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

Summary Report

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(Instructed by Greater Manchester Combined Authority)

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Executive summary

This section provides an overall summary of the key issues raised by participants in the consultation. It provides core information concerning the background and context of the 'Doing Buses Differently' consultation on a Proposed Franchising Scheme, and summarises the key sections including:

- **ES1: Background and context**, covering the purpose of the consultation and response options;
- **ES2: A summary of overall opinion**, covering overall support/opposition for the introduction of the Proposed Franchising Scheme and the reasons underpinning this;
- **ES3: Changes to the Proposed Franchising Scheme**, covering the proportion of participants who think there should be changes to the Proposed Franchising Scheme and what those changes should be;
- **ES4: The Proposed Franchising Scheme**, covering corrections and changes, coverage, services to be included, exceptions, implementation dates, types of contracts, role of small/medium size operators, depots;
- **ES5: The Strategic Case**, covering the case for reforming the bus market, GMCA's objectives for the future provision of bus services, the contribution of franchising to achieving GMCA's objectives and the partnership options;
- **ES6: The Economic Case**, covering value for money, Net Present Value (NPV), phase 2 intervention/investment;
- **ES7: The Commercial Case**, covering packaging strategy, length of contracts, allocation of risk, impact on employees, depots, fleet, ITS approach, procurement of contracts, impact on achieving objectives of neighbouring transport authorities, securing operation of services, impact of partnership options on employees;
- **ES8: The Financial Case**, covering funding and the affordability of the Proposed Franchising Scheme and the affordability of partnership options;
- **ES9: The Management Case**, covering managing franchised operations, the proposed approach to the transition and implementation of the Proposed Franchising Scheme, the proposed approach to the implementation and management of the partnership options;
- **ES10: Impact of different options**
- **ES10: The Equality Impact Assessment;**
- **ES11: Campaign responses and petitions;**
- **ES12: Late responses;**
- **ES13: Response Rates**

ES1: Background and context

- Greater Manchester Combined Authority (GMCA) is proposing changes to how local bus services should be run across Greater Manchester in the future. Specifically, this includes the introduction of a Proposed Franchising Scheme;

- GMCA launched a public consultation, which ran for just over 12 weeks from midday on 14 October 2019 to 23:59 on 8 January 2020;
- Participants could choose to complete a short version of the questionnaire containing nine questions, or a longer version containing 48 questions about the proposed changes¹. Both versions of the questionnaire were made available electronically and in hard copy². Participants could also take part in the consultation via email or by letter in the post instead of completing a questionnaire; and
- The consultation asked participants for their comments about the Proposed Franchising Scheme. Participants were asked to comment on the overall Proposed Franchising Scheme, as well as on specific aspects of the Proposed Franchising Scheme and were also asked to comment on the Strategic, Economic, Commercial, Financial and Management Cases which formed part of TfGM's assessment of the Proposed Franchising Scheme and as set out in a separate consultation document³;
- Please note that some of the comments received may reflect a lack of understanding of the Proposed Franchising Scheme. Nevertheless, such comments have been reported as provided. Other than the correction of typos in verbatim comments, no attempt has been made to change or amend any comments which may not be factually correct or accurate;
- Consultation is a valuable way to gather opinions about a topic, but there are a number of points to bear in mind when interpreting the responses received. While consultations are open to everyone, participants are self-selecting and certain categories of people may be more likely to contribute than others – this consultation is no exception and it means that the responses can never be representative of the population as a whole, as would be the case with a representative sample survey;
- An open consultation can therefore never measure the exact strength of particular views or concerns amongst the wider general public and all organisations and elected representatives, nor may the responses have fully explained the views of those responding on every relevant matter. It cannot, therefore, be taken as a comprehensive, representative statement of opinion;
- Although Ipsos MORI's analysis is qualitative in nature, it can be valuable to understand how frequently particular points were made. The following terms have therefore been used throughout the report when summarising the views of statutory and non-statutory consultees:
 - **A handful/several** – less than 10 responses;
 - **A few** – between c.10-50 responses;
 - **Some** – c.50-200 responses;
 - **Many** – more than 200 responses; and
 - **Most** – more than half of participants commenting on a particular issue.

¹ All nine questions from the shorter version of the questionnaire featured in the longer version of the questionnaire.

² During the consultation period, the electronic versions of the questionnaires could be obtained via the consultation page of the GMCA website <https://www.gmconsult.org/>. Paper copies of the questionnaire were made available in designated public buildings in Greater Manchester and could also be downloaded from the GMCA website.

³ The consultation document can be found on the GMCA website: https://issuu.com/greatermcr/docs/greater_manchester_bus_franchising_consultation_do

- Whilst the above phrases are used throughout the report, some participant groups (e.g. statutory consultees) have fewer participants. Terminology has therefore been used in the context of the number of participants making up those groups – readers should therefore review the tables at the beginning of each chapter to contextualise the number of participants responding to the specific question:
 - **A handful/several/a few** – fewer than 5-10 responses;
 - **Most** – more than half of participants commenting on a particular issue.
- While attempts are made to draw out the variations between the different audiences, it is important to note that responses are not directly comparable. Participants will have chosen to access differing levels of information about the proposals. Some responses are therefore based on more information than others and may also reflect differing degrees of interest across participants;
- Please note that throughout the report, findings are reported on in terms of the number of respondents who made comments, and/or the number of comments made. It is important to bear in mind that a single participant can make both supportive and opposing comments and also raise concerns in a single response. When numbers are mentioned, the report makes clear that this is either the number of participants who made comments or the number of comments made. This will explain why for example that the number of comments made will generally add up to more than the number of participants who made comments. It is important to bear this in mind when interpreting the consultation findings;
- Finally, those who responded on behalf of an organisation or group were classified as stakeholder organisation responses. This also includes responses from both statutory consultees and elected representatives. In the summary sections that follow respondents are referred to as:
 - Statutory consultees – as defined by statute;
 - Non-statutory consultees – other organisations and elected representatives;
 - Members of the public; and
 - Participants – anyone who has responded.

A full list of the organisations that took part, including statutory consultees can be found in Appendix B.

ES2: Summary of overall opinion

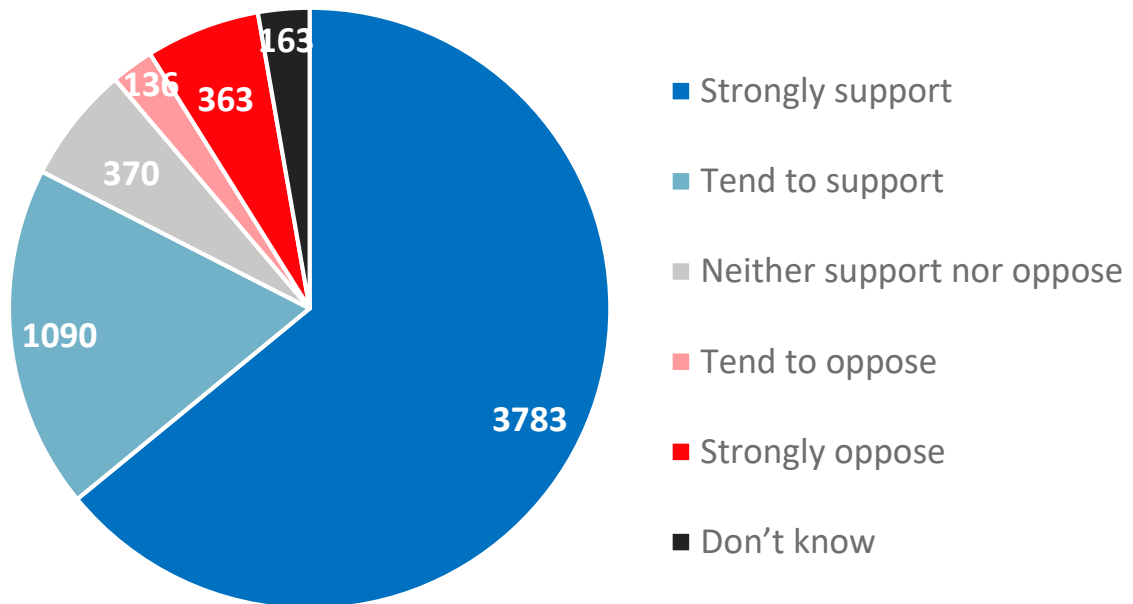
- Most of those who provided a response to the consultation were supportive of the introduction of the Proposed Franchising Scheme⁴. For example, of those who completed a questionnaire and chose to tick a box to indicate their support or opposition (5,978 participants), the vast majority (83%) were

