non-car modes by 2040 and this franchising document does not consider the positive environmental or wider societal implications of bus users switching to more active modes of travel, such as walking and cycling which are also being improved across GM. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | MFT supports the conclusion that the proposed franchising scheme is the best way to achieve the desired outcome of better bus services within GM. |

| | |
|--|---|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | <p>The documents provided are extremely thorough and are well laid out and accessible for those working within a sustainable travel field. It is difficult, however, to translate this document into something that is accessible for all. Users are mainly concerned about potential reductions to their service and ticket costs; both of which are vague within the document. A full breakdown of ticketing examples would be welcomed.</p> <p>In addition to cuts to services, our staff, patients and visitors have expressed an interest in any additional services that this franchising scheme may bring. It is disappointing that routes will continue as normal until the implementation of Phase 2 in 5 years' time.</p> |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | The proposed franchising scheme would have a high positive impact on the elderly and people with sensory impairments and a medium impact on all other groups. Given the rise of an aging population (and therefore more frequent trips to hospitals), we are in full support of the EIA. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | MFT strongly supports the proposed franchising scheme but we do feel that the patronage of buses could be increased by addressing other factors such as congestion by targeting private vehicles in other GMCA schemes such as the Clean Air Zone. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Environmental improvements to the fleet to be fully costed and implemented within phase 1 as well as a more integrated approach to all multi-modal trips and not just by train and Metrolink. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |

| | |
|---|---|
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>Ticketing is the main issue for the decline in public transport use at MFT and there is not enough being done to support this currently or that is specifically mentioned within the document. There are only single, daily, weekly, monthly or annual tickets available and this does not reflect the current patterns of travel for our staff around Greater Manchester.</p> <p>For example, a doctor on full rotational shift may drive for their overnight shift, but catch the bus or walk and cycle during the day when these provisions are available. The current level of ticketing does not support this and penalises those users who do not use the same mode of transport to get to work every day.</p> <p>As well as ticketing, we would like to have more control over timetabling of buses that stop on, or adjacent to our sites. Many buses stop after a certain timeframe (i.e. past 7 pm), making these journeys not viable for all.</p> <p>The introduction of discounted tickets for public sector staff would also be welcomed.</p> |
|---|---|

The Christie NHS Foundation Trust

| | |
|--|--|
| Organisation Name | The Christie NHS Foundation Trust |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | In order to be fully integrated the proposal should include all of Greater Manchester. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | <p>Are you able to clarify what work has been done to assess accessibility to hospitals and links between the hospitals? Linking hospitals together would support a move away from car usage for business travel.</p> <p>Are any of these new services? If so have they been identified? If there are no new routes, then why not?</p> |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | <p>Has this transition model been used elsewhere to increase the chance of a smooth transition?</p> <p>The go live dates for the transition periods are currently stated as:</p> <ul style="list-style-type: none"> o Sub-Area A – 2 April 2021 o Sub-Area B – 25 March 2022 o Sub-Area C – 10 March 2023 <p>How have these dates been established and has any assessment been made to establish if they are achievable?</p> <p>? What are the potential impacts on the whole scheme if any dates slips?</p> <p>? Any contingency plans if provider is unable to deliver the service?</p> |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |

| | |
|--|--|
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | <p>? Has this transition model been used elsewhere to increase the chance of a smooth transition?</p> <p>? The go live dates for the transition periods are currently stated as:</p> <ul style="list-style-type: none"> o Sub-Area A – 2 April 2021 o Sub-Area B – 25 March 2022 o Sub-Area C – 10 March 2023 <p>How have these dates been established and has any assessment been made to establish if they are achievable</p> <p>What are the potential impacts on the whole scheme if any dates slips?</p> |
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | <p>See response to question 6</p> |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | |
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>Direct consultation with the NHS given the size of the workforce and accessibility for patients.</p> |
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | |
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | |

| | |
|--|---|
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>Bus use amongst staff has seen a 3% decline since 2015, whereas Metrolink and train use has seen an increase. This would support the theory that local bus market is not performing as well as it could currently.</p> <p>In our most recent staff survey (2018) 27% of staff identified public transport improvements as what would persuade them out of their car to be more sustainable. In addition 18% of staff identified cheaper ticket prices and combined tickets as incentives for change.</p> <p>If the market is to be improved all the factors impacting the service would have to be improved. This needs to be a formal commitment.</p> |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Any improvements to services would be a positive. Please see response to question 12 for more information. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | These objectives need developed further if a strategic case is to be made. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Any improvements to services would be a positive. Please see response to question 12 for more information. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>As a major employer outside the city centre we have a fundamental issue with the current system. As the bus network in Greater Manchester has become focused on the city centre, services in the peripheral areas have been depleted. What bus services are there can be costly, infrequent and significantly extend journey times. Resolving this issue must be a binding commitment of any proposal.</p> |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Does the time proposed allow time to see improvements or is the risk that they could collapse due to cost pressures?</p> |
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | |

| | |
|---|---|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | Fleet should be zero emission to improve air quality. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Improved journey planning and access to live data would be supported |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | Cross boundaries services need incorporated fully into the proposal to support staff coming from Derbyshire, Lancashire etc. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | Does the time proposed allow time to see improvements or is the risk that they could collapse due to cost pressures. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | No reference found to cost for fleet improvements. If this has not been included could this not risk the proposals not being economically viable? |

| | |
|---|---|
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | A formal commitment that ensures improvements would cover all services and not see any reduction in improvement further into implementation. |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | Benefits for the passengers could be achieved if there are binding commitments to address all factors that have been identified as creating a negative impact on service. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Benefits could be achieved if there are binding commitments to address all factors that have been identified as creating a negative impact on service. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | We do not oppose the introduction of a franchising scheme (please refer to question 13), however please refer to comments raised throughout the survey |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |

| | |
|--|--|
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | See responses to earlier questions |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | <p>The Trust developed a Green Travel Plan with Manchester City Council and is committed to aim for an ambitious target of 60% of staff using sustainable travel by 2030. Any developments on site are reviewed in line with progress on the modal shift. As 72% of staff live over 3 miles from the site public transport has an important role to play in achieving this target. However Bus use amongst staff has seen a 3% decline since 2015. This would support the theory that local bus market is not performing as well as it could currently.</p> <p>In our most recent staff survey (2018) 27% of staff identified public transport improvements as what would persuade them out of their car to be more sustainable. In addition 18% of staff identified cheaper ticket prices and combined tickets as incentives for change.</p> <p>Benefits could be achieved if there are binding commitments to address all factors that have been identified as creating a negative impact on bus service, this would include binding commitments to also tackle traffic and congestion levels.</p> |

| | |
|--|---|
| Organisation Name | The Northern Care Alliance NHS Group |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | To ensure that the full benefits of an integrated network are realised, any measures which are developed from this consultation should be introduced Greater Manchester wide with and also hopefully utilised in areas surrounding the conurbation where cross-boundary services are currently operated. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | As an organisation providing services across a large part of Greater Manchester we are particularly concerned to ensure that any split into sub-areas does not create greater issues with integration and network coverage whilst changes are taking place. We would not want any transition to be detrimental to our users or employees travel needs by the GMCA and TfGM ensuring that this does not create a disparity in service provision, and that in the least there are assurances that any improvements to interchange, ticketing and travel information would also be provided to all services at no detriment. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | As an organisation providing services across a large part of Greater Manchester would be particularly concerned to ensure that any split into sub-areas does not create greater issues with integration and network coverage whilst changes are taking place. We would not want any transition to be detrimental to our users or employees travel needs by the GMCA and TfGM ensuring that this does not create a disparity in service provision, and that in the least there are assurances that any improvements to interchange, ticketing and travel information would also be provided to all services at no detriment. |

| | |
|---|---|
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | We are concerned that some bus service corridors which serve our sites are in this excepted list; particularly as we would regard some of these being our 'more problematic' but very necessary bus services for users. We would be concerned to ensure that this does not create a disparity in service provision, and that in the least there are assurances that any improvements to interchange, ticketing and travel information would also be provided to all services at no detriment. |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | The consultation should be expanded beyond just bus users. We would suggest that some consideration needs to be made of those who are not using the bus network as to the reason for this. We would be happy to link questions within any travel surveys we undertake as an organisation to assist with this. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | We would be concerned to ensure that this does not create a disparity in service provision, and that in the least there are assurances that any improvements to interchange, ticketing and travel information would also be provided to all services at no detriment. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>We agree that there are a number of challenges facing the local bus market and that it is not performing as well as it could currently, certainly from our experience of meeting the needs of our users and employees to access our services. However, a number of the key contributory factors are not specifically as a result of the 'local bus market' and any proposals to reform the bus market should be linked to binding commitments to improve all aspects; such as providing greater public transport priority; restrictions and better management to reduce traffic flow and congestion; a reduction in car-centred planning; improvements to the provision of transport information; the provision of easier local interchange facilities between modes; plus addressing the historical lower usage of public transport and buses which has been seen in Greater Manchester since before the deregulation of bus services in 1986.</p> |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Tend to agree</p> |

| | |
|--|---|
| <p>Q13b Why do you say this?</p> | <p>We welcome any proposal to improve the public transport network in Greater Manchester and would agree that some form of reform to the current situation is required. However as indicated in the previous response, a number of the key contributory factors are not specifically as a result of the 'local bus market' and any proposals to reform the bus market should be linked to binding commitments to improve all aspects; such as providing greater public transport priority; restrictions and better management to reduce traffic flow and congestion; a reduction in car-centred planning; improvements to the provision of transport information; the provision of easier local interchange facilities between modes; plus addressing the historical lower usage of public transport and buses which has been seen in Greater Manchester since before the deregulation of bus services in 1986.</p> <p>We are fortunate enough to have sites which are located alongside 'quality bus corridors' introduced under the previous voluntary partnership schemes. These have seen investment in new vehicles, some bus priority measures, publicity, promotion and commitments to service improvement; but have never delivered the full partnership package required and originally outlined to the detriment of the service now being provided.</p> <p>We would agree that a stronger approach is needed to deliver improvements, but this past history of failing to deliver by all parties is clearly hampering any efforts to fully develop the partnership approach. There appears to have been an approach taken of moving to 'opposite sides' by operators and politicians historically and presently rather than engage in true partnership working.</p> |
| <p>Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?</p> | <p>We would agree with these objectives, but would suggest that for such a large scale proposal to change the bus network, they should perhaps be developed further to create a specific strategic vision for the bus network and a bus strategy? An example of such an approach would be the link below to the Transport for West Midlands (TfWM) strategic vision for bus; https://www.tfwm.org.uk/media/38969/final-strategic-vision-for-bus.pdf</p> |

| | |
|--|--|
| <p>Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>We welcome any proposal to improve the public transport network in Greater Manchester and would agree that some form of reform to the current situation is required. However as indicated in the previous response, a number of the key contributory factors are not specifically as a result of the 'local bus market' and any proposals to reform the bus market should be linked to binding commitments to improve all these aspects. A greater degree of control upon the bus network, service standards, ticketing and branding is a clear positive step, but only if it can fully deliver the objectives listed.</p> |
| <p>Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?</p> | <p>We note that the consultation indicates that local bus operators have not appeared to be prepared to commit to an enhanced partnership, the history of partnership and bus service provision in Greater Manchester since the 1980's has not been conducive to encouraging this either.</p> <p>We are fortunate enough to have sites which are located alongside 'quality bus corridors' introduced under the previous voluntary partnership schemes. These have seen investment in new vehicles, some bus priority measures, publicity, promotion and commitments to service improvement; but have never delivered the full partnership package required and originally outlined.</p> <p>We would agree that a stronger approach is needed to deliver improvements, but this past history of failing to deliver by all parties is clearly hampering any efforts to fully develop the partnership approach.</p> <p>Examples of what can be achieved by effective and enhanced partnership are available from looking at the West Midlands conurbation and in the links below;</p> <p>https://www.tfwm.org.uk/operations/bus-alliance/</p> <p>https://www.tfwm.org.uk/media/38960/bus-alliance-50-deliverables.pdf</p> <p>In the West Midlands, they have also been able to create a common brand for the transport network, originally using powers within the Transport Act 2000 (https://www.networkwestmidlands.com/) and have also developed and retained an 'interoperability' ticket package (https://www.networkwestmidlands.com/tickets-and-passes/).</p> <p>Have these potential options been fully reviewed as part of the discussions with transport operators and also consultation work undertaken? We also note recent information which indicates that this partnership approach has also started to show improvements in passenger numbers; https://www.focustransport.org/2019/12/west-midlands-bus-travel-increases.html</p> |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a ‘high’ ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>The franchising scheme allows the most economic value for money and provides the benefits of this to GMCA, rather than private operators, plus gives the better opportunity for the economic value to be released locally. However, we are slightly concerned that it does not have the best cost/ benefit ratio and the proposed scheme is in effect working with existing resources, particularly when bus services in London have a much higher funding level per passenger journey; so the scheme may not in reality create the best platform to deliver even further economic value.</p> <p>An ambitious partnership, whilst initially difficult to broker and administer might also have the potential to deliver more of the franchising scheme measures if agreement and delivery can be achieved?</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>As an employer and provider of services across a large section of Greater Manchester, we would be seeking re-assurance that some form of service continuity and also to ensure that this does not create a disparity in service provision, and that in the least there are assurances that any improvements to interchange, ticketing and travel information would also be provided to all services at no detriment.</p> <p>The bus network in Greater Manchester has evolved to become more of a city centre based network with much radial travel being impossible or extremely time consuming. We would appreciate seeing this tackled as a priority within any packaging strategy or network reviews.</p> |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>If investment needs to be made in modern low emission vehicles, will franchise contracts be extended to manage these ‘extra’ costs or will the scheme operate on a similar basis to Transport for London (TfL) with TfGM looking to take on some of the risks of vehicle ownership (as with the ‘New Bus for London’)?</p> <p>It is notable that a number of tenders for socially necessary bus services by TfGM in the recent past (although smaller than franchise bids) have had to be cancelled due to higher costs than available budget and if this pattern of increasing costs escalates would this reduce the possibilities for network improvement?</p> |

| | |
|---|---|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | With GMCA defining and specifying the bus network; in Greater Manchester the bus network has evolved over time to become more of a city centre based corridor network with the majority of radial travel being impossible or extremely time consuming, with little or no availability for simple interchange. We would appreciate seeing this tackled as a priority within any packaging strategy or network reviews. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | We would be keen to see environmental improvements through the operation of a more modern, lower emission and carbon fleet and note that this appears to have been included in the economic case. However, it does not appear to be fully costed to be delivered within the scheme and that potential Clean Air Funding may fall short in this respect? |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | We would wish to enable opportunities to link our organisation into common intelligent transport systems and data wherever possible, in order to provide improved travel opportunities and journey planning to all of our users. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| <p>Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?</p> | <p>To ensure that the full benefits of an integrated network are realised, any measures should ideally also be utilised in areas surrounding the conurbation where cross-boundary services are currently operated. Section 4.99 in the consultation document appears a little vague on this commitment. Having a site for which the main bus route is a 'cross-boundary' service stopping nearby, we do not wish to see this reduced or limited under any proposals or indeed a 'transport blight' area created around the Greater Manchester conurbation, as has partially occurred around Greater London.</p> |
| <p>Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?</p> | <p>If investment needs to be made in modern low emission vehicles, will franchise contracts be extended to manage these 'extra' costs or will the scheme operate on a similar basis to Transport for London (TfL) with TfGM looking to take on some of the risks of vehicle ownership (as with the 'New Bus for London')? It is notable that a number of tenders for socially necessary bus services by TfGM in the recent past (although smaller than franchise bids) have had to be cancelled due to higher costs than available budget.</p> |
| <p>Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?</p> | <p>We would agree that a stronger approach is needed to deliver improvements, but this past history of failing to deliver by all parties is clearly hampering any efforts to fully develop the partnership approach. Examples of what can be achieved by effective and enhanced partnership are available from looking at the West Midlands conurbation and in the links below; https://www.tfwm.org.uk/operations/bus-alliance/ https://www.tfwm.org.uk/media/38960/bus-alliance-50-deliverables.pdf In the West Midlands, they have also been able to create a common brand for the transport network, originally using powers within the Transport Act 2000 (https://www.networkwestmidlands.com/) and have also developed and retained an 'interoperability' ticket package (https://www.networkwestmidlands.com/tickets-and-passes/). Have these potential options been fully reviewed as part of the discussions with transport operators and also consultation work undertaken? We also note recent information which indicates that this partnership approach has also started to show improvements in passenger numbers; https://www.focustransport.org/2019/12/west-midlands-bus-travel-increases.html</p> |

| | |
|---|--|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | <p>In section 4.119a of the consultation document, the costs of operating the network do not appear to include the full costs of pursuing vehicle improvements and environmental standards within them. Any changes to specification to enable this will also lead to an increase in franchise bid costs, has this be included in the financial case?</p> <p>We are slightly concerned that the proposed scheme is in effect working with existing resources, particularly when bus services in London have a much higher funding level per passenger journey; so the scheme may not in reality create the best platform to deliver even further economic value.</p> |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | <p>An ambitious partnership, whilst initially difficult to broker and administer might also have the potential to deliver more of the franchising scheme measures if agreement and delivery can be achieved at less risk? We also note recent information which indicates that this type of partnership approach has also started to show improvements in passenger numbers; https://www.focustransport.org/2019/12/west-midlands-bus-travel-increases.html</p> |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | <p>We would be concerned to ensure that this does not create a disparity in service provision, and that in the least there are assurances that any improvements to interchange, ticketing and travel information would also be provided to all services at no detriment.</p> |

| | |
|--|--|
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | <p>We would agree that a stronger approach is needed to deliver improvements, but this past history of failing to deliver by all parties is clearly hampering any efforts to fully develop the partnership approach. Examples of what can be achieved by effective and enhanced partnership are available from looking at the West Midlands conurbation and in the links below; https://www.tfwm.org.uk/operations/bus-alliance/ https://www.tfwm.org.uk/media/38960/bus-alliance-50-deliverables.pdf In the West Midlands, they have also been able to create a common brand for the transport network, originally using powers within the Transport Act 2000 (https://www.networkwestmidlands.com/) and have also developed and retained an ‘interoperability’ ticket package (https://www.networkwestmidlands.com/tickets-and-passes/).</p> |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | <p>We agree that if fully implemented and with binding commitments to resolve the other wider key impacts upon the bus network, there are clear benefits for passengers. However, whilst passengers will benefit from access to a larger network at the same fare, there is a clear need to also deal with congestion and provide bus priority, interchange facilities, ticketing and travel information to maximise the positive impacts.</p> |
| <p>Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?</p> | <p>Reading this section and how it is worded gives the perception that this aspect has not been fully reviewed and considered. Whilst this is understandably down to the reluctance of current area operators to commit to this an ambitious EPS could deliver and continue to deliver as the example in the West Midlands suggests? We are surprised that operators have not embraced this further after making the OneBus joint proposal and previous work undertaken by Stagecoach Manchester in relation to a proposed bus strategy.</p> |
| <p>Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?</p> | |
| <p>Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?</p> | |

| | |
|--|---|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | <p>We would be keen to see environmental improvements through the operation of a more modern, lower emission and carbon bus fleet, but section 19.4 of the assessment which covers wider environmental impacts does appear to make some questionable assumptions. For example, if bus patronage declines there may actually be some environmental benefit if users switch to walking and cycling rather than private car?</p> <p>We would be more confident to understand and support any proposals for bus service reform if they had been more clearly and definitively linked to delivering the broader objectives regarding carbon and clean air, plus improving the health and wellbeing of communities.</p> |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | <p>We agree that if fully implemented and with binding commitments to resolve the other wider key impacts upon the bus network, there are clear benefits to improve bus services and meet GMCA objectives but would suggest that these objectives need expanding and developing further.</p> |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | <p>Whilst the assessment and consultation document are very thorough, it is difficult, especially as we are asked question about the proposed franchising scheme itself to take this information and develop it into a direct impact that users will see for their bus service, particularly as this includes assertions of minimal disruption and also aspirational change.</p> |

| | |
|--|---|
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | The equality impact assessment only appears to have been completed for the franchise scheme proposal and not for the other options included as part of the assessment? Therefore section 5.4 of the consultation document talks of the high positive impacts of the proposed franchising scheme but does not compare with other options as elsewhere in the document? |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Neither support nor oppose |
| Q45b Why do you say this? | <p>We would agree that a stronger approach is needed to deliver improvements, but the past history of failing to deliver by all parties is clearly hampering any efforts to fully develop the partnership approach.</p> <p>If these issues cannot be resolved; to ensure that the full benefits of an integrated network are realised, we would seek to support any scheme or partnership which is established to achieve this.</p> <p>However, without a very strong commitment to tackle traffic and congestion levels across Greater Manchester and giving the bus a far greater priority than it receives now it is questionable as to whether all the GMCA objectives will be fully achieved. Stagecoach anecdotally estimate that around 20% of their current Manchester fleet is operated just to cover traffic congestion. This resource would be better employed in improving the network as part of franchise scheme or an ambitious partnership.</p> <p>In London, the franchising scheme has provided stability and continuity, but only really started to deliver patronage increases when the congestion charges were introduced, other traffic was limited and additional resources were added to the bus network to increase service provision.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Please see responses to previous questions for where changes or improvements have been suggested. |

| | |
|---|--|
| <p>Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?</p> | <p>Quite likely</p> |
| <p>Q48 Finally, do you have any other comments you want to make?</p> | <p>Positive and effective partnerships are a fundamental requirement to seeking any improvements required and are based upon joint actions and mutual trust. All of our greatest achievements as an organisation have been based around this and the sharing of best practice. The introduction of a franchising scheme, if partnership alone cannot meet objectives, still requires positive and effective partnerships for its long term future. The franchise proposal is not a 'panacea' yet.</p> <p>We would agree that a stronger approach is needed to deliver improvements, but the past history of failing to deliver by all parties is also clearly hampering any efforts to fully develop the partnership approach.</p> <p>If these issues cannot be resolved; to ensure that the full benefits of an integrated network are realised, we would seek to support any scheme or partnership which is established to achieve this.</p> <p>However, without a very strong commitment to also tackle traffic and congestion levels across Greater Manchester and give the bus a far greater priority than it receives now, it is questionable as to whether all the GMCA objectives will be fully achieved by any proposal in this document.</p> |

The Northern Powerhouse vision is based around connecting the major towns and cities in the North far more effectively and efficiently, with major rail projects such as HS2 and Northern Powerhouse Rail critical in increasing productivity, boosting economic growth and creating skilled job opportunities. Equally important is ensuring these are integrated in city regions, with local transport networks that allow people to get to work quickly, comfortably and affordably.

In Greater Manchester, giving passengers seamless ticketing and journey experiences across, train, tram, bus, cycling and walking would be a major benefit both economically and for quality of life. Commuters traveling from Bolton or Stockport to other parts of the city region could find themselves using three separate means of public transport which don't connect, paying for each separately to get the least worst price, and taking a considerable amount of time. Encouraging car users to switch to public transport – with the associated benefits towards the net zero carbon emissions targets alongside helping those excluded from the labour market access better quality jobs – is only achievable if public transport options are viable.

Currently, Greater Manchester's bus network is often expensive for integrated journeys, incompatible with other forms of transport by service pattern and does not offer a positive passenger experience. While focus from government and others is often on improving the North's train network (for understandable reasons), buses are the lifeblood for communities both in less densely populated and heavily populated areas. Three quarters of journeys by public transport in Greater Manchester are made by bus. Some further statistics include:

- By 2035 it is estimated that GM will need to support 600,000 extra daily journeys.
- However, use of buses is falling. Between 2008-09 and 2017-18 there was a decline of 39m journeys, a reduction of 17%.
- As a major step to net zero carbon emissions, half of all journeys in the city-region will need to be made by foot, bike and public transport by 2040. Currently, 61% of daily trips in Greater Manchester are made by car. Therefore, to meet the target, one million more journeys every day to be made on foot, bike or public transport.

However, deregulation of the bus network has led to a variety of operators running services across the city region in what has developed into effective and unregulated local monopolies. This has meant TFGM has no oversight over the network, and a lack of integration with tram and train – affecting ticketing and timetables. When and where services run are determined by profit, rather than need, and up to 20% of services would not exist without a significant subsidy from Greater Manchester Combined Authority (GMCA) – around £27m in the last financial year. This is a suboptimal use of public money and GMCA risk effectively being held to ransom by the current operators.

As representatives of businesses in the GM region and more widely across the North, Northern Powerhouse Partnership firmly believe that the current situation must change. As part of this review, we propose that GMCA should oversee a franchised network, bringing the system under direct local control. This would form a central part of the wider GM integrated transport vision as outlined late in 2019 by Mayor Andy Burnham, with smart

ticketing and fluid, flexible, seamless movement between different modes of transport. Any profit would be reinvested in the network for the benefit of passengers.

It is our view that the franchised network would deliver a 'London-style' bus system in the city region, with an ambition to deliver similar solutions across train and tram, as well as major investment in cycling and walking routes. As part of the development of the GM devolution deal in the forthcoming Budget, we would also encourage central government to provide revenue funding for the scheme to deal with the transitional costs of the system until the expansion of routes can be made more affordable through growing market share against the car, resulting in higher patronage and resulting fare box income.

A commitment to financially underpin bus control in Greater Manchester as TfL has in London, alongside private operators contracted to provide the bus services themselves, would be a significant and immediate demonstration of the commitment of our government to the North or England, and a step towards the transport transformation the Northern Powerhouse so badly needs.

Henri Murison, Director, Northern Powerhouse Partnership

| | |
|--|--|
| Organisation Name | Saddleworth Parish Council |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | We fully support the corrections and changes which have been made to the Proposed Franchising Scheme. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | We fully support the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | Given the recent changes to local services, which were made without consulting the community and which have been detrimental to these services, we welcome the proposal to include local services. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | We concur with the 3 sub areas proposed for the purposes of transition and feel that it would be sensible to move in phases. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | We view that the proposed dates are acceptable and hope that these timelines can be met. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | We would hope that any consultations would be widespread and include bodies such as Saddleworth Parish Council who represent varying sections of the community throughout GM. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | We welcome the plan to allow small and medium operators to be involved as our view is that this will enable coverage in depth and the accountability set up within the franchising scheme will enable overview and scrutiny of these operators by local communities. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | We would fully support this proposal. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | We agree that the local bus market is not performing as well as it could. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | In our view the local bus services in our community are currently inadequate and do not serve the needs of the people of Saddleworth. The proposed franchising scheme will address this. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | We hope the objectives will be met, in particular the proposal for simplified and integrated fares. |

| | |
|--|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | The proposed franchising scheme would appear to be a sensible process for achieving these objectives. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | We feel that the partnership option would not sufficiently meet the objectives set out in the proposed franchising scheme. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | We fully agree. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The strategy would support the proposal in Question 10 and allow small and medium sized operators to contribute. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The proposal seems reasonable. However, we would expect this to be reviewed on a regular basis. |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | This would appear to be a sensible option at this stage. |

| | |
|--|---|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | We hope that any potential impact on the employees is minimised through the application of the TUPE regulations. |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | We would hope that the adoption of intelligent transport systems would realise cost savings and service improvements throughout the life of the franchising scheme. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | The franchise procurement process appears reasonable but it needs rigorous audit procedures to ensure that it is upheld. |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|---|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | We assume that appropriate due diligence has been, and will be, applied throughout the process. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | It seems logical and sensible that TfGM would manage franchised operations on behalf of GMCA. |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|---|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | The increase in demand would appear to be a conservative estimate and we hope that take up will be much higher. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | We hope that the proposed franchising model forms a successful part of the greater transport strategy and that this has beneficial effects, economically and socially, across Greater Manchester. |

| | |
|--|--|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Given our previous comments we fully support this. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | We are pleased that the potential impact on persons with protected characteristics has been fully considered. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | We view that this would be an improvement on current inadequate services and that it will have a beneficial impact, both economically and socially, across Greater Manchester. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | We are happy with the current proposal. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

Please see below response from the Liberal Democrat Group on Stockport Council. In any reference to this please note this is submitted on their behalf and not from me.

Response to GM Bus Consultation – Liberal Democrat Group, Stockport Council

This response is submitted on behalf of the Liberal Democrat Group on Stockport Council. It is a narrative response but we highlight certain questions from the long version of the consultation.

To summarise our response, we are supportive of the proposed franchising scheme but we are disappointed it has taken so long for the proposals to be made and disappointed that Stockport residents will be expected to pay towards it from day one but the benefits will only reach Stockport in December 2023, meaning they will pay three years of precepts without accruing any direct benefits.

This is a particular concern when Metrolink still hasn't come anywhere near to Stockport, despite the original proposals from over 35 years ago promising a route to Marple and the much-promised link from East Didsbury seeming no closer to actual delivery.

Q2. We believe that the proposed franchising scheme should apply to the whole of Greater Manchester. We would wish to ensure there is proper engagement outside of GM for the services that cross our Southern borders, namely Derbyshire (High Peak) and Cheshire East as these are strategic services for our residents and leisure users and for accessing employment.

Q3. We believe that local councillors knowledge is not used well enough when TfGM take decisions on subsidised services and, under any new arrangements, we would like to see a strengthened role and better consultation to ensure, e.g., that there is awareness of significant change entailed by apparently innocuous "tweaks" to the timing or routing of services.

Q4. We are disappointed that Stockport will be in the final phase of the franchising process and we fear this will mean two years of worsening services whilst Stockport residents contribute to the cost of improvements elsewhere. This may also impact the air quality in Stockport whilst drawing cleaner bus fleets to the first two sub-areas. This is not equitable and we oppose this decision. Among other measures, operators should be required to reduce the impact of engine idling.

Q5. Through routes, including those which originate/terminate outside of GM, should be brought into the scheme wherever possible.

Q6. We are disappointed that it has taken this long to reach the consultation stage of the franchising scheme and we hope that there will be no further delays in delivering the improvements which franchising should eventually bring.

Q7. We are concerned that Stockport will not see benefits until year 3, and worry that there may be deteriorations to services in the preceding two years.

Q17. We hope that the new government will honour the promises made during the general election campaign to properly fund transport outside of London and that they will make funding available for schemes such as this so that the cost is not entirely borne by GM residents.

Q26. We are concerned at the impact on strategic, cross-boundary services such as the 199 (Buxton to Manchester Airport) which is a key through-service. We would not want to see services like this made less convenient by having fewer stops or the need to operate through interchanges.

Q32. We would like to see greater involvement with local residents and councillors in the routing and timetabling of services.

Ends

Kind regards,

Jason

Jason Good

Political Assistant, Liberal Democrat Group

*Legal & Democratic Governance
Corporate and Support Services*

Stockport Metropolitan Borough Council
Liberal Democrat Office (Room 310),
Town Hall, Stockport, SK1 3XE

<http://www.stockport.gov.uk>

Doing Buses Differently

gmbusconsultation@greatermanchester-ca.gov.uk

Chair of the Place and External Relations Scrutiny Panel

Councillor Mike Glover

Tameside One
Market Place
Ashton-under-Lyne
OL6 6BH

Email: mike.glover@tameside.gov.uk
Phone: 0161 342 2199
Ask for: Paul Radcliffe
Date: 8 January 2020

To whom it may concern,

Doing Buses Differently

I write on behalf of Tameside Council's Place and External Relations Scrutiny Panel. The Panel seeks to submit a formal response to the consultation on Doing Buses Differently, which closes on 8 January 2020. This letter therefore aims to provide a summary of collective points and to express any areas of issue and concern. I would be extremely grateful if on receiving this letter you are able to take the appropriate action to ensure the collective response is suitably recorded and submitted to the consultation.

Tameside, as a place, continues to face significant challenges with an ongoing need to address social, economic and health inequalities. There is also a growing need to ensure that the local and regional bus network supports a wider ambition to connect people and places in Greater Manchester.

The borough continues to benefit from recent investment to improve transport links and connectivity, with examples of the Metrolink extension and current development of a new interchange in Ashton-under-Lyne. The Scrutiny Panel is supportive of plans to deliver a regulated and more integrated bus network across all of Greater Manchester.

With continued efforts being taken to improve air quality across Greater Manchester, this can be further complemented by developing a more joined-up and controlled approach to deliver a new model for bus services that becomes more outcomes focused for residents and communities.

This response letter further supports a motion put forward by Councillor David Mills, at a meeting of Full Council on 23 July 2019. Detail focused on the campaign Better Buses for Greater Manchester and called for improved services and regulation. This also included the future ability of local partnerships to set bus routes, timetables, fares and standards.

The feasibility of delivering a system-wide public transport system will require a significant amount of research and planning. The removal of vital bus routes in Tameside has shown first-hand how challenging some journeys have become for residents of all ages. While there is a justifiable need to ensure popular and more economically viable routes are maintained, there is also a need to review past and present routes that provide access to basic amenities and help to prevent social isolation for some of our most vulnerable residents.

Having familiarised myself with the consultation document, I have listed some of the main points below, which are to be viewed under the collective of Tameside's Place and External Relations Scrutiny Panel.

- That Tameside becomes part of a simplified integrated public transport system for Greater Manchester which concentrates more on the needs of an individual journey rather than the service operator or transport type.
- Current challenges suggest that Tameside, as part of a Greater Manchester public transport network, is in need of a renewed and regulated bus network that becomes increasingly fit for purpose, accessible, reliable, affordable and customer focused.
- There is a future requirement to ensure income generated from financially sustainable parts of the network are used to support expansion into areas of need where a bus service would be essential for social reasons, but not necessarily profitable.
- Residents continue to face significant challenges associated with the complexity of routes, multiple operators and a geographical separation of services between national bus operators.
- Local topography can present a number of challenges for residents, with a need to develop sustainable connections to people living in semi-rural communities.
- There is a possible requirement to ensure a community needs assessment is undertaken for each authority area, with support of targeted engagement to draw insight from the voluntary and community sector and to inform a review of all bus routes.
- That the general affordability of bus travel is reviewed as part of the ongoing consultation, with a view to bring a more consistent approach to pricing that can be easily interpreted by residents and visitors to the region.
- That regulating the bus network in Greater Manchester can further support the work to improve air quality by better meeting the expectations of the public and creating a more consistent offer that can be considered as a genuine alternative to car use.

If further clarity is needed on any of the above points, please do not hesitate to contact me.

Yours faithfully,

Councillor Mike Glover
Chair - Place and External Relations Scrutiny Panel

| | |
|--|---|
| Organisation Name | 607 Rebels of St.James Church |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Evidence shows that bus use is falling. This is because bus companies which routes are profitable and when to run them. People complain many buses don't turn up. Residents complain buses don't turn up or come too early or too late. These are very frustrating for people who are totally reliant on them. Old people attend our surgeries upset and annoyed that they can't get on with their lives. Many weekends there are no buses available from Saturday evening until Monday morning. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|--|
| Q13b Why do you say this? | For the reasons stated above. Also some people who live in rural areas complain they hardly have a reliable service at all. The drivers on the buses extremely rude + aggressive. Both male + female drivers equally aggressive. These are elderly people who depend on public transport to get out and about. However, other residents consider the bus drivers to be very helpful and considerate. Bus services still changing different prices. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |

| | |
|---|--|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | We very strongly support these proposals and consider these changes can only be for the benefit of poor people. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |

| | |
|--|--|
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

Dear GM Consult team,

Below is the Better Buses for Greater Manchester response to the GM Bus Consultation 'Doing Buses Differently'. Many thanks for asking the coalition to respond.

****Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?***

We, as a coalition support a better, publicly controlled bus network because:

1) The bus market is not working well for residents of Greater Manchester. We have lost 8 million miles of bus services since 2010, with our region's bus network shrinking more than any other region.

(<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/bus-services-being-cut-across-14296465>)

2) Fares have increased for three years in a row, with First increasing the price of its Single Adult Fare on January 2nd 2020 by a whopping 46%. Stagecoach increased the cost of its day riders, seven-day, 28-day and Xtra tickets. Stagecoach Manchester raised fares in 2019 also, some by around 6.6%. These huge increases are scandalous when the service does not improve, but in fact gets worse, as routes are cut and cut.

(<https://www.firstgroup.com/greater-manchester/news-and-service-updates/planned-changes/january-2020-fare-changes?fbclid=IwAR0tQr9duiy9UNxs-imfmGXRZPU4p1PYoM7cyQYzWvBN8QH3DsoOsejxero>, <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/travel-price-ticket-increases-manchester-17474945>, <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/stagecoach-manchester-fare-rise-2019-15542525>)

Meanwhile, bus company shareholders in the North West have received an average £18.4 million in dividend payouts a year for the past ten years.(<http://bit.ly/2VX9e2P>)

3) We have little to no control over the vast majority of services, and the network as a whole, though public money is around 40% of bus companies income. The Consultation Document for the GMCA's proposed franchising scheme for buses outlines that in the last year, bus companies have received £89 million in public money to run services.

(http://www.transportforqualityoflife.com/u/files/160314_Building_a_World-class_Bus_System_extended%20summary%20report_FINAL4_for_web.pdf, http://issuu.com/greatermcr/docs/greater_manchester_bus_franchising_consultation_do)

Bus routes and timetables do not link up well with trams and trains, the ticketing is complex and disjointed.

We as a coalition strongly support the franchising scheme, which means public control of our buses. The Local Government Association showed recently that 69% of residents think local councils should be the main decision-makers on bus services. (<http://bit.ly/31fmK2E>)

We have also submitted a petition, signed by 11,510 people: 'Dear Andy Burnham, please regulate our buses.' The petition notes: 'Our buses aren't good enough. Right now, bus companies do what they like and it's a free market wild west. We need public control. Andy Burnham, Mayor of Greater Manchester, has said he will regulate your buses. Regulation would mean affordable fares, and more evening and weekend services, all with a smart ticket where daily spending is capped.'

***Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market.**

- **To what extent do you agree or disagree with this?**

X *Strongly agree*

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

- **Why do you say this?**

We support taking control of our bus network, to give local authorities control of our bus routes, fares, and ticketing, so that the network as a whole can join up to make an integrated bus network that is more accountable to our community. Right now, this system works only for bus company shareholders.

We need buses that are clean and green and accessible and bus companies have not delivered on both fronts.

We also support region-wide standards of pay, conditions and pensions for drivers to be negotiated with Unions representing drivers, which represent over 8,000 workers in the region, so that drivers are respected for their hard work. 'Deregulation in Britain resulted in a 'race to the bottom' (Transport for Quality of Life, Building a World-class Bus System for Britain, es.5).

London's bus network is miles ahead of ours. London's regulated buses carry more people than the rest of England combined.

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/774565/annual-bus-statistics-year-ending-mar-2018.pdf).

A £1.50 flat fare on a smart card, a 24 hour, *reliable*, service is something we should be aspiring to. TfL's temporary deficit is partly because they are investing in improving services and because of huge government cuts. We believe it is great that public authorities were funding a crucial public service which keeps communities connected and the economy thriving.

We support a regulated network because we believe that 'under a regulated network, local authorities have the power to enforce standards on bus companies, telling them what services to run, when, and what fares to charge. It means a service run for you (citizens), rather than bus companies cherry-picking the most profitable routes and leaving public money to fund anything else it can.

It also means local authorities can:

- Plan and expand the network - It will mean profits can be used to subsidised less busy but needed services. Right now, bus companies cherry pick only profitable routes and make a killing, but local authorities could use profits to give all communities a service.
- Make buses affordable – They could also use income to lower fares, which have [increased 55% above inflation in the last ten years](#).
- Make buses reliable and accessible - Bus companies will have to share data - meaning buses don't disappear from the timetable or app. It also makes a [simple and single area-wide zonal ticket, with an automatic cap on spend](#) (like London's oyster card), finally possible. Without a regulated bus network, this is impossible.^[1]
- Make buses frequent - regulation means [managed \(reduced\) profits for bus companies](#). We can use this money better for evening and weekend services, like we had before.

Andy Burnham said in 2017 'today I am calling time on the [failed, free market experiment](#) foisted onto the Greater Manchester public'.

With bus companies running the show, we have a wild west of confusing ticketing, unaffordable fares and patchy services which don't link up, even if they are coming to near you. Since deregulation 30 years ago, bus use has gone down [40% in Greater Manchester](#), while in London (where they have a regulated network, or 'franchising'), it has doubled.

Regulation would transform buses for a lot of us. Partnership, the alternative to regulation is not an option – they're voluntary agreements between bus companies and authorities about what they can offer a local area. There's a reason London's buses are not done through partnerships. It's because regulation compels bus companies to deliver what we need from our buses.'

(http://www.transportforqualityoflife.com/u/files/160120_Building_a_world-class_bus_system_for_Britain_FINAL1.pdf, pg.9)

We do also supports Steady State Manchester's response to the consultation, especially with regards to:

- 1) The slow timescales for transition. We believe it would be more beneficial to transition more quickly wherever possible.
- 2) We agree that there is little on achieving a major modal shift from private motors to collective forms of transport (including buses) and active travel. We believe funding for road schemes should instead be used completely towards public transport and active travel improvements.
- 3) The franchising scheme is the best that can be delivered under the current irrational and pro-private capital legislation. We urge the GMCA to campaign for a municipal bus company option, bringing buses into public ownership and thereby reserving all operating profits for the GMCA and its transport system. This is essentially the view of the Parliamentary All Party transport Committee.
- 4) The Equality Impact Assessment carried out as part of the proposals for the franchising scheme makes it clear that older and/or disabled people, many of whom also have physical and/or sensory impairments, will benefit from bringing the buses back into public control through franchising, and we agree with this. Public control of the buses should mean that there is better access to hospitals and other health facilities such as GP surgeries: at the moment, many older and/or disabled people have to travel to these facilities via private taxi firms, at great expense. Furthermore, the fragmented nature of the bus network means that it is difficult for many older and/or disabled people to visit friends, go shopping, get to work or attend cultural events, leading to a situation where they can become isolated in their homes, lonely and with deteriorating physical and psychological well-being. Franchise arrangements could reliably improve the network of bus routes, their frequency, and safety for older and disabled travellers with consequent improvement in well-being.
- 5) We urge the mayor and TfGM to establish effective bus user and worker councils, or similar governance arrangements to maximise direct democratic governance.

I have also attached a collection of people's stories and experiences of buses that have been submitted to the campaign. We asked people to offer a story to tell Andy Burnham, a reason they support the campaign to bring buses into public control, and these moving stories are what we received.

****Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:***

- offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options,
- provide the most economic value (Net Present Value), and
- create the best platform from which further economic value could be delivered.

Do you have any comments on this?

Currently, public money makes up 40% of bus companies revenue, yet we have no control over fares, the vast majority of routes and timetables. And 10% of that public money is leaked as dividends.

Public control means we take all the fare revenue and give bus companies contracts, halving their profit margins, so that public money is used for buses over shareholders. (Transport for Quality of Life, Building a World-class Bus System for Britain, es.7).

In the bus operators' partnership proposals, bus companies say they will not run bus services if they 'are commercially not viable', meaning unprofitable for them. Bus companies have had decades to make improvements. We have no confidence that, if left to their good will, things will improve. Public control also means that profits from busy routes can be used to pay for socially necessary routes, rather than just bus company profits. Research by bus company Abellio just in the last few weeks showed that 95% of people in GM supported the idea of subsidising bus routes which are unprofitable but necessary for the public good: 'a key feature of a franchised bus network'. (<https://m.stagecoach.com/~media/Files/S/Stagecoach-Group/onebus-proposal-brochure-revised-11-01-18.pdf>, <https://www.abellio.com/news/people-manchester-we-want-better-bus-service>)

We can finally get a better bus network now by going ahead with the proposed franchising scheme.

****Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?***

We think the outlined costs, with the vast majority coming from local authorities, and a total of £14 council tax increase for the average household spread over 6 years to 2025, are a price worth paying.

These costs will mean we can get a better bus network, run for the public over shareholders, with much better value for the public money we currently give to buses (<http://bit.ly/2oRIlkr>)

We particularly highlight the World Class Bus Systems report, which shows that regulating buses across the UK has the potential to save £340 million annually. (http://www.transportforqualityoflife.com/u/files/160314_Building_a_World-class_Bus_System_extended%20summary%20report_FINAL4_for_web.pdf)

***Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?**

X - Strongly support

Tend to support

Neither support nor oppose

Tend to oppose

Strongly oppose

Don't know

Why do you say this?

1. The alternative that is on the table, the Voluntary Partnership, leaves all the power in the hands of the bus companies. Changes will only be made to the extent that they deem it in their interests. We need a system that puts the interests of GM's people first.
2. Franchising is the only option that allows cross subsidy from popular/profitable routes to less busy/unprofitable routes.
3. The additional expenditure over that for the Voluntary Partnership is not large: £25M (£122M vs £97M) over the 5 year implementation period. That's just £5M per year, or £500k per council area, or £4.34 per household per year. (source: TfGM Franchising paper, executive summary, page 23).
4. The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefit than from either partnership model.

Buses are hugely important to our lives and we have a huge opportunity to transform them so that they work for us as citizens, over shareholders.

Polling of Greater Manchester residents has revealed that 82% agree: "as local authorities provide public money for the bus network, they should have more control over bus services." Currently, local authorities have no control over the fares, ticketing and the routes of around 80% of bus services in Greater Manchester, despite the fact that some 40% of bus companies revenue is public money.

76% of participants supported the re-regulation of buses in Greater Manchester.

80% of participants said they supported a London-style pay as you go smart card ticket which caps daily spend automatically, which is only possible with regulation.

(<https://www.survation.com/majority-76-of-people-living-in-greater-manchester-agree-that-the-bus-network-in-the-region-should-be-re-regulated/>)

Further results of the entire polling are in the attached summary.

Thank you for considering and reading this response.

All the best,
Pascale Robinson

[Better Buses for Greater Manchester](#)

Better Buses for Greater Manchester - Poll of Greater Manchester Summary Document

Sample size: 1019

Fieldwork dates: 10th - 22nd January 2019

Methodology: People aged 18+ living in Greater Manchester were interviewed online.

Q1. In January 2019 some bus fares in Greater Manchester for both Stagecoach and First have increased for the second year running, some by as much as 6.6%. Comparatively, London's buses have a three-year freeze on fares until 2020. Both First and Stagecoach say the increase in fares is due to rising costs. Campaigners argue this is unjustified as Greater Manchester's bus network has lost 8 million miles of routes since 2010.

Which of the following comes closest to your view?

| | |
|--|-----|
| The increase in bus fares is justified | 9% |
| The increase in bus fares is not justified | 77% |
| Don't know | 14% |

Q2. In the last ten years, shareholders of bus companies received £149 billion in dividend payouts. This is equivalent to one-tenth of the public money that goes into supporting bus services. In the North West, an average of £18.4 million has been paid to shareholders every year over the last ten years. Some have said this is unfair as fares have increased by 55% in the last ten years, while 8 million miles of bus routes have been cut in Greater Manchester since 2010. Private companies have argued that dividend payments are a fair return for investments in improving the network. £9 million was invested by Stagecoach in 2016 in Greater Manchester for new buses.

To what extent do you think it is fair or unfair that the shareholders of bus companies have received these yearly dividend payments?

| | |
|-------------------------|-----|
| Very fair | 4% |
| Quite fair | 12% |
| Neither fair nor unfair | 16% |
| Quite unfair | 33% |
| Very unfair | 30% |
| Don't know | 5% |

Q3. Currently the bus market in Greater Manchester is deregulated, meaning that private bus companies set the fares, routes, timetables, and have various ticketing structures. They are

not required to run routes they do not want to. In London where the market was never de-regulated the local transport authority, Transport for London, sets the fares, routes, timetables and ticketing.

Which of the following bodies do you think should coordinate local transport in Greater Manchester (e.g. deciding the routes, prices and timetables and decide what company runs which services)?

| | |
|--------------------|-----|
| Local Authorities | 75% |
| Central Government | 10% |
| Private companies | 7% |
| Don't know | 8% |

Q4. The 2017 Bus Services Act allows combined authorities like Greater Manchester to re-regulate their bus networks. Re-regulation gives local authorities the ability to plan the bus network, specifying fares, routes and a standard ticketing system. Private companies would compete for contracts to provide services. This is how the bus network is run in London and Jersey. Some in the bus industry have stated that re-regulating the network is complicated and costly. While Transport for Quality of Life has argued that re-regulating bus networks could generate up to £340 million a year in the UK, due to capturing the 'excess profit' of bus companies.

To what extent do you agree or disagree that the bus network in Greater Manchester should be re-regulated?

| | |
|----------------------------|-----|
| Strongly agree | 41% |
| Somewhat agree | 35% |
| Neither agree nor disagree | 13% |
| Somewhat disagree | 3% |
| Strongly disagree | 1% |
| Don't know | 6% |

Q5. An alternative to re-regulating the bus network would be partnerships between local authorities and commercial bus operators. The services would be operated by commercial bus operators, but new standards would be decided, which bus operators within the partnership agree to abide by. Supporters of partnerships say it would be a quick way of improving the network, and that congestion is one of the biggest factors driving down bus use. Opponents have argued that compared to re-regulation, individual private bus companies would still have the freedom to decide ticketing, routes and fares and that there would be no overarching, accountable body designing an integrated bus network.

Which option for running the Greater Manchester bus network would you prefer?

| | |
|----------------------------|-----|
| A bus partnership proposal | 23% |
|----------------------------|-----|

| | |
|----------------------------------|-----|
| Re-regulation of the bus network | 58% |
| Neither | 5% |
| Don't know | 14% |

Q6. There are currently 140 different types of tickets available in the Greater Manchester bus network. If the network was re-regulated, local transport authorities could set prices and develop standard ticketing systems. This could result in simpler forms of ticketing, such as area-wide zonal tickets valid across all forms of local public transport and a pay as you go smart card ticket like London's oyster card where fares paid for multiple trips in one day are automatically capped. To what extent would you support or oppose the introduction of pay as you go area-wide ticketing with an automatic daily cap on spend on buses in Greater Manchester?

| | |
|----------------------------|-----|
| Strongly support | 44% |
| Somewhat support | 36% |
| Neither support nor oppose | 11% |
| Somewhat oppose | 2% |
| Strongly oppose | 1% |
| Don't know | 5% |

Q7. In places like Greater Manchester, the majority of bus services are commercially run, which local authorities have no control over. The remaining services are subsidised by Transport for Greater Manchester to run services where there is demonstrable need, but operators are unwilling to operate otherwise. In the UK around 40% of the bus companies' revenue comes from public money.

To what extent do you agree or disagree with the following statement? "As local authorities provide public money for the bus network they should have more control over bus services including routes, fares and timetables in Greater Manchester."

| | |
|----------------------------|-----|
| Strongly agree | 49% |
| Somewhat agree | 33% |
| Neither agree nor disagree | 10% |
| Somewhat disagree | 3% |
| Strongly disagree | 1% |
| Don't know | 4% |

Q8. Bus companies have been accused by some of holding the Greater Manchester Combined Authority 'to ransom' on whether they go ahead with re-regulating the bus network. Firms including First have said they will not invest in new buses until the decision is made over whether to re-regulate the bus network. Stagecoach have also said that the costs for their

proposed electric bus investment ‘would be borne by the taxpayer’ if re-regulation were to go ahead. However, OneBus, which represents 18 different operators across Greater Manchester and supports partnerships, denied accusations of holding any council to ransom.

To what extent do you agree or disagree with the following statement? “Private bus companies should not attempt to influence public decisions on whether to re-regulate Greater Manchester’s bus network

| | |
|----------------------------|-----|
| Strongly agree | 44% |
| Somewhat agree | 28% |
| Neither agree nor disagree | 16% |
| Somewhat disagree | 4% |
| Strongly disagree | 2% |
| Don’t know | 6% |

1.

Hello Pascale,

I have never owned a car and have had an unwavering belief in the value of public transport for 50 years although I have little confidence in the merits of a deregulated bus operation. It seems to me that privatised bus operators go out of their way to make their buses and services unappealing - probably because company management has no recent experience of having to use the services they provide. The impression is that bus companies give us those services that meet their own objectives but they really have little interest in the travelling public's actual needs if it is not going to increase their profits. They seem very keen to tell us what we want, apparently knowing more about our needs than we do ourselves.

One man operation may have been a boon for the industry but it is not for the passenger standing in the rain waiting for others to board. There is often an appalling amount of time spent at bus stops whilst the drivers carry out increasingly complex procedures, it seems, regarding passes, online tickets etc. The time seems to have increased hugely during the last year and is a first-class example of how the bus companies show disregard for those forced to use their services. It is a sad fact that I doubt anyone would use buses if they had another option.

