

TravelWatch NORTHWEST

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promoting quality public transport.....

Eamonn Boylan,
 Chief Executive,
 GMCA and Transport for Greater Manchester,
 2 Piccadilly Place
 Manchester M1 3BG

29th January 2021

Dear Eamonn,

Consultation on GM bus market reform and Covid-19 impact

TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing all public transport users in North West England. We responded to the original consultation in January 2020. We do not have a great deal to add to that, response, but see below.

Q1: In looking at the effects of the Covid-19 pandemic on the decision about whether or not to implement the Proposed Franchising Scheme, TfGM has used a number of scenarios which illustrate a wide range of potential longer-term outcomes for travel demand in Greater Manchester. Do you have any comments on this scenario-based approach?

We agree that this is a reasonable approach to take in a time of great uncertainty. Planning has to be on the basis of encouragement and incentives to promote a return to public transport.

Q2: Do you have any comments on the conclusion that the Proposed Franchising Scheme is likely to perform better than the partnership option in achieving GMCA's objectives, notwithstanding Covid-19?

On balance we continue to support the Proposed Franchising Scheme, though given the effects of and financial fall out from Covid -19, there is even more compunction on the government to honour its pledge on financial support.

Q3: Do you have any comments on the consideration of the impact of Covid-19 on the value for money of the Proposed Franchising Scheme and partnership option?

Though we could be looking at a worst case scenario (3) we accept that it could be even worse as you state that problems of market failure in the bus market would be more acute than those previously assumed.

Q4: Do you have any comments on the conclusion that the commercial arrangements described in the Assessment for franchising and the partnership option remain appropriate, notwithstanding Covid-19?

We are happy with this conclusion.

Q5: Do you have any comments on the affordability to GMCA of the Proposed Franchising Scheme and partnership option in the light of Covid-19?

In our response to the original consultation we admitted our lack of expertise in understanding the financial aspects of the proposed franchising scheme. Obviously much is dependent on passengers returning to bus travel when normality returns, whatever the operating scenario. On balance we feel that greater local control through franchising would be best equipped to maintain services as widely as possible.

Q6: Do you have any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, including the proposed approach to managing the risks associated with Covid-19 (as set out in the Management Case of the Covid-19 Impact on Bus Franchising Report) and whether TfGM would be able to manage and implement a partnership on behalf of GMCA, notwithstanding Covid-19?

No comment

Q7: Do you have any comments on the conclusions of the Covid-19 Impact on Bus Franchising Report about how Covid-19 is likely to affect the impacts of the Proposed Franchising Scheme, partnership and Do Minimum options on (a) passengers, (b) operators, (c) GMCA and (d) wider society?

Under all scenarios illustrated in the consultation document we agree the Proposed Franchising Scheme would offer greater benefits for passengers looking forward. To give an example - better integration between modes.

Q8: Do you consider that the Proposed Franchising Scheme (attached at Appendix 3 of the Consultation Document) would not require any further modification beyond those already contemplated and included in the draft scheme?

We see no reason for any further modification.

Q9A: Did you respond to the previous consultation?

Q9B: If you did respond to the previous consultation, please explain in what ways, if at all, your views about the introduction of the Proposed Franchising Scheme have changed as a result of the impact of the Covid-19 pandemic. If your views have not changed then there is no need to provide any additional information.

We did respond. Our views have not fundamentally changed.

Q10: Taking everything into account, do you have any comments on the conclusion that this is the right time to make a decision about whether or not to proceed with the Proposed Franchising Scheme?

It is always difficult to determine the right time but with the hope that this year will bring with it a return to normality or near normality, it is appropriate to look ahead and in particular look to ways to address the challenge of bringing people back to public transport.

Q11A: To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?

Q11B: Why do you say this?

We have not changed our view expressed in our original response to the consultation and repeat that now –

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.
- 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.
- Much simpler, co-ordinated integration with other transport modes.

Q12: Finally, do you have any other comments you want to make?

Again we would refer back to our original response –

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 Bus Users UK as the Appeals body would be unsatisfactory. Bus Users UK'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

Thank you for the opportunity to respond.

Yours sincerely,

John A Moorhouse

John Moorhouse, Company Secretary