⁴ It should be noted that over half of statutory consultees and just under half of non-statutory consultees did not complete the questionnaire and are therefore not reflected in these numbers. For these, a more qualitative summary of their overall responses is contained in the relevant sections of the report, depending on the specific issue raised.

supportive of the introduction of the Proposed Franchising Scheme, while far fewer (8%) were opposed;

- There was very little difference between statutory consultees and non-statutory consultees (87% and 86% were in support of the Proposed Franchising Scheme respectively). Of 5,905 members of the public who completed the question on the questionnaire, most (83%) indicated their support for the introduction of the Proposed Franchising Scheme. Fewer (8%) were opposed to the proposal;

Figure ES1: Levels of support for the proposal among members of the public completing a formal response form



Base: 5,905 members of the public who answered the question in the questionnaire

- Overall, there were 4,285 participants who provided comments about the introduction of the Proposed Franchising Scheme – the majority provided favourable comments;
 - The most frequently cited favourable comments included general support for the proposal, that it would represent an improvement in comparison to the system at present, that it would improve value for money for passengers through reduced fares, and that what was proposed would result in a coordinated and integrated wider public transport network;
 - On the other hand, the most frequently-cited unfavourable comments included general opposition to the Proposed Franchising Scheme, concerns about how affordable the proposals could be, and a belief that there was little evidence to prove that the proposals could work and be successful. However, some of the organisations that provided comments, and in particular, some bus operators favoured a partnership opinion, rather than the introduction of the Proposed Franchising Scheme;
- As well as being asked to comment on the introduction of the Proposed Franchising Scheme, participants were also asked to comment on the conclusion of the Assessment that the Proposed Franchising Scheme would be the best way to meet GMCA's objectives. Of 3,403 participants who provided comments about the Assessment, most (but not all) of the comments were favourable comments:
 - The main favourable comment by frequency of response was a general agreement with the conclusion of the Assessment. Other, less frequently cited favourable comments included a

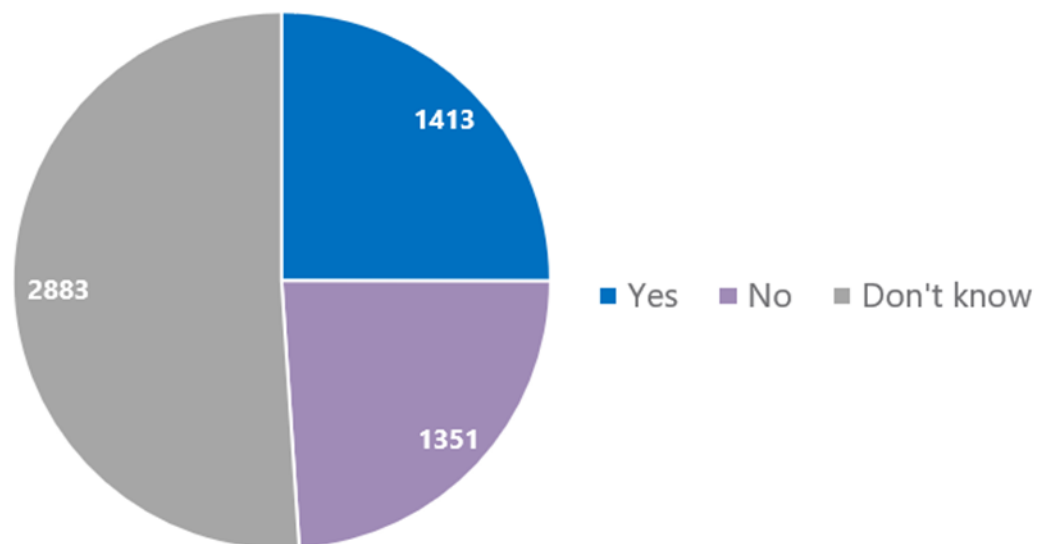
view that bus services would be improved for the better, that there would be increased frequency and availability of buses, and that the changes represented good value for money for passengers;

- The main unfavourable comments were around general disagreement with the Assessment, concerns around cost and value for money, and a belief that the Proposed Franchising Scheme would not be feasible or workable.

ES3: Changes to the Proposed Franchising Scheme

- Those who responded to the consultation were asked if there were any changes they thought would improve the Proposed Franchising Scheme. Of the 5,583 members of the public who responded to this question, half (51%) did not know if there were any changes that they thought would improve the Proposed Franchising Scheme. A quarter (25%) felt there were changes which could improve the Proposed Franchising Scheme and around the same proportion could not identify any changes (24%).

Figure ES2: Changes which would improve the Proposed Franchising Scheme



- For statutory and non-statutory consultees, two in five (42%) felt there were changes that would improve the Proposed Franchising Scheme whilst a quarter (25%) felt there were no changes and a third (33%) did not know;
- Overall there were 1,170 participants who provided further comments and suggestions on changes they thought would improve the Proposed Franchising Scheme. The most cited suggestions to the Proposed Franchising Scheme concerned reducing journey times, subsidising travel for young people and/or students, and ensuring cross-boundary services were considered;

- Of 482 members of the public who completed the question on the consultation response form, 37% would be unlikely to support the introduction of the Proposed Franchising Scheme if the changes they suggested were made. Slightly fewer would be supportive (35%).

ES4: The Proposed Franchising Scheme

- Participants were asked for comments on corrections and changes made to the Proposed Franchising Scheme. In response to this question, many of the comments made were about the Proposed Franchising Scheme, rather than about changes and corrections to it. Those who made favourable comments made general comments in favour or support of what was being proposed, albeit that many of the comments were about support for the overall Proposed Franchising Scheme rather than changes to it. Of those who provided unfavourable comments, the main comment was about general opposition rather than anything specific;
- Overall comments about the Proposed Franchising Scheme being applied to the entirety of Greater Manchester were more favourable than unfavourable. Most of those who provided favourable comments provided general comments in support of universal coverage. However, not all of those who provided comments were in favour. Some of the bus operators in particular raised concerns and/or advocated an alternative approach;
- Consultees were also asked to provide comments on local services proposed to be franchised. The main favourable comment was general support for this aspect of the Proposed Franchising Scheme. Of those who provided unfavourable comments, the main comment was about general disagreement or opposition to what was being proposed;
- There were a mix of comments received in response to the proposal that the Proposed Franchising Scheme would be split into three sub-areas, and on arrangements proposed for the purposes of transition. The main favourable comments were general support for this aspect of the Proposed Franchising Scheme, followed by that it would allow issues in one area to be smoothed out in the other areas due to having a staged or staggered approach. Most of those providing unfavourable comments offered general opposition, whilst some others thought it would be unfair to prioritise one area over the others. There was also concern about timescales;
- When asked for comments on services excepted by regulation under the Proposed Franchising Scheme, most provided generally favourable or unfavourable comments (i.e. just declaring support or opposition for the proposal). A commonly cited unfavourable comment was about opposition to Scholars services being excepted;
- Overall, the majority of comments received about the date that the Proposed Franchising Scheme is currently proposed to come into operation was favourable. Most favourable comments were in support of the proposed date of operation, whereas for those who provided unfavourable comments, the most frequently cited was a belief that there would not be enough time to prepare, followed by general opposition;
- Overall, the majority of comments received about dates that franchise contracts may be first entered into was favourable. Most favourable comments were general comments in support of what was being proposed. The most frequently cited unfavourable comments were about concerns over

timescales, including the length of transition period, and concern about there being possibly too much change at the same time;

- When asked about 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, there were a mix of general favourable and unfavourable comments. Most comments received were suggestions, and the main suggestion was that the nine-month period should be shorter;
- When asked to comment on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working, the majority made suggestions rather than favourable or unfavourable comments, although most favourable comments were in general agreement with how GMCA proposes to consult. Of those who made unfavourable comments, the mostly frequently made were concern about the timeframe, and that consultation would be unnecessary, bureaucratic and/or a waste of money. When it came to suggestions, these included comments that the public and passengers should be consulted, that groups who represent passengers should be included, and that performance reviews should be conducted regularly;
- Consultees were also asked if they had any comments on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme. The majority of comments were favourable. Most of the favourable comments received were general comments in favour of this aspect of the Proposed Franchising Scheme, followed by a belief that inclusion of small and medium operators would allow competition and create a level playing field. Of those who provided unfavourable comments, the most frequent were a belief that smaller operators would be less likely to provide a reliable service, a view that bus services should be provided by large operators, and general opposition to inclusion of small and medium sized operators;
- Consultees were also asked if they had 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. Again, the majority provided favourable comments which generally supported this part of the Proposed Franchising Scheme, were that some believed that TfGM and GMCA would have control over depots. The most frequently cited unfavourable comments (including from some incumbent operators) were concerns about costs, general opposition, and that depots should be the responsibility of bus operators.