The absence or infrequency of evening services. We may live in the third largest city but poor evening and Sunday services discourage outings. The sudden disappearance of buses after 6pm weekdays and the subsequent hourly intervals between buses mean that a night out by bus is not realistic for most people. The fact that evening / Sunday services may be also operated by an entirely different operator is patently absurd when people have bought weekly or monthly tickets and find they are unable to use them. It illustrates splendidly the lack of understanding of the needs of travellers by those who devise such schemes.

Of course it is nonsense that there should be a different major operator on each side of the city. Lack of interavailability of tickets and the loss of cross-city services following deregulation mean that taking the bus is only undertaken by those who have no reasonable alternative. I now have a senior pass but even that does not encourage me to use the buses when it is virtually impossible to cross the city centre without a change of buses - another example of how services are designed to suit the operator rather than the passenger.

A boon for bus operators' profits is the all-over advertising 'wraps' which cover bodywork and windows, where 'contravision' is employed. The effect for the passenger looking out of the window is that, at best, vision is hindered. Nothing else, to my mind, illustrates the abject contempt bus companies have for passengers. Bus companies are not so cash-starved that they have to do this but maximising profits and greed take priority over any concerns for passengers. The next step in this programme will logically require removal all the windows so that moneyspinning advertising is unfettered whilst passengers can sit in the dark. In progressing towards that point, several Stagecoach buses have already had a window 'removed' i.e. completely blacked out by an advert that has been posted over it.

Buses and public transport generally are a mess, rather like everything else in this country. I would certainly not have any faith in a failed politician like A. Burnham to improve matters.

Yours sincerely,

P.S. Since drafting this some weeks ago, I learn today that A. Burnham did not turn up at the public meeting.

Imagine my shock!

You would be better off without him.

2.

As a VERY hacked off passenger who uses the Leigh to Bolton 582 First Bus service I'm glad to see something is finally being done about the buses. A web site and facebook page is long overdue and I have seriously considered setting one up to hit back at the ignorant and uncaring company that is First Bus. This once reliable and regular service has deteriorated into a complete shambles in the past 2-3 years. What was previously a 30-35 minute journey is now regularly taking 50 minutes to an hour. Buses are late most days and scheduled services (supposedly every 10 minutes during the day) are regularly missing altogether with no explanation or apology on the all singing all dancing electronic boards in the new Bolton interchange.

Although though they have to take their fair share of the blame the buses aren't solely at fault for the timetable problems. Idiotic traffic management systems have been put in place on the Leigh-Bolton route that actually cause congestion at peak times and despite complaints I have made to TFGM numerous times these measures are allowed to persist when they are clearly not working. Bolton Road in Atherton is particularly bad and the frankly baffling decision to make 2 minor side streets at Upton Road/Douglas Street (near Atherton Station) into a major junction, immediately after two other sets of busy traffic lights, has long been a cause of congestion and delays. The other blackspot on the return journey from Bolton to Leigh is the Peace Street/High Street junction halfway up Derby street where again 2 minor roads have been made into a major junction causing massive traffic jams on a daily basis at rush hour. What was previously a 6 or 7 minute journey from Bolton up Derby Street now takes anything from 15-20 minutes to travel just over a mile to Peace Street. The traffic lights at this and the Upton Road junction need to be removed and the pedestrian crossings that were previously installed should be restored. It was no coincidence that one day last year when the lights at Peace Street were out (for whatever reason?) the traffic was moving fine and there was no sign of a traffic jam.

Journeys back to Leigh can often take an hour so it is no wonder the buses can't run on time. The queues at Bolton Interchange are ridiculous due to late or missing buses and with people often deciding to push in instead of joining the queue or sit on the seats by the timetables and just walk on ahead of those who have queued makes everyone's blood boil. If the shoddy service of the bus companies is the cause of these queues there should be a station official or an inspector policing them before there is an incident. Buses are leaving dangerously overcrowded and often still picking up passengers because the bus before hasn't turned up. The electronic boards are a complete joke. Scheduled buses are

often shown to be 'approaching' but when they don't appear the next bus is then displayed as scheduled - no explanation, no apology. Only once since the Bolton Interchange opened has anyone from any bus company come out and explained to the massive queue why buses were delayed and hadn't turned up. . Despite a mass of complaints to First bus I have received little more than an acknowledgement of the complaint and then absolutely nothing in most cases. I have asked for compensation due to the cost of my monthly phone pass being hiked up by £8 a month since January 2018 (it went up to £54 ;last January and has just gone up again last month to £58 while the service gets worse. I am sick of being ignored and stressed out trying to get to and from work at a decent time. It should not be taking anywhere near an hour to travel just 8 miles.

I don't know if the site is collecting evidence, complaints or other material to use against the bus companies but I have been so annoyed by the state of the 582 service that I have kept a log of every missing or overly late bus that I have set out to catch in the hope that it can be used to bring First Bus to account and will happily provide this if it would of any use.

3.

Better buses are important to me because: I live only 8 miles south of Manchester city centre, bus route 42B. For 2 years approx, there have been no buses to get me home from about 7pm. Stagecoach are quite happy to take us there, but not bring us back because it is not cost effective. Bloody ridiculous. They are a public service & should take the 'rough with the smooth'!

4.

Hi Pascale,

I agree!

I recently had the experience of getting from Eccles to Urmston by bus (a ten minute car journey). I had a 'First Bus' weekly pass (£17) which took me from Eccles to the Trafford Centre, but to continue my journey I hadn't realised I needed to board a stagecoach. I had no cash left to buy a ticket as I had spent it all on the weekly pass and the buses did not take cards. I am now saving up to buy a car, even though I think this is bad for the environment and our road is already double parked because the public transport system is not a viable way of getting to work.

All the best,

5.

I am a pensioner with a bus/tram/train pass and I live in Cadishead which is on the Gtr. Manchester/Cheshire border. Although I have a car I use the bus system to go into Manchester or Warrington. The only buses that are available to me are the number 67 or the 100. Only recently the operators of the 100 service changed the route of the bus sending it to the Trafford Centre via the new stretch of road and bridge over the Ship Canal, instead of down Liverpool Road via Peel Green and via Barton Road. This effectively cut off a route to the Trafford Centre for the people who live around the Peel Green area and possibly work in the Trafford Centre or close by. This does not directly effect me but it is, in my humble opinion unacceptable. They claim to have surveyed passengers before the change - I have yet to speak to anyone who was asked the question.

I avoid using my car in Manchester because of the traffic jams which have become prevalent in the city centre and roads leading in and out of the centre. I retired from being a van driver delivering in and around the city, I do not miss the driving!

A properly regulated bus/tram and train system in and around Greater Manchester is a must for the future of local travel. I know that Mr. Burnham does not publically want to introduce a "congestion charge" inside the M60 but something must be done to reduce the jams and the pollution. A survey of traffic travelling inside the M60 would probably show a vast number of vehicles with only a driver!

A regulated public transport system would, ideally, ease the jams and pollution.

Thank you,

6.

I support any initiative to improve public transport because our planet cannot sustain all of us having cars. Our society, as a whole, would benefit from having a good, reliable and affordable public transport infrastructure. All too often, our roads cannot cope with the ever increasing traffic. Fossil fuels are finite and they are very polluting, we should limit their use as much as possible until better alternatives are widely used. Because trains or trams don't get everywhere and they are more expensive, it is essential to have reliable and affordable bus services.

As a person living in a rural area and unable to drive these issues are very important to me. Where I live, the buses lack frequency, punctuality, reliability, affordability and accountability.

Thanks again for your interest,

7.

Every person living in Greater Manchester deserves to be able to access a reliable, regular and reasonably priced bus service. The fares are too expensive, it can cost around £3.50 to travel a distance of less than two miles. I live in Bury and when my son started work last year he needed to get two buses, one into the town centre and then another out the other side towards Bolton. He wanted to buy a weekly bus pass but because the two bus routes were run by different companies he needed to buy two separate bus passes every week. He couldn't rely on the buses getting him to work on time (he starts very early) and in the end he bought himself a second hand moped.

8.

I'm in my sixties and do not drive. My daily commute from Urmston to Stockport can take as long as 1 and a half hours each way, so that's another 3 hours added to my working day which makes for an exhausting day.

9.

My life would have been a lot duller without buses, to get to Manchester for better shops and entertainment, to and from school-and work! To get to the

Hills and the moors at weekends, and to keep in touch with friends. To get to trains and ferries then to be able to escape to far distant places!

Well now it all changes, you move South, you have responsibilities. A car becomes essential, your local shops close, and so on.

.Forty, fifty years later you can have a bus pass, and explore neighbouring villages and towns and talk to friendly folk.....until the Monster' Stagecoach moves in, gets Council contracts by undercutting the reliable local bus companies, then runs the rural services down. Three years ago I could spend the day at any of five pleasant local towns in this tourist area and pop easily to three local villages for a bit of shopping. Now we are almost cut off, have no late night or weekend services and many villages have no bus at all any more.

10.

I think it is important to have good, affordable public transport links if we want to consider ourselves to be a world class city. Not only for the residents of Manchester, especially older people who may find it more difficult to get around, but also for the increasing amounts of tourists we are attracting to the city.

I am a regular bus user and in my experience services seem to be reducing while the demand is rising. Private companies seem to be making plenty of money while putting up fares and reducing services. Most services in rush hour are now a pretty uncomfortable experience due to the high demand and cutbacks in services.

Kind Regards

11.

Hi Pascale

I live in Northern Moor, South Manchester and I am shocked at the removal of the bus to Manchester City Centre from the area and the bus to the Trafford Centre.

Stage Coach and Arriva have said that there is an alternative bus, however, it is over a mile away which can make travelling with youngsters very difficult.

Apart from the inconvenience, the reduction of bus services has a big affect on the elderly, who may not be as confident in getting more than one bus to their chosen destination, which stops them from getting out and about and reduces their independence, which can have a knock on effect with their mental health.

I think it is very important for local communities to have a decent bus service and it is because of this that I support the campaign.

Kind regards

12.

Hello Pascale

I have lived in Manchester for 10 years and have regularly commuted to work using public transport.

I am based in Whalley Range and have commuted to various locations, including Bury, Ashton, Hyde, Sale, Stepping Hill and Manchester City Centre.

Despite the fact that I live 2 minutes walk from a bus stop on a well-served bus route (85) the experience of bus commuting has been so bad I prefer to cycle, use the tram (nearest tram stop is a 15-20 minute walk), or a combination of cycle and train. This is not as convenient as using the bus, but has worked out more reliable. Even cycling to Bury or Hyde works out quicker than getting 2 buses and connection time in Manchester City Centre.

I would have particular suggestions about buses and public transport in Manchester based on my experience.

The cost of bus fares should reflect the service that is deliverable. At the moment none of the bus companies can deliver a reliable service.

I have seen repeatedly an attitude among friends and work colleagues that bus travel in Greater Manchester is not a viable option for work commuting, even if they have been open to using buses. Reducing fares by at least half would be a first step to encouraging people back on to the buses, obviously also requiring an expansion of services. The freezing of the System One weekly ticket price over the past few years would seem to reflect that reality. A few years ago I paid £20 for this ticket, which is now £18 for travel on all bus services in Greater Manchester, and fairly close to the weekly ticket prices offered by individual companies. I think this should be reduced further and a system of fare caps introduced.

It should be easier and not cost prohibitive to move between different modes of public transport and different transport providers. The reality of commutes, particularly over longer distances, is that

some combination of bus, tram and train will be the quickest and most convenient way of travelling. I don't think the public transport infrastructure is very well integrated in Manchester, there is definitely room for creating more transport hubs where switching from one provider to another is made easier.

Finally buses should be an urgent priority and the foundation of the whole of Manchester's transport infrastructure. The transport infrastructure is clearly becoming untenable due to the pressures of traffic and the fact that there are too many cars for the system to support, with gridlocks across whole areas of the city becoming more frequent. The expansion of the tram network has been welcome but seems to have been accompanied by cuts in bus services. The population of the city is growing so a radical rethink of the whole transport system is needed.

Thanks

13.

Hi Pascale

I filled in the questionnaire a while back. I don't pay fares on the transport as I have a disabled pass. however before I got the pass I objected to paying bus fare from the bus stop before I got on to the bus stop after the stop I got of at. I do think you should pay the fare for the journey you make, from the stop you get on to the one you get of at. For example if I board the 50 bus at Kingsway /mauldeth road going to east didsbury I should pay from Kingsway mauldeth road not Kingsway /grangethorpe drive.

14.

Hi Pascale,

I live in Scotland and not in Manchester, but we have exactly the same problems. Privatisation and deregulation have left many outlying rural areas without any public transport and this is, in my opinion, an unacceptable situation. Provision of unprofitable but vital services should be imposed on bus companies by councils as part of their licensing conditions. My involvement is only a small way of showing solidarity with the people of Greater Manchester who have similar problems. I hope that helps.

Regards

15.

I regularly use the Stagecoach No. 658 which runs Wigan/Leigh/Higher Folds. Everyone passes a comment if the service is on time as that is an unusual occurrence. Quite often 2 or 3 will turn up together which means that, if the one you wanted didn't turn up, you could miss an appointment or a connecting bus service. I feel that the route is too long and it would be better to have 2 separate services, one that does Leigh/Wigan and then Leigh/Higher Folds.

16.

Hello Pascale,

I use public transport almost everyday. I work nights. I buy a bus pass.

Over the last 18 months I have experienced bus route cuts and stopping of services, both early am and pm making my commute even more stressful. It takes me two buses to get to work, I need these to run as close to timetable as possible to connect, or as a couple of weeks ago I had to take a taxi at a cost of £13, on top of my bus pass !

I used to buy a yearly Anybus pass which has now been stopped so have to buy 28 day pass, costing me approx £200 per year more ! HELP !!!!

17.

There are two reasons why I support the campaign, first I am user of public transport I really on public transport to get to work and from work there is nothing more destroying than when you have done a days work and you have been on your feet all day then at the end of your shift you are stood around waiting on buses that can be 30 minutes late or does not turn up.

Secondly I work at the local hospital and the number of staff that are under pressure doing their jobs and also are stress out because they are worrying about if the bus is going to turn up on time or if it is going to turn up, they need this service because there are parking problems at the hospital so they would not get a parking spot and some of them travel some distance so can take them anything up to hour half to two hours to get home when they may have done a 13 hour shift,

18.

I waited nearly an hour this morning for the 42A which didn't turn up, I had to do a 15 minute walk to the A6 (Stockport Road) to get the 192 and when another 15 minute walk to work – I was freezing!

19.

Better buses are important to me because people on low incomes and those who can't drive rely on public transport and deserve a good service. If more people used buses it would help the environment by reducing the number of cars on the road.

20.

Hello,

I live 6 miles from the nearest city and town. There haven't been any railway stations nearby since the 1960s and so we rely on our own cars, bicycle or buses. Many people in this part of the world (rural Somerset) are elderly and either

can't or don't want to drive. Although I cycle as much as I can locally, there are times when I would prefer to catch a bus.

Our bus service used to provide a three or four times a day service into town until it was discontinued suddenly when the operator went out of business. It was replaced as a temporary measure by two organisations with a shared service so that passengers have to change buses in a village in the middle of the route. The buses themselves are long wheelbase 'transit vans' which have no luggage space or room for wheel chairs or push chairs (wheel chair users have to order a trip the previous day and then they remove a row or two of seats). There are very few actual bus stops so passengers are expected to stand in the lane (no pavements) in all weathers and flag down the bus. The timings of the buses are not very helpful and stop late afternoon, which means that buses cannot be used to get back from town at night. There is no way of knowing whether the bus is late or you have missed it, so you have to be there well in advance of its expected time just in case.

It also only runs during the working week and not Saturdays or Sundays.

Most of the users of this service live in a village only a mile or so away from town and if they get on first and the bus is full other passengers are left to wait for the next bus (an hour or two possibly)

Most of the passengers are using a bus pass. This pays the operator a measly 75p which is grossly insufficient for a profitable service. If we are given a bus pass it should be subsidised sufficiently.

So to sum up our bus service, 67 from Wookey Hole to Burnham on Sea, via Wells and Wedmore, is **unfit for purpose** and needs a complete change. This service serves many villages on its route.

At the moment there is a bus service from Cheddar to Wells which is on a diversion via Wedmore due to road works. It is not allowed to stop and pick up passengers along this route despite the fact that it runs several times an hour for longer times and at weekends.

Thank you so much for reading my thoughts on our poor bus 'service'.

21.

Hello, I first used Manchester buses about 1970 when visiting a friend there. The SELNEC network was co-ordinated and easy to use and made travel possible without prior planning (and no internet to refer to).

Later when trams were introduced, the city began to look like a modern European city (compared with which we had been far behind) and open the concept that travel could actually be faster without a car!

From my experience of travel worldwide, the most civilised cities are those where the car does not dominate. Public transport of a HIGH standard benefits everyone and makes a net contribution to the wealth and well-being of a town or city. Buses are one of the many essential components of this success. I wish you well with this campaign.

22.

Despite seeing massive changes in Manchester in the eight years I have lived here, I have not seen any improvements in the quality of the services provided by buses. In fact, the only thing that seems to have increased is the price - and way beyond the national inflation rate. A 15-minute ride from my house to work now costs 2.5 pounds, and this is not during peak time! Furthermore, the fact that the system is fully privatised and completely deregulated means that you can buy a day pass to go to a place, and found that you cannot use that pass on your way back because a different company operates the same route after a particular time! While other British cities have been showing arrival times at bus stops for more than a decade, still here we have no clue about when our bus will arrive. If they worked like Swiss buses, that would not be a problem, but they rarely keep to time – and road works in Manchester might explain part of the delay in recent years but not the utter incapacity of all buses to arrive and depart at the fixed time.

What we need is a wholly integrated system in which one can use buses, trams and trains, without necessarily having to purchase multiple tickets depending on the medium of transportation and the company operating it. We also need affordable, reliable and clean buses that connect better all the different parts of the city. If Manchester wants to be indeed a global city, as it claims, it needs world-class buses and what we have is very far from that. Otherwise, we will continue to see Manchester roads full of cars, traffic jams, and many more taxis and Ubers, all of which will continue to have a negative impact on the quality of life of people in Manchester and on the environment.

23.

Hello, I live in Cadishead we have 2 buses 67, 100, yesterday we waited nearly 2 hours to get home. 2 67's went through not in service. It happens everyday it's not good enough. If you ring up they don't have an explanation. The drivers take it up on themselves and tell you openly that if they are running late they just terminate the bus as we are too far out for them to travel.

24.

We need to have the same services as they get in London and they the South East of England why are we spending Forty Times Plus more in London than the rest of England even Scotland gets a better deal than the rest of North of England and we have a bigger population than Scotland, Wales and N. Ireland this cannot be right.

We need money to be spent in Stockport and a proper transport system we've been neglected by Greater Manchester and London.

We need to change the system take money out of London and spend it on the North of England reduce the amount we give to London 50 to the North of England.

Things need to be changed immediately.

25.

My story: Better buses are important to me because more buses means less cars means less pollution means less wear and tear on the infrastructure equals less high maintenance equals financial savings. Less pollution means the ozone layer is less likely to collapse means people are less sick equals financial savings to the NHS.

26.

In order to travel from Cheetham Hill to Withington Hospital by bus I would need 2 day passes (First and Stagecoach) or a more expensive (than one travel pass) System One pass and have to change buses (now 42 doesn't run there).

Hopefully if the buses were run for people and NOT for profit I could have one day pass for the whole journey and routes might link up hospitals.

I go by Metrolink as it's cleaner, quicker and more direct and I can use one ticket.

Hope this example helps.

27.

Hello,

I like to use buses to get around - to go shopping or to get to our local bridge club for a game. I am now retired but I often used to go to work by bus. But our local buses are often late or occasionally don't turn up at all. I blame the management for setting impossible timetables but also of course the amount of traffic on our roads makes it difficult for the buses.

I also like to go for days out on buses but there are fewer possibilities these days due to the reductions of inter town services.

28.

I support the campaign for better buses (and lower fares) in Greater Manchester because we need better buses everywhere! To get cars off the road so as to drastically reduce carbon emissions and air pollution.

29.

My name is [REDACTED], I'm 62, and accepted ER/VR from the local council in 2011, both to care for my elderly mother and because my own health wasn't good. I had expected to draw my state pension in 2016 but got a letter from DWP in 2013, announcing my new retirement date in 2022, at age 66. When mum died in 2015, leaving me alone and living on just my small occupational pension, I had to

start using my savings for everyday living expenses, and my car became an expensive luxury I could no longer afford.

Buses, therefore, became my lifeline - without them, I'd be isolated and would also lose my independence, unable to get into town to do banking, errands, shopping, etc for myself. I do find the cost of fares is prohibitive, as I'm not entitled to any benefits, so I can only afford to get out once, perhaps twice a week at most. Had I been born just a few years earlier, I would have been entitled to a bus pass at age 60, and I would certainly find this very useful to allow me to get out more often, but even lower off-peak fares would be very helpful for people like me.

30.

Manchester is gridlocked. there are way too many cars on our roads. Tram system is good but ,of course doesn't cover many routes . A decent bus service with affordable fares and visual time display screens at the bus stops, which they have in London and Nottingham and other cities.

31.

On my birthday we took the bus to the Whitworth Gallery. The V1 and V2 service appeared to be an easy option to get there from Salford. Coming home we had to wait one and a half hours in the dark, cold and rain for a bus. Plenty of Stagecoach buses went by but we had a First Day Pass and so couldn't make use of other buses and had to keep waiting and waiting. This can take the shine off a birthday treat.

32.

Hello,

I use First Buses to get me to my job as a NHS Community Dental Nurse, and the past few months have been a complete nightmare.

I live in Winton and travel to Pendleton and Eccles Gateways every day, and the service is terrible. There is now only one bus which goes direct from Eccles to Winton/Worsley – the 33. It is completely unreliable, and there have been changes to the timetable which have reduced the service further during rush hour.

There is no bus which goes direct from Winton to Pendleton (Salford Shopping City). This is a disgrace – as a resident of Salford I should be able to get from anywhere in the city to the main shopping centre.

The recent roadworks at Regent Road have had a profound effect on the traffic and it now takes me up to an hour and a half to get home from Pendleton to Winton. The person who was in charge of planning this should be sacked – they have caused untold misery to thousands of Manchester and Salford residents.

I think taking the buses in to public control will help a lot in improving the service. We are constantly being told to use public transport to improve air quality etc, and yet why would anyone in their right mind do this when the bus service in our area is so unreliable? People have to be able to get to work on time, it's as simple as that. Until there are radical changes in the bus services in Greater Manchester, car usage will continue to increase and this will be **a direct result of the failure of our Politicians.**

Kind Regards,

33.

Hi Pascale,

I live in Whalley Range, M16. I'm 75 years old, active and very involved in local politics and cultural events in Manchester.

I love going to the cinema, literary events and the theatre. I also take part in lots of fitness activities such as swimming and keep fit.

I totally rely on buses to get to these events. Without a good bus service, I know that I'd be far less likely to go out especially in the evenings, see friends regularly and take part in all the fitness, cultural and political activities that I'm involved with.

As an older person having a reliable and frequent bus service means that I can keep doing the things I love doing. These activities mean that I'm not isolated and I remain mentally and physically fit. Without a good bus service I would not be able to do these things.

I'm willing to share my story.

Best wishes,

34.

Greater Manchester deserves the quality of service co-ordination that London enjoys - anything less is would be discriminatory.

35.

I don't do selfies and I don't catch buses so often. I usually take the tram when going into town from Chorlton as it is so much quicker and comfortable than the bus.

I do rely on buses to go to Woodbank Park in Stockport where I volunteer once a month at the food hub. I use a combination of tram/bus/train to get out and about to join walks with Manchester and Salford Ramblers to visit family and to get about to other places. We need a joined up transport system where buses mesh with other transport.

36.

Some of the Magic Bus fleet operated by Stagecoach are really old. Some of them belch out some really noxious fumes. There needs to be better regulation of emissions from buses.

37.

My wife and I use buses a great deal, to avoid the hassle of driving and to avoid parking charges. We have an excellent, integrated, service in Edinburgh, because services are run by a council-owned company. This contrasts with Glasgow, where local services are operated by different companies and tickets are not interchangeable.

Also in Edinburgh many of the extra-urban routes are run by First Group, who drop services from time to time and the council-owned company has to pick them up.

London has an excellent integrated service. All conurbations should have the same.

38.

I support better buses EVERYWHERE. Where I live the bus services are a joke. Hold it, 'bus service' in the singular as there is only one and that is useless. I spent the best part of 50 years in the bus industry and we warned in 1986 that privatisation and de-regulation would be a disaster and it has been - in spades. I worked for First (Worst in truth) after de-regulation and we were left behind in both wages and working conditions.

The most important thing is to re-instate the terms of the 1930 Road Traffic Act which regulated bus services everywhere apart from in London. It was an act which allowed all the operators in the Greater Manchester area to co-operate and co-ordinate services and it worked. The Tories destroyed all that because they couldn't care less as none of them ever use a bus. The sooner we have a Labour government under Jeremy Corbyn the better as the current shower are a joke and, yes, whether Jeremy Corbyn did or didn't say it, May IS a Stupid Woman and she needs to be kicked out ASAP along with the rest of her useless and uncaring Tory cronies.

39.

Private companies run buses for profit and not for the public. In Doncaster where I live First Buses change and amend routes without any public consultation. We have the ridiculous situation where if one lives in Hatfield Woodhouse there are no buses on a Sunday or after 7.42 in the evening. Also parts of Broadway were left without a bus service and the elderly had to walk anything up to a mile in all weathers to the nearest bus stop. (after public complaints this has now changed)

The buses still ran but routes were amended to be supposedly more efficient and provide a better service. The people who plan and run the buses obviously do not travel on them.

Buses should be run by the public for the public not only in Manchester but throughout the UK. Privatisation has failed the public

regards

40.

I went out to go to bury for an appointment two buses were missing only this week.
My son in law was working for an agency and had the chance of a full time job but lost it because he was late one day the bus did not turn up.
My mother in law waited 45 minutes (she is 85) for a bus that should be every ten minutes
I could go on this is all in the last month involving my family

41.

In London, you can jump on a bus and change buses within the hour for the same fare while monitor their arrival and departures via an app. In Manchester, privatisation means that we have to pay an extortionate price for a short ride and have to wait in the rain until a bus comes or walk for miles not so to avoid paying for another company's fare. Often, a taxi is cheaper to take and share -- which is criminal, also for the environment. Please give us buses that work!

42.

I live in the countryside and as my wife and I get older the more we will have to rely on public transport to go to shopping. There are two journeys a day to our local town.

43.

I have no option but to travel to and from work using First Bus services as I live on the Manchester/Royton/Milnrow 24,181 & 182 route where First Bus Oldham has the monopoly. I can actually get to a train station but sadly that service is run by Northern Rail, which is also a nightmare and to get a tram I would need to get a bus to a tram stop. I leave for work fairly early morning and to be fair to First I rarely have to wait any longer than 30 minutes for a bus to turn up, (although there are meant to be 3 in that time) but return journeys are an absolute shambles. Take for instance the week beginning 10th December, every single day I waited no less than 45 minutes and on two evenings more than 1 hour for a bus, by the time a 'SINGLE DECKER' bus did turn up there were literally over 100 people waiting. You can imagine the mayhem that ensued each night as people were scrambling to get on.

The knock on effect of this is those that need to get that particular bus on Oldham Road after the bus has left Manchester City Centre have absolutely no chance, bearing in mind they too have already waited probably over an hour and the first bus that actually arrives is chocka full so sails past. This isn't an unusual scenario, it happens on a very very regular basis. Some time last year a First Bus Senior Officer addressed a Council Meeting and held their hands up saying they agreed the services First were providing were poor and acknowledging that something drastic had to happen. They were given 6 months to 'put their house in order'. Here we are over 12 months later and are still waiting for them to sort out the downstairs cloakroom let alone the whole house! but it seems to me that neither TfGM or the City Council have any influence or power to force First Bus to supply a decent service, apart from probably sanctioning them in regard to the subsidised routes that the council pay towards.

Added to this I have never yet heard Andy Burnham attempt to address the bus issue, he seems to be only interested in the trams and trains. The service they give on my particular route is shambolic. I used to email to complain but the replies are just rhetoric , its roadworks, its traffic, but never the actual real answer which leans towards 'we just don't have enough vehicles or drivers'. I am not asking for special treatment, all I want is the for the route to be opened up to competition of other services to give people a fairer chance of getting to and from work at a reasonable time and not having to add 3 hours onto their working day to account for buses that just do not arrive or for First Bus Oldham to run my route to the timetable THEY SET. And now they have the nerve to announce a fare increase, it beggars belief!

44.

Hi. I actually live in Portsmouth but I support Better Buses in the hope that any changes to bus services and support for public transport will eventually get to my city. I depend on the bus services and can see how cutting bus services is making more and more people get in cars to get themselves around. Portsmouth is a city that cannot take many more cars on the road so better bus services would encourage people out of their cars and into buses, leaving the roads less congested.

45.

I recently and very reluctantly stopped using buses to get to work after using them for over 20 years. Last winter was truly dreadful as First buses did not heat the buses on many occasions. I have Raynauds disease and my hands and feet get really cold. I complained to First using all their processes and then through the Bus complaints system. FirstGroup bus did not acknowledge they were not heating the buses. People were getting on the bus with blankets.

Very supportive of regulated buses.

Happy to share my story.

46.

Hello, I support better public transport period. But buses emit noxious fumes but trams do not. So I support more tram routes esp Bolton-Radcliffe-Middleton-Oldham-Ashtn

47.

Just by chance I saw something about buses so made an inquiry only to find it was Manchester, I'm in Greater London.

We are losing several bus routes and I shall have to take 3 buses to get to Oxford Street instead of 2. I have never had a car but some people will get their cars out when the bus no longer goes their way !

My beloved Ken Livingstone wanted buses to be free (when he was leader of the GLC) so tha cars would not be used. Under this government we will soon be charged for breathing.

48.

Our bus system is expensive, unreliable and not at all transparent. When I recently bought a house I could not buy a house in the area I had been renting as relying on a single bus route to get to and from work was not feasible. It was often taking me over two hours a day to make the 5 mile journey in and out of the city centre. Buses at peak times were often so delayed or cancelled all together meaning I was constantly late for work. Additionally at the weekend there was often only one bus an hour, not what you expect in a major UK city.

I now live in Swinton, which is serviced by more routes. However, a single ticket into the city centre on first bus costs over £4, with stagecoach £1.50, that is a significant difference and is a prime example of why buses need to be regulated to ensure people across GM are paying a fair price for their journey.

49.

Hi,

I tried to get into Manchester on a Saturday teatime earlier this month to go to the Xmas market with two small children. The scheduled 197 was over 20 mins late (as it always is) and cost £9 for a return for me and my husband. The bus journey took us over half an hour. On the way back we waited for 30 minutes for a 198 bus that never showed up, had to race across town to get a 192 and then that took 30 mins to get home. This all took place in the rain and cold and took a hugely long time to do a 4 mile (ish) round trip. My husband didn't want to get the bus in the first place and I had to strongly argue against driving. The trains were on strike so that wasn't an option either.

If we want people to stop using their cars we are going to have to make it easier and cheaper to get on public transport. Currently it's not.

Thanks,

50.

Now I'm retired, I want to get 'out & about' as much as possible, without adding to congestion & pollution. Keeps me fit & active, good for mental health, & enables me to contribute to our community by volunteering!

51.

Buses carry more passengers, use less road space and collectively use less fuel and create less pollution.

52.

I don't live in Greater Manchester but, hopefully, any success there will help people suffering because public transport, especially buses are being cut. I live in a small village 1½ miles from the nearest bus. This is in the next big village, where there are

no banks plus the bus service into the nearest city has been gradually reduced to an hourly service.

53.

Better buses are important to me because although I no longer live in the Manchester area, it is both where I was born, and where I spent my formative years. I can still remember when our only form of transport were either walking, or the Trolley buses, that we would catch at Crown Point, Denton, to go into the centre of Manchester. It was not as much fun when those buses stopped running or watching as the guards swapped the pick-up arms from one set of overhead wires to another.

As I grew older the number of private cars increased, and the buses became slower and slower as they got caught up in traffic jams, made worse by the increasing numbers of bigger and heavier wagons, taking freight from the railways, to put it unnecessarily (to my young mind) on the road. Dr Beeching had a lot to answer for !!

It is obvious to me in my later years, that the more people who can be convinced to use Public Transport, the less congested our roads would be, and hence the less pollution we would generate, and the less energy we would waste. In addition the less stressed we would become due to all the hold-ups.

Unfortunately for this to happen, what is needed is a complete, public transport system, that is clean and efficient, and suitable for the needs of the whole of the general public, and until the national government can be convinced of that, it is unlikely ever to see the light of day, particularly under the auspices of a Conservative, "I'm alright Jack, sod everybody else" thinking government, with their ideology that includes that self-defeating, utterly useless and completely unnecessary policy of Austerity.

54.

Hello, Pascale

I'm sure I answered this question at your recent meeting at Arena Point in Manchester when your photographer also took my picture. Like many others, I no longer drive a car, so it is either the bus, the tram or the train if I wish to go anywhere. I can't always expect somebody else to offer me a lift in their car, so the bus is the next most convenient option. At the same time, it is noticeable that there is a campaign for cleaner air.

There is a very important poster, ironically opposite a new secondary + primary academy, on Rochdale Road at its junction with Queen's Road which informs us that a day spent at the side of a busy road is equivalent to the passive smoking of 13 cigarettes! Time for Flrstbus to join Stagecoach and give the citizens of north Manchester decent buses with the latest filter emission technology instead of fobbing us off with vehicles which should be in Crich. These newer buses also give passengers a much more comfortable ride.

55.

Hi

Im a 60 year old grandma. I work part time and I can get a 111 bus to work on Oxford Rd but most days I walk because the buses in the morning are too crowded. I should have had my state pension and free bus pass this year. But now I have to wait till 2024. Im on a low income. I dont drive. I have to get a 15 bus to pick my grandkids up from nursery at least once a week. My £15 stagecoach pass does not cover the bus I can get from the nursery at Stretford Arndale to near my grandkids home. Its a small single decker blue bus along Chester road. I can only get a single buggy onto it. So I have to make a 3yo walk half a mile to his house as I push a 1.5yo in the single buggy. Small buses dont help. Fragmented services dont help. The only thing Magic about Magic buses is that they hold together at all. The bus stock is not being updated quickly enough. Can 60+ please have free bus passes?

We are already being robbed by the State?

Thanks

Im happy to have Andy Burnham join me on a day I have to pick up my grandkids. Preferrably on a rainy day so he can feel what that is like.

56.

Hi Pascale,

How to sum up what's wrong with public transport in Greater Manchester? My commute is from Baguley to Stockport. If I were to catch a bus it would take me almost 1h. To put it in perspective: I can run the distance in just over 1h, cycling takes me only 35 min. People will never choose public transport for their commute for as long it's this inadequate and slow.

Tackling congestion and air polution in Greater Manchester can only be done by making public transport the easiest option, which means redesigning the system. Better, smarter routes. Local buses serving each stop on route but supplemented with express busses which only stop at main connecting points. One ticket system, so you can change busses as required.

Also, connecting Greater Manchester without having to go through city centre.

You can use my rant if you wish. I do not really have a picture of myself, I'm not a selfie person.

Kind regards

57.

We need publicly owned and run buses, free at the point of use. We need lots of them, to help avoid worst of climate disaster that looms. This would be easier, cheaper, and safer for nearly everyone.

58.

I had a stroke two years ago. It has affected my vision so badly that I have sent my licence back to the DVLA and given away my car. Now I am dependent upon public transport and lifts from family and friends

59.

Better buses are important to me because I live in London which has, generally, good services. I rely on these and can not imagine what my life would be without them. Everyone in the UK should have good, reliable bus services. Go for it Greater Manchester! Irene

60.

Public transport as well as being important for some older people to get around, buses are good for the environment and relieving congestion if well filled with passengers. Imagine the amount of fuel saved nationally and less pollution if only we could attract more people to use them.

61.

I catch the 524 service every Saturday ,after leaving work at 18.00 and get to the bolton bus station 10 minutes later, there are buses on the timetable for 18.15, 1825, 1835 but nearly every time I get there the buses are scheduled and do not turn up. When I last asked TfGM staff what was going on the reply I got was " you know as much as we do, first bus don't communicate with us" if this is the case first bus should be stripped of there franchise, at the end of the day they don't give a monkey's whether there services run or not and do not care about any sanctions TfGM can impose.

62.

Better buses are important to me because I need to catch a bus to work. The bus is often late which makes me late for work I am having to go out earlier to catch an earlier bus to get to work on time. This is longer I am away from family.

63.

I don't use buses very often these days, however, until I HAD to use a car for work purposes as a community therapist I was a daily bus traveller. Buses are the heart of Manchester. Trams are great but they can't get you right into the area you require unless there is a fixed line taking you there. Buses can take you anywhere!! Some companies are taking advantage of this and charging premium prices, this is silly as people realise they can get a taxi for virtually the same price, or even cheaper if sharing with another person.
Please make our buses great again!!
Thank you

64.

Thank you so much!

share the reason i support a better service from buses there are insufficient spaces for disabled wheelchair users of which i am one so the likes of Andy Burnham does not speak for those of us

whom are so incapacitated liebour lost that capacity over forty years ago claiming they speak for the working class i also had a issue with mega bus on long distance hauls in respect to the disability's act re wheelchair access on the buses again that subject was in regards to weights and die-mention of wheelchair's those like myself feel we are being ignored so only travel arrangements left open to people like myself is rail network

65.

Where I live in Blackley there are no buses nearby and I have to walk 15 minutes to the nearest bus stop on Rochdale Rd. As I am in poor health this is a very long walk especially if I have to carry shopping home. The weather doesn't help either. There used to be a service (64) but it has been withdrawn from our area. I think that as Manchester is Englands 2nd city it is unbelievable that we have such a poor bus service and no night buses for people who enjoy a night out. What about shift workers coming out at night and no buses? And the prices are outrageous !

66.

I am supporting this as I support all such campaigns nationally, and not just in relation to buses. The privatisation of public assets has of course been a total disaster and needs to be reversed across the board ultimately. One might hope that Andy Burnham would know this as well as anyone

67.

Hi,

I was very annoyed 4 years ago when Martin Griffiths the Chief Executive of Stagecoach (him that made a mess of the East Coast line) claimed in a letter that appeared in the Guardian that old people should not have bus passes and pay the fares. The next day someone also wrote a letter to the Guardian reminding him of his offices full of people making claims for grants and subsidies for his bus company.

<https://www.mirror.co.uk/news/uk-news/unaffordable-bus-passes-old-folks-4836524>

Where I live Marple in Stockport predominantly people have to ride on Stagecoach buses and pay his prices with little alternative except for 2 services run by High Peak.

Understandably I support the public control of bus services.

68.

Better buses are important to me because as a pensioner, buses reach all those parts of the city even the tram doesn't. Also, as the son of a bus driver, I won't break faith with my Dad.

69.

I'm very lucky living near the 142/42 bus route on Wilmslow Road where a bus comes every 5 or 10 minutes. I think a similar servicee should be available to everyone in Greater Manchester.

70.

I live in Moss Side, which is less than 2 miles from the centre of Manchester. I normally use a bus pass as I am over 60. However, when I travelled before 9.30am so had to pay, I was surprised to find that the cost was £2.50. This does seem excessive.

71.

Because after cars, its the most important 'mode of travel to work' in the North West, and Greater Manchester. (from government stats 2017) its double the train %. Its the only way to provide the density and frequency of networks of transport that can possibly begin to displace cars, and if you are serious about enabling the population to avoid early death by pollution, we have to do that. Its the quickest way (far quicker than trains or trams).

I should think its probably the cheapest. Its the best way to provide the connectivity that less advantaged communities need to enable them to take advantage of all the new jobs you want to create in Greater Mcr., as they are less likely to have access to a car, or be able to afford trains, if there is one.
In conclusion, we urgently need Better Buses!

72.

The service has been terrible now for a long time. Buses not arriving on schedule meaning overcrowded buses is a major issue. Also why can Greater Manchester not have a 24 hour bus network? Lots of people work shifts and can find themselves stuck at work in an emergency. Times change and this should be a requirement.

Also Greater Manchester should have one central bus company. Lots of different providers makes planning more difficult than it needs to be.

I personally think an underground rail network like London should be the ultimate goal. All the councils of Greater Manchester should be involved and all the town centres, stations and of course the airport should all be provided for.

73.

while I don't live in greater Manchester, nonetheless I'm old enough to recall when public transport was a service and the roads weren't an endless belt. Not until we can return to functioning national logistics can the economy begin to pick up and people's lives start to make sense.
All the best,

74.

I live in Shropshire, not Manchester, sorry; however, you have to use a car around here given how little public transport exists, and costs.

75.

Hello Pascale,

I support the cause for better buses because I believe that an effective and comprehensive transport system is essential to minimising the impact of traffic and therefore pollution, as well as allowing individuals to travel economically so that they might have greater opportunity in employment, social activities etc.

My wife and I are retired, we live in postal code (Ramsbottom), access to public transport is a mile walk down a steep hill, the walk back home from the bus stop is a daunting mile walk up a steep hill needless to say we mostly travel by car as do most people in my neighbourhood. Prior to deregulation a bus service ran past my door if this service still existed life would be very different.

Regards

76.

Over the last few years, Cheadle Hulme has lost :

1. Direct buses to the airport (previously served for 40 years)
2. Lost direct buses to Wythenshawe Hospital.
3. Lost evening buses to Manchester
4. Lost many evening buses to Stockport
5. Reduced frequencies on many routes.

Meanwhile, the forthcoming Stagecoach price rises are three times the rate of inflation.

In London, buses have to have on board visual and aural route information- here no. In London, Bus fares are low and flat rate, some of our fares are £5.50 for a single 5 mile journey.

In London tickets valid on all buses - here too many operators on same route.

No real time bus information in Manchester at major bus stops or even in brand new bus stations. That is unbelievably backward.

Manchester buses are Poor- unreliable- infrequent- expensive & lack bus stop & on board information.

Only a regulated system like London can reverse our bus network failure.

There is no incentive to use buses in Manchester to their full potential because of the cartel between First in the North & Stagecoach in the south.

Cc

77.

I believe a great city like Manchester deserves a great public transport system that caters for the vast population of Manchester.

Buses are run to cater to the companies, are overcrowded, dirty and expensive. Shift workers struggle to get into work either early morning or home late evening and are few and far between on bank holidays and Sundays.

Stop cars going into the city centre, just buses and taxis. Give us a travel system for the future.

78.

Hi Pascale,

Great to hear that someone is active on public transport

Unfortunately I live in Derbyshire whose transport issues are too awful to mention.

79.

It's not just for Manchester, we should have better bus services everywhere - especially in the countryside! As with all our actual and cultural infrastructure, that service has been progressively degraded by Governments. It is not enough to bleat for more money, we must be prepared to pay more taxes to improve those services - instead of splashing out on the latest gizmos - as there is no money otherwise.

80.

Hello Pascale

Haven't got a story for me. I'm fortunate enough to be able to walk short distances but some people I live with can't do that so rely heavily on public transport, or taxi, which of course is expensive.

Taking off the 370 especially impacted on our lives because the 288 which took over is only every hour and none on a Sunday.

I am only writing about our local service but I am sure it will be the same story throughout Manchester.

Anyway Pascale I hope our cries in the wilderness will be heard by someone and wish you best of luck with your campaign.

Sorry can't do picture, don't know how!

Sincerely

81.

Better buses are important to me because I believe we need to get more people onto public transport throughout the country to minimise climate change. If Manchester sets a good example maybe the rest of the country will follow suit

82.

I support better buses because I frequently use the number 8 from Kearsley into Manchester and It's not uncommon for three to come at once, preceded by a half-hour wait when (annoyingly!) many say 'every ten minutes or better' on the front. It happened today. To be fair, much of it is to do with traffic volume and also, I suspect, because there are far too many traffic lights in Farnworth and in Manchester centre. I have had similar experiences with the 37.

Our local service from Ringley (512/513) has been punctual recently, and in some ways it's a good idea to have a 15 minute interval between them because if the first is missing, there's not too long to wait for the second. However, this leaves a 45 minute gap with no service and there's nothing after about 6.30 in the evening.

If we could improve these services, more people would use them and this would help to reduce traffic congestion and air pollution.

83.

Better buses are important to me because we need to get more cars off the road. Where I live has been totally ruined by huge bypasses which has only increased traffic. The answer is not useless cycle lanes that barely anyone uses, we need better transport particularly in areas where they are building huge amounts of houses that will be wholly car reliant. Absolute madness.

84.

Hello Pascale,

I signed your petition as I believe that not only is Manchester requiring a better bus service, but most of the country is too.

Having moved from West Yorkshire, where the bus operator Arriva, stopped many of the bus routes they claimed were none profitable, to Northumberland. I find that a similar policy exists here, again by Arriva.

For me a bus service is exactly that, a service. If you don't want to run a service, then don't buy into it!

In West Yorkshire, many of the services cut did not affect the younger generations, it was the older who suffered, as many do not drive, and live in areas where public transport was needed.

Here in Northumberland, the public transport system does not run efficiently either. I find that my train arrives at our local station 4 minutes after the local Arriva bus has departed. Leaving me with a 56 minute wait for the next bus to arrive!

I am certain that you will know of many like incidents where those running the public transport infrastructure do not communicate with the different areas of transport, leaving us all very frustrated and disappointed with whole sorry system.

I applaud you on your stand for better buses in Greater Manchester, and perhaps once you have been successful there we can expand it across the whole country.

Many thanks for your communication.

85.

Hello, Please tell me your story, why you support the campaign for better buses in Greater Manchester, with a picture and your first name! I will share this with Andy Burnham when we meet him. If you're happy for me to share your story online on our stories page, please say. I'd love to share them and show the support for better buses. Thank you so much!

We used to have good bus services in Higher Blackley, but now if I want to get to Piccadilly it's two buses; a long walk to Rochdale Road; or the 42 which can take up to an hour to get there.

If I want to go to Middleton, the nearest shopping centre, there are two buses, but they have different routes so stop on opposite sides of the road. The stops are nowhere near each other so I can't nip across if I see a bus on the other side of the road. It's very frustrating.

86.

Hello, Please tell me your story, why you support the campaign for better buses in Greater Manchester, with a picture and your first name! I will share this with Andy Burnham when we meet him. If you're happy for me to share your story online on our stories page, please

say. I'd love to share them and show the support for better buses. Thank you so much!

I live in Norfolk and am lucky enough to have a wonderful bus service. With so much traffic congesting our towns and cities, I can't understand why a first class publicly owned bus service isn't a high priority everywhere.

87.

My story: I have been late for work and university so many times due to buses.

88.

Hello, Pascale.

By definition a public service should be run for the benefit of the public not shareholders and profit.

Pre privatisation this was the case and fares were low and car ownership lower. In Tyne and Wear ridership increased every year up to 1986 as the fleet was modernised and services improved and extended.

Fares were pegged and even though car ownership increased like the rest of the UK it was more affordable and convenient to use public transport from 1974 to privatisation.

Since then our roads have become choked and buses become scares as frequencies diminish and services change or cut too frequently leading to lack of public confidence in relying on using the bus to consistently get you there.

Fares are ridiculous yet bus drivers terms and conditions fell back so its a mac job instead of a proud public servant.

All this must change for public confidence to be restored.

Restoring bus services back to the public sector is the start.

89.

I'm afraid I live in the country in Gloucestershire, where there are hardly any buses to rely on! I signed the petition as I have recently met a previously unknown relation who does live in Manchester and felt I should support anyone attempting to improve bus services preferably, not run by private companies.

Good Luck. Given the dangers of Climate Change, it is most important to have more green public transport and to reduce the number of cars on the roads.

90.

Hello, hi i believe that public ownership of our buses will take the industry back to when you could rely on catching one,these private companies have no concern for the indeividual only for profit which means passenger projections allows them to cancel buses that are not full up,for years our village has a saying - if you want a bus into town you'll have to wait till they can fill one.

im retired now and use a car due to chronic arthritis but i know a lot of people who rely on a good reliable bus service that is virtually non existant.

91.

Hello Pascale

I support the campaign for better buses in Greater Manchester and all over the country; but I live in York, so can't really participate in your project.

I've always loved buses; I'm also a WASPI woman (born July 1954), so -- shockingly -- have to wait until I'm almost 66 before I get a freedom pass (having had my pension qualifying age delayed not once but twice; I'm not a happy bunny).

With very best wishes

| | |
|--|---|
| Organisation Name | BUS4US |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | I agree with the summary of the challenges. As an out of town user not having the ability to buy a zone ticket and know that it integrates with the Metro is a very big obstacle to bus usage. I wouldn't mind paying the relatively high cost of the metro if it then allowed me to use the buses in an integrated way |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | It just seems obvious to somebody who travels extensively in London and European cities that this is the way to go. The present system makes the UK look stupid and backward |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|----|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | No |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|---|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | As far as I understood it the financial case does not address funding for services that cross the border. As a case in point Warrington receives a premium for running a half hourly service with the 5 and 5A service but wastes money because the 5A is duplicated by the 247 which runs wholly within GM.. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |

| | |
|--|-------|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Agree |

| | |
|--|--|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | The franchising scheme would allow social needs (independence for young and old in particular) to be played firmly in the mix alongside commercial considerations. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Allow neighbouring authorities to opt into the franchising scheme for certain routes |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | Hurry up and get on with it |

GM Bus Consultation

6 January 2020

Dear Sir

As an organisation, Derbyshire and Peak District Campaign for Better Transport are interested in transport proposals as they affect our area. Consequently, this response only relates to the proposals as they affect services to/from Derbyshire.

We note that the partnership options would not affect these services, but that franchising would.

Two services, 341, Hyde – Glossop and 394, Stepping Hill Hospital – Glossop, are currently wholly operated under contract to both TfGM and Derbyshire County Council. We presume that they would continue as individual contracts. System One tickets are currently valid throughout these routes and we presume that successor multi-operator tickets would continue to be so.

Services 236/7, Ashton – Hollingworth – Glossop is currently operated commercially by Stagecoach during the day and under contract in the evening. Annex 1 of Appendix 4 of the consultation document refers to “Hollingworth – Ashton” as a route to be included in franchising. It isn’t clear if this relates to both commercial and contract services, and, if so, what happens to the Derbyshire end. As this route, and the parallel rail line, have always been regarded as “Manchester” services, and included in the System One area, we think that it would make sense to include this route in a franchise package covering services currently run from Ashton.

Service 358, Stockport – Strines – Hayfield is also currently operated commercially by Stagecoach and under contract in the evening. Again, the consultation document refers to including a “Stockport – Strines” service in franchising. Compared with 236/7, this route has a higher proportion of its route in Derbyshire, and is important in providing access to the Peak Park from Greater Manchester as well as bringing people into Stockport. From memory, it has been operated from Stockport for many years. Consequently, all Stagecoach and System One tickets are currently available throughout. We think that the route should not be split, and that it should either be included in a local package or tendered individually. As it is commercially viable, we assume that an operator would take it on.

Service 199, Buxton – New Mills – Stockport – Airport is the only wholly commercial route and also the only commercial route operated from a depot in Derbyshire (High Peak at Dove Holes). This would presumably remain commercial outside Greater Manchester and be operated on a permit inside. Within Greater Manchester, it provides the main service to High Lane and links points between Hazel Grove and Stockport to the airport. Currently High Peak’s own day and period tickets are available throughout, with reduced priced tickets available, and System One tickets accepted, between New Mills Newtown and the Airport.

Given that the service carries local passengers both within and outside Greater Manchester, as well as cross-boundary, we see a need to retain a variety of tickets offering at least as good value to the passenger as at present. Add-ons to GM network tickets, allowing travel to points along the route, would encourage Derbyshire residents to travel further into Greater Manchester than Stockport, and vice versa.

There is no mention of Wayfarer tickets in the document. We see no reason why these should not continue under franchising. We would hope that GM Wayfarers would continue to be valid both on cross-boundary routes into Derbyshire and on services throughout the Peak District. We hope that Derbyshire Wayfarers will continue to be valid within Derbyshire on 199 and 358 or their successors.

