

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 TOWN would, subject to appropriate funding, be well placed to undertake this role on an ongoing basis. Under this regime, TOWN 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