ES5: The Strategic Case

- Most participants agreed with the challenges facing the local bus market as set out in the Strategic Case, that reform was needed, and that such reform would be the right thing to do to address such challenges. Of the 6,032 participants who completed the tick-box question on the questionnaire, approaching nine in ten (89%) agreed that the Strategic Case for reform was the right thing to do. Furthermore, while approaching three-quarters (74%) agreed strongly with reform, just one in twenty-five (4%) disagreed strongly;

Table ES1: Levels of agreement for reform of the bus market⁵

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	Disagree	Net agree +/-
All who provided a response (6,032)	5,398	355	+5,043
Statutory consultee (16)	15	1	+14
Non-statutory consultee (59)	56	1	+55
Member of the public (5,957)	5,327	353	+4,974

- Of those who provided comments about reform and the case for change (across all response channels, including email and letter, and on the questionnaire) the majority of the comments received were favourable. This included comments about how under the Proposed Franchising Scheme, in the opinion of consultees, bus services would be improved and made more reliable, how ticket prices and fares would be reduced with greater value for money for passengers, and how a more simplified and equitable fare structure would be provided;

Table ES2: Number of participants overall who provided favourable and unfavourable comments

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?		
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...why do you say this?		
	Number of participants who made favourable comments (Q12/Q13 combined)	Number of participants who made unfavourable comments (Q12/Q13 combined)
All who provided a response (5,638)	5,299	542
Statutory consultee (39)	35	20
Non-statutory consultee (101)	99	15
Member of the public (5,498)	5,165	507

- Not all of those who took part in the consultation agreed that reform was needed and/or that the Proposed Franchising Scheme was the right thing to do. Some of those who provided comments believed that change was unnecessary, or raised concerns about cost and affordability issues, or about how operators and employees in particular could be negatively impacted. Some of the bus

⁵ It should be noted that over half of statutory consultees and just under half of non-statutory consultees did not complete the questionnaire and are therefore not reflected in the tables presented throughout this Executive Summary. For these, a more qualitative summary of their overall responses is contained in the relevant sections of the report, and they are summarised where relevant in the Executive Summary.

operators and transport companies in particular did not think that the Proposed Franchising Scheme was the right approach at all, preferring instead a partnership option;

- However, for those who did provide comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case, there were more favourable than unfavourable comments. Many of those who made comments provided general support for GMCA's objectives, and that the Proposed Franchising Scheme could have a number of benefits (e.g. lower fares, simplified ticketing structure, increased reliability of service, better reach and coverage etc);
- On the other hand, of those who made unfavourable comments about GMCA's objectives, this included concerns about cost and affordability, a view that objectives could not be realised or met under the Proposed Franchising Scheme, or even that objectives were not ambitious or far reaching enough, or that one or more objectives were missing. A number of suggestions were therefore made as to how GMCA's objectives could be best achieved and maintained in the medium to long term. This included reducing journey times, and introducing express services;
- Overall, there was more support for the Proposed Franchising Scheme than for any alternative option, including a partnership option. For a majority of those who made comments, they believed that the Proposed Franchising Scheme would be more likely than a partnership option to achieve objectives. However, some bus operators and transport organisations preferred partnership to the Proposed Franchising Scheme. Others provided more balanced or neutral comments about the positives and shortcomings of both the Proposed Franchising Scheme and a partnership option.

ES6: The Economic Case

- Those who responded to the consultation were asked to respond to the conclusion of the Economic Case.

Table ES3: Number of participants who provided favourable and unfavourable comments about the conclusion of the Economic Case

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (2693)	2,147	480
Statutory consultee (22)	16	13
Non-statutory consultee (45)	40	8
Member of the public (2626)	2,091	459

- When responding to the questions concerning the Economic Case, participants tended to reiterate comments made elsewhere in the consultation which focussed on the outcomes which the Proposed Franchising Scheme would deliver, with cheaper and better value bus fares one of the most commonly mentioned positive outcomes (266);

- Specific to the Economic Case, the opinion that bus services should serve the public benefit and not be run for profit (133) and that the Proposed Franchising Scheme provides best value for money of the options presented (130) were other commonly-cited favourable comments;
- On the other hand, of the 480 participants providing unfavourable comments, 139 disagreed with the conclusion of the Economic Case. The main reasons for this included concern about the costs and associated affordability of it the Proposed Franchising Scheme (110) and the perceived lack of evidence to support the conclusion (97);
- A total of 63 participants made suggestions within their response to the conclusion of the Economic Case which concerned potential changes to the Proposed Franchising Scheme. These concerned the importance of subsidised travel for young people (10), free bus travel (7) and that bus services should run 24/7, 365 days per year (5). A total of 366 participants made suggestions within their response to the conclusion of the Economic Case which are already proposed/covered in the Proposed Franchising Scheme Assessment. The main suggestions made included the importance of considering more than just economic value or the cheapest bid (79), that quality of service should be prioritised (46) and that the impact of congestion and effective traffic management to enable any future bus network to operate more efficiently should also be considered (41).

ES7: The Commercial Case

- Overall participants showed favouritism towards the packaging strategy as set out in the Commercial Case.

Table ES4: Number of consultees who provided favourable and unfavourable comments about the proposed packaging strategy

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (224)	114	51
Statutory consultee (16)	9	3
Non-statutory consultee (16)	9	2
Member of the public (192)	96	46

Statutory consultees were generally favourable towards the proposal, although it was felt by some that route-by-route packaging could be a better approach. Members of the public making favourable comments generally reflected those given by statutory and non-statutory consultees, namely that it will allow different size operators to compete for contracts (13), and that it will drive competition across the market (6). Those who were unfavourable (46) were opposed to the proposed packaging of services (18), while specific comments concerned employee and job security (6) or that the proposals are particularly complicated to understand and lack simplicity of explanation (5);

- Sentiment towards the length of franchise contracts under the Proposed Franchising Scheme was mixed.

Table ES5: Number of consultees who provided favourable and unfavourable comments about the proposed length of franchise contracts

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (382)	159	145
Statutory consultee (15)	11	6
Non-statutory consultee (16)	6	5
Member of the public (351)	142	134

Statutory consultees were generally supportive, citing favourability to the five year let for large operators and deeming the proposed differences between contract types to be sensible and appropriate. A few had concerns that the proposed length might be too short and the cost implications of the contract lengths;

- Participants were generally more favourable to the allocation of risk between GMCA and bus operators as set out in the Commercial Case.

Table ES6: Number of consultees who provided favourable and unfavourable comments about the proposed allocation of risk between GMCA and bus operators

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (273)	124	88
Statutory consultee (17)	9	8
Non-statutory consultee (16)	7	4
Member of the public (240)	108	76

Amongst those who were favourable, comments made included general agreement with the proposal to give more authority/risk to GMCA/TfGM. There was also concern about the speed of moving towards a franchising model. Those members of the public who were favourable showed general support towards the proposal, while more detailed favourable comments included the fact GMCA would retain revenue / patronage risk in the spirit of maintaining simpler fares and tickets, and retain more authority over services. The principal unfavourable comments tended to relate to the fact GMCA will retain too much risk or responsibility, and that operators should retain a higher allocation of risk;

- Sentiment towards the potential impact of the Proposed Franchising Scheme on the employees of operators (as set out in the Commercial Case) was mixed.

Table ES7: Number of consultees who provided favourable and unfavourable comments about the impact on employees of operators

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (398)	183	151
Statutory consultee (15)	7	11
Non-statutory consultee (10)	5	4
Member of the public (373)	171	136

Statutory consultees gave mixed views on the proposals in terms of favourability. Amongst the few favourable comments, it was felt by some that the proposal will protect employees or uphold their legal rights through TUPE. For those who voiced an unfavourable view, the main concerns were around the threat to job security under the Proposed Franchising Scheme, such as wages and contracts. Amongst members of the public, general support was slightly higher with favourable comments focussing on how the proposal will protect employees and treat them fairly, that it will protect job security and protect pensions. Unfavourable comments were generally reflective of the concerns voiced by statutory and non-statutory consultees: that it might pose a threat to job security, wages, contracts and/or legal rights;

- Overall participants were favourable about the approach to depots as set out in the Commercial Case.