Yours sincerely

Jim Froggatt

Chair



Steady State Manchester

steadystatemanchester.net

37 Chandos Road South
Manchester
M21 0TH
2 January, 2020

To Whom It May Concern,

*This is a comprehensive response from Steady State Manchester.
We have not answered every question.*

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester

We agree that the scheme should cover the entirety of Greater Manchester. We note that it is a matter of concern that the powers for establishing planned bus services are fragmented in England, with only Mayor-led metropolitan authorities able to take the franchising option. This will inevitably make it very difficult to plan effectively for routes into and out of the conurbation.

Q3. Do you have any comments on the local services that are proposed to be franchised?

It makes sense that there is not unnecessary competition on routes. The proposal appears to remove this “over-bussing” on popular routes.

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

We think the timetable is too slow. It will not be until late 2023, four years from now, that the franchise arrangements will operate in Area C. We cannot wait that long for a properly planned service. We urge GMCA to bring in the changes with a common date, and recognise that this will require more up front expenditure, though the benefits will also be realised earlier.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?

See our answer to Q 4.

Q8. Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

We are a little puzzled as to why an additional 3 months is required. We suggest that 6 months preparation would be sufficient after the franchise is agreed.

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

Consultation with passengers should not wait until after the first transitional franchises have expired. Early and ongoing monitoring of performance is going to be vital and this needs a strong passenger and citizen voice.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

We support these proposals and indeed anything that will break up the oligopoly of the large provider companies.

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

As a public utility, buses should not be provided via a market system. We experience the anarchy and chaos that this means in Greater Manchester. The bus market, even in its own terms, is not working well for residents of Greater Manchester. Having lost 8 million miles of bus services since 2010, 11% of the service, we have a patchy system of bus services, where the interest of shareholders trumps that of passengers.

We have heard many personal stories that confirm the appalling state of the bus system. Examples include gaps in the network, so people have to walk miles to get to a bus stop, particularly outside peak times, when some routes are not running or are very infrequent. Buses are particularly difficult for disabled people, who have to put up with crowded buses, infrequent and unreliable services, inadequate shelters (themselves a conduit for revenue leakage to a French multinational), poorly trained drivers (particularly on some newer entrants' services), services withdrawn willy-nilly and a lack of real time information.

We strongly support the proposed franchising scheme because this will allow public control of our buses. We take the same view as 69% of residents who think local councils should be the main decision-makers on bus services, according to a poll commissioned by the LGA this year (<http://bit.ly/31fmK2E>).

A better bus network would help everyone to take part in society: to get to work, the hospital, shops, public services, recreation and to visit loved ones. For vulnerable groups it will reduce the risk of isolation.

A comprehensive, reliable and affordable system of bus services will be needed if we are to make the rapid, massive shift from reliance on the private car to greener and more energy-efficient ways of getting around.

We find the forecast of bus usage, even with reform (see the graph on page 53), overly pessimistic and indeed tantamount to a *laissez faire* attitude to the crisis of car infestation in our city which requires multiple and firm interventions going far beyond reform of the bus market.

Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?

Strongly agree

Q13b. Why do you say this?

The free market in bus services has failed us. We need buses that are clean and green, reliable and accessible. Bus companies have not delivered on any of these fronts.

Taking back control of the bus network will give local authorities control over bus routes, fares, and ticketing, so that the network as a whole can join up to make an integrated bus network with contractors more accountable to our community. Currently, this system favours bus company shareholders. Based on the experience of the regulated system in London, in comparison with the rest of the country, Greater Manchester's decline in bus usage could be reversed facilitating (and preferably exceeding) the Greater Manchester councils' aim of increasing walking, cycling and public transport journeys by 1 million per day by 2040 (see <https://www.centreforcities.org/wp-content/uploads/2019/11/Improving-urban-bus-services-2.pdf> p. 10). Without a strong intervention of this sort, passengers would continue to drift away, reinforcing the vicious circle.

We support region-wide standards of pay, conditions and pensions for drivers to be negotiated with Unions representing drivers, which represent over 8,000 workers in the region, so that drivers are respected for their hard work. As the franchising proposal notes, "Deregulation in Britain resulted in a 'race to the bottom'" (see <https://bit.ly/33Tb0VR> Exec Summary, p5).

The bus companies have belatedly suggested a voluntary partnership to improve services. This would leave power in their hands. They have had decades to make improvements. We have no confidence that, if left to their good will, things will improve. We do note, however, that some smaller companies, and potential entrants, do support the franchising arrangements which take the revenue risk away from them, albeit meaning some constraining of profits as a quid pro quo.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

They are good so far as they go but in the context of the real challenges facing the city they are **unambitious**. There is nothing on achieving a major modal shift from private motors to collective forms of transport (including buses) and active travel.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

The franchising scheme is the best that can be delivered under the current irrational and pro-private capital legislation. **We urge the GMCA to campaign for a municipal bus company option, bringing buses into public ownership and thereby reserving all operating profits for the GMCA and its transport system.** This is essentially the view of the Parliamentary All Party transport Committee.

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives as set out in the Strategic Case?

The partnership option, which leaves power with the bus companies, and the option of them walking away, will not meet the GMCA's objectives for bus services as set out in the Strategic Case.

Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- ***offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options;***
- ***provide the most economic value (Net Present Value); and***
- ***create the best platform from which further economic value could be delivered.***

Do you have any comments on this?

Currently, public money makes up 40% of bus companies' revenue, yet there is no democratic control over fares, nor over the vast majority of routes and timetables. 10% of that public money leaches away as dividends.

Under the franchising scheme, fare revenue goes to the public authority which then uses it to fund agreed contracts for service. TfGM would take on the risk but by paying a fixed contract fee. This would prevent profiteering, the leakage of excess profits, while still allowing operators to make a fair return, as they do in London. Public control also means that profits from busy routes can be used to pay for socially necessary routes. Research from bus company Abellio showed that 95% of people in GM supported the idea of subsidising bus routes which are unprofitable but necessary for the public good.

(<https://www.abellio.com/news/people-manchester-we-want-better-bus-service>)

The franchising arrangements give the opportunity for proper strategic planning of the network as part of the wider public transport system that includes Metrolink and regional rail, as well, as possible future options, such as collective taxis in less dense areas, filling in the gaps in coverage. This will prevent duplication while ensuring that gaps in coverage can be addressed.

The bias towards the larger and more costly bus operators that is inherent even in the Enhanced Partnership model, will be prevented (see <https://bit.ly/378IL8N> pp. 26-7).

While critical of standard economic cost-benefit analysis, we accept that benefits beyond the purely monetary ones will be made possible by the adoption of the franchising model. Greater Manchester faces enormous challenges as a result of the worsening ecological crisis, the coming economic crunch as the costs of energy and materials extraction rise, and geopolitical shocks impact on supply chains. All of these imply a radical shift to a mode of living that is more collective, less energy and resource intensive, and less polluting. A huge, and rapid, modal shift away from private motorised transport is a part of this and it is difficult to see how that could be achieved under anarchic, free market conditions.

18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

We suggest that the design ("packaging") of the franchises should be consistent with the most straightforward future route to bringing bus service provision back in-house. That is not necessarily the direction of travel that will be taken but the presence of that as a strong possibility will help discipline franchise operators.

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

It is argued that for smaller contracts: *"Shorter terms of three to five years are proposed for small franchise contracts and school contracts, providing greater flexibility and reducing potential risk to both small and medium-sized operators and TfGM compared to a longer contract length."* We suggest that that argument also applies to larger contracts and suggest that these should be of the same length of 3-5 years. We do not favour positive discrimination in favour of large franchises.

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme as set out in the Commercial Case?

We are supportive of this pattern of risk sharing.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators as set out in the Commercial Case?

Broadly yes. We would encourage the improvement of worker terms and conditions, especially for those employed by those “rogue operators” that have entered the market free-for-all, to the extent that this is consistent with making radical improvements to the bus services in the region.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme as set out in the Commercial Case?

We support these arrangements. Should trolleybuses be considered as a low emission and energy efficient addition to GM’s transport infrastructure at some point in the future, then these proposals would need updating.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme as set out in the Commercial Case?

These proposals seem sound.

Q25. Do you have any comments on GMCA’s approach to procuring franchise contracts under the Proposed Franchising Scheme as set out in the Commercial Case?

No comments. It would have been helpful to spell out the pros and cons of this approach and any alternatives.

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities as set out in the Commercial Case?

This is a difficult area which reveals the folly of the government’s piecemeal approach to delegated powers (“devolution”), leading to different regimes in different areas. The proposed approach seems reasonable in this context.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

We agree with the points made in the franchising document.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

It seems clear from the information given that both partnership options would deliver less of the needed systemic change than the franchising option. Moreover, the partnership options are based on incumbent operators and could, paradoxically, be anti-competitive in that they could act as a barrier for new entrants.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

The partnership options would mean no improvement for employees who are caught in the race to the bottom of the free market.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in

advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

In our view, and on the basis of the detailed assessment, the outlined costs, with the majority coming from local authorities, and a total of £14 council tax increase for the average household spread over 6 years to 2025, are a price worth paying. We also note that central government has indicated that it could be willing to pay these costs.

This investment will mean we can get a better bus network, run for the public, with much better value for the public money we currently give to buses.

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

We agree that the franchising scheme would be highly likely to produce overall benefits for passengers in terms of average fare reductions, increases in range that can be travelled for the same money and additional services. We accept the possibility of some short term disruption, due for example, to operator exit. If anything we think the benefits are underplayed in the document.

Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

The impacts would be minimal, not conveying any significant benefit, although the transition risk is lower. The durability of the incumbent-led partnership is not guaranteed.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?

The impacts are acceptable and already modelled in London's successful franchising scheme.

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?

We reject any argument based on increased "economic growth", which is not feasible on a finite planet. On the contrary, the bus franchising proposals are consistent with the need for the material contraction of the economy, which is both necessary to mitigate climate change and inevitable given the increasing costs of materials and energy. A publicly controlled public transport system will reduce the impacts of the decay of the current growth model of the economy, while ensuring that people can still meet a variety of mobility needs.

We agree that bus travel has the potential to make a large contribution to the GMCA's "target of a 50% share for non-car modes by 2040" but we strongly assert that this is a far too timid objective if we are serious about forestalling the climate emergency and making this one of the greenest city regions. As one element in a strategy for greening our region, bus regulation and the franchising model has a key part to play.

Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

We broadly agree with the Assessment's conclusions, as follows:

Network: The scale of the potential is greater under the Proposed Franchising Scheme than under either of the partnership options (only one of which, the incumbent-led voluntary partnership, appears to be on the table anyway). Franchising Scheme has the

long-term potential to develop the network, under GMCA leadership, as part of an efficient, integrated transport system.

Simplified and Integrated Fares: The Proposed Franchising Scheme would enable simpler and integrated fares and ticketing for passengers than either of the partnership options. It would allow through ticketing across the entire network and on the trams and regional rail. A cap on daily and weekly fares, as in London, would be possible.

Passenger Experience: The Proposed Franchising Scheme would enable GMCA to set consistent standards. This has the potential to go well beyond the consistent branding offered by the incumbents' partnership offer.

Environment: The Proposed franchising Scheme offers the potential to help facilitate a massive modal shift away from cars to collective public transport and active travel. It also offers some fairly quick wins on tailpipe emissions. It would incentivise councils to establish complementary measures, including road pricing and car parking levies, since the revenue could be directed to further improvements in public transport. The incumbent-led partnership idea would not do this.

Value for Money: The Proposed Franchising Scheme delivers more benefits than either of the partnership options, even under the rather cautious cost-benefit modelling carried out.

We think that GMCA taking on the revenue risk and a somewhat higher transitional cost, are reasonable trade-offs for such desirable benefits.

Q44. GMCA's draft Equality Impact Assessment identifies the potential of the Proposed Franchising Scheme on persons with protected impact characteristics. Do you have any comments on it?

The Equality Impact Assessment carried out as part of the proposals for the franchising scheme makes it clear that older and/or disabled people, many of whom also have physical and/or sensory impairments, will benefit from bringing the buses back into public control through franchising, and we agree with this. Public control of the buses should mean that there is better access to hospitals and other health facilities such as GP surgeries: at the moment, many older and/or disabled people have to travel to these facilities via private taxi firms, at great expense. Furthermore, the fragmented nature of the bus network means that it is difficult for many older and/or disabled people to visit friends, go shopping, get to work or attend cultural events, leading to a situation where they can become isolated in their homes, lonely and with deteriorating physical and psychological well-being. **Franchise arrangements could reliably improve the network of bus routes, their frequency, and safety for older and disabled travellers with consequent improvement in well-being.**

Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?

Strongly support

Why do you say this?

1. The alternative that is on the table, the bus companies' preferred Voluntary Partnership, leaves all the power in their hands. Changes will only be made to the extent that they deem it in their interests. We need a system that puts the interests of GM's people first.
2. Franchising is the only option that allows cross subsidy from popular/profitable routes to less busy/unprofitable routes.

3. The additional transitional expenditure over that for the Voluntary Partnership is not large: £25M (£122M vs £97M) over the 5 year implementation period. That's just £5M per year, or £500k per council area, or **£4.34 per household per year**. (source: TfGM Franchising paper, executive summary, page 23). As noted above, it is possible that even this small sum will be met by central government.

The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefit than from either partnership model.

We urge the mayor and TfGM to establish effective bus user and worker councils, or similar governance arrangements to maximise direct democratic governance.

Thank you for this opportunity to contribute to this important consultation. Buses are a vital part of the fabric of Greater Manchester and must be allowed to take on a more strategically central role in urgently making the massive modal shift we need from the infestation of private motorised transport that blights our atmosphere, our neighbourhoods and our climate.

| | |
|--|---|
| Organisation Name | Bruntwood |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|---|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | <p>We would agree that the bus market is not operating as well as it could be and is not delivering as effectively as it needs to for people or businesses in Greater Manchester. This means Greater Manchester will not be able to meet its strategic objectives in relation to growth, inclusion, carbon emission reductions or air quality. There is a lack of integration between forms of public transport, tickets are complex, expensive and are a barrier to using the network. It is often cheaper and easier to drive into or around the city region rather than take the bus. We need a reliable, modern, clean, efficient bus system to complement the other parts of our transport network. It is clear from our perspective that we are a long way from having this in Greater Manchester. A more planned approach is required to ensure that there is a stable and effective pattern of bus services that delivers value for money for customers and also makes the most of the investment that the city region makes into infrastructure. At present this is not the case. Reinvesting profits into improvements in services and infrastructure will benefit everyone in Greater Manchester and by supporting our growth aspirations increase the contribution we can make to the UK economy.</p> |

| | |
|--|--|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | The current system does not allow for the level of change needed to meet our objectives as a city region. Radical reform is needed. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>It is notable that the three options within the economic case all show that there are high BCRs attached to improvements in the business network. However it is also important to consider the overall economic value generated and although the investment in the Franchising Scheme will be higher the overall benefits will also be higher. The basis of the assessment doesn't take account of future investment and changes that would be possible to a bus system controlled through a franchising process. All the analysis is based on bus patronage declining over time. However, it is evident through experience in other places and other services that by providing a stable network with excellent customer experience and a package of related interventions into other aspects of non-car based transport there are opportunities to reverse the level of decline. The imperative to find sustainable means of transport will increase over time and this is an opportunity for GM's bus network to buck the long term trend. We would agree with the analysis that the Proposed Franchising Scheme provides the best value for money for Greater Manchester.</p> |

| | |
|---|--|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Making changes of this type will involve upfront investment, however if the prize is a fit for purpose transport network then the benefits will be gained not just by customers, through better services, simpler ticketing, but also by the business community and the city region as a whole. Funding this level of change will require a package approach that will need to be realistic but also one that is able to adapt and flex over time. An example would be if there were further devolution of road taxes, charges related to Air Quality or national carbon taxes that could be further allocated. We are supportive of the reinvestment of profits from the Proposed Franchising Scheme into transport infrastructure that improves services, customer experience and air quality. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |

| | |
|---|--|
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We are persuaded by the arguments in the Assessment that taking everything into account the Proposed Franchising Scheme is the best way to achieve GMCAs objectives to improve bus services. We are also clear that there would be a wide range of related benefits to the way that the City Region functions - for its residents, visitors and businesses. We would be delighted to be involved in further discussions and activity related to the Scheme as part of a wider transport strategy for the City Region. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |

| | |
|--|---|
| Q45b Why do you say this? | <p>The introduction of a Proposed Franchising Scheme is the only way that we can see to radically transform bus services in the City Region. We believe that they have been held back through the current system to the detriment of customers, businesses and Greater Manchester as a whole. Investment and change has been too slow and not met the needs of the growing city. We can see the opportunity to create a platform that will allow for the decline in bus use to be reversed and for the bus network to play its full role within the Greater Manchester transport system.</p> <p>Although not part of the financial case we are supportive of the measured approach to franchising - with 3 phases for delivery, 5-10 franchises and the opportunity for smaller operators to enter the market. This is where we have the opportunity to drive real innovation and raising of standards.</p> |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Neither likely nor unlikely |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|--|
| Organisation Name | intu Trafford Centre |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | We believe that the scheme should apply to the entirety of Greater Manchester and also to any cross-boundary bus route which operates to/from neighboring areas outside GM. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Whilst we understand the rationale behind this phased approach, this may cause some confusion for bus users if we end up with services operating under multiple frameworks and different brands in the interim period. We would welcome some feedback on how this would affect issues such as cross-ticketing. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | As per previous question, this would affect the current service 52 which operates to intu Trafford Centre. We would welcome clarity on how this service would operate within the newly franchised network around intu Trafford Centre. |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | We support the current timescales for the introduction of the Proposed Franchising Scheme. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | We have no material concerns over this period, however we would welcome reassurances that no detrimental changes can be applied to any service during this period. |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | We would be happy in principle to support GMCA/TfGM in this process by offering up mall space within the centre to undertake these consultations with centre staff and visitors. We can also support with wider engagement within TraffordCity. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | We support the proposals for a level playing field in terms of operator participation in the Proposed Franchising Scheme. However, we would want to see minimum service standards specified and enforced, regardless of the size of operator. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | We support this proposal. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | From our experience of working over many years to promote sustainable travel to a super-regional retail and leisure destination such as intu Trafford Centre, the lack of a comprehensive attractive service from many local areas in the early mornings, evenings, weekends and other key trading periods such as Boxing Day and New Year's Day remains an ongoing issue. There remains a significant disparity between the modern day travel demands of the retail/leisure industry and the transport industry, and this presents a challenge in terms of recruitment and retention of employees. On top of this, we echo the comments on the challenges faced by the local bus market in continuing to offer an attractive and reliable service in ever-deteriorating traffic conditions. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|---|
| Q13b Why do you say this? | The case for change is undeniable and it is desperately needed if businesses such as ours are to play our part in supporting the clean air agenda and delivering sustainable economic growth for the region. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | We fully support GMCA's objectives for the future provision of bus services, in particular around enhancing the quality of service provided. The standard of customer service delivery across the industry as a whole, in our view, has room for improvement in order to match the expectations of the modern day user. We would want to see accountability added as a key objective for the future franchising scheme. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Whilst we are also supportive of the proposed operator partnership approach as it will deliver benefits against the status quo, we are of the view that the Proposed Franchising Scheme presents the most effective way to unlock and realise the objectives set out by GMCA in the Strategic Case. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | A partnership option will deliver some benefits against the current system, however in our view this will fail to meet the objectives set out by GMCA as it will not deliver the step change required to be able to offer up the bus as an attractive and viable alternative to the car. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | We support the conclusions of the Economic Case. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | We support this strategy in principle. |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | We support this proposal but request that key stakeholders in the private sector are engaged at an early stage to ensure their views are able to be shared and fed in to the bus network design process. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | We support this approach in principle and would support the roll out of a comprehensive RTI scheme for key stops and interchanges on the franchised bus network to offer a similar standard of passenger information as that offered by Metrolink. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | We would be keen to understand the impacts on service 100, on of the key routes linking intu Trafford Centre, and how this would operate under a franchising scheme given it operates beyond the GM boundary into Warrington. |

| | |
|---|---|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | Could the delivery timescales of the Proposed Franchising Scheme be affected should any incumbent operator choose to object? |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | We would like to see businesses and other key stakeholders across Greater Manchester have a role to in supporting TfGM in the planning, designing and shaping of the bus network. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|---|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | We welcome the reduced risk of service reductions during the implementation period. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | We are of the view that the Proposed Franchising Scheme offers the best option from which to realise the economic growth potential of the city region and also of the TraffordCity area in which intu Trafford Centre operates. Whilst the current commercial network provides some good bus links, the bus remains an underutilised mode amongst employees due to the unattractiveness of the network in terms of frequency, journey times and quality of customer experience. The current lack of a comprehensive service in the early mornings, evenings, weekends and Bank Holidays presents an ongoing challenge for the service industry, one which the Do Minimum option will fail to address. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | We support this view. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | We support the conclusions in section 5.4 of the consultation document. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |

| | |
|--|--|
| Q45b Why do you say this? | We support the introduction of the Proposed Franchising Scheme as, on balance, it appears to present the best route to achieving the necessary reforms in the bus market to allow the full potential of the bus as a viable mode of public transport to be unlocked. Franchising or not, we would support any method of reform which will help realise this aim and begin to break down the many barriers which remain in promoting and developing the bus as a viable and attractive alternative to the car, in particular to destinations such as into Trafford Centre which relies heavily on shift work. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|--|
| Organisation Name | J Murphy & Son |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | As long as the service provider runs from one area into the other on the same fare rate there should be no issues. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | we need to know what proposal is being put in place before we comment |

| | |
|---|---|
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | why can these not be franchised all at once so that everywhere gets the same service. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | if the contracts are awarded it should be that the service starts straight away so there is no drop off of services |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | in order for this to work it has to remain competitive and all suppliers services should be allowed to bid |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | company that do not have the correct number of vehicles to carry out the service should be exempt form the tender |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|--|
| Q13b Why do you say this? | it is supply and demand if cost are low people will use the service |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | the revenue generated from this should be reinvested with in the services with a view to keeping fares low and buses serviced. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | the revenue generated from this should be reinvested with in the services with a view to keeping fares low and buses serviced. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|---|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | This needs to have a break clause into the contract to see that the contract is being serviced properly and any failures are addressed with a possibility of the franchise being removed . |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | Regular audits would need to be carried out to look at all aspects of the service provider to make sure everything is being met |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | the procurement of this needs to be audited to make sure it is compliant with the regulations. |

| | |
|---|--|
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | this will not be known until it is implemented |

| | |
|---|--|
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | This needs to reflect what the passengers needs and at present it does not, there needs to be more regular transport available between peak hours and it also needs to be available to get to work. At present this is not available in Stonecross business park as no public transport comes near public review needs to be held at some point before this goes ahead. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |

| | |
|--|--|
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | Yes |
| Q39b If so, please explain what you think those positive or negative impacts would be. | This would benefit us if transport was available at peak hours and came onto the business park as this would reduce our carbon emissions and help staff parking on site. |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | as long as this is implemented Fairley and with in the guidelines with consultation of the public at some point this should be fine |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |

| | |
|--|---|
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | the reason for this comment is that this needs to be implemented fairly and discussed openly with the public |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Quite likely |
| Q48 Finally, do you have any other comments you want to make? | TfGM and GMCA needs to make sure it consults with businesses, so as t make sure it helps staff get to and from work as well as schools and other organisations. |

| | |
|--|--|
| Organisation Name | Morrison property services |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | <p>Although it is easier for a whole Franchisee, to run the whole area, there are many reasons why this would be better split into a small number of Franchisees.</p> <p>For example it is more likely that local but quiet route, could be phased out by the larger operator on financial grounds . We think they have the right to do so in their agreement.</p> <p>Or they can change the time table to say 1 bus per hour for example, which is almost useless for the user.</p> |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | As previously stated possibly 6 operators would be appropriate; certainly not one. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | This is a long time |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Yes we think the community should be consulted as they are paying for it. So while an online consultation is excellent, unless one knows about it, one wouldn't be able to comment especially if you didn't have a computer. We got to know through the Altrincham Town Centre Managers office and their email system to local businesses. No one informed our business about this consultation. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | Yes this is a good idea; |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | This could cause a conflict of interest as to the winner of the Franchise. If they had to take over a large site for example with a large rent, smaller operators wouldn't stand a chance. The answer is to allow the bidders to state exactly what site they would require and how long that would take to procure. Or possibly sharing an existing large site might be ok but that would need a management system. Hair salons rent seats to stylists so similarly, space could be sublet to smaller better operators. However, the head tenant should not be allowed to squeeze the small operator |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | This is correct; Most people in the North, never use a bus. You need to ask why; Then you get your strategy! With global warming, the GMCA have a golden opportunity to contribute something great and special. Electric busses which would be attractive to travel in. Lack of pollution; quieter environment; Better security at night; more inspectors and security generally. Southern rail are striking over this point as we consider this. They are right in their argument and wrong in their action. Create a great and reliable way to travel and everyone will choose it. Great example Virgin Trains - top operator despite minor niggles. |

| | |
|--|--|
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | If you are successful in attracting several small operators, all operators need a Strategic plan to adopt and work towards. All have to be believers and care taken to ensure the contracts can be terminated with 3 months notice if an operator fails to implement the strategy. It is vital. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | Just adopt the word Excellence for every objective and you can't go wrong! |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | It should help it |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Partnerships are difficult to end if there is trouble. Not sure there is a way to get rid of a Partner easily or without substantial cost. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | <p>We would agree; Keep the Franchisor always on their toes. Have regular access to Accounts; have regular access to all Complaints so you can end it if you need to.</p> <p>Ending the Franchise will be your largest weapon to ensure they do the job they promise. It has to be easy for you and without complication or argument. You remain in charge. They report to you. You are in Charge.</p> |

| | |
|---|---|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | We think you have this covered by employing PR and marketing companies . They are experts in market research and Strategy creation. That research would be required if you package the contracts properly. On the actual Franchise conditions this would go through your Legal advisors obviously. However, you could choose some competent business people to also check this for final and amazing results. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | No. If they are the right people and you have the right to sack them for failing (easily), then they will remain hardworking and responsible whereby timing of the contract is insignificant. It is only when you get failure and impossible argument, that timed contracts become important - by which time the Franchise has already failed. This is why sacking a Franchisee easily is vital. |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | Unless you are supplying something to them, we would say that with caveats you shouldn't have to agree many risk areas. Possible risks to avoid: Franchisee goes bust with debts - No underwrites please Franchisee fails to accord with the Bus Depot Lease so no underwriting of Leases please! Franchisee fails to pay off leases of new plant and equipment. No underwriting please. Just run through all your risks and take them out. Things to check would a death through an administrative error on a bus? Not sure about this but corporate manslaughter needs looking at. (For you and them). Be really negative and risk averse with this subject. Presume the worst. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | All staff must be employed by the Franchisee not yourselves. Again no underwriting. Staff are key to better experiences for the public. So there is a huge subject here to consider which cannot be commented upon simply in a consultation document. |

| | |
|--|---|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>We believe that the old depots may be considered to be a mandatory condition for the Franchisees although this may not be the case.</p> <p>Keep your minds open for those willing to look at new depots, more relevant to modern needs. For example, do you need a depot on an industrial estate, near a town centre, near an airport (for spare parts), near a railway station (for spare parts), etc. The spare parts of the future are likely to be electrical. Where are these made if from the UK ?</p> |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>No knowledge of this excepting that these systems only work if Satellite systems are working. If these are jammed or interfered with, if you invest all your resources into this technology, you may regret it. Here, we have a possible risk for you rather than the Franchisee . If you insist that the F invests in this technology and then there is a problem, they could sue you. So take care.</p> |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>Be more public and try if possible to award this to a British Company. Keep turnover in the UK. Golden rule when proffering public contracts.</p> |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | <p>We agree</p> |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |

| | |
|---|---|
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | Avoid the Partnership route as previously advised |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | Not seen this |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | Avoid |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | Take care |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | Avoid |

| | |
|---|--|
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | As long as the Franchisee does the job properly, the passengers will be happy. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | Avoid |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | Be open to amendment but keep control and their reporting to you each month. |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |

| | |
|--|-----------------------|
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Agree |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | See Previous comments |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|--|---|
| Organisation Name | Nycomm Ltd |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | We really struggle to attract & retain employees who aren't able to drive as there are limited bus services to our head office (Agecroft Road, Pendlebury, M27 8SB) and these are often unreliable. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |
| Q13b Why do you say this? | I think a more coordinated approach would encourage greater coverage and better services, particularly to areas that aren't currently well serviced |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|--|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|--|--|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | I agree it sounds like a good plan |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | As per my previous answers, our head office lacks an effective bus service and I would expect that great control and a more coordinated approach by GMCA would improve services in our area |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |

| | |
|---|-------------------|
| <p>Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?</p> | <p>Don't know</p> |
| <p>Q48 Finally, do you have any other comments you want to make?</p> | |

Ryse Hydrogen Limited

c/o Panancea Limited
First Floor, 86 Deansgate, Manchester M2 3ER

7 January 2020

GM Bus Consultation

Sent by Email

Dear Sir/Madam

Ryse Hydrogen and Wrightbus welcomes this opportunity to make a joint submission to the GM Bus Consultation.

Ryse Hydrogen and Wrightbus (now under the same ownership) are currently working in partnership to provide an initial fleet of 20 brand new design hydrogen-powered double decker buses for Transport for London, using renewable off-shore wind green energy to produce the hydrogen fuel, a ground-breaking innovation which has only been made possible by TfL's ability to specify the bus fleet to be used by franchised operators.

Wrightbus is the only UK owned manufacturer of buses, with a long track record of supplying conventionally powered, electric hybrid, plug-in electric and now hydrogen powered buses to operators across the country, including a significant number in Greater Manchester. Ryse Hydrogen is currently working to deliver hydrogen-powered double deckers elsewhere in the UK in partnership with public transport authorities and bus operators, and we can see clear benefits arising from a bus franchising system in terms of speeding up the transition to clean and sustainable public transport solutions.

While conventional diesel-powered buses will continue to have a medium term role in service provision, any shift towards greater use of hydrogen and electric-powered buses will require the provision of additional infrastructure and fuelling facilities at depots and therefore investment. We consider that the proposal set out in paragraph 3.28 of the Consultation Document that GMCA should provide depots to facilitate the letting of large franchise contracts is an appropriate one, which will support investment in new infrastructure in the longer term, and ensure continuity of provision should franchise contracts change hands. Ryse Hydrogen is currently in planning for its first UK clean Hydrogen production facility in Kent and starting the construction works for the fuel delivery system at the TFL depot in Perrivale both of which involves considerable investment in this infrastructure.

Should fuelling and charging facilities be available at GMCA-provided depots, we would suggest there may be scope for small and medium sized operators to make use of them, which may help remove barriers to them also being able to run clean and sustainable bus fleets. There may also be scope in the future for other partner agencies such as local authorities to make use of fuelling and charging facilities at GMCA-provided depots for their own fleets. Ryse Hydrogen would be pleased to explore options for such provision using its extensive knowledge gained in the current projects noted above which would clearly support wider GM Clean Air objectives.

With regard to Q23 of the consultation, we welcome the proposal in paragraph 4.89 of the Consultation Document that GMCA would have the power to specify emissions standards of vehicles and the use of electric power (or alternatives), which builds upon one of the significant advantages of the current bus franchising model in London in ensuring wider clean air objectives can be better met. As the franchising process moves forward in GM, along with the GM Clean Air Plan, we would however welcome further engagement with regard to the full range of clean and sustainable options available to power buses, how they and the necessary infrastructure might be procured, and how GMCA/TfGM might ensure that GM might benefit from the widest possible range of innovation from across the UK bus industry.

Regarding Q24, Wrightbus has extensive experience of delivering Intelligent Transport Systems through its extensive range of buses, and would be pleased to contribute to any discussions as to how they might best be delivered across the Greater Manchester fleet.

In conclusion, Ryse Hydrogen and Wrightbus welcome proposals contained within the GM Bus Consultation which would support the transition towards cleaner and greener forms of bus provision, particularly where the transition might be made more quickly than may be the case under current arrangements, and in a way which might generate significant economies of scale. We would be very keen to work with GMCA, TfGM and existing and potential new bus operators within GM as to how such proposals might be developed, and would be grateful to be kept informed of further progress in the bus franchising process.

Yours faithfully



Ian Seddon
Director
Ryse Hydrogen Limited

CBRE Limited
10th Floor
One St Peter's Square
Manchester M2 3DE

Switchboard
Fax
Direct Line

+44 (0)161 455 7666
+44 (0)161 455 0161
+44(0)161 233 5652

alice.may@cbre.com

Doing Buses Differently Consultation
Freepost GM BUS CONSULTATION

7 January 2020

By email: gmbusconsultation@greatermanchester-ca.gov.uk

Dear Sir/Madam

REPRESENTATIONS ON BEHALF OF SCHRODERS TO 'DOING BUSES DIFFERENTLY' CONSULTATION

I write on behalf of my client, Schroders, who own City Tower, with regard to the 'Doing Buses Differently' consultation currently being undertaken by Transport for Greater Manchester ("TfGM") on behalf of Greater Manchester Combined Authority ("GMCA"). CBRE Limited ("CBRE") acts on behalf of Schroders in relation to City Tower.

In summary, these representations provide:

- A summary of Schroder's aspirations for City Tower and the surrounding Piccadilly area;
- Comments on the priorities and principles of the 'Doing Buses Differently' Consultation.

Schroders is committed to working with TfGM, GMCA, Manchester City Council ("MCC") and other key partners to ensure the full regenerative benefits of the wider area of Piccadilly Gardens is achieved. Piccadilly Gardens plays a key role as a major transport interchange for those arriving to Manchester by bus, with the existing bus interchange at Parker Street comprising a series of bus stops and stands, as well as tram services which also provide access to this part of the city centre.

Whilst Schroders acknowledge that this consultation relates to the proposed franchising of the bus network, rather than detailed proposals relating to the operation and configuration of the various bus stops and stations throughout the city, Schroders considers that the 'Doing Buses Differently' consultation provides an important opportunity to make comments with regards to the Piccadilly Gardens/Parker Street bus station area which may influence future stages of work and decisions relating to the bus network.

PICCADILLY GARDENS

Piccadilly Gardens is the largest square in Manchester. The area is widely regarded as the central hub of the City Centre and it sits at the convergence of a number of vibrant City Centre areas

including the Retail Core, Central Business District, China Town, The Village and the Northern Quarter, the focus of Manchester's evening economy.

It is located a short walk from Piccadilly Station, Manchester's major Train Station and Tram Interchange. However, Piccadilly Gardens also currently plays a role as a key transport hub for those arriving to Manchester by bus and by tram.

ASPIRATIONS FOR THE AREA

Whilst there are a range of issues affecting the Piccadilly Gardens area – from acute socio-economic problems, including anti-social behaviour and crime, to public realm and design issues relating to pedestrian desire lines, maintenance and lighting amongst others - these representations are limited to consideration of issues arising from the transport arrangements in this location which are of relevance to this 'Doing Buses Differently' consultation.

Piccadilly Gardens bus stops handle 3,369 bus departures every weekday. The sheer volume of bus traffic around Piccadilly Gardens creates a range of air quality, noise and pedestrian safety issues. Furthermore, the Bus Station acts as a major physical barrier between City Tower and Piccadilly Gardens.

Tram Lines and bus routes run to the west and east of Piccadilly Gardens, which, combined with barriers to the south (such as the Britannia Hotel and the Japanese Pavilion), give the impression of a disjointed, transport dominated island site, which is cut-off from surrounding areas.

Trams travelling between Altrincham, Bury, Rochdale, East Didsbury, Eccles and Piccadilly all travel through Piccadilly Gardens. Furthermore, Parker Street acts as the city's main bus terminus. The stop provides a drop off facility for up to 37 different services generating circa 231 buses per hour during peak periods.

Furthermore, the Gardens provide a main thoroughfare between Piccadilly train station and the other key City Centre districts including Chinatown, the CBD, the Northern Quarter and the main shopping area.

This significant volume of vehicular and pedestrian traffic creates a confusing public environment, which can act as a deterrent to visitors of the city who naturally end up in Piccadilly Gardens following arrival in Manchester by bus, tram or train.

This level of traffic arising from vehicles, buses and tram movements, creates conflict with pedestrians around Piccadilly Gardens. This issue does not affect Piccadilly Gardens alone; Portland Street is also very busy with vehicular traffic and whilst the situation has been improved through recent bus improvement schemes, it remains relatively impermeable to pedestrians. Whilst Parker Street does provide a useful city centre drop-off point for those using public transport, the level of conflict between vehicles and pedestrians is unsustainable in the long-term and will lead to further degradation of the character of the area. In addition, the level of vehicular traffic creates a range of noise, air-quality and pedestrian safety issues, which require a strong design response and management solution.

In this context, Schroders strongly supports the vision for a fully integrated transport interchange within the city, and specifically the relocation of buses from Parker Street, which will facilitate

significant improvements to the pedestrian environment and will improve pedestrian permeability throughout Piccadilly Gardens¹. This represents a significant opportunity to rationalise bus traffic in this location and relocate it elsewhere.

The existing “bus station” at Piccadilly Gardens is, in fact a series of bus stops and stands, where buses that serve the wider Manchester area tend to start and end. Tram lines and bus routes run to the west and east of Piccadilly Gardens which, combined with barriers to the south, give the impression of a disjointed island site which is cut-off from surrounding areas.

The relocation of the bus interchange at Piccadilly Gardens provides the opportunity to open up Parker Street and remove barriers created by the significant level of bus traffic between Parker Street and Piccadilly Gardens, as well as enhancing the public realm and reducing issues resulting from high levels of bus traffic (such as noise and air quality) within the immediate area.

Whilst Schroders acknowledge that Parker Street provides a useful city centre drop-off point for those using public transport, it is considered that the current level of conflict between vehicles and pedestrians in this area detracts from the character of the area, is unsustainable in the long-term and will lead to further degradation of the public environment within this area.

In summary, Schroders aspirations for the area include the reduction of bus traffic along Parker Street, and the relocation of buses to Piccadilly Train Station¹. Whilst the total relocation of the terminus may not be realistic in the short-term, there is clearly a significant opportunity to rationalise bus traffic in this location and seek to relocate it elsewhere. This should be carefully considered in parallel with any franchising proposals to ensure that all proposals for the bus network are joined up and considered comprehensively.

‘DOING BUSES DIFFERENTLY’

We fully support GMCA’s aspirations to develop a truly integrated public transport system to make getting around the city easy, accessible and affordable. We consider that this integration and comprehensive oversight by TfGM of the different transport modes – including both bus and tram - would facilitate positive outcomes in terms of the Piccadilly Gardens interchange area.

We also recognise the importance of buses in Greater Manchester with three out of every four journeys being made by bus. However, careful planning and management of key transport nodes such as that at Piccadilly Gardens/Parker Street is required to address challenges such as degradation of the public realm, air pollution, and conflicts between pedestrians and vehicles, as has been set out within the previous section.

In summary, we support the franchising of the bus network on the basis that the analysis set out in the Strategic Case supporting the Proposed Franchising Scheme found that this would enable the integration of the bus network both across bus services and with other modes of transport. It would also ensure the network is as efficient as possible and does not compete against itself, as it does currently. We would like to reiterate, however, that this should be considered in parallel with the proposals for the reconfiguration, integration and rationalisation of the existing bus stops and stations

¹ This is in accordance with the vision for an integrated ‘one station solution’ for Manchester Piccadilly set out within the Manchester Piccadilly SRF (March 2018).

around the city including the existing “bus station” at Piccadilly Gardens/Parker Street in order to ensure that the maximum benefits can be realised.

Schroders respectfully requests that the comments in this letter are considered prior to the next stage of the ‘Doing Buses Differently’ consultation. Schroders welcomes the opportunity to further discuss the content of these representations with TfGM/GMCA, if helpful, and this can be arranged via CBRE if required.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Alice May', with a large, stylized loop at the end.

ALICE MAY
CBRE LIMITED - PLANNING & DEVELOPMENT

| | |
|--|---|
| Organisation Name | Scott-Grant Limited |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|---|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | I agree, it isn't working right now. In particular the current system creates bottle necks in certain city centre places. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |
| Q13b Why do you say this? | Some form of joined up central management is required to improve the services, clearly. Only reservation is whether Manchester has the central expertise to do this effectively. However at least under central management the users/public will have recourse if management don't do a good job. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--------------------------|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | I hope this is correct ! |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|---|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | As a business rate payer in central Manchester I would be happy to contribute to a joined up system of public transport, of which this will form part. So even if the financial benefits are exaggerated I would support the improvements, and pay towards them. Manchester can ill afford to remain so far behind other cities in respect of its public transport. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |

| | |
|--|---|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | I agree and wish the council good speed with it's introduction. |

| | |
|--|---------------------------|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | See my previous responses |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Don't know |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |
| Q48 Finally, do you have any other comments you want to make? | Good luck |

GREATER MANCHESTER BUS REFORM – PUBLIC CONSULTATION OCTOBER 2019 – JANUARY 2020

AUTHORISED RESPONSE TO THE CONSULTATION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT

SUBMITTED BY THE CILT NORTH WEST REGION POLICY GROUP

19th December 2019

QUESTION 1 (page 33)

The role of the Traffic Commissioner is not clear in respect of the proposed Franchising Scheme. Would services continue to be registered and regulated as currently?

QUESTION 2 (para 3.5)

Whilst legally and geographically logical, the proposal should be mindful of creating a barrier for cross-boundary bus services which have a primary role of supplying Greater Manchester from communities dependent on it.

QUESTION 3 (paras 3.6 to 3.8)

No comment.

QUESTION 4 (paras 3.9 to 3.14)

No comment.

QUESTION 5 (paras 3.15 to 3.16)

Full regard should be paid to the role of cross-boundary services, whose integrity should not be compromised by being tethered to a franchise scheme which might undermine their sustainability. They should not have to make changes to route or stopping points to qualify for a permit.

QUESTION 6 (paras 3.17 to 3.18)

No comment.

QUESTION 7 (paras 3.19 to 3.21)

The proposed dates should allow some flexibility in order to accommodate necessary or desirable changes based on experience during the transition process.

QUESTION 8 (para 3.22)

No comment.

QUESTION 9 (paras 3.23 to 3.24)

The consultation proposal refers to 'organisations representing bus users' whereas in legal terms, as set out in the Assessment, the consultation will actually be much wider. This should be clarified.

QUESTION 10 (paras 3.25 to 3.27)

We welcome the plans to allow small and medium sized operator involvement, but there should be flexibility to allow large operators to fill gaps with smaller franchises where no SMO interest is forthcoming. We are unclear if these provisions are consistent with restraint of trade principles.

QUESTION 11 (para 3.28)

No comment.

QUESTION 12 (paras 4.15 to 4.21)

It is not true to state that Greater Manchester has ‘limited competition’ in the bus market without refining that definition. The number of operators and routes with competing supply has grown and reduced over the years in the way that maturing markets work. It can be argued that competition has worked to establish the routes and network which broadly meet consumer demand, and has kept fares lower than would otherwise be the case, and by comparison with other metropolitan areas with lower levels of competitive activity. Just because some routes do not have a choice of operator does not indicate a failure of the system, and the so-called ‘north-south divide’ between major operators which was artificially created in 1993 no longer applies. Cost increases in the entire bus industry have consistently outstripped common measures of inflation, and may continue to do so regardless of who owns or controls its assets. The private sector, in partnership with TfGM, has helped to provide some non-commercial services, and it is not the fault of that sector if services have reduced as a result of TfGM’s reluctance to exercise its powers.

References to the decline in bus patronage do not acknowledge the negative impact of changes to the concessionary fares for young people in 2011, or the expansion of Metrolink in recent years. Nor do they acknowledge the fact that some operators have managed to generate growth in some areas despite these adverse trends.

Operationally there is a need to improve the reliability and punctuality of services, but there is in the Proposal no evidence that franchising will improve these, other than a system of contract enforcement which may well lead to a worse service in terms of frequency or journey times. The Partnership schemes between operators and authorities (especially highway authorities) appear to have a better chance of meeting these objectives which matter most to users.

QUESTION 13a (paras 4.15 to 4.21)

Tend to Agree.

QUESTION 13b

Some, but not all, valid concerns of bus users and potential users can be addressed by reform. Punctuality, reliability, pricing and investment may not be, and concerns about the principle of control and private sector involvement are exaggerated for political reasons.

CILT believes in a ‘Negotiated Network’ approach, where all relevant players are brought together in governance, including local authorities with traffic management and parking policy roles, highway

funderson and business and community representatives, as well as bus company managers and planners.

QUESTION 14 (para 4.22)

It appears that service quality and environmental standards can be achieved through Partnership at a lower cost and lower risk to public finances. Furthermore the 'reach' of the bus network to achieve the objectives in phase 2 will risk adversely affecting patronage on traditional bus links. Just because buses are perceived to compete with the tram network does not mean that they do not perform a sustainable role and offer choice to the consumer.

QUESTION 15 (paras 4.29 to 4.37)

The primary objective of making services reliable and punctual cannot be met by the proposed scheme (as acknowledged in 4.35) without parallel investment in the operating environment and infrastructure. There is scant mention of this in the Proposal and any bus priorities are deferred to a future phase, so there are no short term measures to prevent patronage decline through congestion by actions of TfGM or local highway authorities. Similarly, specific actions to address air quality concerns may be delayed.

QUESTION 16

The Partnership proposals appear to address the concerns raised in Q15 more urgently and at lower cost, although commitments by local authorities (for example on bus priority, traffic management and local car parking policies) are still missing.

QUESTION 17 (paras 4.43 to 4.63)

The 30-year evaluation timescale (para 4.45) seems more suited to road/rail investment schemes, where future traffic levels can more easily be predicted. Applying this to short contract periods where costs are not fully known must cast doubt on the process. If, as stated, the cost/benefit ratio for GMCA is broadly comparable to the partnership options, the franchising case must therefore be weaker.

The chart on page 53 shows that franchising alone does not stop patronage decline, after an initial brief uplift. Para 4.62 concedes that further (unquantified and unevaluated) investment will be necessary. Buses will in the meantime presumably continue to be delayed on congested highways, yet para 4.50 points out that journey times are critical passenger benefits. This cannot be achieved without radical new measures to prioritise buses, which GMCA concedes are difficult because they are in the hands of District Authorities, and no assessment of any such schemes appears in the proposals. There must be some benefits available from measures that are within the direct power of TfGM.

The assumed operating costs of franchising have no basis in experience of what will happen in Greater Manchester. If operator inefficiencies are part of the perceived problem, then these would be better addressed by monitoring regimes as part of partnerships.

An additional factor which will hold back benefits is the stated intention to free up more road space for cyclists and pedestrian facilities. Where this has happened in London, for example, bus speeds have then reduced further and negated any priority measures.

The table on page 52 shows that the stated passenger benefits amount to over 80% of the total franchising benefits (excluding benefits from fares schemes) but it is unclear how franchising the existing network will secure this order of benefit. De-congestion benefits will only accrue if extensive priorities enable buses to be more punctual, and fares benefits will only be achieved through radical price reductions. Whilst there will be benefit in making the network simpler and more integrated, the patronage impact will be nowhere near that which could be achieved if buses were more insulated from general traffic congestion.

We take issue with the statement that networks are always planned to maximise profit. The best operators innovate and experiment to drive up demand, and there is plenty of evidence of commercial operators persevering with low-return services which contribute to the whole. They also have a record of re-investing in the network, and in some cases foregoing short term benefit. The effect of this is a network which can maximise patronage rather than profit; this does still leave gaps, and franchising will have to fill these just as TfGM does under current powers.

QUESTION 18 (paras 4.73 to 4.75)

No comment.

QUESTION 19 (para 4.76)

No comment.

QUESTION 20 (para 4.77)

The cost inflation risk is not defined – is this to be capped?

QUESTION 21 (paras 4.78 to 4.83)

Establishing the criteria for TUPE transfer eligibility is acknowledged to be complex, and it is unclear how franchises might cut across areas of work allocation, especially at large depots and in the transition period, and how employee choice might be taken account of. There might be risks to service delivery as a result.

QUESTION 22 (paras 4.85 to 4.87)

The contingency plans which are necessary to deal with potential risks in acquiring depots (legal actions, negotiations etc) might lead to lengthy delays in delivering the Proposal, and there might be significant cost implications. How might this affect bus service delivery?

Are there situations envisaged where franchises under different ownership might have to share a depot?

QUESTION 23 (paras 4.88 to 4.90)

No comment.

QUESTION 24 (para 4.91)

Given the costs and unpredictability of implementation timescales associated with this type of investment on a large scale, it appears that it might impact significantly on the delivery of the Proposal. Are there contingency plans to adopt and strengthen existing links between current operators and TfGM systems?

QUESTION 25 (paras 4.92 to 4.93)

No comment.

QUESTION 26 (paras 4.97 to 4.101)

The potential impacts appear unduly complex, and we question the need for restrictive criteria for permits. If a local service meets the objectives of a neighbouring authority but serves a substantial function within Greater Manchester, why should it not be regarded as contributing by default rather than having restrictions imposed which might impact on users? The internal GM franchise can be adjusted accordingly.

QUESTION 27 (para 4.102)

No comment.

QUESTION 28 (paras 4.103 to 4.108)

The Partnership options are drawn along fairly narrow lines and appear to exclude, for example, an option where a more wide-ranging Strategic Board could be involved in governance. This could include user groups and local business interests as well as, critically, local highway authorities.

QUESTION 29 (para 4.110)

The Partnership options would appear to have the advantage of avoiding the potential problems associated with transferring staff etc.

QUESTION 30 (paras 4.111 to 4.136)

We note that there are no specific proposals for an enhanced bus network, and indeed that a full review of the network has not been undertaken (para 4.116) so it must be difficult to forecast revenue. If one of the aims of franchising is to boost evening and Sunday services, these are not periods which will generate significant additional patronage. If on-bus advertising is taken away from operators, this will simply lead to higher franchise bids.

There is little reference to long term investment in infrastructure and bus fleets (not even for the necessary improvements in air quality), which must affect costs and affordability estimates. Given the uncertainty in passenger numbers, achieving the stated surplus of £11m in 2019 to 2025 and the cumulative surplus of £94m seems unlikely.

Taking account of the costs of acquiring depots and of borrowing, the cumulative total costs seem likely to exceed £260m as a conservative estimate. We think therefore that the Mayoral precept is likely to increase markedly, and this will mean that the public will not see franchising as offering

value for money compared with partnership options. Furthermore, users will be hit by annual fares increases of inflation plus 1.4%, which is a higher increase than might be expected by most.

QUESTION 31 (paras 4.137 to 4.145)

No comment.

QUESTION 32 (paras 4.150 to 4.157)

No comment.

QUESTION 33 (paras 4.158 to 4.166)

No comment.

QUESTION 34 (paras 4.167 to 4.174)

No comment.

QUESTION 35 (paras 4.176 to 4.185)

It is noted that 73% of bus users are likely to experience no change in fares in phase 1, whilst still being subject to inflation-related increases. It is unclear how the objective of more 'affordability' is to be met. The objective of minimal change on Day One of a franchise is noted and welcomed, although the built-in continuation of patronage decline trends is disappointing.

QUESTION 36 (paras 4.186 to 4.190)

No comment.

QUESTION 37 (paras 4.193 to 4.200)

There is apparent risk to GMCA if operators choose to dispose of assets elsewhere, leaving franchisees short of resources and therefore leading to service disruption. Is there to be a contingency plan for this?

We also wonder if the risks of legal action in respect of the perceived confiscation of assets and business are under-estimated.

QUESTION 38 (paras 4.201 to 4.202)

Partnership options appear to deliver largely similar outcomes with lower cost and lower risk to the public purse, with equal involvement of stakeholders.

QUESTIONS 39a and 39b

Not applicable.

QUESTION 40 (paras 4.203 to 4.204)

We think that the availability of suitably qualified and competent staff for TfGM to manage the entire bus network is under-estimated, notwithstanding the stated intention to recruit people. We

note that the Tyne and Wear Quality Contract Scheme report suggested that the ability of Nexus to act in this capacity was a considerable constraint. Consistent guidelines for service planning, for example, are a necessity and require carefully-researched criteria.