Table ES8: Number of consultees who provided favourable and unfavourable comments about the proposed approach to depots

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (262)	143	69
Statutory consultee (12)	4	7
Non-statutory consultee (10)	6	5
Member of the public (240)	133	57

This was particularly the case for members of the public, the majority of which supported the proposal, in particular towards GMCA's proposed CPOs of depots or GMCA taking over depots. Those members of the public who were unfavourable cited general feeling that depots should remain with the operators, while others expressed that it would be better to use existing depots (as opposed to building new ones) or questioned the affordability of purchasing depots. More statutory consultees were unfavourable – these comments tended to come from bus operators and cited concern about CPOs and the affordability of the approach, unrealistic timescales, or the general principle that depots should remain under the ownership of bus operators;

- Comments towards the approach to fleet as set out in the Commercial Case were mixed.

Table ES9: Number of consultees who provided favourable and unfavourable comments about the proposed approach to fleet

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (327)	97	69
Statutory consultee (19)	5	7
Non-statutory consultee (16)	5	8
Member of the public (292)	87	54

Many of the favourable comments were in general support, particularly around the commitment to low emission buses. Unfavourable comments tended to surround the issue of affordability of the proposal, or the fact that the responsibility of the value of fleet should remain with the operators;

- There was support across all participant groups for the proposed approach to Intelligent Transport Systems (ITS) as set out in the Commercial Case.

Table ES10: Number of consultees who provided favourable and unfavourable comments about the proposed approach to Intelligent Transport Systems (ITS)

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (403)	241	62
Statutory consultee (16)	9	3
Non-statutory consultee (19)	14	3
Member of the public (368)	218	56

Overall, it was felt that the introduction of such technology was long overdue. Unfavourable comments centred on the affordability aspect or that it will not work due to GMCA/TfGM lacking the expertise to implement such systems that might be better left for the operators to deal with;

- Views towards the proposed approach to procuring franchising contracts as set out in the Commercial Case were missed.

Table ES11: Number of consultees who provided favourable and unfavourable comments about the proposed approach to procuring franchising contracts

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (160)	59	45
Statutory consultee (12)	7	6
Non-statutory consultee (10)	4	1
Member of the public (138)	48	38

Favourable comments tended to generally agree with the proposed approach, while a small number of responses were favourable because of the likelihood that it will drive up competition between operators. Unfavourable comments cited a range of issues, including the timescales and consideration that a route-by-route approach would be better. The reasons given by members of the public tended to echo those made by statutory and non-statutory consultees, although some unfavourable comments again questioned whether it was affordable;

- Overall comments towards the achievement of neighbouring transport authorities as set out in the Commercial Case were more favourable than unfavourable.

Table ES12: Number of consultees who provided favourable and unfavourable comments about the impact of the options on the achievement of the objectives of neighbouring transport authorities

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (240)	121	46
Statutory consultee (25)	16	9
Non-statutory consultee (15)	10	4
Member of the public (200)	95	33

Favourable comments supported bus services working together with neighbouring authorities and favoured the retention of cross-boundary services, as well as the importance of a cross-boundary ticketing system. Unfavourable comments included concern about the impact on customers travelling from neighbouring authorities, the asserted failure to promote bus usage as opposed to travelling into Greater Manchester by car, and concerns around the affordability of the proposed approach to addressing the objectives of neighbouring transport networks;

- Comments concerning the Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts were mixed.

Table ES13: Number of consultees who provided favourable and unfavourable comments about the conclusion that GMCA would be able to secure the operation of services under franchise contracts

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (194)	118	68
Statutory consultee (11)	5	5
Non-statutory consultee (10)	5	6
Member of the public (173)	108	57

Of the statutory consultees providing a response, there was a mix of favourable and unfavourable comments. The favourable comments were typically in general agreement with the conclusion whilst unfavourable comments were made about the concern about there being sufficient incentive for operators to bid for contracts or provide services under a Proposed Franchising Scheme. Bus operators were generally unfavourable towards the conclusion. Members of the public were more favourable overall, whilst unfavourable comments were made about operators requiring incentives or profits in order to bid / provide services and the affordability / cost control or value for money of the proposal;

- Across the participant groups there were more unfavourable comments made about the commercial implications of the partnership options as set out in the Commercial Case, than favourable comments.

Table ES14: Number of consultees who provided favourable and unfavourable comments about the assessment of the commercial implications of the partnership options

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (166)	49	92
Statutory consultee (12)	5	8
Non-statutory consultee (13)	6	11
Member of the public (141)	38	73

Bus operators responding to the assessment of the partnership options tended to argue against the limited benefits as set out in the consultation document. Those who left favourable comments tended to be supportive of the proposed partnership option, either generally or relating to the Voluntary Partnership Agreement (VPA) proposed by operators. Members of the public mentioned support for the Enhanced / Ambitious Partnership, while slightly fewer indicated favourability towards the VPA / Operator Proposed Partnership. Other members of the public left unfavourable comments,

which disagreed with the partnership options, presented concerns around costs and felt that the partnership model is flawed;

- Overall, there was a mix of comments about the potential impact of the partnership options on the employees of operators.

Table ES15: Number of consultees who provided favourable and unfavourable comments about the potential impact of the partnership options on the employees of operators

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (174)	46	92
Statutory consultee (8)	6	2
Non-statutory consultee (6)	3	3
Member of the public (160)	37	87

Many of the statutory consultees responding to this question around the impact on employees made favourable comments, agreeing that the partnership options would not impact employees and would keep jobs secure. Members of the public who were favourable generally agreed with the statement, or state in further detail that they agree it will have no impact or effect on employees. Members of the public who were unfavourable mostly expressed concern about employees' job security under a partnership approach.

ES8: The Financial Case

- Those who responded to the consultation were asked to respond to the Financial Case, including the affordability of the Proposed Franchising Scheme and the approved funding proposal.

Table ES16: Number of participants who provided favourable and unfavourable comments about the conclusion of the Financial Case

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (1986)	1411	499
Statutory consultee (19)	8	15
Non-statutory consultee (38)	26	8
Member of the public (1929)	1377	476

- Almost three times as many participants provided a favourable comment compared to an unfavourable comment, with members of the public providing proportionally more favourable comments than other categories of participant. Statutory consultees made almost double the amount of unfavourable comments about the Financial Case conclusion compared to favourable comments;

- A concern expressed by some Greater Manchester local authorities was the uncertainty over the financial contribution which they might be expected to make towards the Proposed Franchising Scheme. Both Tameside MBC and Bolton Council identified a potential risk as to whether future fare contribution would be sufficient to part-fund the Proposed Franchising Scheme, whilst Stockport Council were concerned that this would be levied before residents have experienced the benefits of the Proposed Franchising Scheme and Salford City Council wanted further detail on the impact of using the precept (and Mayoral 'earn back' funds) on future projects and programmes;
- The bus operators questioned the costs identified in the Financial Case to run and operate a Proposed Franchising Scheme whilst several bus operators did not accept the accuracy of the Financial Case (although recognised that based on its conclusion then the Proposed Franchising Scheme was affordable for GMCA). Other concerns from operators related to specific challenges of elements of the Financial Case, including projected farebox revenue and other sources of funding and the Proposed Franchising Scheme not appearing to meet the statutory test for value for money;
- Of the 1,377 members of the public who made a favourable comment towards the Financial Case conclusion, just over a third made general comments in agreement with the conclusion, or offered their support to it. A smaller proportion of participants reiterated the positive outcome, which would be a reformed and improved bus service, whilst a similar number of participants considered it was long overdue; and
- Of the 476 members of the public who made unfavourable comments about the conclusion of the Financial Case, the main comments expressed general opposition to the conclusion of the Financial Case. The principal specific concern was around the affordability of the Proposed Franchising Scheme, particularly concerning the control of costs and associated value for money.

ES9: The Management Case

- Comments on the approach to managing franchised options under the Proposed Franchising Scheme were mixed.

Table ES17: Number of participants who provided favourable and unfavourable comments on the proposed approach to managing franchised options under the Proposed Franchising Scheme

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (183)	73	56
Statutory consultee (14)	6	6
Non-statutory consultee (9)	5	3
Member of the public (160)	62	47

Responses from statutory consultees, although relatively few, tended to focus upon the costs and difficulties associated with securing sufficiently qualified staff for the relevant core and support

teams. There was also concern raised around the risks associated with additional management costs. Comments from bus operators were generally unfavourable, particularly from those operators whose responses focused upon concerns around the stated requirement to employ approximately 57 more full-time employees. Otherwise, operators generally agreed that the additional required full-time employees would be costly to attract, recruit and train and would ultimately not be sufficient to cover the necessary responsibilities. Members of the public making favourable comments thought that the Proposed Franchising Scheme would create jobs, boost employment and/or lead to the recruitment of more staff and drivers and that the Proposed Franchising Scheme would give TfGM/GMCA more authority and control of bus services. Those making unfavourable comments concerned costs, affordability and value for money of the proposed approach, as well as concerns around increases to council tax and precept payments and the use of public funds for further subsidisation through taxation;

- Overall, there were more favourable comments on the approach to the transition and implementation of the Proposed Franchising Scheme than unfavourable comments.