QUESTION 41 (paras 4.205 to 4.214)

We agree that Bus Reform has the potential to have a positive impact on growth and development, but in parallel there will be an increase in congestion and no additional plans to deal with this. We disagree that Franchising will offer a significant enough benefit to offset this trend by itself. Wider environmental benefits such as bus fleet sustainability and air quality are likely to be best served by Franchising, although at a cost which may be lower through Partnership.

QUESTION 42 (paras 4.215 to 4.226)

There is a high cost, and increased risk falling on local taxpayers. We agree that some objectives of integration will be achieved, but not that network development will be universally beneficial or popular, if it is seen to reduce user choice between modes. We agree that unified branding and ticketing will deliver benefits, but note that consistent standards of customer service are more challenging, and are not evidenced in the London model.

QUESTION 43

No comment.

QUESTION 44

No comment

QUESTION 45a

Tend to oppose.

QUESTION 45b

See responses to Questions 41 and 42.

QUESTION 46a

Yes.

QUESTION 46b

There should be a commitment to measures which will improve the performance of existing services more quickly, in order to avoid further inevitable patronage decline.

QUESTION 47

Quite likely.

QUESTION 48

No comment.



HAVE YOUR SAY IN HOW YOUR BUSES ARE RUN: CONSULTATION BY THE GREATER MANCHESTER COMBINED AUTHORITY

EVIDENCE FROM THE CONFEDERATION OF PASSENGER TRANSPORT UK

Background

1. The Confederation of Passenger Transport (CPT) is the national trade association for the bus and coach sector in the UK and represents around 1000 bus and coach operators. We have 98 members in our North West region; 17 of those have bases in Greater Manchester, operating over 1750 buses and over 200 coaches. These members range from subsidiaries of large international companies to sole traders with a single vehicle.
2. OneBus are responding to this consultation on behalf of bus operators in Greater Manchester and we endorse their response. This submission does not seek to replicate that; instead it considers the franchising proposal from a broader, strategic level.

Summary

3. We agree with the outcomes targeted by the consultation - a joined up, integrated network, simple fares and ticketing and an improved customer experience – but believe we can get there quicker and more effectively through a partnership approach between bus operators and the GMCA:
 - There are huge transitional costs involved in the move to a franchising model, none of which deliver direct service improvements to bus passengers.
 - There is significant opportunity cost attached to the money that would be spent on the transition to franchising which will come from the public purse, including higher taxes for local residents. Taxpayers should not have to fund the cost of regulatory change.
 - A YouGov poll earlier this year found that 76% of people in Greater Manchester do not want public transport improvements to result in higher taxes.¹
 - The time taken to make the transition to franchising – with the first tranche operational in January 2022, and the last in December 2023 – could be better spent delivering real improvements to bus services for the residents of Greater Manchester.
 - A franchised model for bus services places all the risks associated with underwriting any shortfalls in fares income on the GMCA and, ultimately, the taxpayer.

¹ Peacock, M (9 October 2019) *Why is franchising the best option?* Routeone news

Delivery of outcomes

4. Bus operators agree with the outcomes that GMCA wants to deliver for bus passengers – a joined up, integrated network, simple fares and ticketing and an improved customer experience. That is why we announced earlier this year in our England-wide strategy *Moving Forward Together* that we would:
 - a. Introduce contactless, multi-operator, price-capped daily and weekly tickets by 2022 in urban areas
 In Greater Manchester: OneBus recommended a two-year price freeze on multi-operator bus fares and more affordable travel for people of all ages in their partnership model for Greater Manchester. Operators in Greater Manchester have already introduced smart ticketing and contactless payments and have pioneered integrated ticketing, known as System One, whereby passengers can choose to buy tickets that are valid on any bus, bus/tram or bus/rail.
 - b. Extend discounted ticketing to apprentices and job seekers by 2021
 In Greater Manchester: Bus operators already offer students and jobseekers discounted fares.
 - c. Make travel easier for customers by providing simple, comprehensive information for customers and encouraging the use of online ticketing, Mobility as a Service (MaaS) and other emerging digital platforms
 In Greater Manchester: Bus passengers already have access to live bus journey information via their smartphones, can buy tickets and plan journeys via easy-to-use apps, and benefit from on-bus Wi-Fi available on most buses.
 - d. Reinvest savings made from improvements delivered through local planning and infrastructure measures
 - e. Only buy ultra-low or zero emission buses from 2025
 In Greater Manchester: Operators are already committing to 450 low-emission buses over the next three years - to improve air quality – with the first 150 delivered by 2020. This investment is paid for from operator profits. Any new buses delivered under franchising would need to be funded by Government – ultimately taxpayer – funds.
5. We can deliver these improvements for passengers in Greater Manchester more effectively and efficiently through a partnership approach, and take faster, impactful action to address the biggest challenges of crippling congestion and poor air quality. We disagree with the very narrow interpretation of the potential benefits of partnership working that the GMCA has taken in its assessment.
6. It is in commercial bus operators' interests to continuously strive to improve the customer experience in order to increase passenger numbers and revenue. In fact, figures from customer watchdog Transport Focus show that bus passengers in Greater Manchester (and many other regions across the UK) are happier than those in London – the only city in the UK currently to have a franchising model in place for bus services.
7. The franchising proposal put forward by TfGM suggests shorter contracts to reduce the risk for services potentially attractive to SMEs. However, these shorter contracts lead to short term thinking and prevent long term investment decisions which are needed to deliver improved services for passengers.
8. The GMCA consultation asserts that Mobility as a Service (MaaS) would be harder to achieve with a fragmented bus market. We believe that, with the introduction of Bus Open Data, this will not be the case. It is likely that

third party suppliers will see a commercial opportunity to bring MaaS solutions forward once the data becomes readily available, as required by forthcoming legislation.

9. The franchise proposal says that fares will increase by the rate of inflation plus +1.4% every year. Forecast inflation data from the Office for Budgetary Responsibility suggests that tickets might rise by an additional 18% by the end of 2023, meaning that the price of Greater Manchester's cheaper weekly ticket (currently £19) would rise to cost more than London's (currently £21.20) under franchising. In contrast, the OneBus partnership plan offers a two-year price freeze on multi-operator bus fares, as well as more flexible and simplified tickets.
10. Under the transition proposals, the first franchised service would be operational in January 2022, and the last in December 2023. The consultation suggests that it is only then that the 'phase 2' interventions required to truly deliver a step change in service quality for passengers would begin to be implemented (see paragraph 10 for more detail). This further supports our argument that improvements for bus passengers could be delivered quicker under a partnership approach.

Consideration of the costs and benefits of franchising

11. The GMCA have forecast that it would cost £122m to move to a franchised bus service over the transition period up to 2024/25 (plus approximately £12.5m of forecast cost escalation relating primarily to travel concessions and supported services). Interest payments on borrowing are likely to add a further cost of around £46.3m over this time period. These transitional costs do not offer direct added value to the passenger (they relate to costs such as standardisation of IT and acquisition of depots). There is significant opportunity cost attached to this money which will come from the public purse and result in higher taxes for local residents. This money could be better spent to deliver on-the-ground improvements to bus services more quickly and effectively. The GMCA acknowledges that in order to really deliver improvements in bus services and arrest the decline in patronage, further investment, which they refer to as 'phase 2' interventions, will be needed beyond the transition phase, and that no funding has yet been allocated to this. If the GMCA took a partnership approach to bus services, the costs and timeframe associated with transitioning to a franchising model could effectively be bypassed and invested directly into 'phase 2' measures such as bus priority measures which would make a meaningful difference to services for passengers.
12. The GMCA state that "the Government has indicated that it will support Greater Manchester to 'deliver a London style bus system in the area' which could include revenue funding." It is imperative that Government does not fund regulatory change instead of measures which will have a direct impact on the passenger experience such as bus priority schemes and measures to tackle congestion. Evidence has shown that every £1 spent on investment in local bus priority measures can deliver up to £8 in economic benefit.² Such measures are a much more efficient and effective use of public funds.
13. Further costs arise under the franchising model for staff – it is forecast that an extra 57 TfGM staff will be required under the franchising model compared to around 6 to 8 extra staff under the partnership approach. There will also be costs associated with a range of temporary specialist consultants in areas including IT, legal and HR, and operators will need to employ more staff under franchising to manage service regulation and monitoring because of the penalty regime that will likely be in place under the contracts. We anticipate that this could be as many as 80 more posts to ensure contract compliance and 20 more for the collection of data as

² KPMG (2015) *An economic evaluation of local bus infrastructure schemes*

required by TfGM. These staff will be paid for through franchise payments as operators will have no other source of income.

14. As well as placing considerable upfront costs on the GMCA, local authorities and the taxpayer, moving to a franchised model for bus services places all the risks associated with underwriting any shortfalls in fares income on the GMCA and, ultimately, the taxpayer. Under a partnership model, that risk lies instead with commercial operators, along with strong incentives to continue to drive service improvements and increase passenger numbers.
15. Even the GMCA's own modelling (table on page 52 of the consultation document) shows that the partnership proposal has a better benefit to cost ratio (£3.66 in benefits for every pound spent) compared to franchising (£3.11 in benefits for every pound spent).
16. A YouGov poll earlier this year found that 76% of people in Greater Manchester do not want public transport improvements to result in higher taxes.³

Impact on small and medium-sized (SME) operators

17. The GMCA consultation suggests that a franchise model will benefit SMEs by making it easier for them to access the market. We believe there are a number of reasons why this may not be the case.
 - a. TfL have found it very difficult to retain SMEs – many have been taken over by larger operators, having found it difficult to continually meet the exacting standards of the TfL contracts which are easier to adhere to with a mass presence.
 - b. Like larger operators, many SMEs enjoy the flexibility of the current regime - for example being able to mix TfGM contracts with other work such as commercial services and private hire which enables them to spread the risk. They would lose some of these options in a 100% tendered environment.
 - c. The requirement for a single brand – and possible bespoke specification - of buses operating on TfGM contracts under franchising may be problematic for SMEs who tend to mix work (as mentioned in (b) above) to 'sweat the assets' and give customers (individuals and authorities) the best value for money. It is possible that, in this scenario, SME operators may decide to avoid bidding for small franchise contracts. This, in turn, could undermine other work they do that has social benefits such as providing private hire for competitive rates to local communities.
 - d. Some of the large area tenders are simply beyond the risk profile and financial capability of SMEs.
 - e. Even the smaller contracts may not be sufficient to draw in the SMEs – larger operators operating the bigger contracts can spread overheads more economically than SMEs and will therefore be in a good position to win the smaller contracts too, thus further squeezing SMEs out of the market.

Conclusion

18. We believe that a partnership approach can deliver high quality, affordable and sustainable bus services without placing huge additional costs on the taxpayer. We have seen the results of such partnerships in places like Merseyside, whose Bus Alliance has seen a 15% increase in fare-paying passengers since 2013-14 and the number of bus journeys taken by young people rise by 168%. Bristol's bus partnership has seen passenger numbers grow by 52% since 2013, and over the past seven years, Sheffield's bus partnership has delivered more than a million extra adult journeys by bus.

³ Peacock, M (9 October 2019) *Why is franchising the best option?* Routeone news

19. We urge the GMCA to reconsider its approach to improving bus services in Greater Manchester and to look again at working with bus operators to deliver real, value for money improvements for passengers and drive growth in patronage.

Alison Edwards
Policy Manager
CPT
January 2020



Wednesday 8th January 2020

Doing Buses Differently – Consultation Response

Greater Manchester Chamber of Commerce is the largest chamber in the UK with 4800 business members who between them employ over 400,000 people, approximately one third of the GM workforce.

For many of our members the current state of transport infrastructure and the lack of an integrated GM transport network is a source of concern and frustration and is seen as a barrier to unlocking future economic growth and development.

Whilst the majority of attention is focussed on rail related issues, the fact that 75% of all public transport journeys in GM are made by bus is often overlooked. It is also worth noting that in the vast majority of cases many people still do not fully understand or are aware of the structure of the current regulated system for buses or the inherent limitations created by this.

Taking this into account it is not an understatement to say that because of the volume of journeys, geographical coverage and the vital integral part buses could play within communities, the continuation of the current system of bus deregulation is in urgent need of review and change. A better way of unlocking potential and further growth within this vital transport network is required and one that will allow continued expansion to match, support and help the city region's economic development.

With regard to the consultation, from the various supporting documents, events, feedback and the excellent Centre for Cities "Delivering Change" report, launched in November 2019, we believe that a franchised model offers more benefits than the proposed partnership. The "Delivering Change" report in particular highlighted via 18 key critical factors the benefits of franchising by 14 points to 4. We believe that franchising will: help deliver the broad ambitions for the city region around growth, health and social inclusion; offer passengers more choice and help set up the foundations for a truly integrated public transport network as outlined in the "Our Network" proposals.

We have outlined our main comments below.

Accountability and Control

Under the current model, and the proposed partnership models, there is little if any direct accountability between the bus operators and existing and potential passengers. The current system 'masks' responsibility – a franchise model will create transparent accountability.

The franchise model will enable the mayor to take greater control over the core fundamentals necessary to deliver a better service. Integral to this will be overall accountability for routes,

fares (including integrated GM wide ticketing), effective links with other transport networks and guidelines for the quality of vehicles - crucial in the drive to implement an effective clean air policy for GM.

Financial Considerations

Whilst the financial model and success of the bus network is obviously critical the decision over what future model works best should not be made on financial grounds alone.

The partnership model does have financial advantages around lower initial set-up costs and offers an element of security against the potential impacts of revenue decline in future years. More of the financial risks will lie with the mayor and the public purse under a franchise model. However there already exists a significant spend from public funds, with little if any financial return. Over the last few years money has been committed to and spent to upgrade interchanges, bus stations, invest in schemes such as the Leigh Guided Busway and cover a variety of other financial requirements such as subsidising 20% of existing services and costs of concessionary fares.

We understand the concerns of current operators about the immediate financial implications of franchising however future opportunities for major and smaller operators will exist under the proposals for the franchises that will be let to ensure a variety of options and services exist. These in themselves will create new commercial opportunities. In other areas of the UK where franchise models exist operators view this model as being more secure and financially viable.

Expansion and Demand

The current model does little to encourage bus operators to respond to demand for new routes. For a number of years we have highlighted the lack of adequate transport planning that takes into account proposed new developments, a core fundamental of the feedback we have given on the GMSF.

We have also highlighted the resultant problems created when the only option is to use a car – increased congestion and poorer air quality.

Under a franchise model, future transport plans can, in theory, mirror development plans to ensure that some form of public transport services are available both for residential and commercial developments. At a time of rapid and continued expansion the transport network has to be as agile as possible to keep pace with demand. The city centre in particular has seen demand outstrip supply for a number of years and as the growth radiates outwards it is vital that the city region's transport network grows at the same pace and in the same space. Operators at present have no incentive or motivation to effectively “risk” a new route without a guaranteed financial return.

Ticketing

The lack of a truly integrated ticket system is also a source of frustration and a GM wide franchise model would enable this to be finally introduced. The easier that a public transport system is to use the greater the opportunity to encourage new users. Reliable services backed

up with easy to use and easy to understand ticketing systems and prices will open up opportunities for new customers and help reverse declining usage. Under the current and proposed partnership model the ability and in some cases the lack of willingness of some operators to introduce integrated ticketing acts as an immediate barrier to expansion, encouraging new users and creating an effective transport network.

Change is necessary and if the ambition exists to create a London-style transport network in GM, something that doesn't just resonate with business and residents alike but will deliver what is actually needed, then the introduction of a franchise model for GM bus services, coupled with other investment and governance changes, is the only way that this process can be started.

Chris Fletcher

Policy, Campaigns & Communications Director

Greater Manchester Chamber of Commerce

HAVE YOUR SAY ON HOW YOUR BUSES ARE RUN

OneBus Response to Consultation

Wednesday 8 January 2020



Background

OneBus

The Greater Manchester Bus Operators Association (GMBOA), was incorporated as a Limited Company in April 2008 as a body to represent bus operators across Greater Manchester.

It was relaunched as OneBus in 2018 and represents operators who cover around 85% of the commercial bus mileage across Greater Manchester. Its members include Stagecoach, Rotala, First, Arriva, Transdev and Jim Stones Travel.

Partnership Proposal used in the Assessment

Along with member operators, OneBus has been involved in the Partnership discussions with officers of TfGM and their external consultants. As stated in some of our answers, we are concerned that TfGM has picked a moment in time where a line was drawn and the Partnership proposal at that stage and was taken as being the best offer to be used for the Assessment without advising OneBus or the operators when that was.

Additionally, the Partnership costings and benefits (where they have been assumed) are numbers created by TfGM without any input from the operators and **are therefore disputed**. A significant amount of work on developing the Partnership has been undertaken in the meantime which has not been considered in the Assessment. Since publication of the assessment we have also been denied access to the data, assumptions and costings used for the partnership proposal despite asking on several occasions. It should be noted that access to the proposed Franchising Scheme data sets and models was also denied to operators and OneBus,

Despite this, operators were keen that Partnership discussions continued, and we have had the opportunity to improve the Partnership offer and this forms part of our response with the additional commitments included at the end of the question section of this response. We request that this revised Partnership offer is analysed and reported on by the Auditor.

Response to the Consultation

OneBus does not have the technical ability to respond on the complex detail of the various cases that form the assessment but offers its knowledge and experience of the bus market and proposed changes. Notwithstanding this, a full report produced by Jacobs is attached outlining observations and concerns following a full and detailed review of the Economic Case as contained in the Assessment. Again, we request that this full document is analysed and reported on by the Auditor.

Additional Documents Attached

In addition to responses to the long questions, there are two attachments which form part of our overall response. The OneBus Economic Review is attached to answers to the relevant Economic Case questions.

- OneBus Economic Review – Jacobs
- Improved Partnership Offer -see below



One Bus
Partnership - 4pp - C

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?

No comments as we were not given access to the original draft.

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

It is logical that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester, however because of the size of the task it cannot be achieved all at once – and shouldn't be! This results in the option as proposed of breaking the Region into areas which gives the bigger complication of an extended and disruptive transition period which will require significant management time and strong public communication to be delivered properly. The risks around the transition are well documented and, in our opinion, they are totally underestimated as detailed in our response to Q4.

At 3.1.1. of the Network Supporting Paper, the reference to *Cross Boundary services being unchanged, although their scope for performing a local role within Greater Manchester would be considered* is vague and could be read either way. Having boarding/alighting restrictions within Greater Manchester will be confusing and not satisfy the concept of passengers being able to board any bus. There is the added risk that these restrictions will impact on the viability of the service. See also our response to Q26

Q3. Do you have any comments on the local services that are proposed to be franchised?

No comments

Q4. Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?

As detailed above in our response to Q2, the splitting into sub areas is sensible however this increases the challenges where services in one area are either de-regulated (operating commercially or with TfGM support) or within the franchise or operating on a service permit basis. This will be complicated for bus users – fares and ticketing acceptance and for driving staff – terms and conditions, customer charters etc. This all seems very messy in comparison to the Partnership proposal which retains buses operating under the present regime but with a much better customer offer and greater control by the Mayor and TfGM.

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?

No comments

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?

This date seems very ambitious and we appreciate the references to it likely to change for various reasons as explained within the Assessment. As detailed in paragraphs 4.103 and 4.104 of the Consultation document the current partnership offer (at the time of developing the assessment) provides enough certainty as a legally binding Voluntary Partnership not to require the complications of an EPS. The VPA can be delivered within a very short time frame and for a fixed or flexible term.

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? and

Q8. Do you have any comments on the nine-month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

Again, it seems to be accepted that any slippage will lead to a delay in implementing the first contracts. That date currently stands at 2 April 2021 with the introduction of services in January 2022. If the do nothing scenario is a bleak as predicted and Bus Reform is needed, why do bus users have to wait 24 months before they see any change at all or wait until **January 2024** for only the transition to be completed (prior to any network changes or funding for new vehicles) when the Partnership offer can deliver much sooner?

It is hoped that there is some slippage as the introduction of a new form of delivery on 2 January 2022 is far from the ideal time of the year to be implemented.

Q8. Do you have any comments on the nine-month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?

Another very optimistic timescale for subsequent sub areas. Even before sub area A is operational, work will have commenced on sub area B with contracts being set three months (25 March 2022) into sub area A being live. Those contracts will be developed well before sub area A went live. It would be more sensible to allow the first sub area to be operational for nine months before issuing contract to have a greater understanding of how the changes have been received. Rushing into the process will likely lead to need to introduce further changes which will require time and resource to renegotiate revisions to the contract. See also answer to Q25

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?

No comments.

Q10. Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?

OneBus supports the opportunity afforded to small and medium operators. We do have some concern about the limit on the number of contracts that can be held by one operator. If the intention of Bus Reform is to introduce 'competition for the market' rather than 'competition in the market' then there should be no restrictions on bidding for the market. Introducing restrictions can lead to distortions in bids. For example, if a bidder is aware that someone else is unable to bid that can influence their own bid favourably costing the franchise scheme more than anticipated.

What consideration is given to the small or medium operator who doesn't win a contract?

Q11. Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?

This seems a logical way forward but is fraught with risks as there seems to be a high level of uncertainty in how this will happen and is dependent upon incumbent operators being willing to negotiate. New builds take time, are expensive and may not be in a suitable location for the services that are allocated there. The last resort is Compulsory Purchase which if an operator takes exception to could delay the whole process and increase costs as highlighted in our response to Q22. We believe that the excessive sums of money to be tied up in property would be better spent on customer focussed bus service improvements.

Q12. The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?

The Strategic Case makes the mistake of comparing the present bus market in Manchester with how it could be in the various Strategy documents and the Draft Delivery Plan. These are objectives that we should all aim to achieve, and it assumes that current operators do not understand or want to attain these objectives. Any successful business can't survive by failing to meet these objectives

Whilst the Strategic Case recognises the value of buses it wrongly blames the decline in bus use on the current de-regulated system. If that is the case, then why during the 1980s when buses were in public ownership or public control, passenger numbers fell from 417m per annum to 350m between 1980 and 1985? Was that due to a failure of the system in place at that time? Likewise, between 1986 and 1996 when buses were still in public control passenger numbers plummeted to 238m. If so, what is the rationale for going back to that system?

During the last 22 years since buses in Manchester have been in private ownership, passenger numbers have fallen by 44m (18.5%) with TfGM accepting that 65% of these trips have been abstracted by Metrolink.

In the 16 years from 1980 to 1996 under public control, passenger numbers fell by a staggering 179m (43%)!

| Year | 1980 | 1981 | 1982 | 1983 | 1984 | 1985 | 1986 | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 2018 |
|---------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| Passenger (m) | 417 | 377 | 358 | 347 | 346 | 350 | 355 | 320 | 314 | 319 | 303 | 290 | 274 | 256 | 250 | 252 | 238 | 194 |

The Strategic Case also recognises that several external trends create a challenge for the bus market – Changes in travel demand, increased car ownership, competing modes i.e. Metrolink, congestion and the introduction of technology in the taxi market (Uber). Franchising will not address the impact of these.

A second list, deemed as 'market failures' which must account for smaller passenger decline include – Fare increases, Lack of network co-ordination, Lack of social services and Complex fares and ticketing. Partnership working will address all of these. OneBus believes that there should be third list identifying a number of 'authority failures' including;

Customer Information – the current printed timetable offer is basic and does little to promote bus. The lack of next bus real time information at bus stops is a significant failure on the part of TfGM and Greater Manchester is on its own by not having this important information for improved customer confidence.

Accessibility at bus stops– bus operators now provide a fleet of buses which have low floor easy access meeting the Public Service Vehicle Access Regulations 2000. The failure of the Districts across Greater Manchester to provide bus stop infrastructure to enable the buses to stop against raised kerbs makes it difficult for less mobile customers and those using wheelchairs to board and alight. The lack of good waiting facilities has recently been cited as a reason for passengers not using buses.

Accessibility to services – in recent years the penetration of buses into main shopping and employment areas has declined leading to bus passengers having to walk further to access shops and workplaces. In Manchester, the removal of buses from Cross Street and Corporation Street to allow Metrolink free movement has left a large part of the City Centre without buses meaning longer walks for those who are disabled or infirm. Interchange between buses has become more difficult with terminal points being more scattered across the City Centre and the road layout not being conducive to the reliable operation of cross city services.

Metrolink customers enjoy real time information at tram stops, level access boarding, shelters and good penetration of City and Town Centres so why should bus passengers be treated differently and with no improvement included in the franchising proposal?

Negativity about buses – As a prelude to the introduction of franchising, over the last two years there has been a strong political campaign critical of buses and the deregulated environment with the sole aim of 'persuading' people that franchising will solve all the problems with comparisons of £1.50 fares in London compared with £4.00 in Manchester. The Franchising Scheme proposal lacks these promises but instead delivers very little.

Whilst recognising the Transport Focus Bus Passenger Satisfaction survey results that 87% of bus users in Greater Manchester are satisfied with their bus services, the Assessment fails to appreciate the true value of this result.

Q13. The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? Why do you say this?

We agree that reform is needed to address the challenges facing the local bus market but we have concerns that the Franchising proposal does not include any measures to improve the main external challenges highlighted above in the answer to Q12 – changes in travel demand, congestion and growing car ownership. Without measures to tackle congestion and introduce bus priorities, whichever option for change is adopted bus use will continue to decline as journey times get slower and car ownership costs are perceived to be low.

Q14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

The objectives set out at 4.22 can be delivered by either scheme forming the keystones to successful bus operations that operators follow under the present structure. Under a Partnership, these can be delivered at a much lower cost to the public purse and much faster.

Network

The proposal under the Franchising Scheme is that the network costs remain as now until the transitional period is completed so how does this deliver the improvements sought in the Vision for Bus part of the 2040 Strategy?

Improving the reach of the network utilising resources saved from competing services will have a negative impact on passenger numbers as the reduced frequency will see greater resistance than the growth assumed from services to areas where the current service is limited.

The Franchise proposal is built around increased latent market travel. Commercial operators, by the nature of their operations will have investigated and most likely satisfied all of these markets and the assumption that passenger growth will come from using resource saved on high frequency or competing services to accommodate these new services is grossly over optimistic..

OneBus also has a concern that the network will not be designed around the needs of passengers but with a degree of political influence. In a regulated network, political input is essential, but it should be recognised that whilst meeting social objectives it will not meet financial objectives too. A report produced by Manchester City Council shows a good example of this process of network design:

Members have previously expressed concerns about key gaps in current service provision and there is currently an opportunity for the City Council to feed into the Greater Manchester wide exercise to highlight particular gaps that it would like to draw to Transport for Greater Manchester's attention. Members' views are therefore sought on any key gaps or other deficiencies in the current network that they would like to see addressed and any other suggestions as to what measures would encourage more residents to use the bus. There is a detailed formal process that Transport for Greater Manchester needs to undertake as a consequence of the Act and this current exercise is one input to an overall assessment of the current bus network across Greater Manchester that is being undertaken.

Where bus services operate alongside Metrolink services, care should be taken when contemplating removing the bus services. Bus stops are closer together than Metrolink stops and the withdrawal of buses will reduce access to public transport for the less mobile and may increase the need to change modes at some point. Lessons should be learned from the Tyne and Wear Metro scheme to force customers travelling from the south to Newcastle by bus to change onto the Metro at Gateshead where buses which had previously crossed the Tyne were terminated.

Simplified and Integrated Fares

The Franchise proposal seeks to simplify fares by removing some products in a similar way that the Partnership aims to achieve simplification. The Partnership proposal is however constrained by current Competition Laws which restrict agreed simplification. There is no detail of how simplified the range of tickets will be in the Franchise proposal or how easy they are to understand - in any business customers prefer choice but need to understand what those choices are. Simplification can be detrimental. In areas where bus fares have been made simple by the introduction of a simple flat fare, customers making short journeys have been critical of being charged the same price as those making a journey from end to end. Experience shows that removing products with the aim of simplification has two outcomes – increased prices and likely passenger decline.

Customer Experience

Both the Franchise and Partnership proposal can deliver the same improvements here, however only the Partnership proposal includes new buses from day one. It is noted that most of the economic benefits linked to customer improvements from the Partnership proposal have not been included in the assessment. Why?

Value for Money

The retention of the average single fare being as now and the proposed annual increase in fares of RPI +1.4% are failing to offer value for money. On the other hand, there is a strong chance that political intervention could reduce the forecast fare rises which would then lead to the economics of the Franchising proposal failing.

Q15. Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

The proposed Franchising Scheme falls short in contributing to GMCA's objectives as set out in the Strategic Case.

It is recognised that punctuality and reliability are the most important factors to bus customers yet the proposed scheme fails to address the causes of inconsistent bus journey times which are affected by highway issues – road works, traffic signal phasing, limited bus priorities, road space used for on street parking. 4.35 in the Consultation document confirms that some of the challenges facing the bus industry cannot be addressed. These are the ones that matter most!

There are no specific plans to address air quality or reduce the fleet age without external funding.

Most other objectives will be delivered after the transition period but with the key objectives needing significant funding, these might never be achieved.

Q16. Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case?

The Partnership proposal will contribute to most of the objectives much sooner than the Franchising proposal without any risk to the public purse or inconvenience to customers as the complexities and confusion during the transition will not apply.

There are many positives within the Partnership offer that are aimed at improving the image and perception of bus travel with the operators focussing on the quality of the vehicles and the Authority needing to focus on bus priorities and highway infrastructure. This recipe has worked well across Greater Manchester through the existing QP schemes, with Vantage being a good example.

Q17. The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:

- offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options,*

This comment is misleading. Even though we dispute the costs associated with the Partnership proposal it still, offers a much better BCR than the Franchising proposal. £3.46 v £3.11. which includes the inflation busting fare rises of RPI +1.4% which are unlikely to come to fruition

- provide the most economic value (Net Present Value), and*
- create the best platform from which further economic value could be delivered.*

There is no evidence to prove this conclusion as the key issues affecting the delivery of good bus services have not been answered.

The main concern is was whether interoperability is a direct user impact. That is, does interoperability refer to journey time / fare savings caused by the ability to use tickets on different services, and therefore within the demand model GJT savings of this type have been isolated from the general GJT reductions (caused by wait time and network improvements)?

It is not clear that interoperability per se offers a benefit to users – i.e. over and above that provided by reductions in wait times, reductions in fares and improved accessibility. From the consultation document and response, it is not clear how interoperability has been specifically incorporated in the analysis.

Is it the case that interoperability benefits are used to describe the journey time improvements achieved by users who currently hold own brand tickets i.e. they are a particular type of time savings / fare savings? Or is it that within the appraisal, interoperability is considered as offering a benefit above and beyond this?

Our understanding from the documentation is that it falls into the second type. If so, can TfGM provide details of any research undertaken to verify that interoperability benefits do provide benefits above direct user impacts through, e.g. increased travel horizons?

Section 5.5 of the Economic Case supporting paper sets out how the Demand and Revenue Model (DRM) accounts for the improved driver standards, customer service and additional FTE positions for the managing the contractual regime.

For improved Driver Standards, this is expected to create a step change improvement in the quality of service offered and a willingness to pay valuation for this improvement is used based, on passenger survey work. We understand that the value for this is 5.0p (2017 prices) based on TfGM research, and is applied 50% for the entire period. However, the details of how this value has been derived and the rationale for applying 50% of the benefit are not clear from the Economic Case supporting paper.

For additional customer service and contract management resource, an assumption of the economic value is used which is broadly equal to the cost of deployment. The rationale for this approach is explained that if this were not to be the case, then staff would be redeployed or curtailed, and also the small scale of the envisaged impacts. It would be helpful to further understand the scale of these impacts (e.g. assumed number of resource and/or evidence of effectiveness of such resource from other similar operations in the UK) in order to strengthen the justification for the approach taken.

Do you have any comments on this?

Please see the attached paper which constitutes an in-depth study of the Economic Case. There are numerous areas of concern flagged up in the report which if not addressed, will have a significant impact on the overall cost and success of the franchising proposal. As detailed above we request that the findings of this report are analysed and reported on by the Auditor.



One Bus Economic
Review V3.pdf

Q18. Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

No comments other than as noted in our response to Q19 regarding the best use of assets.

Q19. Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

Yes, short term contracts may be unattractive to some operators and will be met with a higher cost per annum charge to TfGM than for a longer contract. Operator set up costs will be spread over a much shorter timescale and vehicle leasing costs will be higher for a shorter term.

In some cases, school services and infrequent services will be operated by the same vehicles as daytime interpeak services. These should be packaged together and share the same contract length, otherwise there will be a duplication of some fixed costs.

Q20. Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?

With control comes risk! It is not confirmed if in assessing the contract costs that TfGM has built in sufficient cost to mitigate the risks they are taking on or to cover the increased costs that operators will face by insuring against the penalty regime – increased journey times and increased levels of standby staff, vehicles and supervision.

Q21. Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?

Our concerns are twofold. Firstly, we believe that TfGM has grossly underestimated the number of staff that operators will require compared to how the current operation works. TfGM has assumed the 25 staff who are currently employed by bus operators in marketing roles will transfer under TUPE to TfGM. The Assessment has failed to account for the additional staff the bus operators will require to:

- Ensure that data required by TfGM is collated and maintained
- Manage the punctuality and reliability of buses to provide the level of service as dictated by the contract and to ensure any operational penalties are avoided. One London contract operator employs almost 100 staff to supervise their 900-vehicle operation. This additional cost will have to be built into contract prices at further expense to TfGM

Secondly, the allocation of contracts may mean staff not working from the depot nearest to their home and they will have to consider travelling further or leaving the job. In view of the complexities of pension arrangements and TUPE it will always be difficult to estimate the employment costs associated with the Franchising proposal. The Partnership option does not have these complexities.

The Assessment has not taken account of the close political links that exist with Unite, the driver's union and The Labour Party where there is the potential of requests for pay parity between operators and agreed new starter rates. The Trades Union will be keen to agree these terms and conditions to ensure that their members are not affected by differing employers despite TUPE being in place. Several examples past and present of the Mayors of London agreeing to similar interventions exist.

Q22. Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?

It is noted that there are contingency plans in place should the owners of the 10 strategic depots not be willing to negotiate a satisfactory transfer, however the timescales associated with these alternative plans will likely delay the process and all of the options would have carry greater costs. The Partnership option does not require such non customer focussed additional costs to the Authority.

Q23. Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?

Again, the assumption is that an incumbent operator who does not win a franchise will sell the fleet to the new operator for the guaranteed residual value agreed. This has two obvious flaws. If the incumbent operator decides to transfer the fleet to another of their other operations, the new operator will have to acquire vehicles from elsewhere at greater cost than the above suggested way forward. Secondly, the assumption of the Clean Air Plan not being included in the Assessment will either see the Plan not delivered, or funding required from elsewhere. It is understood that TfGM are not willing to negotiate on the RV agreement with some operators.

Q24. Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?

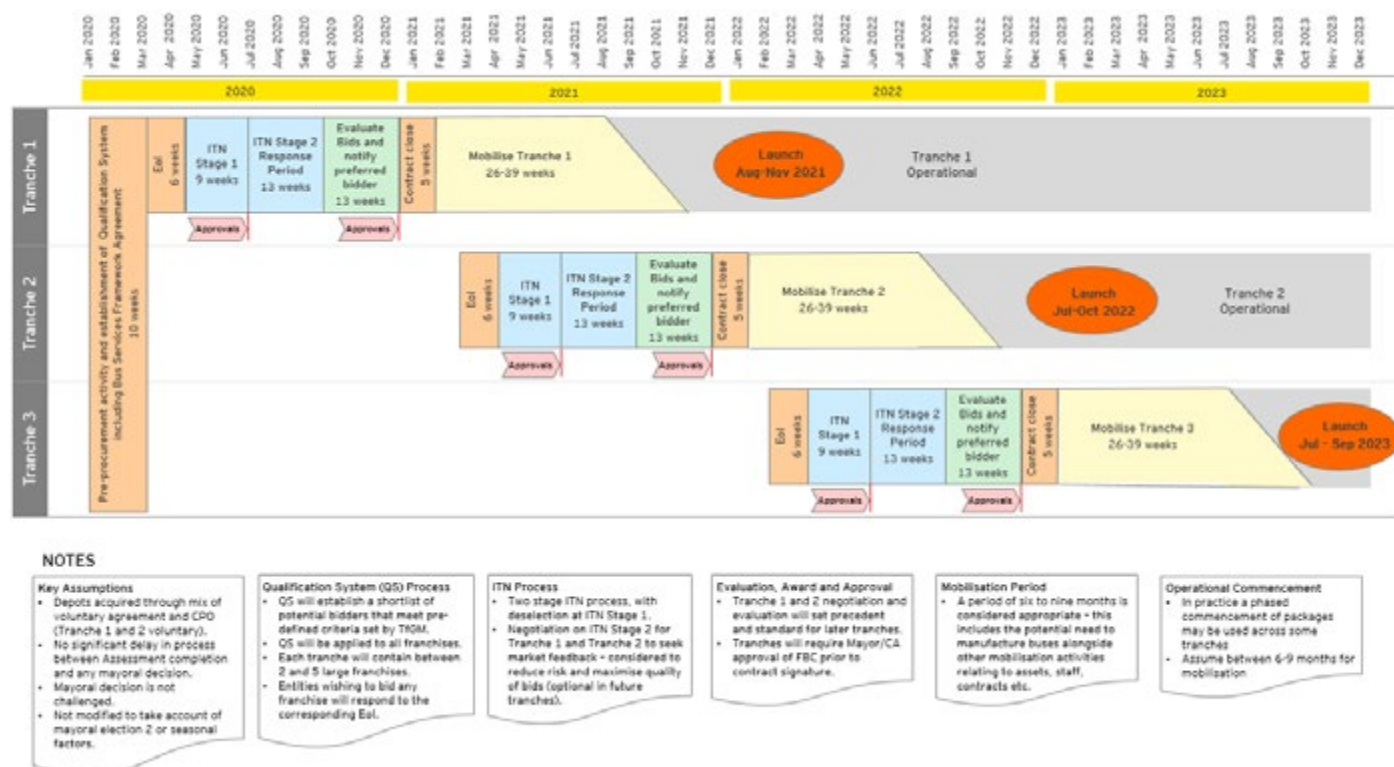
This sounds a very ambitious project and one that our experience shows will not be delivered in a short time frame. What will be in place prior to this system to secure efficiencies and a consistent customer experience through the standardisation of operational and maintenance procedures?

Q25. Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?

As outlined in Q7 and Q8 above, the timescales for the procurement of each tranche are very ambitious and therefore the comment at 4.93 needs further scrutiny.

If an operator is awarded a contract in the first tranche covering Area A, they will not commence operation of that contract until 2 January 2022. The second phase of contracts covering Area B will be awarded on 25 March 2022 and therefore that operator and TfGM will have had no time whatsoever for lessons to be learned from the preceding set of franchise procurements.

It is accepted that the chart below shows the incorrect dates however, it does show that bidding for the second tranche commences well in advance of the first tranche being operational.



At 27.3.5 in the Commercial Case, the risks of these individual launch dates being achieved are also highlighted in that they assume that Depots would be available in time for each large franchise to be let and that a large proportion of the existing fleet will be available to bidders. What if this is not the case?

Q26. Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?

There is the potential that the introduction of a service permit system for cross boundary services may have cost implications and if the service is supported by the neighbouring transport authority, neither they, nor the operator may be willing or able to take on the additional cost and the service could be withdrawn. As explained in our response to Q2, the proposal seems to have some uncertainty about the role of cross boundary services within the franchise area with the option that the service may have picking up and setting down restrictions. This is totally alien to the concept of the customer being able to board the first bus arriving at their stop.

The likely risks of this uncertainty should not be underestimated.

Q27. Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?

The three reasons quoted as being the best way to deliver the commercial proposition need further analysis:

- The current method of delivery can be improved, through a **partnership** to support the achievement of the key commercial aims of delivering bus operations that offer quality of service and value for money and still allow access to the market for small and medium sized operators.
- The market engagement test held in 2018 may well have indicated a high degree of appetite from the operator market but this does not give any indication of the likely final cost or that all contracts will be successfully awarded. TfL admit to finding it difficult to attract new operators to the contract market. Lessons should also be learned from operators of rail franchises who have recently had their franchises terminated early due to poor performance and the misery suffered by their passengers.
- The Partnership model will be deliverable much faster and will less customer inconvenience.

Q28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

Having read paragraphs 4.103 and 4.104 the current Partnership offer (at the time of developing the Assessment) provides enough certainty as a legally binding Voluntary Partnership not to require the complications of an EPS. The VPA can be delivered within a very short time frame and for a fixed or flexible term.

The comment in the box at paragraph 4.106 is totally misleading in that it implies there is no 'interoperability' benefit at present and only the Franchising Scheme can deliver this. There is a range of multi operator and multi modal tickets available now and under the Partnership Proposal the operators have agreed that these products will be the prime products for targeted marketing.

Additionally, it is unlikely that more trips will be generated where two operators exist, than are taken now especially if duplication is to be reduced as part of the Network proposals.

Q29. Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case?

Business as usual can only be good news. Employees will have greater certainty over their future employment without any risk to their pension, pay rates or place of work. Drivers will be better trained and more skilled in their role.

Q30. The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?

OneBus accepts that based on the conclusion of the Financial Case, GMCA could afford to introduce and operate the Proposed Franchising Scheme. However, we do not accept the accuracy of the Financial Case as it stands and have concerns that the final cost of the transition and the ongoing annual costs are grossly understated and likely revenues overstated. The lack of clarity on investment in the fleet and infrastructure is of further concern.

Q31. Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?

We fail to understand where any of the costs in the Proposed Partnership option have come from as at no time during our discussions with TfGM have likely costs been debated or agreed. The operators have always assumed that there would be no additional costs associated with managing the partnership however these have been assumed in the assessment.

TfGM's total disregard for the real economic benefits from the Partnership commitments is not accepted and fails to offer a true comparison with the Franchising Scheme.

THESE ARE TfGM'S ASSUMPTIONS WHICH HAVE NOT BEEN AGREED WITH US. WE THEREFORE DISPUTE THEM.

It is not fully understood why Concessionary trips will increase in the Do Minimum and Partnership options but not in the Franchised Scheme?

Q32. Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?

Whilst 57 Full Time equivalent staff is a significant and unnecessary cost to introduce a system of managing the franchised operations, it will not be enough. These are technical posts and would require staff who are trained and have some local knowledge.

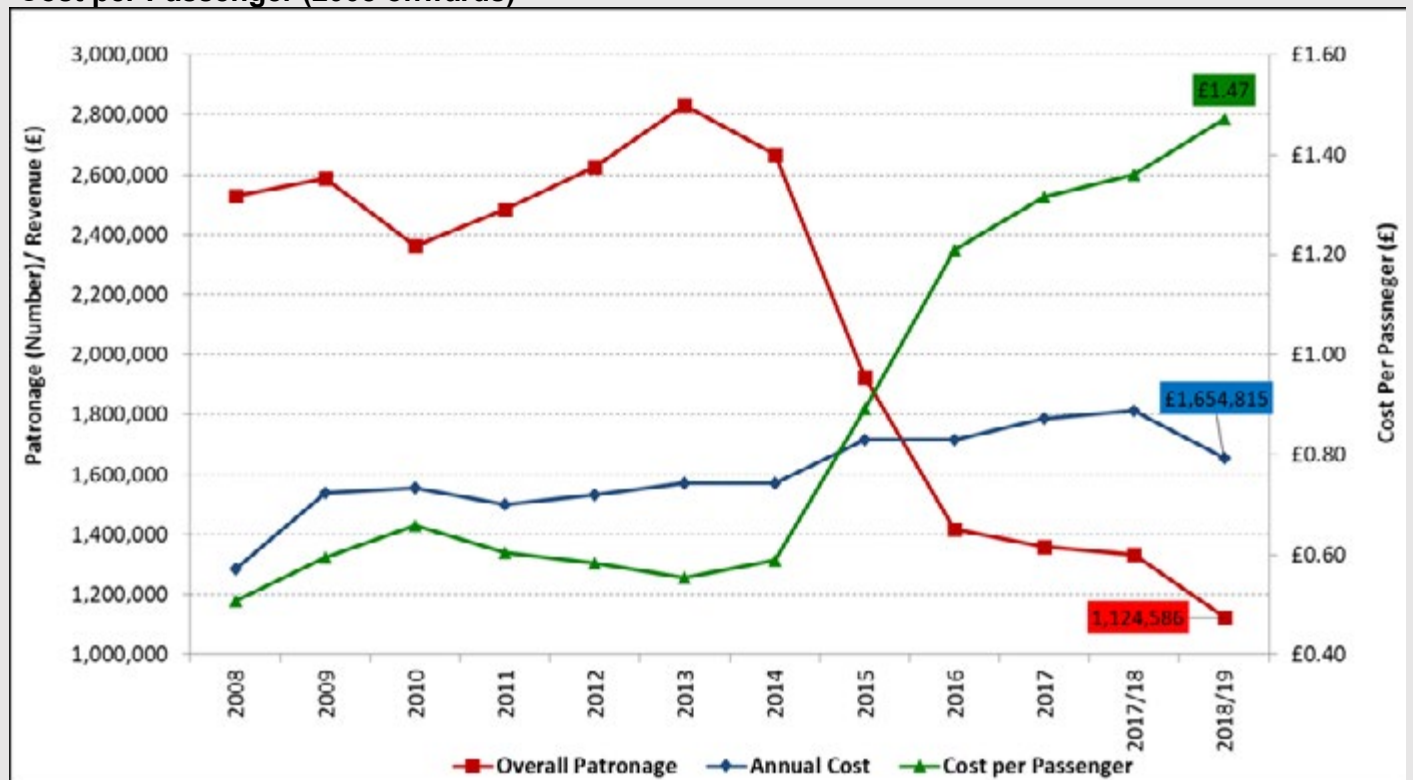
TfGM 's track record in the awarding and managing of the current small number of contracts is poor. In the Summer of 2018, despite bids for School contracts being completed in February of that year, a large number of those contracts were awarded as late as during the school holidays with operators not having sufficient time to register the services, recruit sufficient staff or acquire vehicles. TfGM accepted the delay and blamed it on staff holidays and sickness. This is simply not good enough.

Case Study

Whilst on a much smaller scale than the whole of Greater Manchester but on a similar basis to franchising, TfGM's management of the Manchester MetroShuttle /Free Bus network over the last few years is of grave concern. Following four years of significant passenger decline, changes were made to the services on 28 October 2018 with a very expensive rebrand. The routes were revised to reflect research that had been undertaken on passenger flows. Within a few months of that relaunch, a report was put to the GMCA Transport Committee recommending further radical changes which were introduced on 27th October 2019 completely changing the route of Free Bus 2 to operate in the opposite direction and introducing a further complication of a differing evening service pattern. The report highlighted that overall patronage for 2018/19 was 1,124,586 which represented a notable reduction of 15.7% (209,040) from the 2018 figure (1,333,626) and continued the declining trend in passenger numbers.

The cost per passenger for the Metroshuttle/Free Bus services since 2008 is shown in the chart below and currently stands at £1.47. It has continued to increase as the patronage has declined and service levels have been reduced. The solution to managing the decline has been to increase the subsidy per passenger.

Cost per Passenger (2008 onwards)



As detailed above in the response to Q21, no account has been taken in the Management Case of the additional staff the operators will have to employ to ensure TfGM have the necessary data and information to enable them to fulfil their role or the additional staff to manage and control on the road operations to maximise punctuality and reliability. It is also very unlikely that there are 25 staff employed in roles by the operators that would TUPE to TfGM.

Q33. Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?

The scale of the transition and the risks associated should not be underestimated. A number of these risks have been identified and all of them have the potential to inconvenience customers who will have very high expectations of the new system. Failure to deliver punctual and reliable services early in the transition will lead to passenger decline despite all the theory of growth because of the change.

Whilst the Assessment lacks a lot of clarity on the fine detail of the passenger benefits, it is very detailed about the number of staff TfGM intends employing and the roles that those staff will be appointed to.

Q34. Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?

We support the statement at paragraphs 4.169 and 4.170 that implementation of the Partnership would not be as complex as for the Franchising Scheme and not require the major procurement phase. The Management Case also concludes that by implementing the new operating model and managing the transitional activities jointly with the operators, TfGM would be able to manage either of the partnership options on behalf of GMCA – without the need for excessive numbers of additional staff being employed and therefore we cannot understand why this option has not been taken seriously!

Q35. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?

Firstly, it is disappointing that the impacts on passengers of Bus Reform is not raised until Question 35 of this Public Consultation document which is deemed to have the primary aim of improving their bus services.

As detailed in 61.1.14 and set out in the Management Case at Section 48, there are risks to the level of service passengers receive posed by the transition to the Franchising Scheme option that would not exist in a transition to the Partnership option. We do not consider that the measures suggested in 61.1.15 would be enough to mitigate those risks.

The anticipated growth rate of new passengers at 5.6% (9.3m trips per annum!) over the do minimum is very optimistic to the extent of being unachievable.

The various measures identified to grow passenger numbers each include a level of optimism which is compounded to give the above figure.

Network

If under the current regime where operators are accused of seeking to maximise revenue and therefore profits, this should be a good indicator of where the strongest markets for bus travel are and that any network review that considers the provision of more evening and Sunday services at the expense of daytime frequencies will inevitably generate less revenue.

Section 7.2 of the Strategic Case focusses on the provision of an extensive network that should be easy to get to and take people to where they want to go and when they need to travel. This is then summed up as being comprehensive and simple (easy to understand). It is certainly possible to have a network that is comprehensive and to have one that is comprehensible, but not both. How, therefore does this fit with the objectives of the Network Planning Principles?

Integration

There are plenty of words about the perceived benefits of integration but no examples of how this will be achieved to warrant the suggested passenger benefits. At Section 6.3 of the Strategic Case, the operators are blamed for the lack of integration, however there are many cases of where TfGM fails to promote integration between services – by failing to produce publicity that show composite timetables for buses operating on common corridors and between modes by not having on board announcements on Metrolink that bus services x, y and z are available from the next tram stop.

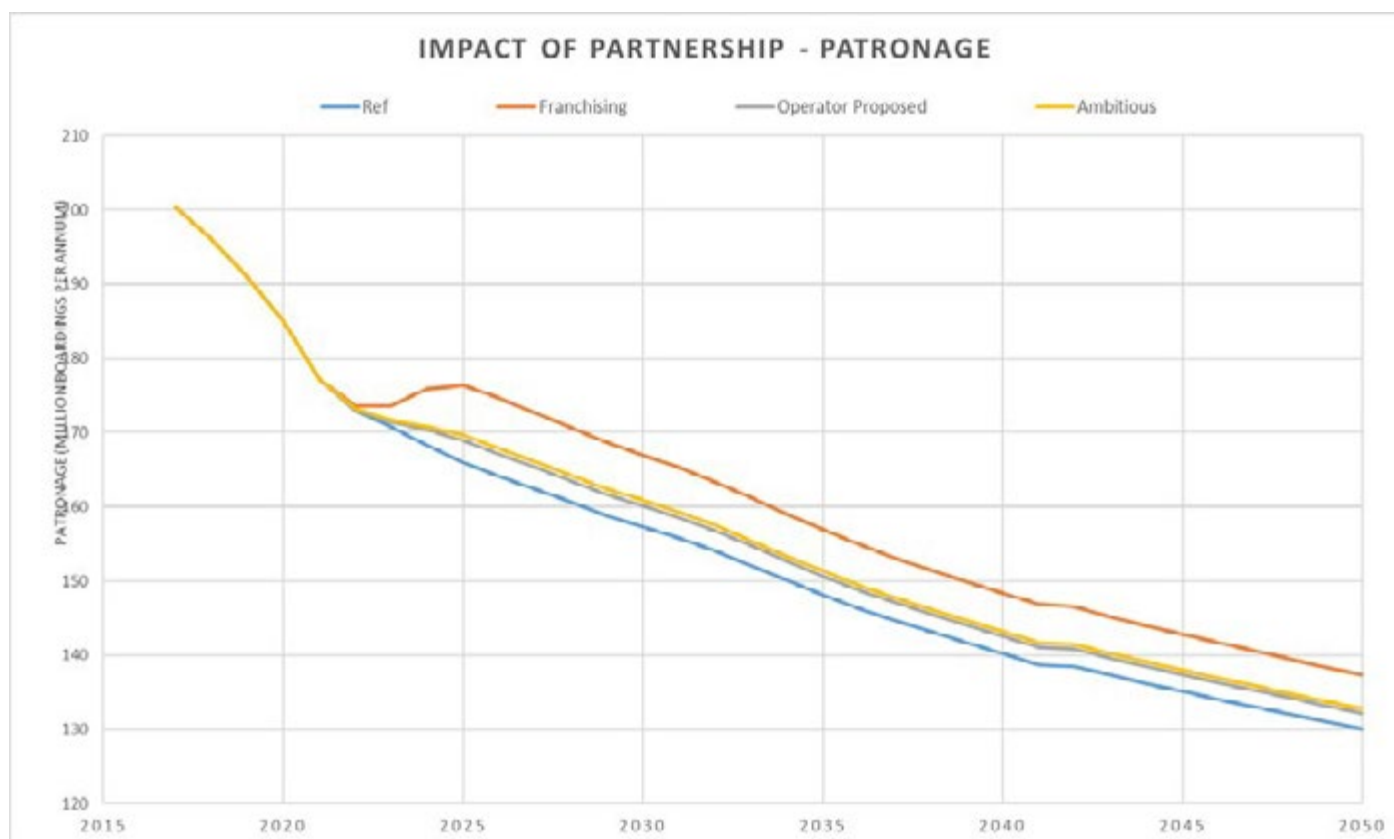
These measures will assist passengers in making their journey more pleasant but are unlikely to generate high levels of new users.