Table ES18: Number of participants who provided favourable and unfavourable comments on the approach to transition and implementation of the Proposed Franchising Scheme

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (258)	130	81
Statutory consultee (13)	5	6
Non-statutory consultee (9)	4	1
Members of the public (236)	121	74

Around a third of those statutory consultees which provided comments made favourable comments, whilst around half made unfavourable comments within their response regarding transition and implementation. A number of the statutory consultees focused their criticism relating to this case on timescales and the lack of time built in for evaluating and reviewing progress during the transition period. Others expressed similar opinions that the associated risks and costs of this transition had been under-estimated and could be avoided under partnership-led approaches. Some non-statutory consultees agreed that TfGM would be capable of managing franchised operations throughout transition and implementation. More favourable comments were made by members of the public, with the majority agreeing with the approach and that risk would be inevitable in such a change. Less favourable members of the public raised concerns regarding the proposed objectives and the feasibility of timescales, referring specifically to the length of transition and potential for delays to implementation and viewed the approach to transition management as over-complicated;

- Comments made in response to the implementation and management of the partnership options were also mixed.

Table ES19: Number of participants who provided favourable and unfavourable comments on the proposed approach to the implementation and management of partnership options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (168)	83	69
Statutory consultee (10)	4	2
Non-statutory consultee (7)	4	4
Member of the public (151)	75	63

Statutory consultees were broadly favourable and identified that required levels of resource would be lower than that necessary under the Proposed Franchising Scheme in terms of additional recruitment. Other bus operators also thought that additional resource would be more limited under the partnership options. Members of the public cited favourable responses provided by participants were in general agreement of the premise outlined within the Management Case, with some agreeing that TfGM would have the expertise to transition to a partnership option. Members of the public who were unfavourable opposed the proposed partnership options as they were supportive of the Proposed Franchising Scheme instead.

ES10: Impact of different options

- Those who responded to the consultation were asked if they had any comments on the impacts of the Proposed Franchising Scheme on passengers.

Table ES20 Number of participants who provided favourable and unfavourable comments about the impacts on passengers of the Proposed Franchising Scheme

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (400)	192	91
Statutory consultee (16)	6	8
Non-statutory consultee (20)	14	4
Member of the public (364)	172	79

Bus operators who made comments on the impacts of the Proposed Franchising Scheme on passengers were all unfavourable. There was some concern amongst local authorities about the negative impact of cross boundary services on their residents, whilst concern about ticket prices was raised by other non-statutory stakeholders. Members of the public were overall more favourable about how the Proposed Franchising Scheme would benefit passengers, particularly concerning the

introduction of a single ticketing fare. They expressed concern over a potential increase in fares and also felt it would not generally benefit passengers.

- Participants were asked if they had any comments on the impacts of the partnership options on passengers, as set out in the sub-section on Impacts of the different options.

Table ES21 Number of participants who provided favourable and unfavourable comments about the impacts on passengers of the partnership options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (202)	48	111
Statutory consultee (15)	7	6
Non-statutory consultee (11)	2	9
Member of the public (176)	39	96

Bus operators felt a partnership option provided greater benefits to passengers than the Proposed Franchising Scheme. Other statutory consultees thought that a partnership option would carry lower risk, particularly when it comes to protecting cross-boundary services. Members of the public were less favourable about the impact on passengers of the partnership options, with a belief that it didn't provide value for money and a general preference towards the Proposed Franchising Scheme. Favourable comments towards the impact of the partnership options came from those who preferred the options and on the basis that there might be fare freezes, with costs being absorbed by operators.

- Participants were asked if they had any comments on the impacts of the Proposed Franchising Scheme on operators, as set out in the sub-section on Impacts of the different options.

Table ES22 Number of participants who provided favourable and unfavourable comments about the impacts on operators of the Proposed Franchising Scheme

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (161)	63	60
Statutory consultee (14)	6	9
Non-statutory consultee (10)	5	4
Member of the public (137)	52	47

Relatively few participants responded to this question. Bus operators warned against potential loss of business if franchising contracts are not awarded, which could result in operators exiting the market

and resultant legal action. On the flip side, other statutory consultees, particularly local authorities outside of Greater Manchester, felt it could be an opportunity for new operators to enter into the market and/or let smaller operators grow. Of the few members of the public who responded to this question, main points mirrored those raised by other consultees, in that it would level the field for smaller operators and actually drive competition. There was concern that current operators should receive fair treatment and/or compensation for losses and whether there would be insufficient services for operators.

- Participants were asked if they had any comments on the impacts of the partnership options on operators.

Table ES23 Number of participants who provided favourable and unfavourable comments about the impacts on operators of the partnership options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (77)	34	36
Statutory consultee (7)	5	1
Non-statutory consultee (6)	3	3
Member of the public (64)	26	32

Bus operators made detailed comments in response to this question, which included the lower risk for GMCA under a partnership option, with market competition and scrutiny being greater under such an arrangement. However, Stagecoach Manchester felt they could not comment fully on the commercial implications of the partnership options as they felt the Ambitious Partnership considered in the assessment had not been tested with operators. As one Greater Manchester local authority identified, it felt that the partnership options would have limited impact on the operators as services, timetables and ticketing would continue to be decided the operators and there would be little change. Members of the public making favourable comments generally cited overall support towards partnership options or a preference for the Proposed Franchising Scheme (17).

- Participants were asked if they had any comments on the impacts of the different options on GMCA as set out in the sub-section Impacts of the different options.

Table ES24 Number of participants who provided favourable and unfavourable comments about the impacts on GMCA of the different options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments

All who provided a response (113)	60	35
Statutory consultee (11)	6	8
Non-statutory consultee (9)	4	2
Member of the public (93)	50	25

Bus operators felt that GMCA would be subject to greater financial and legal risk through the Proposed Franchising Scheme, whilst Bolton Council were clear that none of the risk should be transferred to any of the 10 Greater Manchester local authorities. On balance, members of the public showed support, more generally of the Proposed Franchising Scheme but also specifically concerning the reinvestment of surplus into the transport network.

- Participants were asked if they had any comments on the impacts of the different options on wider society as set out in the sub-section Impacts of the different options.

Table ES25 Number of participants who provided favourable and unfavourable comments about the impacts on wider society of the different options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (344)	187	74
Statutory consultee (14)	11	9
Non-statutory consultee (19)	13	9
Member of the public (311)	163	56

Bus operators referred to the Jacobs Review of Consultation Economic Case concerning the methodology used to calculate the benefits of the Proposed Franchising Scheme and that partnership options would bring about greater benefit. TravelWatch NorthWest highlighted the Proposed Franchising Scheme's forecast that it would reduce car use and promote more sustainable travel. Members of the public tended once again to reiterate support for the Proposed Franchising Scheme in their response, also citing the, positive environmental impacts, such as less pollution and cleaner air. Unfavourable comments included ruling out the 'do minimum' option.

ES11: Equality Impact Assessment

- Under equality legislation, GMCA is required in the exercise of its functions to have due regard for the need to:
 - Eliminate unlawful discrimination, harassment and victimisation;
 - Advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not share it; and

- Foster good relations between those who have a relevant protected characteristic and those who don't.
- The draft Equality Impact Assessment (EQIA) concludes that the Proposed Franchising Scheme would have a high positive impact on children and young people, 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. It does not identify any groups that would suffer an adverse impact;
- There were 285 participants who provided comments on the EQIA, including from 12 statutory consultees, 29 non-statutory consultees, and 244 members of the public;

Table ES26: Number of participants who provided favourable and unfavourable comments on the draft Equality Impact Assessment

	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (285)	130	61	+69
Statutory consultee (14)	4	4	0
Non-statutory consultee (27)	13	5	+9
Member of the public (244)	113	52	+61

- Of those who made favourable comments, the main comments by frequency of response were about general support for what was covered in the draft Equality Impact Assessment, and a belief that it would take into account the needs of all passengers, including minority groups;
- On the other hand, the most frequently cited unfavourable comments were about disagreement or opposition to what was covered in the draft Equality Impact Assessment, or that it was considered to be too vague, lacked detailed or that it was a superficial exercise;
- Most of those who made suggestions made suggestions about aspects that would be already covered or taken into account by the draft Equality Impact Assessment. This included comments that disabled and vulnerable passengers should be considered, that operators should be held to account if they fell short of requirements, and that the draft Equality Impact Assessment should be on similar lines to those in other major cities with franchises, such as in London.