Reliability and Punctuality

Paras 7.2.9 and 7.2.10 recognise the real benefits of reliable and punctual bus services and that these should be improved through targeted investment in bus priority and at relevant junctions. The Assessment however fails to include these in any detail other than referring them as unfunded phase 2 measures.

Passenger Numbers

The Franchise proposal shows the rate of passenger decline after 2025 being the same as the partnership alternative with the early effect of the 9.3m generated trips through improvements made as a result of the proposed Scheme. The proposed Franchising Scheme fails to stop passenger decline. Why?



Q36. Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options?

The assumptions of the actions contained in the partnership proposal on passengers have been assessed by TfGM **with no input from the operators** which is of concern to the operators. In the true spirit of The Act it is imperative for GMCA, TfGM and the operators to work together to identify the most appropriate measures to improve bus services and not for TfGM to cherry pick the from the operators draft proposal without agreeing these with the operators

Q37. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options?

The views of the impacts of the Proposed Franchising Scheme on operators will be split.

Most incumbent operators will not see the need for such expensive draconian measures to change the market when there are great examples across the country where partnership is proven to be successful and

passenger numbers are growing. Bristol, Birmingham and Merseyside being good examples to compare with London's present situation.

These incumbent operators can create a significant risk to TfGM if they decide to move their assets elsewhere across their other operations where they exist if not successful in bidding or are not willing to enter negotiations about the depot assets they hold.

There will also be implications on pension liabilities which is noted in para 4.196 which should not be considered lightly.

It is recognised that there may be legal challenges from operators who oppose the decision to introduce a Franchising Scheme and this could see delay to the introduction and additional costs.

However, there are other operators who will look forward to spending time and resource bidding for the contracts in the hope of winning work as a new operator in Greater Manchester. These may well be operators from outside of Greater Manchester who have no experience of the road network, congestion hot spots and other factors that are unlikely to be included in their bid. This is of concern to incumbent operators who may bid more realistically but then lose the contract award on the grounds of an unrealistic price from the new entrant. Examples of this and poor performance affecting rail franchising are regularly reported in the National and Local media so why should bus users face the same issues unnecessarily.

Q38. Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options?

We dispute the critical and biased way that the operator commitments have been considered when defining economic benefits. There are passenger benefits from the Partnership proposal that match those in the Franchising proposal that are not given the same level of economic benefit.

In 61.2.3 of the Review and Conclusions section, the comment '*but the partnership proposals do not mean a great deal of change from the status quo*' highlights the bias of the whole document. The Partnership offer delivers significant improvements to passengers. It is also noted in 2.1.7 and 2.18 of the Partnership Options – Operators Position and Modelling Implications report that TfGM has not modelled any benefits from the consolidation of single tickets and fare bands, or the adoption of smart integrated ticketing in the form of a 'fair price promise' as proposed by the operators

In 3.1.1 of the same report, no benefit has been afforded to the operator proposal of a single sub brand unlike the significant benefit afforded to the suggested Franchise brand. This point was also picked up by the independent auditor and we do not accept TfGM's response back to the Auditor.

Q39. If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business?

OneBus does not operate bus services in Greater Manchester but represents several large and small operators who do. OneBus is of the firm opinion that the best option is partnership. The benefits of faster delivery with no risk to the public purse outweigh the fact that the proposed Franchise Scheme has political support.

If so, please explain what you think those positive or negative impacts would be.

Q40. Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options?



One Bus Economic
Review V3.pdf

Please refer to para 3.9 of the OneBus Economic Review -Jacobs Report attached

Q41. Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?



One Bus Economic
Review V3.pdf

Please refer to para 3.10 of the OneBus Economic Review - Jacobs Report attached

Q42. Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?

We have some concerns how GMCA will be able to deliver its own objectives to improve bus services. We have even greater concerns if it fails as the Assessment concludes that the Proposed Franchising Scheme is the option which is **most likely** to deliver..... There is no guarantee it will!

Whilst most of the detail in the Assessment relates to the transition, what would happen if funding is not available for Phase 2?

Q43. Do you have any other comments on the Assessment of the Proposed Franchising Scheme?

The Assessment is built upon assumptions based around soft measures and fails to address the key aspects of improving bus services – increased bus priorities and delivery of consistent journey times.

The colour of the buses, the introduction of a one stop-shop for customer queries, inflation busting fare increases and networks based on social need and minimum frequencies are not enough to give passengers confidence to change from using their car.

Bus operators may be seen as 'robber barons' but they are intrinsically more aware of passenger needs than TfGM and their experience of running buses on a more social basis. Failure to acknowledge the key issues in providing a better bus service will not give the result expected from the Assessment.

Question on the Equality Impact Assessment

Q44. GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

As noted elsewhere in this response, TfGM has failed to do their part in the delivery of the PSVAR by making life difficult at bus stops for the elderly and mobility impaired by not creating bus stop clearways with raised kerbs. Wrongly, the Mayor was critical of bus operators failing to have buses with ramps when legislation dictated that they had to be suitably equipped and were. The fact that less than half of the bus stops across Greater Manchester are not suitable for easy access was not picked up by him and will not be addressed by the Proposed Franchising Scheme. In this case the Scheme fails to meet the due regards of those who are disabled.

Q45. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

OneBus does not support the introduction of the Proposed Franchising Scheme as almost the same result can be achieved through a Partnership with no risk to the public purse and the customer improvements needed to make buses better can be delivered much quicker. The Partnership Proposal avoids the complexities of the Franchise transition period and is not dependent on a Phase 2 windfall of public funding to deliver customer benefits.

Q46. Are there any changes that you think would improve the Proposed Franchising Scheme? Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

The Proposed Franchising Scheme fails to tackle several key objectives of the 2040 Strategy. It **fails to stop the decline in bus use**, it fails to make any changes to **reduce bus journey times** or introduce new buses without external funding. It fails to address the **perceived inadequacies in the network** and **falls short of providing value for money with inflation busting fare increases**. Introducing these fundamental changes will improve the Scheme but make it beyond affordability

Q47. If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made?

The suggested changes above would be unaffordable and therefore we would be still unlikely to support the Proposed Franchising Scheme as the Partnership proposal is a much better alternative.

Q48. Finally, do you have any other comments you want to make?

The Guidance Notes to the Bus Services Act 2017 states *It is up to local authorities, working with their local bus operators, to determine which of the partnership schemes, if any, could improve local bus services in their areas....*

The same document confirms *franchising is a big decision which - as well as creating new opportunities - can have significant implications for existing bus operators and passengers and potentially expose local authorities to significant financial risks.*

Over the last two years there has been a barrage of open criticism towards bus operators without any due regard to the problems that they face. Media reports of buses being stuck in severe traffic congestion, buses taking over 30 minutes to pass through one junction in the City Centre and buses becoming gridlocked for over one hour due to road closures for events and parades have been met with no support for the bus passengers and staff whose journeys home have been affected by incidents outside of the operator's control. Despite these incidents, passenger satisfaction remains high, yet this is not recognised in the quest to improve buses across the Region. The only motivation seems to be gaining control of the buses.

There is enough evidence in National and Local media, in GMCA Committee Reports and other documents that franchising or public control of bus services is seen as **the only solution** to solving Bus Reform in the eyes of most local political leaders and some senior officers within TfGM. According to the Act, the purpose of the Assessment is to consider in an open and honest way, the options available to the Authority and operators to deliver the improvements necessary to make buses better. However, reading the Assessment its only purpose seems to be the need to prove that the Franchising Proposal is the only method that is worth pursuing.

Only in the last few days, Andy Burnham was critical of the impact of one area of franchised transport operations on passengers in Manchester saying that rail franchises are 'making people's lives a misery'. We have only one question to ask -why does he want to inflict that same misery onto bus passengers?



Partnership Plus

A new plan to deliver a better, jointly planned
bus network for customers and communities
in Greater Manchester.





INTRODUCTION

We agree with the voices across Greater Manchester calling for the region's buses to improve as the mayor seeks changes to the way bus services are delivered. Our improved Partnership offer is designed to deliver the changes that communities, customers and politicians want to see, without the need for the extra public funds and delays that franchising bring.

Bus operators can go further and faster than the franchise offer and have committed to significant change by working with TfGM and GMCA to 'do buses differently' sooner and without any need for Council Tax increases.

We are delighted that buses are at the forefront of the debate in Greater Manchester and the funding the region hopes to get from central government. Now we

understand what TfGM is proposing, we can build on the strong improvements operators have made over the last decade, with guaranteed commitments to deliver local aspirations, without the need for franchising.

Gary Nolan,
Chief Executive of OneBus,

A partnership representing the majority of bus operators in Greater Manchester, committed to improving bus travel as part of a modern, jointly developed network in our region.

These partnership proposals are supported by bus operators including Arriva, Centrebus, D&G Bus, First, Go North West, High Peak Buses, Jim Stones Coaches, Transdev, R. Bullock & Co, Rotala – Diamond Bus North West and Stagecoach.

BETTER JOURNEYS

To deliver the great bus service our customers deserve, it is essential that public authorities and bus operators work together to act on what customers want. We have developed our partnership proposal to best leverage the knowledge, resources and influence needed secure a modern service Greater Manchester can be proud of, while achieving value for money.

- **Driving up standards**
To demonstrate our absolute commitment to this approach, operators will sign up to a Performance Regime and regular audits to deliver great service levels consistently across all services, and face financial penalties if they fail to deliver.
- **Working as partners**
Operators will team up with GMCA and TfGM to allocate resources where they will best improve the service. We will review bus stops to ensure these are as close as possible to Metrolink and busy rail stations.
- **Tackling congestion**
We also want to pool our resources with TfGM to identify congestion hotspots and jointly agree interventions so that we can increase bus speeds and reduce variability. This will get passengers where they need to be without them sitting idle on gridlocked roads.

- **Greener buses**
We have committed to investing in new buses to boost the reach of the network. Collectively we will provide 450 new buses in the first three years of the partnership, and these will be the greenest ever seen on our roads. We will also add 30 extra buses to the network so that new routes can be established where the community needs them. Operators will refresh fleets to maintain a seven year average bus age. We want to work with the Mayor to agree what equipment will be provided as standard, including Next Stop information and on-board Wi-Fi.
- **More staff**
We will recruit additional Customer Service staff that give customers a single point of contact, regardless of their query. Drivers will be given further specific training on customer care to encourage more people out of their cars and onto public transport.
- **Simplified journeys**
We want to make using the bus network as easy as possible, so buses will be clearly branded to identify where they can take you, and we will work together with the authorities to make sure that the information passengers receive is comprehensive, consistent and easily understood.



BETTER VALUE

When making improvements across the transport network, it is important that bus passengers receive value for their money and that any required funding is targeted and evaluated against results. This will ensure improvements are sustainable and will avoid the huge public financial losses the bus network has seen elsewhere in the country.

Better value for passengers

- To achieve that, operators will fund the staff needed to operate the refreshed bus network directly from existing revenue. This will include setting up Profit Share Schemes to allocate a share of benefits back into consistently improving our services even further.
- We will simplify multi-operator tickets, already valid across all Greater Manchester buses, introducing a clear, simplified fare structure. Single-operator tickets will still be available for those that require them.
- Operators are also committed to working with local authorities to deliver contactless payment technology across all buses in the region, with daily and weekly capping, similar to London. This will improve ease of use and ensure customers are confident they are getting the most cost-effective fare for their journeys.

Better taxpayer value

- The purpose of these changes is to improve the service passengers receive, without costing more in local and central government subsidies or local tax increases.
- Young people coming off Our Pass will be given even lower cost travel, with an opportunity to sign up to a transitional period of half-fare discounts for up to six months.

onebus

BENEFITS: for passengers and the community

We will bring you all the benefits of a bus service that has the backing of both operators and local authorities. We all agree that improvements can and should be made. We strongly believe that our partnership proposal will deliver the best possible service and value to communities and local authorities in Greater Manchester.

- This proactive, positive partnership will quickly deliver:
 - simpler, more cost-effective ticketing systems across Greater Manchester;
 - new, faster and more reliable routes;
 - more convenient bus stops;
 - better-equipped buses;
 - less congestion;
 - greener buses;
 - better air quality;
 - ticketing inspectors to reduce fare evasions;
 - more staff to support you wherever you need to go.
- Under our partnership proposal, these benefits will be met through a combination of operator revenue and public sector funding and will not result in an increase in council tax for Greater Manchester residents.
- We are confident that this proposal is achievable and sustainable. We have committed to investing in the people, buses and equipment we need to deliver it. We welcome collaboration with the public sector and we invite them, and you, to hold us to account whilst we fulfil our agreement.
- To maximise the benefits of our plans, we require measures to address congestion on the road network. The combination of investment in better services and more priority for buses on the road can lead to a step-change in delivering a key part of the region's public transport network which is vital to our economy, environment and social wellbeing.

CONTACT

Gary Nolan

📞 07899 064 968

✉️ gary.nolan3@sky.com

OneBus is a consortium of Greater Manchester Bus Operators Association (GMBOA) members representing the region's network. Gary Nolan is our chief executive and spokesperson.



Partnership Plus

Improved Partnership Offer – 8 January 2020 Partnership Plus

The network would be planned with GMCA and using a percentage of incremental profits from highway interventions that improve bus services we will work with TfGM to identify where this value could be used to meet agreed network deficiencies.

The bus operators have agreed to provide 30 extra buses, to be used on a mix of 'kickstart' style services and to reinforce the existing network, on a basis that will be agreed locally in each district. The intention is to improve connectivity by trialling new services and links that can be grown into new, self-sustaining services while improving connectivity across Greater Manchester.

The Operators agree the introduction of a Performance regime to make them more accountable

Operators will renew their fleets to maintain the seven year average age with at least 450 new buses over the first three years. These buses will feature additional standard equipment as determined by a conversation exercise run by the Mayor

Working with TfGM, bus services would be revised to call at new bus stops sited as close as possible to Metrolink stations and heavy rail stations to improve interchange and connectivity

A price will be agreed for multi operator tickets at £x per week from January 2021 with annual increases after a two year price freeze. Single operator tickets retained to offer the customer choice.

All multi operator period tickets (e.g. Day or week) would be valid on all buses within GM. Operator own tickets will be simplified to a single suite to offer better value for money

With agreement through GMTL , the Partners will Introduce a transitional arrangement for those Young People coming off Our Pass providing the opportunity to sign up to half fare discounts for up to six months.

The partners commit to a TfGM or TfN led 'fair price promise' scheme across all operators in Greater Manchester

Simpler fares - universal ticket and fares structure across Greater Manchester and a significant reduction in the number of tickets available.

No change to fares on discounted corridors

Improvements in driver training around customer care and the aims of the Partnership

Accelerated rollout of wi-fi and other equipment on board

Comprehensive unified livery with customer focussed route/corridor branding

Additional Customer Service and Revenue Protection staff

A single point of contact for customers to resolve issues with the addition of operators retaining the direct link to maximise customer accountability with them

Consistent and comprehensive information provision

Additional resource to monitor and manage performance

Consistent service standards across all operators with regular audits

Introduction of a joint process to identify congestion hotspots with interventions to increase bus speeds

Operators continue to take the revenue risk and decline the option of accepting a guaranteed publicly funded profit through franchise contracts

No excessive public funding required to provide the best service possible

Profit Share Scheme where Partnership Interventions grow profit to be put back into the services rather than being passed to shareholders

Introduction of some form of Liquidated Damages for significant breach by any party

No need for the significant additional staff costs of preparing, managing and monitoring the contracts



Manchester Bus Market Reform

Review of Consultation Economic Case

Version 3.0

20 December 2019

Prepared for OneBus

Project Name

Project No: LKPS2512
 Document Title: Review of Consultation Economic Case
 Document No.: N/ A
 Revision: 3
 Document Status: Approved
 Date: 20 December 2019
 Client Name: OneBus
 Client No: N/ a
 Project Manager: Ben Tirunawarkaristu
 Author: Mario Rivas
 File Name: One Bus Economic Review V3

Jacobs Limited

Cottons Centre, Cottons Lane
 London SE1 2QG
 United Kingdom
 T +44 (0)20 3980 2000

www.jacobs.com

© Copyright 2019 Please select a legal entity from the Change Document Details option on the Jacobs ribbon. The concepts and information contained in this document are the property of Jacobs. Use or copying of this document in whole or in part without the written permission of Jacobs constitutes an infringement of copyright.

Limitation: This document has been prepared on behalf of, and for the exclusive use of Jacobs' client, and is subject to, and issued in accordance with, the provisions of the contract between Jacobs and the client. Jacobs accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.

Document history and status

| Revision | Date | Description | Author | Checked | Reviewed | Approved |
|----------|--------------|--|-------------|------------------|--------------------------------|--------------|
| 1 | 27/ 11/ 2019 | First review of document | Mario Rivas | Benedict Durrant | Ben Franklin/ Russel MacDonald | Ben Franklin |
| 2 | 04/ 12/ 2019 | Second review of document including client comments | Mario Rivas | Benedict Durrant | Ben Franklin | Ben Franklin |
| 3 | 20/ 12/ 2019 | Final amendments and including comments from One Bus and Bus operators | Mario Rivas | Benedict Durrant | Ben Tirunawarkaristu | Ben Franklin |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Contents

| | |
|---|----|
| Executive Summary | 1 |
| 1. Purpose of the study | 4 |
| 2. Introduction..... | 5 |
| 3. Economic Case Review | 7 |
| 3.1 Introduction | 7 |
| 3.2 The Economic Case | 7 |
| 3.3 Introduction | 9 |
| 3.4 Option Descriptions | 9 |
| 3.5 Appraisal Methodology | 13 |
| 3.6 Economic Appraisal | 15 |
| 3.7 Impact on Passengers | 18 |
| 3.8 Impact on Operators..... | 19 |
| 3.9 Impacts on the GMCA and TfGM..... | 24 |
| 3.10 Impacts on Wider Society | 25 |
| 3.11 Risk Assessment | 27 |
| 3.12 Economic Case Conclusion | 30 |
| 4. Economic Case Supporting Paper Review..... | 31 |
| 4.1 Introduction | 31 |
| 4.2 Overview | 31 |
| 4.3 The Forecasting Framework | 31 |
| 4.4 Establishing a Baseline | 33 |
| 4.5 Establishing the Reference Case | 34 |
| 4.6 Establishing the Impacts of “Do Something” Interventions 21 | 37 |
| 4.7 Economic appraisal framework | 39 |
| 4.8 Wider economic impacts (WEIs)..... | 40 |
| 4.9 Bibliography..... | 41 |
| 4.10 Appendixes..... | 42 |
| 5. Summary of Key Findings..... | 43 |
| Appendix A. Full Tables..... | 49 |

Executive Summary

On 14 October 2019 Transport for Greater Manchester (TfGM) launched a consultation¹ on a series of proposed options for reforming the bus market in Manchester. TfGM's preferred option for reforming the bus market is to introduce franchising across the network. This report has been prepared for the industry group responsible for representing bus operators in Greater Manchester (known as OneBus) and the findings of this report will form part of OneBus's response to TfGM's consultation.

This report summarises the findings of a technical review completed by Jacobs of the methodology and modelling assumptions used in the economic case section of the consultation business case. Ultimately, the methodology and modelling assumptions reviewed in this report have been used to justify TfGM's preferred option of franchising.

The following areas of the economic case have been identified as “Red - Potentially a significant area of concern in the assessment”, requiring further exploration by OneBus in their consultation response in order to ensure that the decision made by TfGM to move to a franchising model is based on robust evidence and modelling approach.

Demand forecasting and appraisal methodology

- The use of a 30-year appraisal period has the potential to unfairly favour franchising as this option has the longest operational timeframe compared to the partnership options.
- The Do Minimum scenario excludes proposed future transport schemes that do not have confirmed funding. For example, only two Metrolink schemes are assumed over 30-year appraisal period. It may be unrealistic to assume that no further public transport interventions are made by TfGM over this long timeframe.
- There is a significant risk that the modelling approach double counts benefits from the introduction of interoperable tickets and a more frequent service level. Both facets of franchising may have similar impacts, and therefore modelling the impact of both policies separately has the potential to overestimate the impact of franchising on demand.
- The demand and revenue model uses an elasticity-based approach. This may not be appropriate given the scale of proposed changes to the bus network, as elasticity-based modelling is normally used for smaller-scale interventions such as revisions to existing timetables. This has the potential to either underestimate or overestimate future demand levels compared to a real-world scenario.
- Service quality improvements are assumed to have a significant impact on levels of demand. However, this is only backed up by limited evidence from other studies. Therefore, there is a risk that the scale of these benefits has been overestimated. Also, soft initiatives can be implemented in the Ambitious Partnership scenario which would increase benefits and Value for Money (VfM).
- The assumptions that have been used in sensitivity testing have not been fully “stress-tested”. Sensitivity tests included in the analysis vary input assumptions by a smaller proportion than would be expected in an economic case such as this. Additionally, the results from several sensitivity tests were counterintuitive (for example had the opposite impact on demand that would have been expected). This undermines the credibility of the analysis. For example, the lower population growth scenario was found to improve the business case compared to the central scenario. It would be more reasonable to expect this scenario to worsen the business case as demand would be lower in a scenario with a smaller population.

¹ <https://tfgm.com/future-travel/proposed-franchising-scheme-consultation>

- It is not clear how reliability and frequency were considered in the demand model. These two variables are highly correlated with demand, meaning that demand could potentially be overestimated within the model.
- Further clarifications are needed on how TfGM have built the baseline for demand, and how they have abstracted the effect of demand growing in Metro and the reduction on Supported Services.

Revenue Forecasting

- Fares were expected to increase by RPI + 1.4% in each option for all ticket types. This assumption is particularly high given average fare yield growth across English metropolitan areas since 2004/05 has been at a rate below RPI². Therefore, modelled revenue levels are likely to be over-estimated as a result of this assumption.
- With the introduction of bus franchising, TfGM are likely to be subject to political pressure to limit the increase of fares in real terms - as has been the case in Greater London recently. This would impose future limits on fare rises, particularly single fares which have seen the largest increases price in recent years.
- The modelling of revenue for English National Concessionary is inconsistent with recent evidence which shows falling trips made under ENCTS. The assumption is also counter-intuitive as it might be reasonable to assume that bus use by pensioners will fall in the future as car-use becomes a more affordable alternative to travel for this group due to rising incomes amongst this cohort. Additionally, the ENCTS eligibility criteria will change in the near future, leading to a further reduction in bus use by this cohort.

Impact on Operators & TfGM Finances

- TfGM assumes a blanket 7.5% operator margin across all future franchise contracts. This ignores operational risks, likely bidder interest and the number of routes. Taking these factors into consideration suggests that under franchising operator margins will vary across different parts of Manchester depending on local factors, and that the average 7.5% margin assumed may not be reflective of real-world commercial factors.
- There is a risk that the involvement of public authorities in the award of future franchise contracts could lead to higher costs than assumed in the economic case (which are assumed to be similar to the current arrangements) as political pressure leads to a higher-than-expected increase in service levels.
- There is a risk that the rate of bus replacement will slow down in the years preceding the implementation of bus franchising, which could lead to higher bus replacement costs in the initial few years of implementing franchising. The economic case also assumes that the cost of replacing buses will increase in line with RPI over the appraisal timeframe, but this may be unrealistic as it is inconsistent with anecdotal evidence received from the industry on vehicle costs and also does not take into consideration the fact that the higher level of specification of buses under franchising may also result in higher vehicle costs.
- The cost of acquiring bus depots currently owned by existing operators could be higher than currently assumed in the business case. Existing operators are unlikely to put depots up for sale in order to facilitate a franchising competition which they have a chance of losing. TfGM assumes that the configuration of bus depots across Greater Manchester will remain the same. However, the bus network under franchising will have a different service pattern which may require the purchase of new depots which would increase costs higher than is assumed in the business case. Similarly, spending by existing operators on plant equipment maintenance may fall in the years preceding the implementation of

² Department for Transport, 2019, 'Bus Statistics'. Available at: <https://www.gov.uk/government/organisations/department-for-transport/series/bus-statistics>

franchising which may lead to higher-than-expected bus depot refurbishment costs during the implementation period of franchising.

- There is not of a risk mitigation plan, which could lead to higher-than-expected costs. Finally, it is not clear in the economic case if TfGM have included costs related to new infrastructure (e.g. high-quality bus shelters) across Greater Manchester which are needed to implement bus franchising.

Wider Economic Impacts

- The methodology used to calculate the wider economic benefits from introducing bus franchising raises significant concerns. These benefits usually accrue to businesses who benefit from an increase in productivity as a result of improvements in transport journey times. As only small proportion of journeys made during the day by passengers on work duties are made by bus, it is unlikely that these benefits will be realised.
- There is a further concern around how wider economic benefits have been calculated as no evidence has been provided on the assumptions used to calculate local (as opposed to national) wider economic benefits. Whereas national values used to model these transport benefits are available on the Government website, TfGM have calculated their own values for local impacts. The methodology used to generate these local values is not transparent.

Risk Assessment

- In general terms, TfGM has underestimated the risks related to the scheme, and there is not a clear methodology on how the criteria was established for the impact and probability of each risk in the Non-Quantifiable Risks section. For example, it is appropriate to assume that the implementation risk of an incumbent operator not winning a contract as being 'high', but equally so the wider transitional risks. On the other hand, Other cities, including London, have transitioned their bus business models through various stages where both operators and the 'local authorities' have at times retained both risk and reward, to a position now where quality incentives can enable operators to both develop their business and offer passengers service improvements.
- Several risks are interlinked with one another and should be explored further. In addition, it seems that there are some risks that would flow through each of the scenarios but are not captured in each. An approach which groups risks by broad category rather than perhaps by scenario may ensure that each risk is captured.

1. Purpose of the study

OneBus³ is a partnership of commercial bus operators based in Greater Manchester. It was launched in 2006 and rebranded in 2018 to represents the commercial interests of bus companies in the city.

In November 2019, OneBus commissioned Jacobs to review the economic case section of the business case which was published by Transport for Greater Manchester (TfGM) alongside a consultation⁴ on options for reforming the bus market in Manchester.

The purpose of the technical review was to identify the key issues in the analysis used in TfGM's economic case in order to enable OneBus to effectively assess whether the methodology on which the recommendation to introduce a system of franchising is robust. Ultimately, the findings of the technical review will either provide OneBus with assurance that decision to introduce franchising was based on robust analysis, or (if this is not the case), the required information to challenge the basis on which the decision to introduce franchising was made.

This document presents Jacobs' findings from its technical review of the economic case chapters of the following documents:

- Bus Franchising in Greater Manchester Assessment (September 2019). The Economic Case sections were reviewed.
- Bus Franchising in Greater Manchester Assessment - Economic Case Supporting Paper (September 2019). Chapters 11 to 21 and the relevant appendices were reviewed.

In accordance with the scope of the review, it should be noted that we have not reviewed in detail the other four cases in the business case document (e.g. the Strategic, Commercial, Management and Financial Cases).

The structure of this document is as follows:

1. Purpose of the study
2. Introduction
3. Economic Case Review
4. Economic Case Supporting Paper Review
5. Summary of Key Findings
6. Appendix

In reviewing and identifying the key issues and risks in the economic case, Jacobs has drawn on our deep knowledge and expertise in transport business cases, transport economics (including HM Treasury Five Case Business Cases), operational and commercial aspects of bus operations as well as our local knowledge of Greater Manchester and the bus operators.

³ <https://www.one-bus.co.uk/>

⁴ <https://tfgm.com/future-travel/proposed-franchising-scheme-consultation>

2. Introduction

The preferred option proposed by TfGM as part of the consultation is to implement a franchising system for bus services across Greater Manchester. Under this proposal bus services would continue to be run by private operators. However, unlike under the current arrangements, TfGM would be responsible for specifying bus routes, fare levels, ticket structuring and service levels. Under the proposals, TfGM would also take on farebox revenue risk. TfGM's preferred option is therefore likely to have a profound impact on how the bus network operates across Greater Manchester.

These proposals are expected to impact a wide range of stakeholders, including bus operators, bus users, and the users of other modes of transport. Given this impact, it is important that the bus industry in Manchester (as represented by OneBus) is given the opportunity to robustly assess the economic case which has been used by TfGM to justify the need for this change to the market, and to justify the economic value of its preferred option to introduce franchising.

Some of the queries or clarifications regarding the economic case that were identified also touched on the other four cases of the business case (the Strategic, Financial, Commercial and Management Cases) as well other supporting documents on the consultation website. Where relevant, sections of these other documents were briefly reviewed. Where relevant, we have noted where we have reviewed these other documents and the relevant sections.

For each section within the economic case and the supporting paper, we have each of the issues identified according to a Red/ Amber/ Green (RAG) rating system as set out below, reflecting the severity of any issues or queries we have identified from the assessment:

- i. **Red** – Potentially a significant area of concern in the assessment. For these areas we have significant concerns regarding the methodology, evidence base used, or analysis conducted, and would need further information in order to verify that there are no fundamental issues with the economic case. Our concerns would likely have a material impact on the conclusions and results presented in the economic case.
- ii. **Amber** – Several minor issues or a small number of major issues identified with this area of the assessment which would require clarification. The level of impact on the economic case assessment and conclusions from this may be uncertain, and our clarifications would need responses to allow concern to be moved into either green or red categories. That is, a satisfactory response likely means that there is no significant issue, and so no material impact on the assessment of the scheme whereas an unsatisfactory response likely means that further evidence will be required and there is the potential for significant issue with the conclusions and results presented in the economic case.
- iii. **Green** – No significant issues or clarifications identified. Any issues identified would include minor clarifications on the description of the analysis, the methodology employed, or data used, but generally the approach and conclusions seem reasonable and as we would expect. We would expect that these issues will not have a material impact on the scheme assessment or change conclusions.

For sections where clarification requests were not included, we have incorporated comments detailing why it is not needed.

Any recommendations provided by Jacobs in this report are based on the documents listed above which are available on the TfGM/ GMCA consultation websites.

This report has been prepared exclusively for OneBus and no liability is accepted for any use or reliance on this report by third parties.

3. Economic Case Review

3.1 Introduction

This section describes our review of the economic case section of the 'Bus Franchising in Greater Manchester Assessment September 2019 WEB' document. It includes the key issues identified, key points for OneBus to consider, and our queries and questions regarding this document. The headings below mirror each of the key sections of the economic case chapter of the assessment document.

3.2 The Economic Case

3.2.1 Economic Case Summary (Para. 11.1, Page 156)

Key Issues:

The economic case focuses on examining the question of the value, in economic terms, of an intervention in the bus markets, covering a 'do minimum' reference case and three potential intervention options, which are:

- 1) A new Franchising Scheme.
- 2) An Operator Proposed Partnership reflecting the 'Consolidated Proposal' put forward by operators under the remit of the OneBus organisation.
- 3) A more ambitious partnership that reflects what might be achieved if proposals for a partnership were more ambitious.

TfGM have assumed that the introduction of franchising will generate the following four categories of benefits: -

- I. A standardised ticketing structure introduced across the network.
- II. Benefits to users from bus interoperability across Greater Manchester.
- III. More efficient allocation of buses services across the city; benefitting passengers by providing more frequent services on under-served routes using vehicles currently deployed to areas where there are currently sufficient service levels.
- IV. Benefits from improved customer service and higher performance standards.

Under franchising, changes in ticket prices and the fare structure would be introduced over three years. Fully interoperable ticketing and customer service improvements would be introduced from day one. Network changes (e.g. rationalisation and the introduction of new timetables) would be implemented over a five-year period for each let franchise contract.

Overall assessment: **Green**. No specific issues identified in this section.

3.2.2 What is the Economic Value of Each Option? (Para 11.3, Page 158)

Key Issues:

The economic case concludes that, of all the options, the Franchising Option would deliver the highest economic value for money as measured in Net Present Value (NPV) terms. This option offers the highest value for money for the taxpayer, as this option is assumed to attract higher patronage than each of the other options.

The Franchise Option is forecast to generate the highest benefits, while costing more to implement than the other options. The NPV of the Franchise Option is estimated to be £234m which is more than twice the value of Ambitious Partnership option (estimated to be £103m).

TfGM also modelled the Wider Economic Impacts (WEIs) for each option. The analysis indicates that the Franchising Option would generate approximately £208m PV in WEIs over the appraisal period – substantially higher than other appraised options, and primarily driven by increases in agglomeration impacts, though with increase in all assessed values. With the inclusion of WEIs, the BCR of the franchise option remains the lowest of the three options (4.99 compared to 5.01 and 5.68 for the Operator Proposed Partnership and Ambitious Partnership options respectively).

Overall Assessment: **Green**. No specific issues identified in this section.

3.2.3 'Phase 2' Interventions (Para 11.4, Page 161)

Key Issues:

This section indicates that additional 'phase 2' interventions are likely to be required to help stabilise the market. TfGM states that these interventions were not included in the economic case because they do not have committed funds.

Some details are provided for these phase 2 interventions in the Strategic Case. The interventions include many measures which have been applied on the London bus franchise system such as integrated public transport fares, accessibility improvements, increases in average vehicle speed, service reliability improvements, and customer service enhancements.

Many of these initiatives would require additional public funding to deliver. It is unclear which or any of these phase 2 interventions are required in order to realise the benefits of the Franchising Option as claimed in the economic case. More clarity is required on which costs have been included in the Economic Case, and where funding would be sourced for Phase 2 interventions.

Key Questions:

- Can TfGM provide details regarding the specific investments identified for Phase 2 interventions including their cost and assumed funding sources? Does the list of Phase 2 interventions cover construction of new/ extended depots and additional buses?

Overall Assessment: **Amber**. Further information is needed regarding Phase 2 interventions and whether they are essential to the successful implementation of a franchise network i.e. whether these should be captured in the economic case. Excluding costs needed to implement franchising may lead to an overestimation the Value for Money of this intervention compared to lower cost options.

3.2.4 Value for Money for Public Investment - Derivation of the Value Metrics (Para 11.5, page 161)

This section provides information regarding franchising scheme evaluation guidance.

Overall assessment: **Green**. No specific issues identified in this section.

3.3 Introduction

3.3.1 Approach (para. 12.1.1, Page 164)

Key Issues:

The demand uplift from implementing franchising is assumed to happen within the first three years of the scheme, resulting in permanently higher patronage over the remaining appraisal years compared to the other options. Three years is a very short period for implementation, and it might be reasonable to expect the benefits of introducing franchising to be realised over a longer time period.

Key Questions:

- Has the delayed demand impact from the introduction of franchise initiatives been captured in the demand forecast for this option?
- What is the justification for assuming a three-year implementation period? Can TfGM provide a detailed programme for delivering franchising within the claimed timeframe?

Overall assessment: **Red**. An implementation period of three years is overly optimistic. In order to justify this assumption TfGM should provide a delivery programme for each of the options. It is possible that BCR for the scheme has been overestimated if it takes longer than three years for the benefits of the scheme to be realised.

3.4 Option Descriptions

3.4.1 Definition of Options (Para 13.1, page 165)

Key Issues:

For the franchising option the demand drivers are assumed to be effective within three years (all of the impact on the demand is assumed to occurred within three years), but network changes from franchising are assumed to potentially not be in place for 8 years (third round of procurement + 5 years implementation). This could mean that the demand shift

associated with the network improvements is incorporated too early in the franchising scenario, which could overstate the early years of franchise benefits, which in terms of appraisal are the most valuable.

Key questions:

- How has the delay in demand effects during the implementation phase been modelled, and is it possible that the early year benefits of the franchising option are overstated?

Overall assessment: **Red**. The potential to overstate benefits during the first 3 to 5 years is significant, especially when combined with issues identified elsewhere. This could bring the NPV of the franchise and partnership options closer together, increase costs thereby reducing the BCRs for these options.

3.4.2 The Franchising Scheme Option (Para 13.2, page 168)

Key Issues:

Main changes applied in the network design for running this model were forecast to be net cost neutral⁵ and which were assessed for impacts on passenger benefits using the GM Public Transport model. The model has included: strengthening daytime frequencies; Improving coordination of services on shared corridors, including the removal of service variants; Improving frequency for evening and Sunday on core routes (including removal of variants), re-routing services within corridors to redistribute resources to improve efficiency.

Although the issue of interoperability is important to users as its introduction may provide public transport users with more convenient options to get to their destination, no evidence is presented as to the number of people who currently suffer due to lack of tickets which are accepted by different operators. It is not clear how issues around double counting between the demand drivers is dealt with.

The fares in the franchise option appear to have been set at a level similar to the partnership options, except where people would have to interchange between operators. However, Section 14.5.4 shows an extra 50 million trips over the 30 years between these options, due to fare reductions. If fares are broadly similar, and interoperability is covered separately, it is not immediately clear why there should be such a significant increase in trips due to fare reduction.

Key questions:

- The main benefits come from travel time savings, and according to the table 8 in the economic case, 67% of passengers will have a decrease over one minute in travel time. However, it is not clearly stated the number of people (%) which will have a reduction on their travel times of 1-2 minutes, and which proportion of the total benefits are

⁵ Operational and costs risks associated with network changes for the Franchise Option are discussed in Section 3.8.4, and so are not considered within this rating.

included in this range of travel time savings. It would be useful to create an additional scenario in the sensitivity test removing this group of people who probably would not switch from cars to the public transport for saving 1.30 minutes in travel times. Therefore, benefits from decongestion and travel time savings could be overestimated having a direct impact on VfM.

- How many people would have higher travel times due to re-distribution? And therefore, will move to other mode of transport.
- Can analysis of the number of users currently affected by interchanging between operators be presented?
- Interoperability will benefit users by reducing journey times and ticket prices, but the effect that these have on demand is calculated separately. What evidence is there that the benefit of interoperability acts as a demand driver above and beyond the journey time and fare improvements?

Overall assessment: **Red**. Due to staged introduction of franchises over three years, there is the potential for overestimation of benefits if a lag effect has not been modelled. There is potentially insufficient evidence that interoperability acts as a demand driver above and beyond the journey time and fare improvements. In sensitivity tests TfGM have not considered the responsiveness of bus users to changes in journey times. For example, it might be prudent to run a sensitivity test whereby those passengers saving journey times less than 2 minutes may not increase their demand.

3.4.3 The Partnership Options (Para 13.3, Page 170)

Key Issues:

Network design changes were not modelled for the Operator Proposed Partnership option as it was stated that changes providing passenger benefit would be subject to significant delivery obstacles. Limited network changes identified as being legally deliverable under an Ambitious Partnership were modelled. These assumptions are conservative and do not consider the full range of network changes that could be implemented within the constraints of Partnership models.

Ideally a detailed route-by-route analysis would have been carried out for each of these options to identify efficiencies that could be generated through Qualifying Agreements between operators. The appraisal should have taken into consideration likely changes in the future structure of the bus market and increased scope for inter-operator cooperation.

Under the Partnership Options, fares are assumed to be frozen for two years with the same fare indexation as the reference case (do minimum) thereafter. Operator-own tickets are assumed to continue to be valid only on operator services, with System one tickets valid on all services. All other fares assumptions are the same as in the reference case. Given the limited variation relative to the reference case, these assumptions are reasonable.

Operators continue to collect and retain farebox revenue under Partnership Options. There remain incentives to differentiate operator-own fares from System One fares and maximise revenues. For the Ambitious Partnership, two corridors were modelled to be fully interoperable within corridor, providing interoperability benefits for all passengers. As with the modelled changes to network design, these assumptions do not fully consider the full range of changes that are possible under a partnership option.

Both partnerships are assumed to involve the costs and benefits of free Wi-Fi and better driver training. All other 'soft' initiatives including more on-bus inspectors, unified branding and quality improvements are not included in Partnership Options as it is stated that no substantive or costed proposals have emerged from operator negotiations and no other pathway to benefit realisation has been identified. This assumption unreasonably rules out the potential for additional customer improvements to be introduced under a partnership option either through negotiation or unilaterally by operators. Some of these 'soft' initiatives will have a positive business case for bus operators and may therefore be introduced without TfGM / GMCA intervention.

The benefits of a partnership option are appraised over a 30-year period – which is the same as for the franchise option. It is claimed that it is a conservative assumption to assume benefits over a 30-year period given that a partnership would be expected to terminate over a shorter period. While this may be true, it is equally likely that another partnership structure would be put in its place which would deliver the same level of benefits or higher. The scope for yielding customer benefits from a partnership option may grow over time as the market consolidates and new ticket payment technology becomes available. A more appropriate assumption may have been to assume a 30-year appraisal period, with a 10 or 15 partnership duration at which an improved partnership is negotiated.

Key questions:

- In the network design assumptions for the Partnership Options, has TfGM considered the likely changes in the future structure of the bus market which may provide greater scope for inter-operator cooperation?
- Can TfGM provide further clarity on why 'soft' initiatives are assumed would not be implemented under a partnership option?

Overall assessment: **Red**. Assumptions used in the appraisal for network design, fares & ticketing, interoperability and 'soft' initiatives relating to the partnership options are conservative and do not consider the full potential of these options to drive passenger benefits and improve interoperability. Benefits, demand and revenue for these options therefore may have been underestimated.

3.5 Appraisal Methodology

3.5.1 Introduction (Para 14.1 Page 174)

No comments. This section provides a brief summary of the modelling framework, and the four steps in the modelling process. The high-level modelling process is similar to the process followed for other appraisals; therefore, we have no comments on this section

3.5.2 Modelling Methodology (Para 14.2, Page 175)

Key Issues:

The report states that the Greater Manchester Public Transport Model (GMPTM) is used to model the impact of small-scale improvements to the network. The proposed scope of service changes in the consultation document is extensive, and therefore an elasticity-based approach may not be appropriate to justify the economic case for changes to bus regulation in Manchester. If an elasticity approach is to be used, then modelling (e.g. testing the appropriateness of the specified elasticities for larger impacts such as the proposed policy) should be carried out to justify the use of this approach in this instance. This modelling approach potentially either underestimates or overestimates demand in each of the modelled scenarios. A complementary modelling approach, such as benchmarking against similar policies (e.g. the TfWM Major Partnership approach) employed elsewhere, should be employed in order to test the robustness of the elasticity-based modelling.

Key questions:

- It would be useful to understand the scale of proposed changes in capacity and service frequency to assess the appropriateness of using GMPTM in modelling the impact of the policy on the network.
- Was the impact of the 2018 network review modelled in GMPTM? Have these changes taken effect in the network, and would they act as the base network operation for the provision of a franchised area network of services? Has the modelling done for the 2018 network review been validated against real-world ex-post changes in bus use (this might help to validate the model for use in modelling the proposed changes to the bus network as part of this review)?
- What sensitivity testing has been completed to test the sensitivity of the results of the analysis to changes in assumed elasticity values?
- In justifying the appropriateness of applying an elasticity-based approach to modelling the impact of such a large policy intervention, have TfGM bench-marked the results of the intervention against similar changes elsewhere?
- Demand revenue model includes modelling of the impact of soft factors. It would be useful for TfGM to provide a list of new soft measures in order that OneBus can

understand how dependent these measures are on franchising, and the extent to which they could be introduced under the current service or one of the partnership options.

Overall assessment: **Red**. The use of elasticities which have been derived from observations of the link between small changes in explanatory variables and demand may not be appropriate for modelling large-scale wholesale changes in bus services. This has the potential to either underestimate or overestimate future demand levels compared to a real-world scenario.

3.5.3 Benefits Analysis (Para. 14.3, Pages 177)

Key issues:

The modelling assumes a 30-year appraisal timeframe. This is based on the justification that “it would not be normal practice to apply such a long appraisal period for a bus industry Partnership scheme, where there is no evidence or precedent of schemes lasting over 10 years”. The use of a 30-year appraisal period biases the analysis against the industry Partnership scheme. For this reason, TfGM should consider including a 10-year appraisal period sensitivity, in addition to the 30-year core appraisal period.

Key questions:

- What consideration has been given to the use of a 10-year appraisal period?
- The current appraisal period is 30 years long. What assumptions have been made about the duration of each Bus Partnership? Assuming Bus Partnerships are expected to last for less than 30 years, what assumptions have been made about the renewal of Bus Partnerships across the 30-year timeframe?

Overall assessment: **Red**. The use of a 30-year appraisal period has the potential to prejudice the results of the analysis, as it will potentially favour options with a longer timeframe (e.g. franchising). In order to ensure a balanced analysis of the different proposed policy changes, TfGM should consider running sensitivities either by including a scenario with a shorter timeframe consistent with the Bus Partnership option or should include the option for Bus Partnership renewal within the core (30-year timeframe) scenario. Reasonable assumptions should be made around the renewal costs for the Bus Partnership option (it is reasonable to assume that the cost of renewing Bus Partnerships will fall over time, as both the Authority and industry become more familiar with its implementation).

3.5.4 Demand and Revenue Forecasting (Para 14.4, Page 179)

Key issues:

The economic case explains that the modelling of changes in bus demand incorporates the impact of other forms of transport on bus demand (for example, changes to tram fares, car user operating costs, and car journey times).

Our current understanding is that only the Trafford Park Line Metrolink extension and purchase of new Metrolink vehicles are included as interventions in the analysis. The former

of these (Trafford Park Line Metrolink) is due to open in 2020, the latter (new Metrolink vehicles) will be introduced in 2020. Given the length of the appraisal timeline (30 years), it is not realistic to assume no further major public sector transport interventions in Greater Manchester. TfGM should therefore consider including further transport interventions both in the core scenario and with further investments as a sensitivity. Although we accept that many of the interventions highlighted in the Greater Manchester Transport Strategy 2040 Draft Delivery Plan remain unfunded, it is unrealistic to assume that none of these interventions will be implemented.

Key questions:

- How have future public transport improvements, as set out in the Greater Manchester Transport Strategy been incorporated into the analysis?
- How has the uncertainty around whether these schemes will be implemented been treated within the analysis?
- Higher levels of car ownership are forecast to reduce demand for public transport by 10.9%. What assumptions have been made around the introduction of which could impact on car ownership (e.g. introduction of better public transport provision such as bus lanes) across Manchester?
- What assumptions have been made on the wider climate change agenda's impact on car usage?

Overall assessment. **Red**. Additional transport investment in competing modes could abstract passengers from the bus network (e.g. tram). As these interventions have the potential to reduce bus patronage, their exclusion from the analysis may therefore lead to a higher BCR for franchising than would otherwise be the case if they were included in the analysis.

3.5.5 Annual Demand Forecasts for Franchising Scheme and Partnership Options (Para 14.5, Page 182)

No comments. This section provides the results of the analysis (demand forecasts over time). The underlying drivers of changes in demand appear well-reasoned.

3.5.6 Option Outcomes (Para 14.6, Page 184)

No comments. This section provides the results of the analysis (monetised benefits in terms of changes in journey times, decongestion and ticket sales revenue). The underlying drivers of changes in demand appear well-reasoned.

3.6 Economic Appraisal

3.6.1 Approach (Para 15.1, Page 184)

No issues have been identified in this section, which summarises the approach to economic appraisal as described in the DfT's WebTAG guidance, along with a high level (theoretic)

discussion of how costs should be treated, and the need for market failure in order for Wider Economic Impact benefits to be captured as part of scheme appraisal.

3.6.2 Treatment of Costs (Para 15.2, Page 186)

No issues have been identified in this section. The use of a QRA and optimism bias are standard in this type of appraisal. The list of costs included within the appraisal appears suitable for a project at this stage of development.

Key issues:

We have also reviewed section 42.3 of the Financial Case. It is not clear how depot land costs have been calculated, only that they were calculated on the basis of “an indicative valuation exercise”. More detail on how these costs were calculated is needed, so that the cost estimates can be subjected to scrutiny.

The 2010 baseline does not properly reflect recent increased employment costs such as pensions, the apprentice levy, the effect of increasing the minimum wage, recent pay increases (which have been around 25%). Employment costs account for over 50% of operator’s income so this is likely a key consideration.

The position on pensions is not clear. The TfGM proposals do not reveal the Funding Strategies for pensions for each of the options, and if franchising is introduced, which party (i.e. whether the franchisee or TfGM would be responsible for meeting any potential pension deficits). This represents a significant cost, which if unaccounted for could impact on the BCR for the franchising option.

Key questions:

- How depot costs have been calculated?
- How much higher are you expecting to pay for a bus depot considering the market price as a base?
- How CPO and legal fees have been considered in the financial model?
- Which are the mitigation plans if TfGM cannot control the strategic bus depots?
- Please could you provide an additional sensitivity test scenario increasing costs related to the labour force?

Overall assessment. **Amber**. Given their significance, further clarification on how depot costs have been calculated is needed in order to determine how robust they are. Further clarity is required on how pensions will be funded including how pension deficits will be dealt with. These costs are significant and therefore could have a significant impact on the BCR if they have been calculated incorrectly.

3.6.3 Option Results (Para 15.3, Page 186)

The categories of costs and benefits presented within the table are reasonable for a scheme of this type, with no obvious omissions. The split of private-to-public sector costs is not immediately clear from the table but is clarified in Section 6.4 (“Detailed Economic Appraisal”) of the Economic Case Supporting Paper. This is discussed later in this review. As noted previously the effect on the level of time benefits (and the potential to double-count these as interoperability benefits) appears high for the franchise case and should be clarified. The value of the Wider Economic Impacts also appears high. This is discussed in greater detail later.

3.6.4 Economic Value of Further Investment in the Bus System (para 15.4, Page 188)

This section is unrelated to the main economic case, and not included with scheme valuation. At this stage this is a strategic case argument, as funding for Phase 2 does not currently exist. It is also not immediately clear that the claimed benefits would accrue additionally to the Phase 1 benefits, or that they would not be applicable to the Partnership options.

3.6.5 Sensitivity Tests (Para 15.6, Page 195)

Key Issues:

The range of sensitivity tests included seems reasonable, though it would be sensible to include more conservative tests – for instance if the franchising is more disruptive than anticipated, takes longer to implement or is more costly. These could have significant impacts on the BCR. A “high operating cost” option should be included.

Some of the results in the sensitivity tests seem counter intuitive – for instance an increase in population and employment growth decreases the relative benefit in the franchise case. This is counterintuitive, as is the differing impact between the two scenarios on the active travel investment scenario.

Key Questions:

- Can a detailed breakdown of all sensitivity test assumptions be provided, to allow for the test outcomes to be compared easily?
- Can output tables for the sensitivity tests be provided, so it is possible to see where the impacts are manifested?

Overall Assessment: **Red**. The sensitivity tests have not used assumptions that sufficiently reflect the range of potential outcomes and have excluded some sensitivity tests that are typically carried out e.g. sensitivities around the capital investment required to implement each option. [remove the next sentence]. There are implementation and benefit realisation risks which have not been tested, which may adversely affect the value for money of the franchise option should they materialise. The Franchise Option achieves a lower value for money metric (BCR) compared to the partnership option). Under additional sensitivity scenarios (example CAPEX requirement) it is possible that the Partnership Options would achieve higher value for money due to their inherent

lower risk profile. It appears that scenarios that would have tested the sensitivity of the franchise option to realistic alternative assumptions have not been included in the set of tests.

3.7 Impact on Passengers

3.7.1 [Untitled] (Para 16.1, Page 202)

Key Issues:

The differential in the service quality benefits between the franchise and partnership options is significant (£125m), and the driver for this is the value given to ticket inspectors and branding. As noted in Grant Thornton's audit report, branding is given a 4.1p per trip benefit to users in the franchise case – valued at £102m over the life of the appraisal. This comes from a 1996 study by Steer Davies Gleave⁶ (in London) and in that report it is a value applied to trips from hail and ride services only. As such is not clear that values derived for London are directly applicable to Manchester, both due to the geographic and time difference and as relatively few services in Manchester are hail and ride.

In Table 13, in the Franchise option fares are reduced by 20p for 20% of all trips. This is a significant reduction and will lead to an associated loss of revenue to TfGM. If this has not been incorporated correctly then costs to TfGM could be being understated.

Issues around the quantification of risks for partnership and franchise options are detailed later. It is noted that the transition to a franchise system poses more risk to passengers than the use of a partnership system.

Key questions:

- Has any work been undertaken to verify that users in Manchester would value a branded bus service at 4.1p / trip?
- Could value in branding be a proxy for a user appreciation of better service quality, which is captured elsewhere, and so be double counting the benefit?
- Please, could you explain the rationale for applying the 4.1p / trip value for branding for the franchising scheme factored as 100% for all years? Was any consideration given to the transition period when there may be different brands working together for a period of time?
- What proportion of the reduction in fare take from existing users is anticipated to be met by fare take from new users? Given that the TfGM bus operator is anticipated to make a net profit of £136m, how does the loss in revenue from existing users affect profitability forecasts?
- Which proportion of the new 9.3m passengers are related to the passengers, which would save between 1-2 minutes in travel times? Please, can you include a sensitivity

⁶ C.F. "The Demand for Public Transport: A Practical Guide", TRL Report 593

test scenario removing this population as new passengers in the system (Franchise Scenario)?

- Redistribution of resources across the network for improving accessibility and connectivity to users with low access level means that a high number of passengers will increase their travel times due to the lower frequency in their routes, and it is highly probable that these measures will impact routes with high demand. Please, can you provide information about how many people will be negatively affected due to the Franchise proposal?
- 73% of demand will have a positive impact of less than 1p change on fares. Please, can you provide the number of how many people of this population will increase travel times (Franchise scenario)?
- Please, can you include a sensitivity test scenario where the ambitious partnership reaches the same level of Franchise scheme' improvements?

Overall Assessment: **Red** The level of impact here is high and is backed up by only limited evidence from other studies. Given the age and different geographic area of that work it is important to demonstrate that the assumptions are still valid, or to consider a range of more conservative sensitivity tests.

3.8 Impact on Operators

3.8.1 Introduction (Para 17.1, Page 208)

Key issues:

TfGM assumes that the franchise scheme will result in a disbenefit to operators resulting from a reduction in the average operator margin under a franchise scheme relative to current. The EBIT margin is based on benchmarks from the London franchise market, with adjustments applied for Greater Manchester. Therefore, if the franchised scheme and the cost estimation from the bus operators at the bidding process cannot be reached in the real scenario due to externalities, these effects can hurt the potential for sustainable quality of journey.

The same margin has been applied to all franchises uniformly, however it is reasonable to assume that in practice there will be significant variation across franchises relating to operational risks of some franchise areas and the number of routes served.

The assumption regarding operator margin is dependent on a sufficient level of bidding competition under a franchise scheme compared to the alternative. This will vary across franchise areas.

The franchising scheme ensures a specific margin for the bus operators, provided operating costs are contained within bid thresholds. This can produce negative outcomes by encouraging bus operators to engage in cost suppression at the expense of better service.

This could lead to TfGM having limited leverage to improve service quality and result in lower benefits than forecast for the Franchise Option.

The franchise model is also likely to encourage the outsourcing of services (e.g. customer service) which can be delivered by companies within the same owner group in order to increase the margin by the holding company rather than the bus operator per se. Costs in the franchise bid would be based on the local operation however costs when operated will be lower using holding company resource and focus on increased margin through cost suppression rather than through better service.

Key questions:

- It would be useful to see the outcome of a 'bottom-up' analysis of operator margins - this may result in a different conclusion on the scale of operator impacts than is presented in this analysis. Has the potential for variation in operator margins across franchise tranches been considered in the business case? (Franchising aspiration could be underdelivered if operators perform tight margins. The margins on London bus operations are rather lower than in the regions and require subsidy by TfL. The franchised model could have no levers to pull to improve service quality, thus the reorganised volume of provision will underperform, and benefits will dissipate over the life of the franchise).
- How have the variations in operational efficiency and potential for cost risk across franchises been considered when determining the average operator margin for this analysis?
- Has the impact of the age of each franchise tranche's fleet been considered when establishing the operational targets? Franchise tranches with older fleets will have more bus failures across the operation increasing the risk around meeting performance targets. These tranches will require either less ambitious performance targets or higher investment in fleet replacement, so this will allow sustainable value for all stakeholders.
- Has TfGM considered the optimal number of buses at each of the key strategic bus depots considering rush hour journey times, space requirements, layout and facilities for preparing the buses for the next service? Will this result in additional investment at depots beyond what is included in the business case?
- How have TfGM calculated the operational impacts and investment requirements at bus depots from introduction of large numbers of electric buses to the fleet?

Overall assessment: **Red**. The BCR and VfM results are affected by the operational costs and investment required for implementing the franchise option. Insufficient information has been made available regarding future operating cost and capital investment. It is imperative to provide

this information to determine whether the franchise payments estimated for the business case are enough for the proposed Franchise Option interventions.

3.8.2 Do Minimum (Para 17.2, Page 212)

Key issues:

This section states that under a Do Minimum scenario, there would be relatively little change to the bus market in Greater Manchester over the appraisal period without intervention [forecasting a continuing reduction in the overall size of the Greater Manchester bus network; however a relative growth in fleet and operating hours (and hence cost) to maintain effective service levels for a given operating distance is also modelled as a result of forecast congestion (for further details see section 4.1 Business Case)]. The rate of decline in patronage is expected to decline at broadly the same pace as the franchising and partnership options.

The business case acknowledges that there will be a requirement for investment in fleet replacement due to the introduction of the proposed CAZ charge. However, it is recognised that is uncertain whether Central Government funding will be available for this purpose. For the purposes of the economic case, it is assumed that vehicles that do not meet the CAZ specification would not be removed from service unless public subsidy became available.

This could represent an issue for a TfGM-managed franchise which would likely be subject to greater pressure to internally fund replacement of buses to meet CAZ specification compared to multiple independent bus operators as in the do minimum. The implication is that the risk of higher levels of fleet replacement investment have not been factored into the assumptions for the Franchise Option.

Key questions:

- Can TfGM confirm whether a higher rate of bus fleet replacement rate in the early years of the appraisal period triggered by the introduction of the CAZ charge has been factored into the Franchise Option cost estimates? Please, also can you include the assumptions related to cost replacement which has been involved in the financial model for the bus operators to validate the financial health across bus operators.

Overall assessment: **Amber**. TfGM has assumed that under a do minimum scenario, buses that do not meet the specifications to avoid the CAZ charge would not be removed from service unless public funding was made available for this purpose. Based on the information set out in the economic case, it appears the same assumption has been applied for the Franchise Option. However, given franchises would be managed by TfGM and subject to greater public scrutiny, there is a risk that franchise operators would be obliged to increase the rate of bus replacement to comply with CAZ resulting in higher franchise payments than assumed in the economic case.

3.8.3 Partnership Options pages (Para 17.3, Page 212)

Key issues:

TfGM expects that a partnership option would be financially neutral or positive for incumbent operators with the potential effect of reducing competition through network or service specifications which reduce the potential for new entrants.

The models were run by TfGM with operational targets that have an impact on the forecasted revenue and costs for the Franchise Option. Information on the assumed operational targets should be shared to validate the results.

As mentioned in the previous section, a higher pace of fleet replacement due to CAZ implementation will have economic and operational impacts on bus operators due to work interventions on bus depots and due to a new operational model/ Costs for running electric buses in the network.

Key questions

- What is the assumption for the number of bus operators that will leave the system due to the introduction of the Franchise Option? This could lead to ramifications across UK bus market: franchising's potential for dispossessing operators could lead to pressures on these operators elsewhere and inadvertently reduce service outside Greater Manchester.
- Which are the specific assumptions regarding changes to the network plan that were modelled for the Ambitious Partnership option?
- Can TfGM provide detail on the operational targets assumed for each franchise tranche?

Overall assessment: **Amber**. It is imperative to have a good understanding of the assumptions considered for the Ambitious Partnership option. This is a flexible model where additional interventions can be specified which may increase the VfM of the option.

3.8.4 The Franchising Scheme Option pages (Para 17.4, Page 216)

Key issues:

A franchise option would represent a major change in the risk profile of operators – TfGM would take all revenue risk/ rewards and operators would be paid a set service fee in addition to performance target incentives/ penalties. TfGM will define the nature of the network, fares and service quality which will define the contract.

Operators would continue to manage cost risks, be subject to targets to maintain performance levels and cover risks around mobilisation and transition of franchises.

Currently, there is wide variation in the margin earned by operators on their networks. Due to the lower risk profile in a franchise model, TfGM expects the average margin to be lower and more stable than current. This will result in a disbenefit for some operators and a benefit for other operators currently achieving low margins. The net impact on average operators'

margins across the GM bus network is estimated to be negative compared to a do minimum scenario.

The margin is assumed at 7.5% for all franchise tranches. In practice, the margin will depend on the bid competition for each franchise tranche, the tranche size, potential for cost risk and the scope for operator to optimise costs. As each bus asset increases in age, the annual maintenance spend increases while the patronage for that route decreases relative to the outcome with new buses. Forecasting operating cost over a longer-term bus franchise will represent risks and challenges for operators, particularly new entrants taking over bus fleets and depots from incumbent operators.

Bidding for franchises represents a new additional cost which will be financially negative for operators in addition to the lower operator margin. This cost will likely act as a barrier for new entrants without the necessary parent company resources. Operators are also likely to incur higher annual operating expenditure than current in order to deliver TfGM's ambitious customer service and performance targets. Additional buses may also be required to deliver on the strategy.

TfGM state that a Residual Value (RV) mechanism for bus fleet, active depots and other assets would be introduced. This would lower barriers to entry for new entrants. This will provide protection to bus operators from having stranded capital assets such as depots or bus fleet.

There would be a nine-month mobilization period for implementing the franchised services which might be a short period of time depending on the number of services which have been won, CAZ implementation, bus depot infrastructure and bus equipment implementation. Also, it creates uncertainty for passengers, which might have a negative impact on revenue.

Finally, transition costs relating to bus fleet and depots are potentially underestimated. For example, TfGM's cost estimate for "On bus equipment and branding- Wi-Fi, driver radio, telematics, CCTV" is approx. £3,850 per bus. The Public Transport Bill Draft Regulatory Impact Assessment for introduction of bus franchising in Wales estimated the equivalent value for these items was estimated at £15,000 per bus. The level of investment will depend on the extent to which these items are already installed in the bus fleet at the time of transition, however it is a reasonable likelihood that transition costs have been underestimated.

Key questions:

- Can TfGM provide further information on how they have calculated operational costs, including operational cost targets that TfGM are expecting to set in the contracts, and their assumed profit margin?
- Can TfGM provide details of the draft franchise contract, including financial penalties and contract termination agreements?
- Can TfGM share an overall franchise plan, including services per zone and how they will be allocated across each of the bus depots?

- Are new bus depots planned? Where will these be located?
- Could TfGM provide information on expected bus frequency, capacity and demand for services?
- Can TfGM provide additional information on how they have set the operational targets and costs for the period when the fleet replacement will be developed by the operators due to CAZ scheme?

Overall assessment: **Red**. Based on our assessment, there are significant risks around the cost assumptions being overly-optimistic. For example, costs related to bus depots and fleet appear to be lower than we would expect. This could have a substantial impact on the VfM and BCR of the Franchise Option due to the scale of the potential extra cost and investment needed.

3.9 Impacts on the GMCA and TfGM

3.9.1 [Untitled] (Para 18.1, Page 231)

Key issues:

The Franchise Option will require a subsidy from TfGM (-£110.8 m PV) compared with current arrangements. A key risk for TfGM is the uncertainty around the level of subsidy required. These payments would cover the operating cost and allowed depreciation up to a level set out in the franchise agreement as well as operator margin and any other expenditure incurred by the operator and agreed by TfGM.

As set out in section 42.3 of the Financial Case (page 360) franchised operators will incur any capital expenditure related to fleet or other capital assets and these costs will be reimbursed through franchise payments as an amortised cost or depreciation. Strategic bus depots would be purchased by TfGM and provided to operators on a lease basis.

The proposed fleet specification and average age of fleet under franchising are assumed to be similar to that under a Do Minimum scenario. Should this assumption prove over-optimistic and higher levels of investment are required to facilitate the franchise system to function as desired, franchise payments would be materially higher than assumed in the economic case, resulting in a negative impact on TfGM finances.

A realistic consequence of introducing a franchise system may be the departure of certain operators from the market. This could lead to a reduction in bidder competition leading to a higher required margin than assumed in the business case. If this scenario were to occur, this would increase the financial burden of the franchise option TfGM compared to what is assumed in the economic case.

The presentation of net financial impacts to TfGM in this section is not sufficient to decompose the revenue and cost impacts from unified services, fare initiatives and the additional services. A detailed summary table is required.

Key questions:

- Can TfGM provide further details about Metrolink revenue change, investments costs and TfGM bus operator assumptions as these items will have a high impact on PVC and BCR.
- Can TfGM provide a detailed justification for why the proposed fleet specification and average age of fleet under franchising are assumed to be similar to that under the Do Minimum scenario?

Overall assessment: **Amber**. The implementation of franchising represents a substantial risk to TfGM finances. There is significant risk that the assumptions employed in the economic case (and in this instance the financial case) are too optimistic regarding the incremental costs of a franchise option relative to the Do Minimum option.

This section does not provide sufficient detail to allow proper scrutiny of these assumptions. The Financial and Management Cases do include detailed information but following review of the material in the financial and management cases, the conclusion remains that there remains a risk to TfGM from the introduction of franchising.

3.10 Impacts on Wider Society

3.10.1 Introduction (Para 19.1, Page 233)

The introduction to this section discusses how the proposed intervention might result in wider economic impacts (WEIs). The description is in line with DfT guidance. The values in the table presented are larger than might be expected for this type of scheme. (A 2011 survey of appraisals found that including WEIs increase the value of appraisal by 25% on average⁷, rather than 58% suggested here for the franchising option). They are discussed in detail in later sections for the SOBC document, and specific issues / questions are raised in the relevant sections of this document.

3.10.2 The Wider Economic Impacts (WEIs) of Bus Reform (Para 19.2, Page 234)

The introduction to this section provides a more detailed background to WEIs than the previous section.

Key Issues:

In para 19.2.6, the report describes that the Level 2 impacts have “been assessed reflecting new development in key economic areas across Greater Manchester”. It is not clear whether this development is assumed to occur irrespective of the bus improvements, or whether the bus improvements are designed to facilitate this development. The assumptions around how the intervention interacts with changing land use and the existing market failures is key to understanding the appropriateness of incorporating WEI values, which are easily overstated. WEI are quantified and included within an enhanced BCR for the scheme.

⁷ <https://www.oxera.com/agenda/deep-impact-assessing-wider-economic-impacts-in-transport-appraisal/>

Key questions:

- What assumptions underly the assumed development? If the development is occurring irrespective of the bus enhancements is the criteria in terms of market failure met – as in this case the market supports the development? If not, is it reasonable to assume that the introduction of an improved bus service will induce development?
- What evidence is there for the statement in 19.2.7 that “a significantly improved bus system will help support sustainable development and economic activity across GM”? GM is served by light and heavy rail. Permanent improvements to this type of infrastructure is typically seen as more attractive to developers than potentially temporary bus enhancements. What work has been done on the market viability of the developments with respect to bus improvements vs market viability with respect to light / heavy rail improvements?
- What work has been undertaken to critically review the potential wider impacts, and to ensure that the values are not overstated?

Overall assessment: **Red**. Significant benefits are claimed within the WEI calculation, but little evidence is presented to justify the claim that they will be achieved. Typically, wider economic impacts are associated with major infrastructure projects, and so the level claimed for bus provision optimisation is unexpected.

3.10.3 Net Wider Economic Impacts (WEIs) (Para 19.3, Page 235)**Key Issues:**

The net agglomeration impacts of the franchise option are significant (£165.8m over 30 years). Agglomeration impacts consider improvements in business to business interaction, due to increases in effective density. Improvements in effective density could come from reductions in e.g. delivery times between business sites or reductions in the time it takes for workers to travel between meetings. Typically, business to business trips are not taken by bus. Deliveries would be made via LGV or HGV, and person trips would be made by car for short distance trips.

Key questions:

- The agglomeration benefits are valued at just under half the direct user impacts. Has any review of the outcome of similar bus market interventions been reviewed to see if this level of agglomeration impacts is feasible?
- Has any analysis been undertaken to review the origins / destinations of the business trips which are benefitting to understand how they are interacting with the transport network, and to provide assurance that the level of benefit achieved is in line with the changes in journey time for business users? And to determine whether it is appropriate to include all of the benefits within the WEI calculations?

- Has sectoring been used to calculate the WEI impacts? If so, has the potential for the reduction in trips, and associated decrease in effective density in the reference case, to overstate the agglomeration benefits been considered in the presentation of the results?

Overall assessment: **Red**. The level of local impact on business to business interactions seems especially large, given that most business trips are typically not made by bus. Evidence from the DfT suggests that only 3.1% of person bus trips are for business purposes. The level of congestion relief would be unlikely to support such a large valuation for other highway trips.

3.10.4 Environmental Impacts (Para 19.4, Page 236)

The approach to assessing the environmental impacts appears proportional at this stage.

Overall assessment: **Green**. The standard environmental benefits are quantified in the appraisal and the total value is small in comparison to other benefits – which is as expected.

3.11 Risk Assessment

3.11.1 [Untitled] (Para 20.1, Page 239)

Key Issues

TfGM have conducted a risk assessment that appears consistent with HMT Green Book guidance on identifying and quantifying risk. The approach is set out in further detail in the “Risk and Optimism Bias Supporting Paper” on the consultation website which we also reviewed. The risk assessment has been done from the perspective of the TfGM, a standard approach for an economic case, where the risks as passed through to the relevant government authority are assessed, noting where the interfaces and interactions with other organisations may impact this.

A Quantified Risk Assessment (QRA) approach has been used to establish the risks, estimate their potential impacts and the associated likelihood and overall probability distribution of the risk. The methodology for this as set out in the “Risk and Optimism Bias Supporting Paper” appears consistent with the HMT Green Book and DfT Web TAG guidance on Quantified Risk Assessment. The modelling undertaken and the key points of the methodology are set out in the supporting paper, including Monte Carlo simulation modelling and use of the P(Mean) values within the Economic Case.

A separate risk assessment through scenario-based methodology has been used to value revenue risks. The methodology used has focussed on “endogenous” risks within TfGM’s control with other external risks such as economic growth, population growth, demographics etc. considered separately through sensitivity tests. The methodology for the risk assessment seems reasonable in terms of assessing and modelling these by scale of impact and length of duration, combined with probabilities of scenarios occurring. The outputs of this exercise are

shown in the economic case but there appears to be no detail shown on the specific scenarios assessed.

Key questions:

- It'd be useful to understand further details on the risk modelling conducted – e.g. could more detailed outputs available from the Monte Carlo analysis be provided?
- It would be useful to understand the specific scenarios used for the revenue risk modelling.

Overall assessment: **Amber** The approach undertaken for the quantified risk assessment appears to be appropriate to establish risk and outline mitigation. Any additional risks or changes to the risk profile would need to be considered.

3.11.2 'System One' Risk (Para 20.1.7, Page 240)

System One risk has also been modelled using the Monte Carlo approach using ticketing data from the DfT's National Travel Survey (NTS) regarding the proportions of different ticketing types sold in Manchester.

Key issues:

This seems a reasonable approach but there is no information presented on the specific Monte Carlo modelling scenarios undertaken, only the parameters of the triangular distribution used.

Key questions:

- Would further outputs from the System One risk analysis be able to be provided?

Overall assessment: **Amber**. The approach which has been adopted appears appropriate. A further approach would be to present the modelling scenarios.

3.11.3 Non-quantifiable Risks (Para 20.2, Page 241)

Key issues:

Non quantifiable risks are set out in Appendix B (pages 579 to 594) of the assessment document. Tables are shown describing each identified risk, with associated causes, consequences, and probability and impact scores. Tables are shown for each of the assessed options, namely the Do Minimum, Franchising, and a Partnership approach.

The methodology for identifying and assessing these risks is explained in the management case (section 46.7 describing TfGM's Risk Management Policy and Strategy. This section explains that the risks were identified through workshops with stakeholders to capture input including key impacts and mitigations. Each risk was assigned an owner who regularly reviewed and updated the risks, quantified them, and developed mitigations.

Key questions:

- The tables presented in Appendix B would benefit from setting out how the very low to very high impact and probability scores have been derived, for example if there were set criteria established for these scores.
- The issues of implementation and transition to a revised bus operating model are to some extent linked. It is appropriate to assume that the implementation risk of an incumbent operator not winning a contract as being 'high', but equally so the wider transitional risks. Is it a fair reflection to suggest that the Transition Risk in F071a would be scored low, if the underlying cost of running the network were to increase?
- Other cities, including London, have transitioned their bus business models through various stages where both operators and the 'local authorities' have at times retained both risk and reward, to a position now where quality incentives can enable operators to both develop their business and offer passengers service improvements. Would risk F018 be minimised if engagement with operators focused on an initial implementation period (and transition) through a negotiated contract arrangement, thus giving existing operators confidence in their existing business models and giving the authority some confidence in continued collaborative working?
- Is there a link between F029 and F069 which hasn't been included? Advances in technology have in the past been linked to vehicle and fleet specifications, and it appears slightly at odds that F029 is scored low, particularly if contract requirements place the need for improved technology in contract specifications and it can't be delivered in time - because of manufacturer timescales - by successful operators.
- Reiterating the point above where there appears to be 'technology' links between Risk F069 (critical) and F82 (medium).
- Should the same (or a version of the same) risks have flowed through qualitative assessment for each 'model'? There is for example no account for the impact of franchising on small operators, but a reputational risk is included in the 'partnership' model.

Overall assessment: **Amber** Several risks are interlinked with one another and should be explored further. In addition, it seems that there are some risks that would flow through each of the scenarios but aren't captured in each. An approach which groups risks by broad category rather than perhaps by scenario may ensure that each risk is captured.

3.11.4 Optimism Bias (Para 20.3, Page 241)

Optimism bias has been considered as part of the appraisal and is set out in this section, with further supporting detail provided in the "Risk and Optimism Bias Supporting Paper". The methodology broadly appears sound and is consistent with the HMT Green Book supplementary guidance on optimism bias, with the key rationale for the specific values explained with reference to the values provided in the Green Book.

3.12 Economic Case Conclusion

No issues have been identified in this section. This section summarises the quantitative results and overall conclusions from TfGM's analysis in the economic case. A standard method for explaining, describing and concluding the economic results has been deployed.

The validity of this conclusion depends on factors considered in the analysis including the risks around the level of benefits achieved and calculation of wider economic benefits, as discussed throughout this document.

4. Economic Case Supporting Paper Review

4.1 Introduction

This section summarises the review of the economic case supporting paper, along with key issues identified, key points we recommend that OneBus note, alongside our queries and questions regarding the economic case. The headings below set out our review of each of the key sections of the economic case supporting paper.

4.2 Overview

4.2.1 Document purpose (Para 1.2, Page 3)

No comments for this section. This section of the report describes the purpose of the supporting paper and the elements covered

4.2.2 Document structure (Para 1.3, Page 4)

No comments. This section of the report sets out the document structure.

4.2.3 Economic Case – Key Assumptions at a Glance (Para 1.4, Page 4)

No comments. The review of assumptions is covered in the relevant sections in the main document review.

4.3 The Forecasting Framework

4.3.1 The Demand and Revenue Model (DRM) (Para 2.2, Page 5)

No comments. This section gives a high-level overview of the Demand and Revenue Model. There is insufficient detail to critique the approach taken in modelling demand and revenue, but the methodology covered at a high-level is sensible. We have requested further information on the modelling approach (including modelling assumptions) at various points in this document. It is not possible to assess the appropriateness of the modelling approach without further information.

4.3.2 The Financial Model (FM) (Para 2.3, Page 5)

Key Issues:

This section explains that ticket revenue data is combined with other income sources such as concessionary reimbursement, tendered services, etc. It would be useful to understand which ancillary revenue items are considered within the modelling.

Key questions:

- How are ancillary revenue items - such as advertising - treated within the modelling, and how are these revenue items treated differently between the different policy options appraised?
- Could TfGM get higher advertising revenue under a franchising arrangement?
- Figure 7 of the Financial Case does not show a decline in ENCTS trips over time. This is inconsistent with the latest concessionary patronage figures published by the DfT⁸ which shows falling ENCTS figures. The majority view from within the bus industry is that concessionary fares are expected to fall at least in the near future. Even if the number of concessionary trips were to rise, then the costs of additional capacity should be factored into the analysis.

Overall assessment. **Amber**. There is some uncertainty around the treatment of ancillary revenue within the financial model. It is not possible to determine whether ancillary revenue has been modelled correctly without a further explanation of how these revenue items have been treated within the modelling.

4.3.3 The Cost Benefit Analysis Model (CBAM) (Para 2.4, Page 8)

No comments. This section of the document clarifies that the BCR has been calculated following industry best practice for the appraisal of transport interventions as set out in the DfT WebTAG guidance.

4.3.4 The Greater Manchester Public Transport Model (GMPTM) (Para 2.5, Page 8)

Key Issues:

Our understanding is that the GMPTM is an elasticity-based model. The proposed services changes are significant. Where large 'step-changes' in service provision are proposed, applying the rule-of-a-half may not be suitable. An example of this is for new railway stations. The Government's Passenger Demand Forecasting Handbook (PDFH)⁹ clearly states that an elasticity-based modelling approach should not be used for new railway stations as it is not appropriate to use elasticities to model the impact of new services. There are clear parallels between the opening of new train stations and the creation of new bus routes. We would therefore recommend reconsidering the use of this approach.

Key questions:

- Have TfGM considered modelling the impacts of separate component parts of the intervention separately? Alternatively, has sensitivity testing been undertaken on the elasticities assumed in the modelling?

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/774523/concessionary-travel-statistics-2018.pdf

⁹ <https://www.raildeliverygroup.com/pdf/about-the-pdfh.html>

Overall assessment. **Amber**. Using an elasticity-based approach has the potential to either over-estimate or under-estimate the demand response from introducing franchising. Therefore, further testing on the elasticities employed as part of the modelling should be undertaken.

4.4 Establishing a Baseline

4.4.1 The Base Year (Para 3.1, Page 9)

No comments. This section gives a high-level overview of the base year position in the financial year 2016/ 2017.

4.4.2 Base Year Demand - Overview (Para 3.2, Page 9)

Key Issues:

The response to changes in the bus network are assumed to be homogenous across the Greater Manchester bus network.

The Demand and Revenue Model is run for each of the assumed scheme years. Forecasts are disaggregated by journey purpose, time period and location.

Key question:

- Can TfGM provide information why they did not consider the following variables in their modelling and whether are they able to provide the impacts of these variables on the Business Case?
 - i. Fare evasion
 - ii. Operational performance of buses at rush hours
 - iii. Frequency and Reliability
 - iv. Bus capacity across the service route

Overall assessment: **Amber**. The models have taken a reasonable approach in calculating demand and revenue. However, the variables listed above could have a significant impact on demand and revenue, which would affect the BCR for each option.

4.4.3 Demand Segments (Ticket Types) (Para 3.3, Page 9)

No comments. This section gives details of the different ticket types modelled and sets out how the elasticities are applied within the modelling. This information is in the Appendix.

4.4.4 Demand by Time Periods (Para 3.4, Page 10)

No comments. This section gives details of demand by time periods.

4.4.5 Demand by Geography (Para 3.5, Page 10)

Key Issues:

Greater Manchester was divided into 29 sectors to model spatial impacts of interventions on different corridors. Changes in demand were modelled in response to changes in Generalised Journey Time (GJT).

Key questions:

- Could you share the origin destination matrix for each of the 29 sectors in Greater Manchester? This will allow us to assess whether the new bus plan is consistent with the Generalised Journey Time assumptions in the model.
- Has reliability been included in GJT? If it is, please explain how.

Overall assessment: **Amber**. The models follow standard methodologies and assumptions for calculating demand in Greater Manchester. However, it is important to determine whether reliability impacts are included in wait time assumptions. Also, TfGM should have assessed whether the franchised bus network plan can be implemented in practice given the number of vehicles available to bus operators.

4.4.6 Base Year Demand - Metrolink and Rail (para 3.6, Page 11)

No comments. This section gives details of how Metrolink and rail demand have been captured in the DRM.

4.4.7 Demand Based Derivation of Revenue (Para 3.7, Page 12)

No comments. This section gives details of how Revenue is calculated by applying average fares per trip to each of the ticket, operator and person type categories.

4.4.8 Base Year Market Supply (Para 3.8, Page 12)

No comments. The information provided by this section is consistent with the financial case.

4.5 Establishing the Reference Case

4.5.1 Demand Model Functional Form (Para 4.2, Pages 13)

No comments. The demand model functional form seems reasonable with the inclusion of appropriate explanatory variables such as cross-mode demand elasticities, changes in generalised journey times and changes in exogenous costs.

It is worth noting that the explanatory variables are incorrectly labelled in the documentation (although this does not affect the outcome of the analysis).

4.5.2 Explaining Changes in Reference Case Demand - Exogenous Variables (Para 3.4, Page 14)

Key issues:

Baseline population and employment data was taken from the 2016/ 17 financial year. The text does not set out what quality assurance checks have been completed to ensure that population and employment data for this year area not outliers.

Modelling appears to net off city centre dwellers from the analysis on the basis that mostly journeys made by this demographic are by foot. However, this neglects journeys made by these residents by bus to out-of-town-locations, or for other reasons such as to interchange with other forms of public transport such as tram.

Key questions:

- What quality assurance checks were completed to ensure that 2016/ 17 was not an “outlier” data point in the time series data set?
- What is the justification for not including any journeys for city centre dwellers? Is there data, or anecdotal evidence to suggest that this cohort of Manchester residents do not make any journeys at all?

Overall assessment. **Amber**. It is not possible to say with certainty the impact that revising 2016/ 17 data and the inclusion of city-centre dwellers might have on the outcome of the modelling.

4.5.3 Explaining Changes in Reference Case Demand - Competing Modes Explanatory Variables (Para 4.4, Page 16)

Key Issues:

Bus journey times are assumed to increase over time in the reference case scenario. It is not reasonable to assume that bus journey times will increase in proportion to car journey times given the proposals to introduce bus priority measures¹⁰ such as Quality Bus Transit on key bus corridors such as e.g. Wigan-Bolton, Oldham – Ashton etc.

Bus patronage figures do not appear to have been adjusted to reflect the extent to which the Metro has taken passengers away from bus use. Similarly, they have not been adjusted to take into consideration the level of reduction in financial support for bus services received from the Government. It is reasonable to assume that while these impacts were significant in the recent past, their impact will be less over the remainder of the 30-year appraisal period, as the impacts of these interventions wears off.

¹⁰ https://assets.ctfassets.net/nv7y93idf4jq/2GBbEBM4hm68q9qqvdal1T/97f7b3d51ef9b312b756cd15bd0b008c/190128_Delivery_Plan_2020-2025_Draft_MASTER_final.pdf

Key questions:

- What assumptions have been made around the increase in length of bus lanes, and introduction of new bus lanes across Greater Manchester during the study period?
- Please, can you provide information on how Metro and supportive services have been considered for creating the baseline on bus demand?

Overall assessment. **Red.** Assuming that bus journey times increase in line with car journey times has the potential to underestimate the level of future bus demand, given proposals in the Greater Manchester Transport Strategy to introduce bus priority measures¹¹. The impact of new Metrolink services as well as cuts to financial support need to be factored into the analysis.

4.5.4 Explaining Changes in Reference Case Demand – Endogenous Explanatory Variables (Para 4.5, Page 18)

Key Issues:

The fare growth assumption is RPI+1.4%. This annual fare increase assumption is based on recent bus operator revenues and a plausible profit margin. The rate-of-return should vary between the reference case and the do-something case if under franchising operators face lower fare-box revenue risk.

Patronage is assumed to fall indefinitely in a 1:1 ratio to reductions in capacity service levels. This is not a realistic assumption as there is a limit to how far patronage can fall. For example, the DfT Concessionary Reimbursement Calculator includes a Mohring factor of 0.6 and a service frequency factor of 0.66 as default values. There is a base level of demand which will always be met by bus provision (serving those without access to alternative modes of transport such as those without a drivers' licence or those unable to afford to switch to alternative modes of transport (assuming that bus always remains more affordable than car ownership).

Key questions:

- Can TfGM provide the assumed rate-of-return, as well as the components used to generate the rate-of-return, for each of the modelled scenarios?
- What assumptions have been made about base level demand (i.e. the level of bus demand which is not strongly affected by income and cross elasticities of demand)?
- Has TfGM considered using a different ratio to measure changes in patronage in response to changes in capacity service levels?

Overall assessment: **Red.** Rates of return for operators may be lower under the franchising option, compared with the current status-quo. Given this, fares may need to increase by more

¹¹ https://assets.ctfassets.net/nv7y93idf4jq/2GBbEBM4hm68q9qqvdal1T/97f7b3d51ef9b312b756cd15bd0b008c/190128_Delivery_Plan_2020-2025_Draft_MASTER_final.pdf

than RPI+1.4% in order to attract franchisees into the market. This may reduce demand compared with the current level of demand modelled for the franchising option. Conversely, modelled future patronage levels might be underestimated, if the model does not assume that a proportion of those who travel by bus have no other mode to switch to when faced with rising fares or longer bus journey times due to congestion.

4.5.5 Reference Case Summary (Para 4.6, Page 20)

No comments. This section provides a summary of the reference case demand and summary, and the results are expected when considering the modelling assumptions used in generating these forecasts.

4.6 Establishing the Impacts of “Do Something” Interventions

4.6.1 Network Redesign Interventions (Para 5.2, Page 22)

No comments. This section explains how network reconfiguration has been tested, and the process for inputting changes in generalised costs into the DRM and CBA models.

4.6.2 Fares Unification Interventions (Para 5.3, Pages 23)

Key Issues:

Fares are assumed to be set equal across each of the new franchisees, and time-based products such as daily and weekly tickets will be set to the lowest of the four operator categories (in this case FirstGroup). There may be reasons why FirstGroup fares are the lowest in Manchester, which could relate to trip length, topography, fleet age and configuration and patronage levels. Applying these low fares to the whole Manchester network may tend to either overestimate future demand (if it is not possible to achieve these low fares) which will affect the outcome of the analysis. There is no mention of a fare unification strategy (i.e. how this policy will be implemented). Franchising will be implemented over 3 years - as there will be different ambient fare levels and cultures for three years. This has the potential to discourage users from taking the bus, which would lead to lower levels of demand than has been modelled in the franchising option.

Key questions:

- What analysis was done to test whether it would be reasonable to assume that it is possible to set all fares to the lowest of the four operator categories?

Overall assessment: **Red**. The increase in modelled demand results from the ability of the new franchising authority to set fares to the lowest of the four operator categories. This assumption does not take into consideration differences in operating costs between the four operator categories (and potentially ignores higher operating costs under franchising if service standards are set higher), which might prevent fares from being cut so aggressively. If it is not possible to cut fares by the extent set out by TfGM then the modelling may overestimate the increase in demand from introducing franchising.

4.6.3 Interoperability Interventions (Para 5.4, Page 24)

Key issues:

“The DRM calculates a demand response to the willingness-to-pay values by deducting the willingness to pay value from the appropriate fare and applying the fare elasticity”.

The above statement indicates that the DRM deducts users' willingness-to-pay for ticket interoperability from fares to model the demand response from users resulting from interoperability. Interoperability provides users with a more frequent service as they can use more than one bus company's vehicles on shared routes, hence why users are willing to pay more for interoperability. However, this benefit may also already be captured within GJT improvements from a more frequent service level. Deducting users' willingness to pay for interoperability therefore potentially double counts benefits from a more frequent journey service which are already included in the modelling.

Key questions:

- Can TfGM confirm whether the modelling double-counts interoperability benefits which may also be captured in the modelling through a more frequent service level?

Overall assessment: **Amber**. From the document it is not possible to determine whether the modelling of interoperability benefits potentially double-counts benefits which are already captured within the model as benefits from a more frequent service. Further clarification is needed from TfGM.

4.6.4 Service Quality and “Soft” Factors Interventions (para 5.5, Page 26)

No comments. Service quality improvement values are based on research from TfGM and TRL. A conservative approach has been taken in monetising these benefits (e.g. only 50% of benefits accruing from Improved Driver Standards have been included in the assessment, and benefits from improved Wi-Fi provision are assumed to taper away from 20% of passengers benefitting during the implementation period down to 0% of passengers benefitting after 10 years of franchising).

4.6.5 Lagged Responses (Para 5.6, Page 29)

No comments. A conservative approach has been taken in modelling the demand uplift resulting from a reduction in GJT and fares. However, our assessment is that 3 years is too small an implementation period, and it is likely that any increase in demand will ramp up over a longer timeframe.

Overall assessment: **Amber**. It is unrealistic to assume such a short implementation period and therefore TfGM should consider a longer implementation period. The current assumption has the potential to overestimate the BCR by front-loading modelled benefits (which would be more heavily discounted if TfGM were to assume a longer implementation period).

4.7 Economic appraisal framework

4.7.1 [Untitled] (Para 6.1, Page 29)

Key Issues:

There is little detail provided on specific technical work reviewed as part of the “Book of Knowledge” which informed the behavioural change. It would be helpful to understand in more detail where data and assumptions have been drawn from.

Key questions:

- Can a summary of the reviewed literature be provided?

Overall assessment: **Green**. The overall appraisal appears to follow standard guidelines, so clarification here is unlikely to alter the outcome.

4.7.2 Valuing Improvements to the Passenger Experience (Para 6.2, Page 30)

This summarises the economic benefits accruing to users. There are no issues with this section.

4.7.3 Valuing Economic Externalities (Para 6.3, Page 30)

The externalities included are appropriate for a scheme of this type.

4.7.4 The Detailed Economic Appraisal (Para 6.4, Page 31)

Economic values have been illustrated in the standard format, and the main queries related to each line of revenue, costs, benefits and economic indicators have been described across this document.

4.7.5 Value for Money for Public Investment - Derivation of the VfM Metrics (Para 6.5, Page 32)

This is a general theoretical discussion of how value for money can be measured. Therefore, there are no comments.

4.7.6 Alternative BCR Formulations (Para 6.6, Page 32)

There is no issue with theoretic discussion around the different formulations of the BCR. We note that the recommended formulation serves to boost the BCR of all categories, and that because the impact on the rail industry is most significant or the franchise option, this is the option which benefits the most from the reformulation. It is recommended that the TAG formulation is presented alongside the “recommended formulation”, to allow for direct comparison with other schemes.

4.8 Wider economic impacts (WEIs)

4.8.1 The wider economic impacts (WEIs) of buses (Para 7.1, Page 36)

The introduction to this section covers the conceptual ideas behind wider economic impacts. There is no issue with the theoretical discussion, however more evidence should be presented for some of the claims made as to how this will translate to the situation in Manchester. There is some disconnect in the text as to the amount of impact expected and the benefits claimed. These are discussed in more detail below.

4.8.2 Economic benefits to key centres (Para 7.2, Page 40)

Key Issues:

Although quantified, the values presented in this section do not appear to be included within the value for money statement of the scheme. Para 7.1.7 says that the assessment assumes static land uses, but 7.1.6 implies that there is an assumption that the bus interventions will support development – “inputs are consistent with the land use assumptions used for Bus Reform”.

If land use is static in the appraisal, then benefits of the development should not be included - only benefits to the development from the intervention. It is not clear what has been included within the assessment. Para 7.1.8 iii, says that “Large scale changes in travel times can promote dynamic land use effects....at this stage we have assumed....do not have a dynamic effect”. The agglomeration benefits are approximately ½ the overall travel time benefits. TAG table A1.3.4 indicates that on average only 3.1% of business person trips are made by bus. Agglomeration impacts only affect business trips. It is hard to reconcile these figures and suggests that the claims made about agglomeration may be overstated.

Key Questions

- What evidence is there that business to business interactions will improve as a result of the bus changes? For “white collar” type business interactions there is already a free city centre bus service, so it is hard to see what benefit will be felt here. For “blue collar” type business interactions it is equally difficult to see how e.g. deliveries, site access etc will benefit from the bus reforms.
- What level of review has been undertaken to ensure that the employment effects presented are believable? Further analysis should be presented to show the geographic areas and market segments which benefit from labour supply improvements and upskilling. Specifically, the external market failures which are being addressed should be presented in detail, to ensure that the use of a “broad brush” approach isn’t overstating the impact of the scheme.

Overall Assessment: **Red**. The level of evidence and analysis presented for the inclusion of WEI benefits on a bus scheme is minimal. No detail of where secondary market failures occur is presented, and no market feasibility either. Although at this stage the schemes perform well without the WEI values, in light of concerns raised elsewhere in this document it is not guaranteed

that this will remain the situation as the business case progresses and it is not clear that WEI values could be relied upon to inform a value for money case.

4.8.3 Net Wider Economic Impacts (WEIs)

Key Issues:

No information is provided as to how the local values have been separated from the national values. As noted previously the WEI values are larger than might be expected from a scheme of this sort, and without the analysis being presented it is impossible to tell whether the results are genuine.

The values in the table suggest that although in aggregate the values benefit users are positive, in some categories the WEI values are negative. It is not clear why this is, again this suggests that the capture of WEIs within this appraisal is not appropriate.

Para 7.3.3. appears to be incorrect – agglomeration impacts (in terms of TAG) are concerned with linking businesses and not “linking people with opportunity”, which are covered in labour supply and better job matching impacts

Key questions:

- What process has been used to split local and national values?
- Why is the move to more productive jobs value negative?
- What quality assurance has been undertaken to ensure that the results presented are genuine?

Overall Assessment: **Red**. It is not clear how these values have been created and given their magnitude there is a significant risk that the value is being overstated. More evidence should be provided, for example has a commercial and labour market viability assessment, a review into areas of low employment / productivity been undertaken and a functional economic market area (FEMA) review been undertaken?

We would expect that (if it is appropriate to include the significant WEIs claimed) that it would be simple to demonstrate that without the bus intervention that the commercial developments are unviable, but that with the improved bus routing they are viable, and that with the developments identified specific issues within the economic market can be addressed.

4.9 Bibliography

No Comment. This section provides references to publicly-available documents (e.g. DfT's WebTAG guidance). This section has no impact on the outcomes of the analysis.

4.10 Appendixes

4.10.1 Appendix 1 – DRM Assumptions and Parameters (Page 44)

No comments. Section provides source of inputs used to model demand in future years. Sources of assumptions and modelling inputs seem reasonable and based on credible (and therefore robust) sources (e.g. DfT WebTAG, NTEM).

4.10.2 Appendix 2 - Appraising the Transition Period (Page 57)

No comments on this section, this section gives a high-level overview of how the transition period was applied. Access to the model is needed for producing further queries.

4.10.3 Data used and Results (Page 58)

No comments on this section, this section gives a high-level overview of how Data Used and Results were applied. Access to the model is needed for producing further queries.

5. Summary of Key Findings

The purpose of the review is to enable OneBus to effectively assess the risks and uncertainties associated with the economic case and to request further clarifications where they are needed. Each sub-section was assessed according to a Red / Amber / Green rating system, reflecting the severity of any issues or queries identified. The risk rating of each sub-section is labelled in the relevant sections of this report and in the Executive Summary. We highlight in this summary section those issues we identified and assessed with a Red rating.

TfGM proposes a new Franchise Scheme covering the existing Greater Manchester bus network. The intervention is expected to the following benefits for passengers, network-wide operational efficiency and performance:

- Simplified and integrated fares across the network;
- Benefits from bus interoperability across the network;
- More efficient resource allocation to yield greater passenger benefits; and
- Benefits from improved customer experience and performance improvements.

To achieve this, TfGM will assume revenue risk and reward on all franchise operators, collecting fare revenue across the network. TfGM will invest £95.4m PV in the purchase of existing depots and other required investments. Franchise operators will receive an estimated 7.5% operator margin and retain cost and performance risk.

The economic case evaluated two other options: The Operator-Proposed Partnership option and an Ambitious Partnership option. The conclusion from the technical review was that the assumptions for network design, fares & ticketing, interoperability and 'soft' initiatives relating to the partnership options are conservative and did not explore the full extent of options that could be feasible.

The following table provides a summary of the economic case BCR and NPV results for the three options.

Table 1: Economic Case Results Summary (£ million in 2010 prices and values)

| £m in 2010 prices and values (PV) | Franchising Scheme Option | Operator Proposed Partnership | Ambitious Partnership |
|-----------------------------------|---------------------------|-------------------------------|-----------------------|
| Time Savings | 299 | 68 | 85 |
| Decongestion | 61 | 15 | 19 |
| User Charges – Fares Paid | 56 | 29 | 29 |
| Private Sector Operators | -49 | 5 | 14 |
| Rail Operators | -24 | -6 | 7 |
| Other Benefits | 6 | 1 | 2 |
| Indirect Tax | -6 | 1 | 0 |
| Present Value of Benefits (PVB) | 345 | 113 | 142 |
| Investment Costs | 95 | 4 | 5 |

| | | | |
|------------------------------|------|------|------|
| TfGM Bus Operator | -136 | 7 | 8 |
| Metrolink Revenue Change | 28 | 6 | 8 |
| Ongoing Costs | 124 | 16 | 18 |
| Present Value of Costs (PVC) | 111 | 33 | 39 |
| Initial BCR | 3.11 | 3.46 | 3.66 |
| Net Present Value (NPV) | 234 | 81 | 103 |
| Wider Economic Impacts | 208 | 51 | 78 |
| Adjusted BCR | 4.99 | 5.01 | 5.68 |
| Adjusted Net Present Value | 442 | 131 | 181 |

Appraisal methodology

The proposed scope of service changes as set out in the consultation document are extensive. An elasticity-based approach was used to estimate the incremental impact of internal (e.g. fares, journey time) and external factors (e.g. employment, population) on the long-term trajectory of bus demand over a 30-year appraisal period.

The review concluded that the elasticity-based approach may not be appropriate given the scale of proposed changes – this approach is normally used to evaluate moderate changes to services and frequencies. (Red).

The use of a 30-year appraisal period has the potential to advantage the option with the longest timeframe (i.e. franchising) compared to the partnership options which are unlikely to be in place for that duration. The cost of renewal may fall over time and future benefits may be larger than is currently possible. TfGM should have run sensitivities either by including a franchise scenario with a shorter timeframe or a scenario where the partnership options are renewed during the appraisal period. (Red).

Demand Forecasting

The Demand and Revenue Model (DRM) developed for the business case applies several assumptions which were considered to be a significant area of concern in the assessment. These are summarised as follows:

- Demand drivers are assumed to be effective within three years. The demand shift associated with the network improvements is incorporated too early resulting in a material impact on the estimated level of benefits and overstating in the early years where discounting is lowest. (Red).
- There is a significant risk that the model assumptions are double counting benefits from fares and interoperability assumptions. The economic case suggests that the differential in fares for individuals who would otherwise have had to interchange will drive an extra ~50 million trips over the 30 years - above the 81m extra trips from interoperability improvements. If fares are broadly similar, and interoperability is covered separately, it is not immediately clear why there should be such a significant increase in trips due to fare reduction. (Red).

- The economic case states that the DRM incorporates the demand abstraction impact of other transport modes. However only the Trafford Park Line Metrolink extension and purchase of new Metrolink vehicles are included in the analysis. Given the length of the appraisal period, it is not realistic to assume no further transport interventions in Greater Manchester. Additional interventions could have been identified in the Strategy 2040 Draft Delivery Plan. Their exclusion from the Reference Case has likely resulted in a higher BCR than would otherwise be the case. (Red).
- The range of sensitivity tests seems reasonable, though it is recommended that more conservative (extreme) assumptions are applied for the tests. Some of the results in the sensitivity tests seem counter intuitive – for instance an increase in population and employment growth decreases the relative benefit in the franchise case. This undermines confidence that appropriate sensitivity tests have been carried out on the modelled BCR outputs. (Red)
- Bus journey times are assumed to increase over time contributing to a continuous fall in bus patronage. It is not reasonable to assume that bus journey times will increase in proportion to car journey times given the potential to introduce bus priority measures. (Red)
- It is not clear how reliability and frequency were considered in the model. These two variables are highly correlated with demand, meaning that demand could potentially be overestimated within the model. Also, it is not clear how TfGM have considered the demand which has been moving to Metro and the reduction of subsidies for Supported Passenger Services which could lead to a variation on the base demand from 17% to 5%, impacting the level of benefits (Red).

Revenue Forecasting

The economic case assumes that average bus fare will rise by RPI + 1.4% in each year over the 30 years. This assumption has been applied to the Reference Case, both partnership options and the franchise option. It is unrealistic to assume that fares would increase by such a high rate. Currently, RPI inflation is estimated to be 3.7%, meaning that fares would increase by 5.1% each year on current trends. This assumption would therefore lead to fares increasing by 64% (after compounding has been taken into account) over a ten-year period. We do not believe that this assumption is credible. It would be useful to benchmark this fare assumption against observed fare increases made by other public transport authorities who have implemented franchising. For example, in London, where buses are franchised, single fares have been frozen at £1.50 since 2016. There is no reason to assume that TfGM would not come under the same level of political pressure to freeze fares, as has been the case in London. (Red).

We have also reviewed the appropriateness of applying the RPI + 1.4% assumption to all fares. Our understanding is that a significant proportion of journeys are completed with non-single fares (e.g. megarider). Department for Transport evidence on recent bus fare increases in England metropolitan areas suggests that bus fare increases have been more moderate over the past decade. The RPI + 1.4% assumption should therefore only be applied to single tickets, and not day or season tickets. Consequently, it is likely that revenue under each option has been over-estimated. (Red).

The modelling of revenue also assumes that journeys made under the English National Concessionary Travel Scheme (ENCTS) will rise over the scheme appraisal period. However, this is inconsistent with recent evidence which shows falling trips made under ENCTS. The assumption is also counter-intuitive as it might be reasonable to assume that bus use by pensioners will fall in the future as car-use becomes a more affordable alternative to travel for this group due to rising incomes amongst this cohort, as well as the fact that ENCTS eligibility criteria will change in the near future, leading to a further reduction in bus use by this cohort. (Red).

We also challenge why a reduction in revenue due to the removal of price discrimination has not been factored into the modelling. Currently, bus operators can set fares independently of TfGM. This means that operators can price discriminate, charging users from more affluent areas higher fares. Under a franchising system, operators may be required to introduce flat fares which would reduce overall revenue, and therefore limit the extent to which TfGM are able to increase geographical coverage and frequency on currently under-served routes. (Red).

Impact on Operators & TfGM / GMCA

TfGM predicts that introduction of the franchise scheme will result in an overall disbenefit to operators. This will involve paying a long-term average operator margin under a franchise scheme of approximately 7.5%. Currently some operators achieve higher margins than this while others achieve low or negative margins. TfGM will take on revenue risk while cost and performance risk will remain with the operators.

TfGM and GMCA will take responsibility for revenue on the franchise and will incur set up and ongoing additional costs from managing the franchise system compared to the Reference Case.