ES12: Campaign responses and petitions

- Of all responses received, 1,240 were considered to be campaign responses. All of these responses related to one campaign from Better Buses for Greater Manchester. The main points contained within the Better Buses for Greater Manchester campaign gave support for a better, publicly controlled bus network. Of these:

- 930 responses included text which Better Buses for Greater Manchester included on its website, which made several points in response to the Strategic Case, including the challenges facing the local bus market and the conclusion that it is not performing as well as it could be. The campaign also provided comments in response to the agreement that reforming the bus market is the right thing to do to address the challenges facing it;
 - 502 responses provided a comment which replicated text used by Better Buses for Greater Manchester on its Facebook page (entitled Publicly Controlled Buses). Support for better, publicly controlled buses which could see Greater Manchester set a precedent across the UK; and
 - 63 responses provided a comment which replicated text used on a postcard produced by Better Buses for Greater Manchester.
- In addition, Better Buses for Greater Manchester submitted a petition. A total of 11,510 members of the public and other organisations signed the petition, the text of which was as follows:

"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.

The final decision hasn't been made. Sign the petition now to make your buses better.

Dear Andy Burnham, please regulate our buses."

- Another petition was submitted by Councillor Adrian Pearce of Stalybridge North Ward. This supported the Proposed Franchising Scheme as it would make bus services more responsive to the needs of the people of Ridge Hill in Stalybridge. It was signed by 53 residents.

ES13: Late responses

- While the consultation closed at 23:59 on Wednesday, 8 January 2020, 72 responses were received after the consultation deadline. As per the protocols set up at the beginning of the consultation, late responses have been analysed separately, with a short summary of what was said included in this chapter of the report. Key points raised included:
 - The Competition and Markets Authority provided a response in support of making the bus market work better. They provided a response focused upon their view of franchising and the

provided alternatives with the stated offer to have input into the final packaging strategy and design if the Proposed Franchising Scheme were to be adopted;

- The Association for British Commuters provided a response which stated their full support for the Proposed Franchising Scheme, with the caveat that stronger legislation will be needed and the option for a fully integrated, publicly owned transport system should be urgently explored. They recognised the benefits which would be brought to Greater Manchester;
- Members of Age UK Bolton met to discuss the consultation and provided the following comments. They discussed current challenges such as unreliability of services, cancellation of services, poor standards and cleanliness and a lack of information through timetabling. They also had criticisms about the consultation document and its accessibility and usability;
- Councillor Charlotte Martin (Audenshaw, Tameside) raised issues caused by privatisation of the bus services such as price increases, lack of investment, poor timetabling and no effort to integrate ticketing. Councillor Martin was supportive of the Greater Manchester Better Buses campaign, in order to utilise powers to coordinate the network and introduce standards;
- Venture Arts shared notes taken from a steering group session run regarding the Proposed Franchising Scheme. They provided a number of comments regarding the experiences of members with learning disabilities, about how current use of buses impacts on them; and
- Finally, there were 27 late responses submitted by members of the public. All of these responses provided comments which were in-keeping with the themes raised by members of the public analysed in detail in throughout this report.

ES14: Response Rates

The table below summarises the response to the consultation via the various response channels⁶.

○ Response channel	○ Members of the public	○ Statutory consultee	○ Non-statutory consultee	○ Overall total
Online response form	5,700	13	56	5,769
(Short version)	(4,534)	(5)	(37)	(4,576)
(Long version)	(1,166)	(8)	(19)	(1,193)
Paper response form:	308	5	3	316
(Short version)	(276 ⁷)	(0)	(3)	(279)

⁶ Excludes campaign responses

⁷ This number includes 4 attachments that were sent in with paper forms and coded separately and included in the analysis.

(Long version)	(32)	(5)	(0)	(37)
Email	1,100	23	55	1,178
Whitemail ⁸	12	0	1	13
Total	7,120	41	115	7,276

⁸ Responses submitted by post not using the response form structure (letters, reports etc).

1. Introduction

1.1 Overview

Greater Manchester Combined Authority (GMCA) is proposing changes to how local bus services should be run across Greater Manchester in the future. Specifically, this includes the introduction of a Proposed Franchising Scheme.

In order to allow statutory⁹ consultees and other interested parties (including service users) the opportunity to comment on the proposed changes, GMCA launched a public consultation. The consultation ran for just over 12 weeks from 12.00 on 14 October 2019 to 23:59 on 8 January 2020.

Participants could choose to complete a short version of the questionnaire containing nine questions, or a longer version containing 48 questions about the proposed changes¹⁰. Both versions of the questionnaire were made available electronically and in hard copy¹¹. Participants could also take part in the consultation via email or by letter in the post instead of completing a questionnaire.

Ipsos MORI was commissioned by Transport for Greater Manchester (TfGM) on behalf of GMCA to analyse responses to the consultation, and to prepare an independent report of the findings. This document contains a summary of the comments that were received.

1.2 Context

The Bus Services Act 2017¹² amended the provisions of the Transport Act 2000 ("the Act") and provides new franchising and partnership powers with the aim of strengthening, and in some circumstances, reforming, the operation of local bus services in England.

The Act contains powers for mayoral combined authorities to create bus franchising schemes in their regions. Following the introduction of the Act, GMCA considered the use of the new franchising powers and decided to prepare an assessment of a Proposed Franchising Scheme in accordance with sections 123B and section 123C (4) of the Act. The assessment took the form of a five-model business case in line with The Department for Transport's (DfT) Franchising Scheme Guidance ("the Guidance"), and compared a Proposed Franchising Scheme with other available options.

⁹ Statutory consultees are organisations and bodies, defined by statute, which GMCA was legally required to consult with before reaching a decision on how local bus services should be run across Greater Manchester in future. A list of the organisations that participated in the consultation is included in Appendix C of this report.

¹⁰ All nine questions from the shorter version of the questionnaire featured in the longer version of the questionnaire.

¹¹ During the consultation period, the electronic versions of the questionnaires could be obtained via the consultation page of the GMCA website <https://www.gmconsult.org/>. Paper copies of the questionnaire were made available in designated public buildings in Greater Manchester and could also be downloaded from the GMCA website.

¹² <http://www.legislation.gov.uk/ukpga/2017/21/enacted>

Having met the various requirements of the Act and Guidance, including the assessment having undergone an independent audit, the Proposed Franchising Scheme was determined as the preferred option for Greater Manchester and it was decided that a statutory consultation should be carried out.

The Guidance covered what should be included in the consultation (as detailed in Section 123E of the Act). TfGM, on behalf of GMCA, has taken such Guidance into account, and has undertaken a statutory consultation on a proposal to replace the current system of deregulated bus services in Greater Manchester with the Proposed Franchising Scheme, in which all bus services continue to be operated by private companies but under contract to GMCA.

TfGM have reviewed the consultation responses and TfGM has now finalised its report on the consultation. As the consultation closed before the outbreak of COVID-19 and any effects of COVID-19 on the bus market in particular and the economy more generally manifested themselves, the consultation did not address those matters. Consideration of this would need to be carried out by TfGM on behalf of GMCA before any decision could be taken by the Mayor as to whether or not to make the Proposed Franchising Scheme (with or without modifications).

1.3 Why GMCA believes changes are necessary

GMCA believes that the current system is disadvantageous to users and detracts from its ambition to provide world class public transport across Greater Manchester as set out in the Greater Manchester Transport Strategy 2040¹³. As set out in Section 4.18 of the consultation document, GMCA is of the opinion that the current system offers limited competition which results in:

- **Fare increases.** Fares have increased above inflation between 2003 and 2017, and recent increases have confirmed this trend, although some of the increase may be attributable to increases in cost factors.
- **Lack of co-ordination of networks.** Firms operate individual networks that are not co-ordinated with each other's or with the wider transport network, particularly with Greater Manchester's rail and the Metrolink system.
- **Services for social and economic need are not provided where they are not profitable.** This can reduce the utility of the network as a whole for passengers as evening and weekend services cannot be provided, which in some cases leads GMCA to have to step in and fund a replacement service.
- **Complex fares and ticketing arrangements.** The market does not incentivise integrated fares as operators seek to keep passengers on their own buses and networks. This creates a confusing picture for passengers with a vast range of tickets available for trips, often at different prices.

Subject to the outcome of the consultation and as part of the Greater Manchester Transport Strategy 2040, GMCA believes that the introduction of the Proposed Franchising Scheme would align with its

¹³ <https://tfgm.com/2040>

ambitions for network integration, provision of a simplified and integrated fares system, a consistent customer experience, and value for money. If the proposed changes are implemented, such ambitions could be realised given that bus services throughout Greater Manchester would come under local authority control, with GMCA deciding on which bus routes to run in the interests of service users.

1.4 Scope of the consultation

The consultation therefore asked participants for their comments about the Proposed Franchising Scheme. Participants were asked to comment on the overall Proposed Franchising Scheme, as well as on specific aspects of it, including whether it should apply to the entirety of Greater Manchester and about arrangements for the purposes of transition from the system that operates at the moment. The consultation also asked for comments on a number of aspects of the Proposed Franchising Scheme, including services excepted from regulation, the proposals for funding the Proposed Franchising Scheme and the proposed date of implementation. Participants were also asked to comment on the Strategic, Economic, Commercial, Financial and Management Cases which formed part of TfGM's assessment of the Proposed Franchising Scheme and as set out in a separate consultation document¹⁴. Where appropriate, questions were also asked about the partnership options that provided the comparison to the Proposed Franchising Scheme in the assessment.

A separate Draft Equality Impact Assessment (EQIA) was also consulted on as part of the consultation. The EQIA asked participants if they believed certain groups with protected characteristics would be more likely to be impacted as a result of the proposed changes. Please see Chapter 13 of this report for a summary of the responses received.

It should be noted that the Act does not set out the questions that should be asked in a consultation on a Proposed Franchising Scheme. It does, however, include detail on the requirement of the consultation document and other materials to be published for the purposes of consultation. The consultation document and the consultation questions were prepared by TfGM on behalf of GMCA. Please see Appendix F for full details of all questions that were asked in both the short and longer versions of the consultation questionnaire.

1.5 Report structure

This report has been divided into 15 chapters.

- The first three chapters cover the background and objectives of the consultation, including how the consultation was carried out, the number of participants, including statutory consultees, who responded via the various advertised channels, and how the responses were analysed and reported on;

¹⁴ The consultation document can be found on the GMCA website:
https://issuu.com/greatermcr/docs/greater_manchester_bus_franchising_consultation_do

- Chapters 4 to 11 include a summary of comments received on the possible changes to the Proposed Franchising Scheme, as well as comments on the Strategic, Economic, Commercial, Financial and Management Case;
- Chapter 12 provides a summary of the impact of different options on passengers, local bus operators, the GMCA and on wider society;
- Chapter 13 comprises a draft Equality Impact Assessment, focussed on how participants believe the proposed changes could impact on people with protected characteristics;
- Chapter 14 includes a summary of the campaigns and petitions that were received; and
- Chapter 15 is the final chapter and includes a short summary of responses received after the consultation closed. In the interests of fairness to those who took part within the consultation window, late responses have been summarised separately.

The appendices include a participant profile, a list of organisations and statutory/non-statutory consultees that responded to the consultation, copies of the long and short response forms, comments on the consultation process and technical details on the coding and analysis process. The complete analytical codeframe and short and long response forms are provided as appendices under separate cover. The data tables are also available under separate cover.

1.6 Reading the report

The responses set out in this summary report are based on the comments members of the public and statutory and non-statutory organisations/consultees made in their responses to the consultation. Each section presents the number of favourable and unfavourable comments made in response to the open-ended question overall and then explores in more detail responses from statutory consultees, non-statutory consultees and finally members of the public.

It is important to point out that not all of those who took part in the consultation made specific comments about the Proposed Franchising Scheme. For example, some of those who participated in the consultation made general comments about bus services. This might include general comments such as *"I prefer to walk to/from a train station than use a bus"*, neutral comments about the operators in specific areas (e.g. *"in my area I use the bus provided by Stagecoach Manchester"*) or about staff employed by the bus operators (e.g. *"the bus drivers are always friendly and polite"*).

Please note that some of the comments received may reflect a lack of understanding of the Proposed Franchising Scheme. Nevertheless, such comments have been reported as provided. Other than the correction of typos in verbatim comments, no attempt has been made to change or amend any comments which may not be factually correct or accurate. Further details of how responses were analysed, including their interpretation are included in Chapter 3 of this report.

2. The consultation process

2.1 Publicising the consultation

GMCA and TfGM developed a comprehensive communications and engagement plan to raise awareness of and encourage participation in the consultation across a range of channels. This activity was designed to ensure that as many people as possible knew about the consultation, the reasons why GMCA were consulting on the Proposed Franchising Scheme and the Proposed Franchising Scheme itself, how to participate in the consultation and where to obtain the information to do so.

A full overview of this activity is included within the GMCA report on the consultation as it did not involve Ipsos MORI.

2.2 Consultation response channels

The consultation document¹⁵ and response form were available to download from the GMCA website. In addition, copies of the consultation documents and response form were also made available in designated public buildings across the Greater Manchester area.

A number of response channels were set up so participants could provide feedback on the proposals. These response channels were:

- a **response form** on the dedicated response platform setup for the consultation, which could be accessed via the consultation webpage: <https://www.gmconsult.org/>. Two response forms were available, a long response form comprising 48 questions about the proposal, and a shorter form comprising nine questions. All nine questions from the shorter version of the questionnaire featured in the long version of the questionnaire. The content of each response form is detailed further in Appendix C.
- **pdf versions of the response forms** that could be downloaded from the consultation webpage. This could be completed electronically and submitted via email, or it could be printed out and sent as a hard-copy response through the post.
- a **freepost address** (FREEPOST GM Bus Consultation) was provided in the consultation documents to enable members of the public and organisations to post their response, either as a completed response form or a letter; and
- a dedicated **consultation email address** (gmbusconsultation@ipsos-mori.com) was set up to enable people to respond via this method if they preferred.

¹⁵ This is the document that sets out the objectives of the consultation, and includes a copy of the consultation questions, and details about how to take part. The consultation document also includes where to get more information, and next steps.

These response channels were all managed by Ipsos MORI on behalf of GMCA.

All responses dated and received within the consultation period were analysed and are summarised in this report. In addition, to make allowance for any potential delays with the post or misdirection of emails, paper responses, letters and emails received up until 17:00 on Monday 13 January 2020 were reviewed to check the date and time at which they were sent. If they were sent before the closing deadline, they were accepted. All responses with a postmark on or before 8 January 2020, or other verifiable proof of postage before the deadline, were included in the analysis.

In addition, some responses to the consultation were sent through other channels. Where such correspondence was received during the advertised consultation period, it was forwarded to Ipsos MORI by GMCA. Any such correspondence received by GMCA within the consultation period was processed and included within the consultation analysis where relevant.

Responses received after the consultation closed were not analysed by Ipsos MORI but forwarded to TfGM on behalf of GMCA to take forward as appropriate.

2.3 Number of responses to the consultation

In total, 7,276 participants submitted a response to the consultation. The responses were received through a number of channels, as set out in Table 2.1.

Table 2.1 Responses received to the consultation by response channel and consultee type¹⁶

Response channel	Members of the public	Statutory consultee	Non-statutory consultee	Overall total
Online response form	5,700	13	56	5,769
(Short version)	(4,534)	(5)	(37)	(4,576)
(Long version)	(1,166)	(8)	(19)	(1,193)
Paper response form:	308	5	3	316
(Short version)	(276 ¹⁷)	(0)	(3)	(279)
(Long version)	(32)	(5)	(0)	(37)
Email	1,100	23	55	1,178
Whitemail ¹⁸	12	0	1	13

¹⁶ This table excludes the 1,240 campaign responses received (discussed in Section 2.4 below)

¹⁷ This number includes 4 attachments that were sent in with paper forms and coded separately and included in the analysis.

¹⁸ Responses submitted by post not using the response form structure (letters, reports etc).

Total	7,120	41	115	7,276
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Of those who responded to the consultation, 7,120 were from individual members of the public, and 156 were from organisations, including elected representatives. Organisational responses are responses sent on behalf of wider groups rather than individual members of the public. Examples of organisational responses include those from bus operators, local authorities and transport user groups. A full list of the organisations that responded is found in Appendix B of this report.

Those organisations determined as statutory consultees in line with the requirements of the Act have been highlighted. In total, 41 organisations that responded to the consultation were considered as statutory consultees.

2.4 Campaign and petitions

In addition to the responses in Table 2.1 above, there were a further 1,240 responses received that were considered to be campaign responses. It is common in high profile public consultations for interest or campaign groups to ask their members, supporters and others to submit responses conveying the same specific views. An organised campaign is defined as a co-ordinated approach by an individual or organisation to facilitate others into submitting responses. The outputs may include, but not be limited to, printed response postcards, suggested response text provided on a campaign website, or leaflets and reproduced response forms. Where such identical/near identically worded responses have been received these have been treated as organised campaign responses.