The technical review examined the assumptions in the economic case and relevant sections of the financial case. The review identified several significant areas of concern in the assessment which are summarised here:

- Insufficient information has been made available regarding future operating cost and operator margins. TfGM has assumed a blanket 7.5% margin across the franchise tranches and does not appear to have considered operational risks, likely bidder interest and the number of routes for some franchise tranches which will affect the operating margin. Some tranches will require a higher operating margin to be attractive to bidders. (Red).
- Under the franchise option, TfGM will exercise significant control but also responsibility over the delivery of bus services. The economic case has not considered the risk that greater public scrutiny will oblige greater investment for bus replacement and other elements of service than is assumed in the Economic Case. There is a risk that franchise payments covering operating costs (including fleet replacement) will be higher than modelled in the Economic Case, resulting in a lower BCR than estimated. (Red)
- The economic case assumes that under a franchise option, the bus fleet and the general cost base will remain the same as current. The technical review concluded that there are significant risks for TfGM and GMCA that higher operating expenditure would be required to deliver customer service and performance targets. Additional buses may also be required despite the plans to generate efficiencies through optimisation of the

route network. These changes have the potential to increase the cost of franchise payments relative to what has been assumed in the Economic and Financial Cases. Assuming all other elements remained constant, this would result in a lower BCR than estimated. (Red).

- There is not of a risk mitigation plan, which could lead to higher-than-expected costs. Finally, it is not clear in the economic case if TfGM have included costs related to new infrastructure (e.g. high-quality bus shelters) across Greater Manchester which are needed to implement bus franchising. (Red).

Wider Economic Impacts

TfGM has estimated Level 2 Wider Economic Impacts (WEIs) for the proposed Franchise Scheme. WEIs are not estimated for every business case and only where the transport intervention is expected to result in a reduction in efficiencies in a secondary market i.e. where there is a demonstrated market failure. Agglomeration impacts are estimated for business trips and impact of 'move to more productive jobs' are estimated using commuter trips.

The estimation of agglomeration benefits for a bus franchise business case raise significant concerns. Agglomeration impacts measure the net business productivity increase as a result of improvements in effective density. The majority of business trips are typically not made by bus. The estimated level of local impact on business to business interactions seems especially large, given that, and the level of congestion relief would be unlikely to support such a large valuation for other highway trips. (Red)

A further concern is the estimation of local and national estimates of WEI impact. No evidence is provided on the assumptions behind the local values. Given their magnitude, there is a significant risk that the values are being overstated. (Red)

Risk Assessment

In general terms, TfGM has underestimated the risks related to the scheme, and there is not a clear methodology on how the criteria was established for the impact and probability of each risk in the Non-Quantifiable Risks section. Several risks are interlinked with one another and should be explored further. In addition, it seems that there are some risks that would flow through each of the scenarios but are not captured in each. An approach which groups risks by broad category rather than perhaps by scenario may ensure that each risk is captured.

Red Flag Summary Tables

| Bus Franchising in Greater Manchester Assessment September 2019 WEB | | | | |
|---|--------|-------------------------------|------------------------------|--------------------|
| Jacobs Report Section | Rating | TfGM Document Section Heading | TfGM Document Section Number | TfGM Document Page |
| 3.3.1 | Red | Approach | 12.1.1 | 164 |
| 3.4.1 | Red | Definition of Options | 13.1 | 165 |
| 3.4.2 | Red | The Franchising Scheme Option | 13.2 | 168 |
| 3.4.3 | Red | The Partnership Options | 13.3 | 170 |

| | | | | |
|--------|-----|-------------------------------------|------|-----|
| 3.5.2 | Red | Modelling Methodology | 14.2 | 175 |
| 3.5.3 | Red | Benefits Analysis | 14.3 | 177 |
| 3.5.4 | Red | Demand and Revenue Forecasting | 14.4 | 179 |
| 3.6.5 | Red | Sensitivity Tests | 15.6 | 195 |
| 3.7.1 | Red | Impact on Passengers | 16.1 | 202 |
| 3.8.1 | Red | Introduction | 17.1 | 208 |
| 3.8.4 | Red | The Franchising Scheme Option pages | 17.4 | 216 |
| 3.10 | Red | Impacts on Wider Society | | |
| 3.10.2 | Red | The Wider Economic Impacts (WEIs) | 19.2 | 234 |
| 3.10.3 | Red | Net Wider Economic Impacts (WEIs) | 19.3 | 235 |

01 Economic Case Supporting Paper WEB

| Jacobs Report Section | Rating | TfGM Document Section Heading | TfGM Document Section Number | TfGM Document Page |
|-----------------------|--------|---|------------------------------|--------------------|
| 4.5.3 | Red | Explaining Changes in Reference Case Demand - Competing Modes Explanatory Variables | 4.4 | 16 |
| 4.5.4 | Red | Explaining Changes in Reference Case Demand – Endogenous Explanatory Variables | 4.5 | 18 |
| 4.6.2 | Red | Fares Unification Interventions | 5.3 | 23 |
| 4.8.2 | Red | Economic benefits to key centres | 7.2 | 40 |
| 4.8.3 | Red | Net Wider Economic Impacts WEIs | 7.3 | 40 |

Appendix A. Full Rating Tables

| Bus Franchising in Greater Manchester Assessment September 2019 WEB | | | | |
|---|-------------|---|------------------------------|--------------------|
| Jacobs Report Section | Rating | TfGM Document Section Heading | TfGM Document Section Number | TfGM Document Page |
| 3.2.1 | Green | Economic Case Summary | 11.1 | 156 |
| 3.2.2 | Green | What is the Economic Value of Each Option? | 11.3 | 158 |
| 3.2.3 | Amber | 'Phase 2' Interventions | 11.4 | 161 |
| 3.2.4 | Green | Value for Money for Public Investment - Derivation of the Value Metrics | 11.5 | 161 |
| 3.3 | N/ a | Introduction | | |
| 3.3.1 | Red | Approach | 12.1.1 | 164 |
| 3.4 | N/ a | Option Descriptions | | |
| 3.4.1 | Red | Definition of Options | 13.1 | 165 |
| 3.4.2 | Red | The Franchising Scheme Option | 13.2 | 168 |
| 3.4.3 | Red | The Partnership Options | 13.3 | 170 |
| 3.5 | N/ a | Appraisal Methodology | | |
| 3.5.1 | No comments | Introduction | 14.1 | 174 |
| 3.5.2 | Red | Modelling Methodology | 14.2 | 175 |
| 3.5.3 | Red | Benefits Analysis | 14.3 | 177 |
| 3.5.4 | Red | Demand and Revenue Forecasting | 14.4 | 179 |
| 3.5.5 | No comments | Annual Demand Forecasts for Franchising Scheme and Partnership Options | 14.5 | 182 |
| 3.5.6 | No comments | Option Outcomes | 14.6 | 184 |
| 3.6 | N/ a | Economic Appraisal | | |
| 3.6.1 | No comments | Approach | 15.1 | 184 |
| 3.6.2 | Amber | Treatment of Costs | 15.2 | 186 |
| 3.6.3 | No comments | Option Results | 15.3 | 186 |
| 3.6.4 | No comments | Economic Value of Further Investment in the Bus System | 15.4 | 188 |
| 3.6.5 | Red | Sensitivity Tests | 15.6 | 195 |
| 3.7.1 | Red | Impact on Passengers | 16.1 | 202 |
| 3.8 | N/ a | Impact on Operators | | |
| 3.8.1 | Red | Introduction | 17.1 | 208 |
| 3.8.2 | Amber | Do Minimum | 17.2 | 212 |
| 3.8.3 | Amber | Partnership Options pages | 17.3 | 212 |
| 3.8.4 | Red | The Franchising Scheme Option pages | 17.4 | 216 |

| | | | | |
|--------|-------|---|--------|-----|
| 3.9 | Amber | Impacts on the GMCA and TfGM | | |
| 3.9.1 | Amber | [Untitled] | 18.1 | 231 |
| 3.10 | Red | Impacts on Wider Society | | |
| 3.10.1 | N/ a | Introduction | 19.1 | 233 |
| 3.10.2 | Red | The Wider Economic Impacts (WEIs) of Bus Reform | 19.2 | 234 |
| 3.10.3 | Red | Net Wider Economic Impacts (WEIs) | 19.3 | 235 |
| 3.10.4 | Green | Environmental Impacts | 19.4 | 236 |
| 3.11 | N/ a | Risk Assessment | | |
| 3.11.1 | Amber | [Untitled] | 20.1 | 239 |
| 3.11.2 | Amber | 'System One' Risk | 20.1.7 | 240 |
| 3.11.3 | Amber | Non-quantifiable Risks | 20.2 | 241 |
| 3.11.4 | N/ a | Optimism Bias | 20.3 | 241 |
| 3.12 | N/ a | Economic Case Conclusion | 21 | 242 |

01 Economic Case Supporting Paper WEB

| Jacobs Report Section | Rating | TfGM Document Section Heading | TfGM Document Section Number | TfGM Document Page |
|-----------------------|-------------|---|------------------------------|--------------------|
| 4 | N/ a | Economic Case Supporting Paper Review | | |
| 4.1 | N/ a | Introduction | | |
| 4.2 | No comments | Overview | | |
| 4.2.1 | No comments | Document purpose | 1.2 | 3 |
| 4.2.2 | No comments | Document structure | 1.3 | 4 |
| 4.2.3 | No comments | Economic Case – Key Assumptions at a Glance | 1.4 | 4 |
| 4.3 | N/ a | The Forecasting Framework | | |
| 4.3.1 | No comments | The Demand and Revenue Model (DRM) | 2.2 | 5 |
| 4.3.2 | Amber | The Financial Model (FM) | 2.3 | 5 |
| 4.3.3 | No comments | The Cost Benefit Analysis Model (CBAM) | 2.4 | 8 |
| 4.3.4 | Amber | The Greater Manchester Public Transport Model (GMPTM) | 2.5 | 8 |
| 4.4 | N/ a | Establishing A Baseline | | |
| 4.4.1 | No comments | The Base Year | 3.1 | 9 |
| 4.4.2 | Amber | Base Year Demand - Overview | 3.2 | 9 |
| 4.4.3 | No comments | Demand Segments Ticket Types | 3.3 | 9 |
| 4.4.4 | No comments | Demand by Time Periods | 3.4 | 10 |

| | | | | |
|--------|-------------|---|-----|------|
| 4.4.5 | Amber | Demand by Geography | 3.5 | 10 |
| 4.4.6 | No comments | Base Year Demand - Metrolink and Rail | 3.6 | 11 |
| 4.4.7 | No comments | Demand Based Derivation of Revenue | 3.7 | 12 |
| 4.4.8 | No comments | Base Year Market Supply | 3.8 | 12 |
| 4.5 | N/a | Establishing the Reference Case | | |
| 4.5.1 | No comments | Demand Model Functional Form | 4.2 | s 13 |
| 4.5.2 | Amber | Explaining Changes in Reference Case Demand - Exogenous Variables | 3.4 | 14 |
| 4.5.3 | Red | Explaining Changes in Reference Case Demand - Competing Modes Explanatory Variables | 4.4 | 16 |
| 4.5.4 | Red | Explaining Changes in Reference Case Demand – Endogenous Explanatory Variables | 4.5 | 18 |
| 4.5.5 | No comments | Reference Case Summary | 4.6 | 20 |
| 4.6 | N/a | Establishing the Impacts of “Do Something” Interventions | | |
| 4.6.1 | No comments | Network Redesign Interventions | 5.2 | 22 |
| 4.6.2 | Red | Fares Unification Interventions | 5.3 | 23 |
| 4.6.3 | Amber | Interoperability Interventions | 5.4 | 24 |
| 4.6.4 | No comments | Service Quality and “Soft” Factors Interventions | 5.5 | 26 |
| 4.6.5 | Amber | Lagged Responses | 5.6 | 29 |
| 4.7 | N/a | Economic appraisal framework | | |
| 4.7.1 | Green | Economic appraisal framework - Untitled | 6.1 | 29 |
| 4.7.2 | No comments | Valuing Improvements to the Passenger Experience | 6.2 | 30 |
| 4.7.3 | No comments | Valuing Economic Externalities | 6.3 | 30 |
| 4.7.4 | No comments | The Detailed Economic Appraisal | 6.4 | 31 |
| 4.7.5 | No comments | Value for Money for Public Investment - Derivation of the VFM Metrics | 6.5 | 32 |
| 4.7.6 | No comments | Alternative CBR Formulations | 6.6 | 32 |
| 4.8 | N/a | Wider economic impacts WEIs | | |
| 4.8.1 | N/a | The wider economic impacts (WEIs) of buses | 7.1 | 36 |
| 4.8.2 | Red | Economic benefits to key centres | 7.2 | 40 |
| 4.8.3 | Red | Net Wider Economic Impacts (WEIs) | 7.3 | 40 |
| 4.9 | N/a | Bibliography | 8 | 43 |
| 4.10 | N/a | Appendixes | | |
| 4.10.1 | No comments | Appendix 1 – DRM Assumptions and Parameters | 9 | 44 |
| 4.10.2 | No comments | Appendix 2 - Appraising the Transition Period | 10 | 57 |

| | |
|--|--|
| Organisation Name | University of Manchester Students' Union |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | The Proposed Franchising Scheme should definitely include all of Greater Manchester to allow people to be able to access the entire Greater Manchester bus network much more easily and allow for the entire bus network to be brought up to speed rather than having some areas that continue to be run for profit and have poor coverage |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | The list of services will need to be checked and updated throughout the process; the current service model is obviously run for profit and therefore the franchised services need to make sure this model is not just replicated instead it needs to improve the bus network across Greater Manchester. In order to do this the list of services will have to be regularly updated to make sure that areas of low coverage are picked up and can be remedied. |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | <p>This proposal would allow for refinement and reflection once each Sub-Area has been put in place and any mistakes can be rectified and improvements made.</p> <p>However this is likely to be very confusing for people if there are multiple tickets and to know which routes are and aren't franchised. This would be particularly discouraging for students, especially those who are new to the area as buses are complicated enough without this transition period. This may have an effect on student bus use, particularly if student bus passes that cover Greater Manchester are not available</p> |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |

| | |
|---|---|
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | This doesn't seem to provide much time between the start of service in Sub-Area A (02/01/2022) and the entering it a contract of Sub-Area B (25/03/2022) this doesn't seem to be enough time to assess how the proposed franchising scheme is working within Sub-Area A and therefore if anything in the subsequent contracts needs adding, amending or removing. |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Thought needs to be put into which organisations represent bus users, will this be groups like BetterBuses, the Universities, Community Groups and Unions? I think this should also be an open consultation open to everyone to respond and should take into account any comments or complaints that have been made throughout the franchise contract so that service users can be consulted directly on how the franchising scheme is working. |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | What happens if you do not find multiple small operators to take on Franchised contracts? There's a worry that if there aren't enough smaller operators then these services will also end up going to a larger company, which could result in a monopoly or may mean that the council have to run them which may make the scheme financially untenable in the long run. |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | Could the GMCA use some of the current bus depots to do this? This may cut costs which could be spent on other customer facing aspects of the service and would be much more environmentally friendly. Obviously this may mean purchasing them off of current owners who may be unwilling to sell them but might be much more beneficially than building more depots and having the ones that currently exist remain empty. |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Tend to agree |

| | |
|---|--|
| Q13b Why do you say this? | The Proposed Franchising scheme will allow the GMCA much more control over the bus network and therefore where a problem is identified could be much more easily dealt with than the current system. However one of the challenges highlighted in paragraph 4.18 is the lack of "On-Road" competition. This is something which the franchising scheme isn't going to be able to improve however it may solve the other issues highlighted namely, fare increases above inflation, lack of coordination of networks, the need for services where they're less profitable and for more integrated fares. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | While these should be priorities, accessibility needs to be a key priority for GMCA. This could include practical things i.e. having a second door, voice announcements of the stops but also things including training for drivers. This may fit well into the customer experience however it needs to be explicitly stated within the proposal. This would not only improve the bus network for those with access needs but would improve journeys for anyone who was visiting or new to the area and would drastically improve the experiences of students. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | The proposed franchise scheme seems like it would give much more control to the GMCA and the GMCA would therefore be in a much better position to achieve it's strategic goals, particularly when it comes to having a much more integrated transport system in Manchester. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | I think the partnership options has a very limited ability to impact on GMCA's overall objectives, it sounds like this would have the potential to re-prioritise bus routes however this would still be up to service providers and as they would continue to run on a for profit basis this re-prioritisation is in no way guaranteed. As such it's unlikely that this would have as much of an impact on the GMCA's objectives as the proposed franchise scheme. |

| | |
|--|---|
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>While offering a 'high' ratio of benefits to cost this seems to be the lowest out of the 3 options however the present economic value is much higher than either the operator proposed partnership or the ambitious partnership.</p> |
| <p>Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>There is a risk here that one company buys many of the franchises and therefore is unlikely to create competition, especially if a company like stagecoach buys many of the franchises and prevent competition with other larger companies like currently happens.</p> <p>Furthermore how will points 4.74 and 4.75 relate to depots, would a company be assign to a depot or would multiple companies share a depot depending on franchises.</p> <p>On top will smaller franchises be decided upon need and if so how has need been assessed?</p> |
| <p>Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>The contracts should have scope for a review every year on a rolling contract so that if an operator is receiving many complaints or operating a sub-par service that their contract could be reviewed. On top of this as each sub-area comes into operation additions may be needed to be made to contracts if issues or problems arise that weren't originally considered. Therefore having this on a rolling contract may really help when it comes to reviewing these contracts.</p> |

| | |
|--|---|
| <p>Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Operational quality and safety risks need to be managed from a central place i.e. TfGM. Due to this there should be a central complaints procedure and accountability and bus user complaints should be taken up seriously with the operators who's franchises are getting complaints. While quality, safety and operational risks are the responsibility of the operator there needs to be a central place to hold them accountable.</p> <p>Furthermore how will cost risk stay with the operator? GMCA would be liable for many of the costs including depot construction etc.</p> |
| <p>Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case?</p> | <p>There needs to be an assurance that employees would be rehired by whichever company takes over the franchise once the contract ends.</p> <p>Due to this there needs to be some form of standardisation of training so that employees aren't having to be retrained by each operator as this means operators would be more likely to rehire rather than hire new employees so that employees aren't losing their jobs every time the contracts expire.</p> |
| <p>Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>As stated before could GMCA focus on buying the current depots rather than building new depots from scratch. Since the GMCA have declared a climate emergency it would be much more sustainable to retrofit existing depots than build new ones. Moreover it is likely to be much cheaper to retrofit depots than to build them.</p> <p>This does however mean that there is an issue of operators not being willing to sell their depots to GMCA; in which case it needs to be thought about how GMCA will acquire these. It also seems like it would be worth thinking about how much the proposed franchising scheme would be slowed down if the GMCA are required to build bus depots as this would take time and couldn't be done in the time scales set out in the strategic case.</p> |

| | |
|---|---|
| <p>Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>There doesn't seem to be much of an incentive for operators to buy more buses if they have their own already if they're buying out a franchise from another operator. Especially if they have to retrofit these buses in the future to meet emissions standards.</p> <p>The level of emission standards also needs to be properly worked out, including how long operators have to comply with these standards and how it will be enforced. A lack of clean air in Manchester results in the equivalent of 1200 deaths a year and as such this needs to be set at a high standard and enforced regularly, with high penalties for operators who fail to comply with these standards. This should be a key part of the proposal given the declaration of a climate emergency by the GMCA.</p> |
| <p>Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>This new ITS system should include voice/audio at stops, like in London. Furthermore TfGM should also develop an app that integrates the entire bus/tram network around Greater Manchester. These would both make the buses much more accessible for those with accessibility needs and for people who are simply visiting the area and need to get around. One of the key issues with buses is that there isn't a central place from which you can plan journeys and having this may increase bus and tram patronage as people would be able to navigate Manchester on public transport much more easily.</p> |
| <p>Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p> | <p>Use of the negotiated procedure seems like it would offer the best balance and allow for more competition between bidders so that GMCA could have the maximum gain from the franchises so that more money and resources could be spent on bus users and their needs.</p> |
| <p>Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case?</p> | <p>Cross boundary travel should be maintained where possible; due to this as long as most changes were relatively minor this shouldn't be an issue. However bus users need to be made aware of these changes and as such GMCA should work to signpost all changes to cross boundary services.</p> |
| <p>Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts?</p> | <p>Thought needs to be given to what happens if operators don't behave as expected, for example if they decide not to rehire employees or if the cross boundary services threaten to terminate over the changes they would have to make to fit within the proposed franchising scheme.</p> |

| | |
|---|---|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | <p>Operator accountability has to be made really strong. In a partnership case I think it would be imperative to have some sort of sanctions scheme with financial costs with the potential option of de-registration if there was continual failure by an operator.</p> <p>It doesn't sound like an EPS mechanism is likely to happen as you're unlikely to get operators to sign up to have more accountability.</p> |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | In the unlikely event of getting an ambitious partnership, a mechanism should be put in place so that if an operator is de-registered and they were no longer allowed to operate that employees would be guaranteed to keep their jobs. |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | There is a worry about how GMCA will prioritise this compare to other key issues and where this fits in terms of priorities for funding. Especially considering that more funding cuts to local councils is likely to happen over the next few years while the Proposed Franchise Scheme is being implemented. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | GMCA needs to make sure that there is a uniform and accessible complaints procedure for ease with a central point for complaints. Currently as users have to complain to the operators directly there is a lack of transparency, clarity and action over what operators do with those complaints. As such this needs to be made clear to people and this central complaints procedure needs to have the power to hold operators to account. |

| | |
|--|--|
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | <p>It needs to be made clear to passengers what tickets to buy and where they cover. It is currently already very complicated and while the franchising of buses will, in the long term, provide a solution to this, during the transition period this is likely to be very confusing, complicated and hard to access. Therefore during this transition period ticketing needs to be made clear.</p> <p>On paragraph 4.164 A plan needs to be made to mitigate this as there is a large risk that this could cost a lot of money and really affect passengers. Rather than just having emergency lettings of short term contracts, which could really harm GMCA when it came to negotiating later down the line.</p> <p>This would obviously require a lot of work over the transitional period and may require extra staff beyond those proposed earlier in the management case.</p> |
| <p>Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case?</p> | |
| <p>Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options?</p> | <p>There needs to be a key focus on accessibility of the bus network. Having things such as Audio of what stop the bus is reaching, a second entry door to allow much easier access. This would not only help those with access needs such as wheelchair users or people who have visual impairments but also anyone who hasn't been in the area long and doesn't know exactly where they're going.</p> <p>Moreover when the scheme is operational having a level fair, like in London would help to make things easier for all users and reduce confusion. Including a maximum cap would also be very useful for many who may struggle to get around without the aid of public transport.</p> <p>The point made in paragraph 4.182 around withdrawing service prior to the Proposed Franchising Scheme. Along with having temporary service contracts could it be possible to have this count against any operators who withdraw services and then bid for a franchise?</p> |

| | |
|---|---|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | As part of a partnership a cap should be set on operators tickets so that they cannot raise their fare rates massively (for example setting this to at the rate of inflation so that they couldn't increase fare prices more than this every year). |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | <p>It seems likely that the same companies would continue to run the buses just with more accountability and regulation.</p> <p>There does seem to be a risk however that as larger operators will continually out compete smaller operators that there starts to become a monopoly of the bus network which could undermine many of the changes that GMCA are trying to make by implementing the Proposed Franchise Scheme</p> |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | Need to make sure that, although an EPS mechanism is unlikely, that it allows smaller operators to compete as if not you could end up with one or two large operators running all of the buses across Greater Manchester which c=ould mean that the situation with buses could be worse than it is now as those operators would have control over everything. Therefore could separate EPS mechanisms be put in place for large, small and medium operators so that they could all compete. |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | Don't know |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | There should be a feedback mechanism that allows people to tell GMCA what they think the surplus is spent on more specifically or have this based on the feedback and complaints that might be received. This way GMCA can target the key problem areas for the people who use the buses and those who want to but are being prevented from doing so because a specific issue. |

| | |
|---|--|
| <p>Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options?</p> | <p>In terms of the environment this bus franchising isn't going to have much impact on it's own GMCA needs to introduce policy and laws that actually cut carbon emissions. For example following Amsterdam's model and get more people cycling..</p> <p>Furthermore as 2038 has been set as the carbon neutral target having only 50% share of journeys on Public transport then this doesn't seem to fit this target and in fact seems much too late.</p> <p>Any new depots should include sustainability initiatives such as charging ports for electric buses which use solar/wind etc to operate.</p> |
| <p>Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this?</p> | <p>This seems like the best way to regain control of buses across Greater Manchester. Doing this would therefore mean that GMCA will find it much easier to achieve their objectives around improving the bus service.</p> |
| <p>Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme?</p> | <p>Accessibility has to be a key feature on the buses things that should be included within this are: Training for all buses drivers including things like active bystander training, dementia friend, Having audio cues for stops so that people know where they are and when to get off. A second door, like on buses in London, enabling much easier access on to and off of the bus. TfGM should sign up to be a third party hate crime reporting centre. Especially if it is the central point when people wish to make a comment or complain.</p> <p>On top of this: Having an Ask for Angela type system that people can use if they're feeling threatened or uncomfortable that the bus driver can report and act on. GMCA should also open up a consultation, in collaboration with different community groups across Greater Manchester, as to how to make buses safer and more accessible e.g. working with the LGBT foundation, Age UK Manchester etc.</p> |

| | |
|--|--|
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | <p>Accessibility has to be a key feature on the buses things that should be included within this are: Training for all buses drivers including things like active bystander training, dementia friend, Having audio cues for stops so that people know where they are and when to get off. A second door, like on buses in London, enabling much easier access on to and off of the bus. TfGM should sign up to be a third party hate crime reporting centre. Especially if it is the central point when people wish to make a comment or complain.</p> <p>On top of this: Having an Ask for Angela type system that people can use if they're feeling threatened or uncomfortable that the bus driver can report and act on. GMCA should also open up a consultation, in collaboration with different community groups across Greater Manchester, as to how to make buses safer and more accessible e.g. working with the LGBT foundation, Age UK Manchester etc.</p> |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | This could have some really positive benefits to people within Greater Manchester. Some things could be made much stronger like having accessibility as a top priority, but in general this could massively improve the bus network across Greater Manchester. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Having Accessibility as a priority and doing much more around environmental sustainability. More work needs to be done with community groups to properly look at what they want the buses to be and how GMCA can best use the buses as a benefit to Greater Manchester. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Quite likely |
| Q48 Finally, do you have any other comments you want to make? | |

Response to Bus Consultation

We are pleased to respond to this consultation on behalf of the students of the University of Salford, as their elected representatives. Our response is informed by our own experience, and the experiences of our members who live and work across the Greater Manchester region, and who study in Salford.

We welcome the opportunity to highlight the need for improvements to the bus network of Greater Manchester. We agree that the service is not currently performing as well as it could, as highlighted within the consultation document. Below is an outline of the problems the current system causes students, and reasons we believe a franchised system managed by the GMCA would alleviate these problems.

It is because of the reasons below that we are in support of GMCA franchising the bus network.

Student Fares for all Students

The Problem

- Currently the System One student discount is only applied to students up to the age of 26. Studying is a financial burden to all – at any age – and this should be reflected in an age inclusive student fare discount.
- As representatives of a significant mature student population, we want to see a reform which reflects the reality of our diverse student demographics.

The Solution via Franchising

- Under a franchised system, GMCA would be able to set student fares. We ask that they bring an equitable discount to all students, not just those under 26.

Complex Pricing and Routes

The Problem

- The bus network being serviced by multiple operators can lead to confusion and financial difficulties for students. Whilst some operators offer a term time fare, it can be difficult for students to know which company is best suited to their needs. Students have been left out of pocket when routes have changed operator midterm, and students on placement may need to purchase multiple termly passes for different operators. All of this is a significant financial burden and a barrier to accessing learning.
- On a day-to-day basis, multiple operators make daily use difficult as there is limited fare and route consistency across the network.

The Solution via Franchising

If buses were franchised by the GMCA, they could ensure fares were simpler to understand, and both fares and routes were integrated with other travel networks (e.g. a combined tram and bus pass). This would have a significant positive impact on students, especially those who commute to study at Salford, as it would make their travel simple and consistent.

Parity with London

The Problem

- As a region with the highest student population outside of London, parity with the capital is essential to ensure fair access to Higher Education throughout the UK.
- The provision in London is significantly better than that of Greater Manchester. This is reflected in the steady increase in bus patronage in London, whilst it has fallen across the country. We believe that our region, including Salford, deserves the equal access to the best in planning, pricing, and technology.

The Solution via Franchising

- We want to see buses with double doors across the network to improve access for people with disabilities, as well as reducing boarding and departing times for all.
- We want to see a £1.50 Hopper Fare. Not only would this reduce students' costs to commute, it would also allow them to explore the diversity of the Greater Manchester region.
- We want to see a network which serves the entire region equitably, with a fair distribution of transport hubs that meet customer needs.

We believe all these improvements can be best actioned by a franchised network where routes and fares can be centrally managed by the GMCA.

Passenger Safety

The Problem

- As a Students' Union we are committed to making the city as safe for students as it is possible to be. We know that public transport can be an area of concern – especially for women. Sexual harassment is commonplace, and often goes unreported.

The Solution via Franchising

- We would urge the GMCA to establish an approach equitable to Project Guardian in London, where reporting of harassment has been made easier through the partnership of the London Metropolitan Police and TfL. We would hope that Greater Manchester Police and TfGM can have the same working relationship, and we believe this would be easier to establish if the bus network was franchised by GMCA.

Conclusion – Increase in quality for an increase in use, for a Greener Greater Manchester

Ultimately, we as representatives of the student community in Salford know that bus usage needs to significantly increase in order to tackle the climate crisis. However, we cannot expect our members to change their travel patterns if the public transport provision doesn't meet their needs.

We are pleased to support the franchising proposal via this consultation and look forward to the improvements a franchised network can bring.

Signed – USSU Officer Team

Evangeline Adams – President

Megan Hayward – Arts & Media Officer

Temi Adebayo – Business & Law Officer

Adedapo Oni – Science, Engineering & Environment Officer

Abbie Baker – Health & Society Officer

Manchester Airports Group (MAG)

| | |
|---|---|
| Organisation Name | MAG |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|--|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | We agree that the local bus market is underperforming, and from a Manchester Airport perspective, the modal share of bus for both passengers and staff is not what it could or should be. Whilst a number of challenges and reasons have been identified in this Case, no single one can be classed as the primary cause. They are intertwined and it will require a significant shift in operational strategy to break these links. Such a move would provide an opportunity for comprehensive reform, of which the focus should ensuring services are tailored to public demand and as such more attractive to the public. |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | As stated in our response above, we agree that the market is underperforming and that if reform can address this we are supportive. Our priority is that the right services are put in place to meet current and emerging demand, at prices that are competitive with alternative modes, both to ensure fairness and consistency, and also to encourage modal shift to public transport from private vehicles. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |

| | |
|---|--|
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | <p>It is for GM to determine the economic case that delivers the best value for money. Our priority as set out in our responses to the questions above is ensuring that our passengers and staff have access to the right services at the right times, with attractive and reliable travel times. Franchising needs to be able to give the direction to the market to deliver the appropriate services whilst ensuring the costs to users are competitive and public subsidies are affordable. We would be keen to see a model that allows major users, such as Manchester Airport, to input meaningfully into service design, as this can help drive modal shift.</p> |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|---|---|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | This is a matter for the GMCA to determine, and needs to be considered within the context of GM's wider transport objectives and investment plans. Whilst Franchising is an opportunity for bus to play a greater role in public transport delivery for GM, this should not diminish the other transport investment priorities also identified. It is also important that Franchising results in a fair and transparent system of bus fares for users that is part of a flexible and integrated GM offer, with bus competitive with other modes, and in particular able to encourage the switch from private vehicles to bus. |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different | |

| | |
|--|---|
| options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | It is a matter for GMCA to determine the best way forward, but we are supportive of GMCA's objectives for improving bus services. It is important that bus develops into a central element of an integrated GM transport system, rather than the fragmented offer that is currently in place. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |

| | |
|--|--|
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | It is for GM to determine the best form of delivery, but we support GM's overall objectives for the development of a far more comprehensive and integrated transport system. In particular a move towards 'London-style' integrated ticketing and interchangeability will play a key role in ensuring public transport is flexible and therefore attractive to users, encouraging a shift from private vehicles. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | In line with our response above, it is important that Franchising ensures that integrated ticketing can be developed, enabling flexible interchange without penalty between modes, particularly bus and Metrolink, but ultimately also heavy rail and other modes, including emerging options, such as cycle hire. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | |
| Q48 Finally, do you have any other comments you want to make? | Further to comments already made above, more direct control of the bus market by GM should be utilised in support of overall modal shift away from private vehicles in a coordinated and strategic way. This could range from promotional and awareness raising activity, through to dynamic real-time journey planning using new technologies, through to tailoring services to meet demands created by restrictions on private car usage (such as emissions charging). |

| | |
|--|---|
| Organisation Name | Passenger User Group |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | It should not apply to the entirety of Greater Manchester. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | I would leave it to the market to run |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | People travelling don't think in areas, they want to get from A to B. |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | List should be much wider. GMCA does not have knowledge and expertise of how to manage services |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | Cancel altogether please |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | Stop altogether |

| | |
|---|--|
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | No |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | Seems like you have already decided to go for it. That is not how democracy works unless you are happy to follow North Korea |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | And then you will ask them to provide references of ten other operations? |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | That means taking away property from private operators. Again only in North Korea the state would demand private property |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Same challenges as London has. A passenger does not consider taking a bus if it franchised or not, he or she wants to get from A to B |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly disagree |
| Q13b Why do you say this? | You only care about your own area and when you will have a monopoly about management of bus services you don't need to care what the passenger thinks. Is your next step to franchise supermarkets? Perhaps for the next 5 years you want everyone to go to Tesco because you think you should decide and know better what I want? |

| | |
|--|---|
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | I would recommend a visit to North Korea, there is a lot more you can take back under control if you want :-) |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | It will not |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | You forget to mention that the taxpayer does not want to pay extra for this scheme. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|---|
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | They spend more time than anyone else on a bus. If you want everything to be run as cheap as possible good luck |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |

| | |
|---|------------|
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | See before |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | no |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | no |

| | |
|---|----|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | no |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | no |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | no |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | no |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | no |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | no |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | no |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Disagree, you already had that conclusion before you started the work. Would be nice to use independent source like an university. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | Visit to Russia might be useful too. |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly oppose |
| Q45b Why do you say this? | You take away all innovation. Furthermore how do I know my money is efficiently used? Does GMCA need to sit in an expensive office in the city centre to manage all this? Or would a container be sufficient? |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |

| | |
|--|--|
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | <p>Extremely unlikely</p> |
| Q48 Finally, do you have any other comments you want to make? | <p>You had your solution already there for years, so you won't do anything with the outcome anyway. Happy to facility a visit to North Korea if required.</p> <p>Many thanks</p> |

| | |
|--|---|
| Organisation Name | SE Manchester Community Rail Partnership |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | As with so much of the Consultation Document this section is written in a complicated, almost legalistic fashion. If you wanted more a wider range of responses from people with a wide range of educational achievements you would have made the whole document and the language you use in the document much, much simpler. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | I live in Marple, east Stockport. Many bus services in our area run across the GM boundary (eg 358, 199). You are unclear about how these will be dealt with. |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | Again, you can't use a short paragraph when six will do. Did a lawyer write this? |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |

| | |
|---|--|
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | You quote 6 March 2020. you must stick to this date at all costs. The sooner GM moves down the franchising route, the better. |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | Again, essential these target dates are met. |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | You know the bus market but I surmise that small operators are likely to be more enthusiastic about franchising than the big operators. You are right to build in safeguards to prevent the big operators dominating the GM franchising market |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | Does this mean that ALL bus depots in GM would be owned by GMCA/TfGM? |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | Long overdue |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |

| | |
|--|---|
| Q13b Why do you say this? | this is the way forward. Bus re-regulation is the first essential phase towards GM fully integrating all modes of public transport |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | Another case of GMCA overcomplicating a simple issue. The major thing that bus passengers look for is 'reliability'. This is not mentioned in your list of objectives. Passengers want their bus to arrive when it should arrive. How is a GMCA/TfGM going to ensure higher levels of reliability for passengers? |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | An essential item that passengers look for is a real-time information screen in shelters at the principal stops. They are not mentioned. Does this mean that TfGM is to stick with its opposition to information screens at bus stops. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | TfGM must listen to transport user groups about modifications to routes, particularly in relation to integrating bus services with train and tram services. The present private operators show no interest in co-ordinating their bus services with train services. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | My experience of integrated, franchised bus services is in London and Switzerland. It is clear that both of these regions have benefitted hugely in economic terms from having franchised bus services. Manchester must follow their examples and franchise its bus services. It must go a step further and follow the Swiss example of closely integrating public transport modes to the benefit of both the passengers and the local economy. |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |

| | |
|--|--|
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | GMCA can afford to seek best practice from other authorities, eg TfL but also European cities, that have franchised bus networks to devise an optimum risk allocation strategy. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | I assume that GMCA will follow established best practice in terms of fleet ownership |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | Best practice and the most advanced technology in terms of Intelligent Transport Systems must be adopted by GMCA/TfGM |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | It is essential that GMCA employs best practice in relation to cross-boundary services. For those who live near the borders of GM it is important that existing cross-border services are maintained and enhanced after franchising. |

| | |
|---|---|
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | I hope that GMCA's conclusions are deemed realistic. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | Again, I'm sure that best practice elsewhere will guide GMCA/TfGM in how to manage franchised operations. |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |

| | |
|---|---|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | TfGM must be the principal vehicle for the implementation of franchised bus services in GM. |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | Passengers will look to TfGM to implement franchised bus services in GM that are as successful as those in London in giving passengers better, more reliable services. We will all expect to see an end to the downward trend in bus usership in GM |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | If franchising encourages more operators to come to GM, this has to be a good thing. |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |

| | |
|--|---|
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | The proposed franchising scheme will benefit all residents of GM. A London-style bus network in GM must lead to a growth in bus usage and an increase in modal shift from car to public transport. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | I agree with this conclusion. The only frustration is the likely long timescale in achieving these objectives. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | It is, in my opinion, a 'no-brainer'. The success of the franchised bus network in London and in other major cities in Europe must be replicated in Greater Manchester. My main concern is that you have made this consultation far too wordy and too complicated. Your use of a very technical language style, at times legalistic, must be a discouragement to many people to respond to this consultation. You will get a disproportionate level of responses from the educated middle classes. This is not representative of the majority of existing bus users. These people will be discouraged from responding to the consultation. You could have made it much shorter and much simpler |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | My experience of using buses in franchised networks (London, Switzerland and many major European cities) shows these to be vastly superior to the free-for-all that exists in G Manchester. The sooner GM can move to a similar franchised network, the better. in my view it cannot happen soon enough |

| | |
|--|--|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |
| Q48 Finally, do you have any other comments you want to make? | You have made this consultation too long, too complicated and too difficult to understand. The case for franchising is so strong that a much shorter, simpler consultation would have produced a wider response but with the same overall answer ie the people of GM are desperate for an improved bus network along the lines of TfL. |

| | |
|--|---|
| Organisation Name | BRYN AND MAKERFIELD RUG |
| S1 | The short version containing nine questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | |
| Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition? | |
| Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme? | |
| Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made? | |
| Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into? | |
| Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract? | |

| | |
|---|----------------------------------|
| Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working? | |
| Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme? | |
| Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme? | |
| Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this? | |
| Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this? | Strongly agree |
| Q13b Why do you say this? | Too many buses running 90% empty |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |

| | |
|--|--|
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | |
| <p>Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would:</p> <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. <p>Do you have any comments on this?</p> | |
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | |

| | |
|--|--|
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | |

| | |
|--|--|
| Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters? | |
| Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options? | |
| Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case? | |
| Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case? | |
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | |

| | |
|--|--------|
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | Agree. |

| | |
|--|--|
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Tend to support |
| Q45b Why do you say this? | THINGS NEED TO CHANGE, FAR TO MANY BUSES RUNNING NEAR EMPTY. |
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | No |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Don't know |
| Q48 Finally, do you have any other comments you want to make? | |

| | |
|---|--|
| Organisation Name | Mobilities Justice CIC (pending registration) |
| S1 | The long version containing 48 questions |
| Q1 Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme? | It must be very disappointing to have had to make such a statement not only around typographical errors but also some significant substantive changes. I guess that this is in part for legal reasons. I hope that GMCA and others involved will be avoiding the need for corrections and changes in similar documents going forward. |
| Q2 Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester? | <p>I support the PFS applying to the whole of Greater Manchester. I would also support partnership and cooperation arrangements around and across the borders of Greater Manchester to reduce or eliminate friction and loss of service level around cross border services. Not only those that exist(ed) in the past, now and at the time of each of the (three) successive implementation phases but also for any useful services that might be brought forward in future.</p> <p>Reason: The formal area of GM is only that, a formal area. Although this might have been imagined or hoped to correspond with a functional area when it was settled this may not have been the case even then and it is certainly the case that even then substantial areas of Lancashire, East and West Cheshire, Merseyside, Derbyshire, West Yorkshire and Staffordshire (at least) are within the functional area that is the GM travel to work, travel to shop, travel for leisure, travel for study etc areas that would benefit from being served by a coherent, integrated, value for money, high level of service bus network which also meshes well with heavy rail, tram train, tram and road networks.</p> |
| Q3 Do you have any comments on the local services that are proposed to be franchised? | All services in GM and where possible in the GM TTW etc areas that exist already or can be imagined should be included within the scheme. |

| | |
|---|--|
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> | <p>This reasons for these geographical and phasing arrangements are understood. However, these reflect (the majority of) the existing services which have evolved under a very unsatisfactory market arrangement, albeit with bus service support packages to meet some otherwise unmet journeys, and they reflect origin and destination patterns (for example with the regional centre (and other centres) as origin and destination for many services rather than seeing through services. In my view this existing model has implications for the future network which may see these geographical phasing arrangements crystallising these OD assumptions when through routes may be desired by customers and beneficiaries and may also be the main lacks of the current network. For example there may be significant demand for services such as direct airport connections for workers, contractors, passengers and visitors to Manchester Airport (and other employment centres)</p> <p>The existing infrastructure of transport interchanges, bus stands, bus stops, garages etc reflects a model that has developed through largely commercial decisions and managed decline and concentration on profitable corridor routes and existing needs for independent arrivals and departures at hubs for services run by multiple independent companies and independent units of companies making independent decisions largely based on profitability of granular services/routes with it seems scant regard for maintaining and improving the network despite the logical commercial reasons for doing so.</p> |
| <p>Q4 Do you have any comments on the proposal that the Proposed Franchising Scheme would be split into three sub-areas and on the other arrangements proposed for the purposes of transition?</p> <p>Continued</p> | <p>In essence the PFS will change these arrangements so that independent arrivals and departures are less of a feature and coordination, integration and BRT corridors too are more available. This could mean that infrastructure servicing reliable dependent arrivals and departures instead of unreliable and uncoordinated independent arrivals and departures, similar to the infrastructure seen in more advanced bus and integrated passenger transport ecologies would be more suitable than what will be inherited.</p> <p>The type of service transition offered in the PFS with its geographical and phasing proposals could preserve less than optimal features of hubs designed for independent services and that should be avoided in my view.</p> <p>Letting contracts for three, two and one years for the successive geographical areas (or four, three, two; or five, four, three) would create a common year in 2024, 2025 or 2026 where such effects could be managed and reduced.</p> |

| | |
|--|---|
| <p>Q5 Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?</p> | <p>Excepting existing scholars schemes makes sense. There is a good case for excepting these and creating different clusters and work packages from time to time. The dedicated fleet for many of these services (eg green yellow buses) should be deployed as far as possible for other journeys on school days, and on non school days including weekends, occasional days, and school holidays. But the principle of holding these arrangements outside the PFS is understood.</p> <p>The need for some temporarily excepted services, eg for established services across the borders of the three proposed sub areas, is also understood. These are not however the only cross border services that can be imagined and in my view care needs to be taken to avoid arrangements which crystallise arrangements which have grown up under the laissez faire deregulated arrangements of the past 35 years.</p> |
| <p>Q6 Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?</p> | <p>None except that I would welcome changes that involve the initial date and other dates being brought forward to be sooner, but I would not welcome changes pushing that date and other dates backwards to be later.</p> |
| <p>Q7 Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?</p> | <p>No.</p> |
| <p>Q8 Do you have any comments on the nine month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract?</p> | <p>A pregnant pause? No.</p> |
| <p>Q9 Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?</p> | <p>I have strong views on how "consultation" is carried out by GMCA and other public bodies at present. In many cases this barely satisfies the definition of consultation and is a very long way from ideals of real involvement in decisions on proposals and most important in developing proposals. This is not the place to rehearse those except to say I favour approaches that are far higher up the ladder of participation than most if not all those taken by GMCA. Including this one.</p> |

| | |
|---|--|
| <p>Q10 Do you have any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme?</p> | <p>I welcome this. I would welcome the privileging of small and medium-sized operators, including community businesses, charities, co-operatives, social enterprises = particularly those which are genuinely locally based and locally operated and locally staffed at all levels, for any and all contracts where this is possible, pushing social value arrangements to the limits available from the Treasury and other bodies in tendering as these change from time to time.</p> <p>I am a great believer in community wealth building and that the PFS offers a good chance for BSOs to be significant anchor institutions instead of extractive corporations.</p> <p>It is particularly important in my view that the scheme goes beyond *allowing* opportunities on paper and instead *privileges* these with great care in how social value clauses and tender assessments so that this is more than lip service. There are many examples for how this might be done and this is not the place to rehearse these in detail but as one example GMCA should not be risk-averse on eg the strength of covenants offered by those tendering, or their ability to provide CSR contributions in cash money. Newer and smaller and more local organisations will by definition have poorer covenants than corporations and be less able to contribute directly, in financial terms.</p> <p>The risk of the first of these examples can be managed eg by appointed or approved representatives on governance bodies and the loss of the second may be made up for by substantial local multipliers from genuinely local operators.</p> |
|---|--|

| | |
|--|--|
| <p>Q11 Do you have any comments on the proposal that it would be appropriate for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme?</p> | <p>This is sensible. In fact, this is a great opportunity - along with other transport hubs already owned, controlled or influenced by GMCA, or which might be in future - which GMCA should explore which is to cause the building of dense developments, of housing and related retail and services, at any and all significant transport hubs. Bus depots are generally medium to substantial sites yet the air space immediately above them is rarely used in an integrated way even though they can be, by definition, well serviced with sustainable connectivity to employment, education, retail and leisure. Bus depots should not only be provided by GMCA but also treated as major development opportunities for homes with a range of jobs and services on site. One example, which does not include a bus depot but which is on a highly sustainable bus corridor, is the Pembury Court development in Hackney, London. In this, the local authority worked with the innovative housing trust Peabody to replace about 40 low-density homes which were in a moderate to poor state of repair at best with a sustainable community of some 270 homes, with shops and services. The option with no private car parking was chosen so that homes were sold or let to families who would use passenger transport services and commercial units to businesses and organisations providing truly local services.</p> |
|--|--|

| | |
|---|--|
| <p>Q12 The Strategic Case sets out the challenges facing the local bus market and says that it is not performing as well as it could. Do you have any comments on this?</p> | <p>This is clearly the case. The way in which the bus network has seen a managed decline and cynical profit-taking has been hard to watch. To fix this relies not only on changing overall governance and management arrangements but also some fundamental changes in wider systems. For example:</p> <ul style="list-style-type: none"> - The local bus market would benefit greatly from private car users paying the full cost of that use - The externalities of private cars and of motorised road movement, in general, have been estimated at £3.75 Bn annually in GM (Made to Move report 2017) - This estimate of costs includes only congestion, air quality, collisions, global heating and suppression of activity - This estimate of costs does not include isolation and loneliness, noise and disturbance, visual disamenity, land use and land value issues, under trading etc - Road space should be reallocated including to buses in specific BRT projects and also general availability of full-time bus lanes - Part-time bus lanes make little sense in many cases and should be avoided if we want reliable 24/7 or even 18/24 bus services - Medium and small buses, including service taxi scale buses, should be included to service local areas and last miles and feed high-frequency bus, tram and train hubs and, if appropriate, park and ride sites - The managed decline shown in the graph even after franchising is a depressing - GMCA should show far greater ambition to increase ridership - Lower fares, including better concessions and more free services, more and better bus lanes, dependent interchanges, off bus ticketing, properly priced carnet products, significantly better fleet, more reliable and frequent services, greater integration with other modes, proper last mile and local feeders would all assist in increasing ridership - Although the above measures may in some cases appear to have significant net costs they will not if the savings in the existing health and social and economic costs of roads are properly assessed and banked - Transport is a major public good and private cars are a significant harm and they should be treated by GMCA as such in a whole picture approach not just a bus silo . |
| <p>Q13a The Strategic Case says that reforming the bus market is the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?</p> | <p>Strongly agree</p> |

| | |
|---|--|
| Q13b Why do you say this? | There are clear opportunities to improve buses per se and also for the overall performance of transport, of the economy, and of communities by bus service reform within a joined-up approach to transport and economy. This is a necessary, though insufficient on its own, step to improve lives in GM. |
| Q14 Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case? | I would like to see far more ambition and big-picture thinking in this and in all GMCA and other public projects. It seems very easy to talk the talk about how these proposals will, for example, help address the five major road harms mentioned above as assessed for Made to Move, or the other harms but it would be helpful to seize these opportunities by the scruff of the neck and optimize every one of them. These are not merely nice to have by-products of decent bus services, they are vital opportunities to improve lives. |
| Q15 Do you have any comments on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | Be more ambitious please. In particular in relation to private cars and other motorised road vehicles. |
| Q16 Do you have any comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case? | BSOs have had 35 years to do better. It is time to take back control. Make GM Buses great again. |
| Q17 The Economic Case concludes that the Proposed Franchising Scheme provides the best value for money compared to the partnership options because it would: <ul style="list-style-type: none"> • offer a 'high' ratio of benefits to the cost to GMCA, one which is broadly comparable with the partnership options, • provide the most economic value (Net Present Value), and • create the best platform from which further economic value could be delivered. Do you have any comments on this? | Agree wholeheartedly with the Economic Case as far as it goes. By including reductions in road harms - the externalities of private cars etc - the economic case would be improved further. These additional economic benefits are more available by joined-up big-picture franchising over what is bound to be sub-optimal partnership options. |

| | |
|---|---|
| Q18 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | This seems reasonable. Notwithstanding comments about geographical units and phasing above. |
| Q19 Do you have any comments on the packaging strategy for franchising contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | <p>I would like the length of franchise contracts to be relatively short and for opportunities to bring the geographical areas and the timetable into synch as soon as possible. For reasons of optimising opportunities for existing and possible future cross sub-area services.</p> <p>I understand that the willingness and ability of franchise operators to invest for example in the fleet, in stops and services, in major infrastructure could be improved by longer franchise contracts but believe that GMCA can borrow as cheaply or significantly more cheaply than the effective costs of borrowing via operators.</p> <p>For this reason I would always tend to support GMCA investing and operators operator and not generally trade off longer franchise contracts for investment.</p> |
| Q20 Do you have any comments on the proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme, as set out in the Commercial Case? | GMCA should back buses and be prepared to take significant risks in doing so. Declining opportunities to grow ridership as in London and many European markets because of the financial risk profile should be a rarity not a preferred approach. |
| Q21 Do you have any comments on the potential impact of the Proposed Franchising Scheme on the employees of operators, as set out in the Commercial Case? | Full TUPE rights will of course be observed, it's the law. However, GMCA should take every opportunity to enhance the terms and conditions of employees for example through social value appraisal of tenders for franchises. Existing employees of enterprises may also be in a very good position to be intrapreneurs and entrepreneurs within the small and medium sector, with local, user, worker ownership that GMCA should wish to build up and GMCA could and in my view should take steps to encourage this. |
| Q22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case? | I would like to see depot sites developed with housing, employment and services above and alongside given their sustainability in transport terms. |

| | |
|--|--|
| Q23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case? | I would like to see a far more varied fleet profile in terms of size than the market has provided. In my view medium and small bus units, even service taxi type services, would contribute greatly to increasing overall ridership as well as increasing the health of places. |
| Q24 Do you have any comments on the approach to Intelligent Transport Systems under the Proposed Franchising Scheme, as set out in the Commercial Case? | There is currently very poor data capture and use on our bus network. The level of service tool is underused, not mapped, and shows the embarrassingly poor level of service under the current arrangements. GM is decades behind other geographies in providing real-time information to passengers and also having management information for GMCA. Everything possible should be done to catch up and match the best. |
| Q25 Do you have any comments on GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case? | I would like to see greater ambition on social value. |
| Q26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport authorities, as set out in the Commercial Case? | Not at this stage. |
| Q27 Do you have any comments on the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts? | I very much welcome this conclusion. |
| Q28 Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case? | I do not find any version of partnership compelling in this case. |
| Q29 Do you have any comments on the potential impact of the partnership options on the employees of operators as set out in the Commercial Case? | Not at this time. |

| | |
|--|---|
| <p>Q30 The Financial Case concludes that GMCA could afford to introduce and operate the Proposed Franchising Scheme. After completing the Assessment and in advance of this consultation, GMCA has proposed how it would fund the introduction of a fully franchised system. Do you have any comments on these matters?</p> | <p>I support this conclusion. I would like to see greater ambition in the near future which may mean higher funding requirements, albeit with savings and benefits elsewhere in GM eco-systems.</p> |
| <p>Q31 Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?</p> | <p>Not at this time.</p> |
| <p>Q32 Do you have any comments on the approach to managing franchised operations under the Proposed Franchising Scheme as set out in the Management Case?</p> | <p>Not at this time.</p> |
| <p>Q33 Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, and the conclusion that TfGM would be able to manage franchised operations on behalf of GMCA, as set out in the Management Case?</p> | <p>Not at this time.</p> |

| | |
|---|---|
| Q34 Do you have any comments on the proposed approach to the implementation and management of the partnership options, and the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA, as set out in the Management Case? | I don't support the partnership options. |
| Q35 Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the sub-section Impacts of the different options? | I would hope and expect there to be substantial positive impacts on passengers and also on other stakeholders. As in everything, I would back greater ambition to increase these. |
| Q36 Do you have any comments on the impacts of the partnership options on passengers as set out in the sub-section Impacts of the different options? | Passengers would be very disappointed indeed if the franchising proposals are not delivered. |
| Q37 Do you have any comments on the impacts of the Proposed Franchising Scheme on operators as set out in the sub-section Impacts of the different options? | They will choose whether to tender and on what basis and they will be just fine under this PFS. There will be opportunities for good operators to grow shareholder value and revenue by increasing ridership rather than through perverse incentives to corrode service levels for many citizens. |
| Q38 Do you have any comments on the impacts of the partnership options on operators, as set out in the sub-section Impacts of the different options? | I do not support partnership options. |
| Q39a If you currently operate local bus services in Greater Manchester, do you anticipate any positive or negative impacts that the different options may have on your business? | |

| | |
|--|--|
| Q39b If so, please explain what you think those positive or negative impacts would be. | |
| Q40 Do you have any comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options? | Not particularly on the impacts of this project as opposed to general comments on the operations of GMCA which should not be rehearsed here. |
| Q41 Do you have any comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options? | The franchise option offers by far the greatest opportunities for wider society. Identified in these documents and beyond. |
| Q42 Taking everything into account, the Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Do you have any comments on this? | I agree wholeheartedly with this conclusion. I only wish there was more ambition. |
| Q43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme? | Not at this time. |
| Q44 GMCA's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it? | I accept these assessments. Greater ambition could see greater positive impacts. |
| Q45a To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? | Strongly support |
| Q45b Why do you say this? | Many reasons. Outlined in answers above. |

| | |
|--|---|
| Q46a Are there any changes that you think would improve the Proposed Franchising Scheme? | Yes |
| Q46b Please provide further details as to the changes you think would improve the Proposed Franchising Scheme. | Greater ambition. |
| Q47 If you oppose the introduction of the Proposed Franchising Scheme, how likely would you be to support it if the changes you suggested in answer to the previous question were made? | Extremely likely |
| Q48 Finally, do you have any other comments you want to make? | Good luck. Well done so far. Be ambitious. Get BusFranch Done! Make Bus Services Great Again. |

Michael Renshaw
Executive Director
Transport for Greater Manchester
2 Piccadilly Place
Manchester
M1 3BG

February 2020

Dear Michael,

Doing Buses Differently - proposed franchising scheme for Greater Manchester

The Competition and Markets Authority (CMA) has a statutory duty to promote competition for the benefit of consumers. Our aim is to make markets work well for consumers, businesses and the economy, right across the UK. We are an independent non-ministerial department responsible for merger control, antitrust and consumer enforcement as well as conducting market studies and investigations to address sector-wide issues.

The CMA works with national and local bodies to inform policy making in transport, spanning rail, bus, aviation, roads, taxis and private hire vehicles. Improved public transport networks benefit passengers through improved choice, service and better value fares. They benefit residents through improved air quality and reduced congestion. They benefit the local economy and drive wider economic growth and productivity.

The CMA considers bus transport to be a crucial part of the UK's transport infrastructure, particularly for those on low incomes, those without access to private transport and to people in vulnerable circumstances (and particularly for those with additional mobility needs).¹ The CMA is therefore keen to support policymakers in making local bus markets work better.

As you will be aware from our engagement, the CMA has been making preparations for the UK's withdrawal from the EU. The UK government has now confirmed that the UK will enter a transition period. At the end of the transition period, on 1 January

¹ We note that car ownership is linked to household income. TfGM, Greater Manchester Transport Strategy, [Evidence base](#), Figure 13.

The Cabot, 25 Cabot Square, London, E14 4QZ • Telephone 020 3738 6000 • Fax 020 3738 6067
www.gov.uk/cma • general.enquiries@cma.gov.uk • Twitter [@CMAgovUK](https://twitter.com/CMAgovUK)

2021, the CMA is expected to take on responsibility for larger and more complex merger, cartel and competition enforcement cases that were previously reserved to the European Commission.² We will however, continue to work with government at all levels to support policy making that works to promote competition and deliver good outcomes for consumers and businesses.

We have followed with interest the potential for Greater Manchester to become the first authority to adopt bus franchising under the new powers provided by the Bus Services Act 2017. The CMA welcomes the opportunity to engage, given our work in bus markets and the recommendations we made when the Bus Services Bill was in draft.

The CMA recognises the particular importance of bus services to the economy, with buses being the most commonly used form of public transport³ in the UK, albeit with declining ridership,⁴ which is consistent with the experience of Greater Manchester.⁵

Our response

We are responding as a statutory consultee in the Transport Act 2000⁶ (as amended, herein “the Act”). Rather than completing the questionnaire, we focus on those areas where we believe we can add greatest insight. As Greater Manchester is the first combined authority to consult on a franchising proposal, we set out in some detail the background to the CMA’s engagement in local bus markets and the CMA’s view on franchising in general.

Our response is in two parts:

- Background and the CMA’s view on bus franchising and alternatives; and
- CMA’s observations on the Greater Manchester proposals.

The CMA welcomes opportunities to work with authorities considering using their powers in relation to bus partnerships or franchising under the Act. Likewise, we welcome engagement with authorities who are concerned that competition law will restrict their ability to work with operators – through a partnership or other means – to improve a local network.

² <https://www.gov.uk/government/news/the-uk-s-withdrawal-from-the-eu-the-cma-s-role-post-brex>

³ About 59% of public transport journeys in England are by bus. [Annual bus statistics](#) (March 2018).

⁴ The number of passenger journeys in England, for example, declined by 1.9% from 2017 to 2018, with the greatest decrease in journey numbers in metropolitan areas. [Annual bus statistics](#) (March 2018).

⁵ GMCA states that journeys have declined from a peak of 233 million in 2008-09 to 194 million in 2017-18. Paragraph 2.1.8, the Strategic Case, Greater Manchester Combined Authority.

⁶ [s.123E\(4\)\(i\), Transport Act 2000](#)

Next steps

We will continue to offer advice to Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) and look forward to continuing our engagement as Greater Manchester seeks to develop an increasingly integrated public transport system.

Should the Mayor of Greater Manchester choose to adopt franchising, the CMA is willing to input into the final packaging strategy and design of franchises.

The Competition and Markets Authority

Annex – response to the doing buses better consultation

Background and the CMA's view on bus franchising

The CMA and its predecessors have engaged with local bus markets several times, though most notably in 2011 through a market investigation and then engagement with the Department for Transport on the Bus Services Bill. We have also engaged through an open letter to local transport authorities (LTAs) to provide some comfort on the risks of breaching competition law in entering into partnership arrangements. We summarise relevant points from each of these below.

Local Bus Services Market Investigation – 2011

In 2011 the Competition Commission (CC) completed a Market Investigation into Local Bus Services following a reference from the Office for Fair Trading.⁷

The CC found that competition was not working, in particular that:

- head-to-head competition was uncommon;
- competition is not effective in those local markets where head-to-head competition does not exist;
- many local markets exhibit persistently high levels of concentration; and
- ongoing sustained head-to-head competition, where present, delivers significant benefits to customers.

The CC decided against using franchising as a way of addressing the competition issues it had identified as it considered that other remedies would be less costly and more proportionate.⁸ The CC also identified material risks around a transport authority having skills and capabilities to design and monitor a network and the impact of information asymmetry between the transport authority and the operators, which might lead to mis-specified franchise contracts.⁹ It instead focused on increasing multi-operator ticketing schemes, restrictions on changes to timetables and several other measures. However, in making that decision, the CC acknowledged that LTAs have wider social and policy objectives which franchising may help to achieve.¹⁰

⁷ <https://www.gov.uk/cma-cases/local-bus-services-market-investigation-cc>

⁸ CC, [Local Bus Services Market Investigation](#), Summary, paragraph 69.

⁹ Ibid, paragraph 15.444. The Group noted however that experience of commissioning subsidised services might provide some experience of contracting.

¹⁰ Ibid, Summary, paragraph 69.

CMA recommendations on the Bus Services Bill – 2016

When the Bus Services Act was at Bill stage, the CMA wrote to the Department for Transport setting out recommendations on the content of the Bill, and the CMA's views on franchising.¹¹ The CMA set out the benefits to passengers that local on-road competition can deliver, which include incentives for operators to:

- deliver innovation and evolution of networks and service provision; and
- offer a high quality of service, low fares and efficient service operation.

Building on its previous work, the CMA set out several risks associated with franchising:

- Requiring LTAs to acquire and develop additional skills and capabilities in areas such as network design and monitoring;
- The evolution of network design under central control may be less responsive to changes in customer demand. Incentives for efficiency and service quality may be less marked than under a deregulated system, particularly if there is no effective competitive threat posed during the contract period. While minimum service standards may raise the attractiveness of bus travel, if they are over-specified, they may unnecessarily raise costs; and
- The need for effective competition for the franchise: competition for the right to operate a franchise can help ensure value for money. This in part depends on the potential for multiple operators with appropriate facilities to service a fleet capable of operating different routes within an area. If this is not the case it may limit the opportunities for competition to operate the franchise(s) and limits the incentives on incumbent operators to invest.

The CMA's open letter to local authorities on bus partnerships – 2016

In 2016, following concerns expressed by LTAs and operators about the competition law risks of entering into partnership arrangements, the CMA published an open letter. The letter provides some clarity and advice on achieving the appropriate balance between competition and partnership working.¹²

The letter explains that the potential benefits of joint ticketing schemes and alignment of fare zones are recognised explicitly in the public transport ticketing

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/533700/cma-recommendations-on-bus-services-bill.pdf

¹² <https://www.gov.uk/government/publications/letter-from-the-cma-to-local-transport-authorities-on-bus-partnership-arrangements>

schemes block exemption,¹³ so operators should not take too risk averse an approach. It also makes clear that authorities are free to engage in network planning in a partnership, subject to the mechanisms set out in the Act.

The CMA's position on bus franchising

The CMA recognises that franchising may be appropriate in specific circumstances but believes that on-road competition should only be abandoned in favour of competition for the market in circumstances where this is the only way to secure better outcomes for the travelling public, residents and taxpayers.¹⁴

The CMA's position remains as set out in the 2016 letter, namely that better outcomes are most likely to be delivered by making the local market work better through partnerships. In general, franchising risks being more harmful to competition and passenger interests. There is a significant risk that should any franchising scheme not deliver the intended outcomes, the structure and functioning of a local bus market may be permanently changed with significant impacts on competition and consumers that may well prove hard to reverse.¹⁵

We recognise that partnership approaches might not be appropriate in all circumstances. We also note that LTAs may have multiple policy objectives in proposing a franchising scheme that go beyond the promotion of competition for the benefit of consumers. Privy to all the information and details, and cognisant of these many factors, as prescribed by the Act, our view is that LTAs are best placed to make that decision.

CMA observations on the Greater Manchester proposal

In the same vein, responding to this consultation, we are mindful of the policy objectives and the context in which franchising is being proposed. For example, over the past ten years, bus use in Greater Manchester has been falling, with a decline of journeys of around 14-17%.¹⁶ We also note the target included in the Greater Manchester Transport Strategy 2040 to increase the proportion of journeys made by walking, cycling and public transport to 50%,¹⁷ which will require an 11 percentage

¹³ This is set out in s.9(1) of the Competition Act 1998. The CMA has published guidance on this on its website (<https://www.gov.uk/government/publications/public-transport-ticketing-schemes-block-exemption-guidance-cma53>).

¹⁴ <https://competitionandmarkets.blog.gov.uk/2016/07/05/bus-services-bill-retaining-the-benefits-of-competition/>

¹⁵ Specifically, the risk that operators exit a local market and dispose of key assets that reduces the likelihood of future entry.

¹⁶ The level of decline depends on timeframe and base year chosen over the period 2007-2018. Regardless, journeys have declined from a peak of 233 million in 2008-09 to a 194.3 million in 2017-18. TfGM, Bus Franchising in Greater Manchester Assessment, 'Strategic Case', Table 3: Total passenger journeys.

¹⁷ TfGM, [The Greater Manchester Transport Strategy 2040](#); TfGM, Bus Franchising in Greater Manchester Assessment, 'Strategic Case', paragraph 2.1.5.

point increase in ‘sustainable modes of transport’.¹⁸ More broadly, we are conscious of GMCA and TfGM’s intention to develop an integrated transport network.¹⁹

We have reviewed the full assessment and supporting papers, but we do not comment on the detailed analysis conducted by GMCA which we note has been subject to an ‘audit’ as required by the Act.²⁰ We therefore focus our comments on the nature of the proposed franchising scheme and areas where we think particular focus should be given.

The CMA recognises from previous work that each local situation is different and requires a tailored approach to policy making but that there are clear risks in making significant interventions in a market. LTAs therefore, need to conduct sufficient analysis to provide comfort that their chosen course of action is the most effective way of delivering their objectives.

As mentioned above, the CMA is not in a position to determine whether a franchising or partnership approach is the most effective way of delivering GMCA’s multiple broader policy aims. We do however recognise and accept that franchising could be the most effective vehicle for delivering these policies – with the basis for this view being set out in the assessment. Within the assessment GMCA concludes that a franchising scheme gives it the full range of tools and levers to enable it to improve the functioning of the bus service and achieve its objectives of the bus network more fully.²¹ For example, GMCA concludes that while partnership approaches would allow some of its ‘phase 2’ objectives such as bus prioritisation, they would not allow it full flexibility to determine fares or deliver frequency improvements.²²

However, in our view, there are significant risks, which we set out in this response, with the adoption of franchising, which the GMCA should ensure it has considered fully before proceeding. We again emphasise the risk of causing long term changes to the structure of the bus market, which may not be reversible and may have negative impacts on passengers in the long-term.

Our observations are structured as follows:

- Possible approaches to the improving the local bus market;
- Design of individual franchises;

¹⁸ TfGM, [Draft Delivery Plan 2020-25](#).

¹⁹ TfGM, [The Greater Manchester Transport Strategy 2040](#).

²⁰ We further note the auditor’s observation on the calculation of the economic value of soft benefits and in particular the benefit accruing from a “unified brand” though under the modelling conducted, this does not affect the relative benefits of different schemes.

²¹ TfGM, [Bus Franchising in Greater Manchester Assessment](#), ‘Strategic Case’, paragraph 2.1.29

²² Ibid, paragraphs 2.1.27-28. GMCA differentiates between ‘Phase 1’ and ‘Phase 2’ interventions, with the adoption of franchising or partnerships as phase 1.

- Access to fleet, garages and depots;
- Impact on fares;
- Ongoing network design, supporting innovation and Mobility as a Service (MaaS); and
- Passenger complaints and customer service.

Possible approaches to improving the local bus market

The GMCA presents evidence of local bus market(s) that are not working in the interests of passengers. As part of its assessment, the GMCA has prepared and quantified its expectation of the economic benefits and financial impact of three options:

- Do Minimum – the reference case
- New Partnership (including an “Operator Proposed Partnership” and an “Ambitious Partnership”)
- Franchising

We are pleased that the GMCA includes partnership-based approaches in its assessment. As we have been clear in our published views, for franchising to justified suitable other options should be considered. Department for Transport guidance on franchising also makes this clear, stating that ‘[t]he authority should [...] give a clear explanation of why these outcomes would not be achieved in any other way such as the introduction of partnership arrangements’. The statutory elements of the guidance similarly reinforces the need for assessment of alternatives.²³ In considering the alternative approaches we note both that GMCA has experience of previous partnership approaches in Greater Manchester and that GMCA has engaged with local operators.²⁴

In the assessment, GMCA has included two partnership scenarios – the Operator Proposed Partnership and the Ambitious Partnership. The CMA notes that discussions with operators have taken place which have led to the Operator Proposed Partnership, which is a voluntary partnership agreement (VPA). Given the lack of enforcement mechanisms under a VPA (ie that operators can choose to stop participating) we recognise that GMCA’s concerns over the deliverability of all aspects of the VPA.

²³ [The Bus Services Act 2017 Franchising Scheme Guidance](#), paragraph 1.13 and paragraphs 1.36-1.38.

²⁴For example, the [A6/Manchester-Stockport-Hazel Grove Corridor Quality Partnership Scheme](#).

In considering the Ambitious Partnership through an Enhanced Partnership Scheme (EPS)²⁵ GMCA has set out the necessary process it would need to follow. It has as part of this process identified the need to complete a 'Part 1 Competition Test' under the Act, which requires an assessment of whether there is a significant adverse effect on competition.²⁶ Given the provisions in the Act GMCA has identified that an EPS could be implemented if it has broad operator support (ie even if small operators objected).²⁷ GMCA has however identified a risk that a small operator could challenge an EPS on the basis of the application of the Competition Test.²⁸ As a result, GMCA believes that there is a 'material risk' that the need to comply with the process under the Act would lead to a risk of 'watering down' of its requirements if it wanted to avoid legal challenge.²⁹ We note however, GMCA's broader assessment of the relative merits of franchising and partnership partnerships.

The CMA is keen that, in general, any LTA considering the use of powers under the Act does so based on the most effective tool available. While the 'Part 1 competition test' under the Act is not required for franchising, this should not be a reason to pursue franchising over an EPS, if an EPS would deliver the LTA's objectives and with significantly reduced risks to the market. As GMCA notes, the risk of such challenge can be mitigated by demonstrating that it has considered specific impacts on individual operators, though we acknowledge the additional cost of anticipating challenge.³⁰

Furthermore, even where a partnership approach is adopted but does not deliver the desired outcomes, the LTA would still be able to subsequently introduce franchising. While this could delay the realisation of the benefits anticipated in the franchising scheme, it would also avoid some of the risks.

Design of individual franchises

As we understand it, the proposed franchising scheme will effectively end competition *in* the market and replace it with competition *for* the market. Therefore, the design of both individual franchises and the competition to win those franchises is of paramount importance. The number and size of franchises will have a significant impact on which firms are able or willing to bid for those contracts, which in turn may permanently affect the number of firms competing in the market.³¹ However, structuring franchises to maintain the current number of firms may equally lead to a reduction in the intensity of competition.

²⁵ Details of this are set out in TfGM, Bus Franchising in Greater Manchester Assessment, section 36.5.

²⁶ The test is set out in [Schedule 10 of the Transport Act 2000](#) (as amended).

²⁷ TfGM, Bus Franchising in Greater Manchester Assessment, 'Proposed Mechanisms to Support Partnership Proposals Considered in the Assessment', paragraph 36.6.4.

²⁸ Ibid, paragraph 36.6.5.

²⁹ Ibid, paragraph 36.6.6.

³⁰ Ibid, paragraphs 36.6.5-6.

³¹ Small local operators, in particular, may cease trading if they do not win contracts.

In our view, the potential impact of franchising on competition will be particularly determined by four key factors:

1. Size of franchises;
2. Length of franchises;
3. Frequency of competitions (ie the timing of renewals); and
4. The ability of the LTA to oversee franchisee performance and take remedial action.

Together these factors will affect the intensity and nature of competition in both the initial franchise competitions and future franchise competitions. We note the importance of the initial transition to franchising. A fact reflected in the approach adopted in other locations where the move to franchising has been either been partial (as in Dublin)³² or phased (as in Perth, Australia),³³ whereas franchising in London coincided with privatisation.³⁴

The proposal to use three franchise areas and roll these out in three blocks (albeit with several franchises within each block), provides the ability to implement and transition to a franchise model more quickly and to deliver the intended benefits at an earlier date. We understand that at present, the market share held by the three large incumbent firms varies substantially across different parts of Greater Manchester.³⁵ If the three franchise areas directly align with areas of particularly high concentration for a given firm, there may be risk that the firm with the largest share has an advantage in participating in a tender, which may deter other firms from participating.

We strongly encourage the GMCA to consider and reflect on its engagement with operators on what the expected level of competition for a given individual franchise (ie a package of routes) is likely to be and whether this can be increased through the design of the tender process.

Should the Mayor decide franchising is the preferred option, we recommend that GMCA considers whether smaller franchises (that is, more packages of fewer routes) would give greater flexibility and stronger competition in future.³⁶ However, given the anticipated length of franchises, 5-7 years, there is a risk that significant

³² Dublin Bus operate the vast majority of services.

³³ Transperth Bus Contracting Model - [Bus Service Franchising Masterclass](#), 8 June 2017.

³⁴ Transport for London, "History" (retrieved from <https://web.archive.org/web/20120815190432/https://tfl.gov.uk/corporate/modesoftransport/londonbuses/1554.aspx>).

³⁵ This is particularly significant as at present the market structure appears to have largely been affected by the nature of the split and privatisation of GM Buses into Greater Manchester Buses North Limited and Greater Manchester Buses South Limited which in turn were [subsequently acquired by the First and Stagecoach groups respectively](#).

³⁶ That is, GMCA may seek to implement franchising across all of Greater Manchester in a relatively short period using the three sub-areas and a small number of franchises but that subsequently these franchises could be made smaller.

change in the structure of the market in each sub-area will have occurred by the next franchising round and that some operators may have left the market.

We welcome the proposal to incorporate both 'large' and 'small' franchises as part of the scheme. The inclusion of the latter should give smaller operators opportunity to participate in the franchise competition as barriers to participation should be lower. The proposal to restrict the number of small franchises any given operator can hold should limit, in particular, a large or incumbent operator from excluding smaller firms. However, care needs to be given to the sequencing of franchise awards to ensure that the potential exclusion of a large firm (having reached a cap) does not reduce the level of competitive pressure on firms participating in a later competition.

We discuss the depot strategy below but note here that GMCA proposes to adopt different approaches in relation to depots for small and large franchises. Whereas large franchise holders are anticipated to have access to a GMCA owned/controlled depot, small franchises are expected to provide their own depot.³⁷ If part of any franchise award is based on an objective of directly or indirectly reducing dead-mileage, the existing market structure risks being reinforced. Given that some small franchises would be limited to two vehicles (and six on average) it is not clear that a new entrant would anticipate sufficient return to invest in acquiring and investing in developing new depot capacity (or that incumbents would choose to sell or lease capacity to a new entrant). We set out a potential approach to this in the next section.

We note that the packaging strategy (how individual routes are grouped for tendering) means that the scale of large franchises (five to ten franchises, requiring in the order of 125 to 250 buses per franchise) is considerably larger than that of small franchises (25 franchises requiring two to 14 vehicles each). While medium sized operators might be able to acquire a number of small franchises, GMCA and TfGM need to consider their role as market makers and shapers³⁸ and whether and how a small or medium operator could realistically expand their business in the Greater Manchester area to demonstrate the track record that may be needed to win a larger franchise, especially if there is a cap on holding smaller franchises.³⁹

Small franchises being available more often provides more frequent opportunity to participate in competitions but also limits the period over which investment (eg in new fleet) can be recouped.⁴⁰ While the residual value scheme will potentially

³⁷ TfGM, Bus Franchising in Greater Manchester Assessment, 'The Commercial Case', paragraph 25.1.4.ii.

³⁸ That is, the ability of government to use markets to deliver policy objectives and as part of this may have the ability to design competitive tender processes to support these objectives. See also chapter 10 of [Office of Fair Trading, Government in Markets](#).

³⁹ We note that the availability of resource contracts may at least partially facilitate this, though the smallest firms may not maintain sufficient fleet capacity to operate additional school services only operated in mornings and afternoons.

⁴⁰ Subject to the final asset strategy.

mitigate this, there may still be significant financial risks which discourage innovation or more ambitious service improvements on routes within small franchises.⁴¹

We support the proposed nine-month period between contract awards and services operating on the basis that it is enough time to acquire new buses if needed but, as set out below, this may be more problematic for acquisition of depots.

Access to fleet, garages and depots

To operate a franchise, an operator will need fleet to operate the service and appropriate garaging/depot space to store and maintain buses. The ability to acquire these assets, potentially at short notice, could affect the intensity of competition for the franchises and we welcome the inclusion of an asset strategy.

The proposed scheme includes a residual value mechanism that would facilitate the transfer of fleet between operators at the commencement of a new franchise, reducing both the financial outlay for an incoming franchisee and reducing financial risk at the end of a franchise.⁴²

At the start of any franchise arrangement, there will exist a substantial fleet of buses that are currently owned and operated by incumbent firms. The residual value mechanism should facilitate a transfer of fleet between operators, much as rollingstock is in rail franchising. However, the success of the residual value mechanism will clearly depend on the willingness of incumbents to make this fleet available to competitors on the initial transition to franchising.⁴³

There is an additional risk that there may be uncertainty over the exact nature of fleet that a franchise winner may 'inherit'.⁴⁴ As the current fleet across Greater Manchester is not all the same general specification, franchise bidders may face commercial risk in estimating any costs of upgrading or replacing older vehicles to meet a particular specification required of the franchise.

In relation to depots and garaging, our engagement with stakeholders in bus markets across the UK has indicated that the acquisition of land in suitable strategic locations for bus depots and obtaining planning consent can be difficult.⁴⁵ Evidence from the 2011 Market Investigation on the ease of establishing depots was mixed, though operators generally indicated establishing depots was more difficult for fleets of 50 or

⁴¹ If the franchise period is shorter, the payback period from capital improvements will also be shorter than for large operators.

⁴² TfGM, Bus Franchising in Greater Manchester Assessment, 'The Asset Strategy', s.26.2.

⁴³ Operators who are part of larger national groups may cherry-pick certain fleet assets for transfer to other operating units elsewhere in the country.

⁴⁴ If GMCA takes ownership of fleet, this is likely to be less of an issue, but is a relevant concern for the initial round of franchise awards.

⁴⁵ The electrification of bus fleets may ameliorate some concerns around the siting of bus depots, but this is unlikely to be the case for some time and won't fully address the potential impact of vehicle movements.

more buses.⁴⁶ This is of particular relevance given the size of the larger proposed packages of franchises. The ability to acquire or establish a depot between being awarded a franchise and its commencement may be even more difficult the shorter the period between the award of a franchise and its commencement.

We are pleased that GMCA in its assessment recognises that access to depots will constitute a barrier to entry for the larger franchises⁴⁷ and is of sufficient significance to warrant intervention.⁴⁸ The consultation indicates that GMCA will seek to acquire depots of existing operators and make these available to new franchisees.⁴⁹ We support this approach to better facilitate entry, competition and flexibility of franchise awards.

There is a risk that if incumbent operators either decide to exit the market, or simply perceive they will not be awarded a relevant franchise, they may choose to dispose of depots as development sites for alternative uses to maximise returns.⁵⁰ There is a clear balance to be struck between the need to protect strategic assets that will facilitate franchising (specifically new entry and transition between franchise holders), the property rights of private enterprise and maximising value for money for GMCA and taxpayers. However, while there may scope for TfGM to acquire land to develop depots itself this may affect the timeframes over which franchising can be delivered. Regardless, of approach we consider that the importance of access to depots makes it a risk for the successful implementation of franchising.

The consultation appears to structure individual franchises and bundles of routes on the location of existing depots.⁵¹ The 2011 Market Investigation found that “in many cases market structures reflect patterns of depots at privatization.”⁵² This appears to be true in Manchester, given the split and privatisation of GM Buses and current ownership. By structuring franchises around the location of existing depots, there may be a risk that network planning is not optimised.

Innovation through entry and expansion could also be constrained by restricting access to GMCA/TfGM owned depot to a single franchisee. If instead two or more smaller entrants were able to operate from the same GMCA/TfGM owned depot, a wider range of operators might be willing to participate in tenders for smaller (ie not the very largest) franchises. This approach of depot sharing could be considered for

⁴⁶ Competition Commission, 2011, paragraphs 9.162 to 9.173. It is not clear the extent to which the availability of unoccupied light industrial units reported in the Market Investigation in cities such as Manchester has changed, or the extent to which this is true across Greater Manchester.

⁴⁷ TfGM, Bus Franchising in Greater Manchester Assessment, ‘The Commercial Case’, paragraph 25.1.4.

⁴⁸ Ibid, ‘Asset Strategy’, paragraph 26.1.3.

⁴⁹ Ibid, ‘Asset Strategy’, paragraphs 26.1.18 & 26.1.5.

⁵⁰ Or, subject to commercial strategy operators may wish to rationalise their estate.

⁵¹ TfGM, Bus Franchising in Greater Manchester Assessment, ‘The Commercial Case’, paragraph 25.1.3.

⁵² Competition Commission, 2011, paragraph 28.

the 10 large strategic depots (or whichever depots are under GMCA's control) if practical arrangements are able to be established.

GMCA should also consider whether and how GMCA or operators would be responsible for the cost of upgrading infrastructure (eg upgrading the electrical supply or constructing a substation to support charging a fleet of electric buses) if future franchise holders will benefit from those improvements.

Impact on fares

The franchising proposal will affect fares in two ways – first the number, structure and complexity of fares across the network, second the overall fare level.

On the first, GMCA presents evidence within the assessment that bus fares are confusing and complicated, with different fares being charged for exactly the same journey but on different services (even where those services are operated by the same operator).⁵³ According to the assessment, one of the challenges facing passengers in Greater Manchester is complex fares and ticketing.⁵⁴ One benefit of introducing franchising is the simplification of fares and the reduction in the number of ticket types.⁵⁵ For the first time, passengers will be able to use any bus in the franchise area on the same basis without paying an additional premium over an operator specific ticket.⁵⁶ This may lead to benefits to passengers who now can change travel patterns on the basis of utility and journey time rather than cost (or simply benefit from a greater choice and more frequent buses on corridors where routes overlap).⁵⁷

As each of the individual franchises is awarded and each sub area transitions to franchising, there is scope for some confusion for passengers and there may be “cliff-edges” for journeys which span sub-area boundaries. GMCA should therefore approach any changes with care and consider how to communicate and advertise fares in the transition period.

On the effect of franchising on the overall level of fares, GMCA proposes that all period tickets will be the same price as the lowest of the large incumbent operators. This should lead to a reduction in prices for many passengers (and potentially a

⁵³ TfGM, Bus Market in Greater Manchester Supporting Paper, section 3.9.

⁵⁴ TfGM, Bus Franchising in Greater Manchester Assessment, section 6.

⁵⁵ Ibid, section 7.3.

⁵⁶ TfGM, Bus Market in Greater Manchester Supporting Paper, table 9.

⁵⁷ The nature of this impact will clearly be dependent on individuals' journeys and whether multiple operators currently operate routes that partially overlap or facilitate interchange.

majority of passengers), while also providing opportunity to travel on any route in the network.⁵⁸

The reference case includes a projection that fares will increase by RPI+1.4% in the initial period, based on historic trends. If existing fares for period tickets are used as basis for fares under franchising these predicted above inflation increases will make bus travel less affordable and GMCA should consider whether franchise competitions can lead to lower fares.⁵⁹ The reference case modelling contrasts with the proposed two-year fare freeze included in the Operator Proposed Partnership.⁶⁰ However, the broader benefits accruing to passengers may well still be greater than the financial cost of increased fares (which may arise at the launch of franchising because of increases in the period prior to launch).⁶¹

Ongoing and future network design, supporting innovation and Mobility as a Service (MaaS)

In inheriting a large, complex network, as GMCA recognises, TfGM will need to develop its ability to manage both the day-to-day operation of the network but also its capabilities in identifying strategic amendments to current routes.⁶² This will necessarily take time either in recruiting or training staff and developing a baseline model for modifications for the network. GMCA recognises the ‘significant organisational change’ needed to manage franchised operations.⁶³

We understand that many of the current bus routes have existed for decades, with some dating back to the tramways and trolleybuses of the 19th and early 20th centuries. Network and route design have a significant impact on travel patterns. The current market structure, which varies across different areas,⁶⁴ combined with operator-specific period tickets⁶⁵ is likely to have had an impact of current passenger behaviour. While many routes such as the 192 follow main roads between key

⁵⁸ TfGM, Bus Market in Greater Manchester Supporting Paper, table 9. Evidence on current pricing of different period tickets for 1, 7 and 28-day tickets indicates the most expensive operator specific ticket is 20-25% more expensive than the cheapest.

⁵⁹ TfGM, Bus Franchising in Greater Manchester Assessment, ‘Sensitivity Tests’, paragraph 15.5.1

⁶⁰ Ibid, ‘The Strategic Case’, paragraph 2.2.25.ii. We note that this modelling will not necessarily directly determine fares at the commencement of franchising but may give an indication of fare levels where these are set based on subsequent changes to fares.

⁶¹ The provisions of the concessionary travel scheme may alleviate the impact of any above inflation fare increase on some vulnerable passengers. The overall impact is considered as part of the economic case. We note the broader context of the revenue risk and transition costs to be incurred by GMCA, as well as the anticipated improvements to the network (and initial reduction of fares) and that this approach allows delivery of wider policy objectives.

⁶² TfGM, Bus Franchising in Greater Manchester Assessment, ‘The Management Case’, paragraph 46.2.4.

⁶³ Ibid, paragraph 46.2.6.

⁶⁴ The large operators each have a much greater presence in some areas around Greater Manchester, which itself may be a legacy of the historic privatisation of GM Buses.

⁶⁵ TfGM, Bus Market Supporting Paper, paragraph 3.7.2. Some 80 to 90% of journeys are completed on period rather than single tickets.

economic centres, many others might result from historical quirks which may not reflect the current needs of passengers.

Should GMCA proceed with franchising, it will give opportunity to GMCA and TfGM to consider whether reshaping the Greater Manchester bus network would deliver greater benefits than a simple continuation of services.⁶⁶ Development of pan-network smartcard ticketing that provides TfGM with access to travel patterns, could unlock powerful insights into the needs of bus and public transport users across Greater Manchester and the point-to-point journeys they make.⁶⁷ It is positive that GMCA has considered 'Mobility as a Service' (Maas) and the improved opportunities to offer a genuinely multi-modal transport network

Furthermore, if GMCA provides open access to timetable and live bus location data to third parties, such as app developers, this may lead to further insights of travel patterns and vehicle loading. In London for example, CityMapper has used user search patterns⁶⁸ to offer its CM2 Night Rider night bus and CMX1 'popup' SmartBus services. However, this would require a framework that allows third parties to propose and operate new services. Importantly, the potential ability for new entry in between scheduled franchise competitions may act as a disciplining device on bus operators. However, it is important to ensure that this does not facilitate cherry-picking of routes which might undermine the financial viability of franchised routes.⁶⁹

The consultation makes clear that a service permit scheme would be implemented, though this would be primarily for the purpose of facilitating services that connect Greater Manchester with surrounding areas.⁷⁰ We consider that there may be scope to extend the use of such a scheme, for the purpose of facilitating innovation, subject to appropriate assessment. Such an approach would ensure that franchising does not ossify the network at the point that the franchise contract is let.

Passenger complaints and customer service

At present, our understanding is that customers are expected to complain directly to operators (though can complain via TfGM's customer relations team). Such an arrangement has the potential to lead to inconsistent passenger experiences.

⁶⁶ We note that such a role is at least partially envisaged. Strategic Case, paragraph 8.47; Economic case, s.13.

⁶⁷ We note research into the impact that 'shocks' to transport systems can have in helping passengers optimise their routes and question whether new routes might help optimise travel patterns. For example, we note research on the impact of strike action in 'The Benefits of Forced Experimentation: Striking Evidence from the London Underground Network', The Quarterly Journal of Economics, Volume 132, Issue 4, 1 November 2017, Pages 1969-2018, with Shaun Larcom and Tim Willems.

⁶⁸ <https://citymapper.com/news/1800/introducing-the-citymapper-smartbus>

⁶⁹ The impact of this will be determined on the extent to which revenue risk on franchised services sits with TfGM or the operator and any incentive mechanism based on passenger numbers.

⁷⁰ TfGM, Bus Franchising in Greater Manchester Assessment, Cross-boundary Services and the Permit Regime, s.33.

We are pleased to note that should franchising be implemented that there will be an increase in customer service staff and a single point of contact for complaints and would expect that TfGM would use this as an opportunity to monitor quality across the network. This, if combined with appropriate ability for TfGM to take remedial action (such as through a service level agreement with the franchisee) could be used to enforce better quality services. For this to have greatest effect it will need to be promoted to bus users to ensure that there is no confusion about the handling of passenger complaints.

Concluding remarks and next steps

As we have set out, we recognise that franchising could deliver significant benefits to passengers in Greater Manchester. However, we believe that partnership approaches could potentially deliver many of the benefits of franchising with fewer risks, though acknowledge that the outcomes achievable from partnerships may be more limited than through franchising.

The introduction of franchising will have potentially long-felt effects on local bus markets and in potentially becoming the first LTA to introduce franchising following the Act GMCA's experience will influence other LTAs in whether to similarly pursue franchising or other partnership arrangements.

While we have expressed the CMA's view on the risks of franchising and particularly around its potential to change a market permanently, we note the detailed analysis contained in the Assessment and the comparative analysis of other partnership approaches.

We welcome GMCA's consideration of its proposed asset strategies for depots and fleet which allow for the transfer of or access to key assets. However, given the indicative range of franchise package sizes, GMCA should consider whether there could be scope for split use of GMCA owned/controlled strategic depots by different operators if it provides greater flexibility in the design of franchise areas.

We also consider that there is scope for GMCA to act as a market maker and foster competition from smaller operators through careful design of its franchise award competition. GMCA has included a number of provisions, such as in relation to franchise size that allow participation by smaller operators but should also consider how to facilitate subsequent expansion by smaller operators to 'staircase' towards larger franchise awards to promote competition.

Alongside this, GMCA needs to ensure that it can create space for innovation and it therefore needs to ensure it has considered, at the outset, how third parties might suggest and introduce new, innovative services or services in underserved areas. This needs to also be suitably flexible to reflect the potential range of approaches including demand responsive and hybrid services (which might be regulated as private hire vehicle). At the same time, appropriate consideration of the impact on

incumbents needs to be included to avoid third parties potentially cherry-picking profitable routes and distorting franchises after their award.

We continue to offer our advice and input to support GMCA's ultimate proposal to make the Greater Manchester bus market work better.

Dear GMCA

I'm a regular user of the bus network and the current deregulation is simply not fit for purpose.

I'm also represent over 10,000 residents in Audenshaw, Tameside.

The privatisation of buses since 1986 has seen the prices of tickets sky rocket, with little to no investment in the bus infrastructure, time tables or any significant effort to integrate tickets (which would not benefit the current monopolies First, Stagecoach and Diamond amongst others).

I represent a borough of GM which is considered one of the most deprived in Greater Manchester and Tameside is in desperate need of quality bus infrastructure to link our towns, not to mention commuters to and from the city centre and Media City, who may wish to forgo their cars and contribute to the green economy. Sadly, this is not realistic for many working Tamesiders because a 10 minute car-journey can often be a 40-60 minute bus journey.

Under a regulated network, I agree with GM Better Buses campaign that Borough Councillors like me who use our buses on a daily basis are best placed to utilise planning powers to coordinate the network and follow certain standards we all like to expect on our buses but have never had in my life time.

I would like GMCA to consider the second class service we get compared to Transport for London comparing our ticketing to integrated ticketing. You can travel all day for as little as £1.50 and I'd pay the same for 1.5 miles across my ward in Tameside. This prices many citizens out of bus travel, and makes green travel seem illogical, compared to the expense of running a car currently.

Furthermore, Andy Burnham has used his devolved power as Mayor to negotiate lower priced bus ticketing for under 18s "our pass" this year and this demographic has benefited massively. If we extend this towards full regulation with integrated ticketing, we can reap the benefits of one single bus network which does not place profit over people.

Finally, as a tax-payer I am concerned private companies are willingly keeping the majority public in the dark about public subsidies they receive to run services. During this campaign they have denied the scale of public funds they receive and by ridding ourselves of privatised buses, we can gain transparency where the public can vote people out if they feel the service is inadequate.

It works in London, it's good enough for my residents too.

Yours faithfully,

Councillor Charlotte Martin
Audenshaw Ward TMBC

Dear Madam/Sir,

I would like to make a submission on behalf of the Association of British Commuters, a non-profit organisation run by a grassroots network of passengers and citizen journalists across the country. Earlier this year we made a campaign documentary called 'The Fight for Greater Manchester's buses' which we now submit as part of our evidence in recognition of all the benefits bus franchising will inevitably bring to Greater Manchester, including: multi-modal ticketing and capping of fares, more environmentally-friendly buses, a better frequency of services, advantages in urban planning, regional development and connectivity, and perhaps most importantly of all - more local power and accountability.

We seek to maintain maximum transparency with our members and audience, so have published a blog on the Greater Manchester consultation this evening in advance of this email, which forms part of our submission: <https://abcommuters.com/2020/01/08/better-buses-in-greater-manchester-could-help-us-fight-injustice-across-the-uk/>

The statement below is an additional message for the attention of Mayor Andy Burnham:

We fully support Andy Burnham's plans for bus regulation in Greater Manchester, and would like to begin by pointing out the absurdly lengthy, complex and expensive process there has been for Greater Manchester to even get as far as the public consultation stage. When plans for bus regulation succeed it will be against the odds and largely due to the laudable intention from the Mayor, as well as an incredibly vibrant campaign called Better Buses for Greater Manchester, who along with other non-profits, think tanks, climate and anti-poverty campaigners and the excellent regional press have put in a great amount of work to keep this issue current. Paradoxically, perhaps, it is the very success of this campaign that has so many implications for bus campaigners around the country, who in following Greater Manchester's example may not have the culture of local political support to rely upon. This is especially the case for passengers in rural and low income areas who are disenfranchised firstly by their lack of access to transport, and secondly by their lack of access to democracy. It is in this context that we take the warning in Philip Alstrom's UN report on poverty so seriously: the deregulated private market plus the ten years of austerity and underfunding have denied people access to essential services, which is nothing less than an offence against their human right to participate in public life. Needless to say, the continuing failure of the UK's public transport policy affect *all* disenfranchised groups disproportionately, whether young, old, disabled, lower income, rural, female, LGBT, BAME - or facing any other obstacle in accessing the human rights they should be able to take for granted. The common factor across all exclusion from all modes is of course economic - transport poverty and socioeconomic class.

Bus passengers now represent 59% of all passengers, and the latest government transport statistics (2018) state that there were 4.85 billion bus passenger journeys vs 1.71 billion national rail passenger journeys in the same period. And yet, of total transport expenditure (32.5 billion) 55% was spent on the railways and 8% of the budget was spent on local public transport. It is clear that the social, economic, and environmental urgency to invest in buses is being completely ignored at the national level, while at the same time, there is a gulf of national strategy or leadership for local public transport.

We are seriously concerned that, with the government's Rail Review, we might expect to see new opportunities for transport corporations to profit from getting into the infrastructure and tech markets, which according to our understanding will now be the main growth areas in transport. If the government continues to make new legislation so heavily weighted towards corporate profit, we believe that vital opportunities for wealth creation and regional development will be lost in the crucial era of Brexit. On this note, we take it as a sign of bad faith that bus companies put obstacles in the way of Transport for the North's plans for smart ticketing last year, as reported by the Yorkshire Post. This should be taken as a sign that transport companies will be seeking to corner the technology market in buses as well as rail, and it is another reason to exhaustively explore every avenue for a fully integrated transport system under public ownership. With the success of bus regulation and the incredibly active movement behind the Northern Powerhouse, we believe that Andy Burnham should take every opportunity to explore avenues for public ownership, such as regional citizen's assemblies, for example. We call on him in his capacity as Mayor to make this a national conversation, with the explicit priority of an open and democratic discussion about the 'fourth industrial revolution' that seeks to prioritise the public interest and public wealth in new developing markets.

The toxic influence of private bus companies in public life should remain a key consideration, with caution at every stage. The combination of weak legislation, underfunded local authorities, an underfunded media, and lack of democracy and consultation have led to the perfect storm for campaigners, who to participate at all unfortunately have to do so in a compromised, and sometimes toxic public culture. Healthy civic engagement in the era of Brexit needs to be an absolute urgency and elected Mayors of Combined Authorities have the ability to spearhead this, in particular through transport franchising powers, which are now among the strongest they hold.

Transport campaigners have their work cut out for them, having to oppose, for example, Stagecoach's propaganda carried on the sides of buses last year, which was quite frankly an embarrassment to the public space of Greater Manchester. And bus company opposition to plans in Newcastle back in 2015 remains an infamous episode for bus campaigners we've spoken to all over the country. As was clear at the Transport for North discussions today over the Northern rail franchise, we believe Chris Heaton-Harris very well when he said the government is scared of being 'sued to high heaven'. This is even more the case at the local authority level, where we believe there is a nervousness among councillors across this country about publicly challenging the bus companies, in fear of future legal challenges.

There are several upcoming court cases in the works concerning franchising in rail, and with exactly the same transport corporations involved, it seems unlikely that this will not also be a concern when bus franchising is brought in in Greater Manchester. Therefore, we urge the Mayor to do all he can to investigate the options for public ownership of local bus and rail services. This could begin with local strategies of democracy such as a regional citizens assembly on the public ownership of all modes of transport and we urge the Mayor to seriously consider this option as Greater Manchester's success becomes a beacon to the rest of the country.

In the example of Greater Manchester, we believe it is no longer credible to argue that the powers granted in the Bus Services Act are sufficient and we fully support Andy Burnham's plans for bus franchising with the caveat that much stronger legislation is needed and options for a fully integrated and publicly owned system should be urgently and publicly explored across the whole country.

Best wishes,

Emily Yates

Co-founder of the Association of British Commuters

Website: abcommuters.com

Twitter: [@ABCommuters](https://twitter.com/ABCommuters)

Dear Sir/ Madame,

I wanted to share notes from a consultation session that took place at Venture Arts regarding the proposed bus franchising scheme in Greater Manchester. Venture Arts is an arts organisation based in Hulme Manchester that supports adults and young people with learning disabilities and autism to develop as visual artists. The consultation took place with our steering group which is made up of six Venture Arts artists, all of whom have a learning disability. Apologies that this is late, I hadn't realised that the deadline was in January.

During the discussion several points were raised regarding people's experience of using the bus network in GM, what was good and what they would like to see improved:

- As a disabled person you have a bus pass and that means you can get on any bus which is really good (this means that things like having to buy multiple tickets from different operators doesn't affect people as much).
- The bus times are an issue - sometimes too close together and then at other times you have to wait ages.
- People don't like having to change buses during a journey - for someone with a leaning disability this can be confusing and stressful and can put people off using the bus. It would be better if there were more routes across the city rather than just into the centre of Manchester.
- Safety was a big thing for people - you want to feel safe and that crime/anti social behaviour will be dealt with. It would be good to have a code of conduct on the bus.
- The trams are very busy (which can be stressful for someone with a learning disability or autism) so people need more options, like the bus, to make them less so.
- Could there be space for Manchester charities to advertise for free on buses?

I hope this can be of use.

Many thanks,

Lydia

Lydia Burke

Project Coordinator

Venture Arts

Doing Buses Differently

Background

The Over 55's People's Platform, a public forum which takes place bi-monthly in Bolton, and is facilitated by Age UK Bolton, met on the 12th November 2019, with the intention of reviewing the 'Doing Buses Differently' public consultation document.

The meeting was attended by 6 representatives from the Over 55's People's Platform, all of whom regularly volunteer their services within Bolton or participate in the forum on a regular basis.

Each of the representatives have either used buses previously in Greater Manchester, or currently use buses on a regular basis.

Having read through the information document, we held an informal forum session, lasting 60 minutes, during which time we opened up a general discussion, aimed at capturing opinions and feedback from the representatives on the key themes around 'Doing Buses Differently'.

Current Bus Use and Awareness

We asked the representatives to tell us which bus companies and bus services they currently use:

What bus companies do you currently use?

- Diamond
- Arriva
- Blackburn Bus Company
- Vision
- First
- Rosso

What bus services do you currently use?

- 471 Rochdale
- 561 and 562 Breightmet Circular
- 525 and 527 Halliwell Circular
- 125 Preston
- 575 Chorley New Road
- 582
- 534
- 571 and 572
- 1 Blackburn
- 500 (Free Service)

Thinking about the current bus service, what doesn't work/don't you like?

- Long waiting times
- Shelters – less of them or no shelters. Many have been removed and not replaced.
- Unreliable service
- Diamond operating a service with less drivers than were previously employed.

Doing Buses Differently

- Shortage of drivers has a negative impact on service provision
- Buses are frequently cancelled with no explanation as to why
- Lack of information from drivers when the bus is late or a previous one failed to turn up
- Late and unreliable services leaves older passengers feeling cold/tired/more vulnerable
- Evening services are extremely limited, which has a big impact on activities that older people feel they can take part in, later in the day.
- When bus service is running late, drivers frequently drive away from a stationary position before passengers are safely seated.
- Services don't always stop for passengers waiting at the bus stop.
- Over 60's bus passes can't be used at peak times – which doesn't suit the majority of activities for older people and medical appointments, which require travel to start before 9.30am.
- Buses aren't clean – food/metro/papers left all over seats
- Timetables change too frequently and without adequate notification
- Timetables are created but the service doesn't appear to run the times stated
- Drivers don't always pull in close enough to the kerb – this creates problems for people with mobility issues
- Drivers don't always lower the step
- Service is too expensive for younger people who don't have access to subsidised fares

What do you like about your bus service? What works well?

- New buses are comfortable
- Aware of wi-fi but don't use it
- More space on newer buses
- Some positive bus drivers
- Outside of GM boundary; more positive experience with bus drivers/seem more helpful

If you don't use buses at the moment, why not?

- Previous bad experience (unreliability) so used taxi instead
- Cost is prohibitive
- Buses in Bolton are very expensive compared to other towns and cities

What would encourage you to use buses more often?

- Integrated ticketing (like the Oyster Card in London)
- Idea of the 'Wayfarer' ticket which allowed for integrated bus/train service
- More polite drivers
- More spaces for wheelchairs and walking aids
- Less cramped
- More consideration from other users
- More reliability

Doing Buses Differently

- Later services – last bus service finishes too early
- Extend the late bus service

Do you support the idea of reforming the bus service in GM?

- Yes support for reform
- The previous integrated system worked well
- Currently a waste of time
- Would support improvement
- Accept the fact that transition would be difficult, but worth it if the service improved

However.....

The representatives at the forum felt that the approach to the Doing Buses Differently consultation was:

- Not user friendly – the consultation document (at over 180 pages long) was far too long and complex to be easily understood by any of the representatives within our forum. Reading a document this length (even the shorter version) was arduous and would be particularly challenging for an older person with sensory impairments.
- The approach to the work that has gone into the consultation document, does not feel as though it has been grass roots and community based.
- The information available via printed format and online was not felt to be user friendly or accessible – particularly for most people aged 55 and over.
- Language not user friendly
- Information was not presented in a concise, brief and easily accessible format
- The Doing Buses Differently survey document was not easy or user friendly to complete – several colleagues within the Age UK Bolton office attempted to complete the survey but gave up after the 2nd question, because the way in which the questions were phrased was not user friendly or inspiring, which suggests the tone of the document was not appropriate for the target audience.