The very nature of many campaigns makes submitting a response to a consultation relatively easy. Those responding are provided with suggested text to use for each question. They are not asked to articulate their reasoning behind their opinion as a verbatim response within a specific field, nor do they have to submit a bespoke response in the form of a letter or report etc. We therefore present these responses separately in Chapter 14.

In addition, Better Buses for Greater Manchester submitted a petition. A petition differs from a campaign response in that it will comprise a single response alongside a number of signatures. This is detailed further in Chapter 14. A total of 11,510 members of the public and other organisations signed this petition.

Another petition was submitted by Councillor Adrian Pearce of Stalybridge North Ward. The petition was signed by 53 residents.

2.5 Late responses

There were a number of responses received after the closing date. The details of these responses have not been included in the consultation and are summarised in Chapter 15 of the report.

2.6 Deliberative research

Alongside the consultation process summarised in this report, a programme of qualitative research was also carried out to explore the Proposed Franchising Scheme and the other options considered by GMCA in its assessment with members of the public and other key interest groups, including businesses, young people and those residing outside of Greater Manchester in neighbouring authorities. These findings will be reported alongside the results of the consultation to help the Mayor to decide whether or not to deliver the Proposed Franchising Scheme and to consider whether there should be any modifications to the proposal.

Given that levels of knowledge and interest in how bus services are planned and run were expected to be low (based on previous GMCA research), GMCA was keen to conduct qualitative research having provided participants with the detail of how the current deregulated system of bus provision works and how any potential alternative models, such as partnerships and the Proposed Franchising Scheme, would work. They also wanted a forum in which participants could ask technical questions and then respond from an informed viewpoint. To this end, the qualitative research was a combination of deliberative workshops and focus groups discussions.

Deliberative workshops are designed to allow the detailed presentation of particular issues. In this case, a range of participants were recruited to attend a full day (10:00 until 15:15pm) which meant they could receive information about the Proposed Franchising Scheme and then be given an opportunity to express their spontaneous and then informed opinions, both within plenary sessions but also in small group formats. Recruitment quotas were set on gender, age, ethnicity, disability and socio-economic group to ensure a broadly representative mix of individuals from Greater Manchester participated. There was also a range of users, lapsed-users and non-users of public transport and a mix of frequent and infrequent bus users to ensure that a range of individuals with different experiences came together to share their views. Finally, quotas on local authority residence ensured that there was balanced representation from each of the ten boroughs in Greater Manchester. A total of 80 members of the public attended the two workshops over the two weekends, 40 in each.

GMCA also wanted to engage with some specific target groups as part of this qualitative research strand. These groups included young people, those residing outside of Greater Manchester and small and medium size businesses within Greater Manchester, specifically:

- Young people;
- Business owners; and
- Cross-boundary users of bus services in Greater Manchester.

A series of focus groups were held with these groups. These groups were shorter in length compared to the deliberative workshops. Given this, it was impractical to present the same level of detail about bus reform and the Proposed Franchising Scheme within these groups compared to the deliberative

workshops. The discussion within each group was therefore tailored to cover specific issues which were of interest to each target group. A total of 69 participated in the focus groups.

Please see the deliberative research report for further details and insights, which is presented under separate cover.

3. Analysis methodology

3.1 Receipt and handling of responses

The handling of consultation responses was subject to a rigorous process of checking, logging and confirmation to ensure a full audit trail. All original electronic and hard copy responses were securely filed, catalogued and given a serial number for future reference, in line with requirements of the Data Protection Act (2018), and General Data Protection Regulations (GDPR).

3.2 Analysis of responses

The questionnaire was made up of predominantly open questions because GMCA wanted to get the fullest possible understanding of participants' opinion.

As discussed in Chapter 1 of this report, participants could choose to complete a long questionnaire or a short questionnaire. All of the questions on the short questionnaire featured on the longer questionnaire. For those who completed the short questionnaire, their comments were analysed alongside the relevant question or questions in the long questionnaire. For example, if a participant provided comments to Question E (the open question about the Financial Case in the short questionnaire), this was analysed alongside comments at question 30 in the longer questionnaire. For those who provided comments via email or letter (and not in the questionnaire format), their comments were attributed to the relevant questions in the long questionnaire. This mean for example, that if a bus operator completed their response via email and made comments about the impact of the Proposed Franchising Scheme on operators, such comments were analysed alongside responses to question 37 in the long questionnaire.

While most questions were open questions, a small number of closed questions were also asked. The purpose of having closed questions was to enable measurement of agreement or disagreement with, for example the need for bus reform and support for, or opposition to, the introduction of the Proposed Franchising Scheme. Please note that these questions were not answered directly by those who submitted a response not on the response form (i.e. by e-mail/white mail etc.).

Coding of open question and free text responses

The process of analysing the content of each response was based on a system where unique summary 'codes' are applied to specific words or phrases contained in the text of the response. These codes include a sentiment, in this case whether a comment was favourable or unfavourable. A number of responses also made suggestions, and these have prefixed as such in the codeframe. The application of these summary codes and sub-codes to the content of the responses allows systematic analysis of the data.

Ipsos MORI developed an initial coding framework (i.e. a list of codes to be applied) based on the text of the first responses received. This initial set of codes was created by drawing out the common themes and

points raised. The initial coding framework was then updated throughout the analysis process to ensure that any newly-emerging themes were captured. Developing the coding framework in this way ensured that it would provide an accurate representation of what participants said.

Ipsos MORI used a web-based system called *Ascribe* to manage the coding of all the text in the responses. Ascribe is a system which has been used on numerous large-scale consultation projects. Responses were uploaded into the Ascribe system, where members of the Ipsos MORI coding team then worked systematically through the comments and applied a code to each relevant part(s) of them.

The Ascribe system allowed for detailed monitoring of coding progress, the organic development of the coding framework (i.e. the addition of new codes to new comments). A team of coders worked to review all of the responses as they were uploaded to the Ascribe system. All coders received a thorough briefing about the objectives of the consultation before they could undertake analysis of responses. It was also necessary for coders to have read the consultation document before undertaking their analysis of responses.

To ensure that no detail was lost, coders were briefed to raise codes that reflected what was being said in responses. These were then collapsed into a smaller number of key themes at the analysis stage to help with reporting. During the initial stages of the coding process, weekly meetings were held with the coding team to ensure a consistent approach in raising new codes and to ensure that all additional codes were appropriately and consistently assigned.

3.3 Interpreting the consultation findings

Consultation is a valuable way to gather opinions about a topic, but there are a number of points to bear in mind when interpreting the responses received. While consultations are open to everyone, participants are self-selecting and certain categories of people may be more likely to contribute than others – this consultation is no exception and it means that the responses can never be representative of the population as a whole, as would be the case with a representative sample survey.

Typically, with any consultation, there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views. Responses are also likely to be influenced by local campaigns.

It must be understood, therefore, that the consultation, as reflected through this report, can only aim to catalogue the various opinions of those who have chosen to respond to the consultation. It can never measure the exact strength of particular views or concerns amongst the wider general public and all organisations and elected representatives, nor may the responses have fully explained the views of those responding on every relevant matter. It cannot, therefore, be taken as a comprehensive, representative statement of opinion.

Although Ipsos MORI's analysis is qualitative in nature, it can be valuable to understand how frequently particular points were made. The following terms have therefore been used throughout the report when summarising the views of statutory and non-statutory consultees:

- **A handful/several** – fewer than 10 responses;
- **A few** – between c.10-50 responses;
- **Some** – c.50-200 responses;
- **Many** – more than 200 responses; and
- **Most** – more than half of participants commenting on a particular issue.

Whilst the above phrases are used throughout the report, some participant groups (e.g. statutory consultees) have fewer participants. Terminology has therefore been used in the context of the number of participants making up those groups – readers should therefore review the tables at the beginning of each chapter to contextualise the number of participants responding to the specific question:

- **A handful/several/a few** – fewer than 5-10 responses;
- **Most** – more than half of participants commenting on a particular issue.

Verbatim quotes have been used to illustrate some of the points made by participants. These verbatims have been selected to provide a mix of positive and negative comments which best exemplify the issue raised in the analytical text of the report, and to represent the views of both members of the public and named stakeholder organisations.

While attempts are made to draw out the variations between the different audiences, it is important to note that responses are not directly comparable. Participants will have chosen to access differing levels of information about the proposals. Some responses are therefore based on more information than others and may also reflect differing degrees of interest across participants.

It is important to note that the aim of the consultation process is not to gauge the popularity of the proposal; rather it is a process for identifying new and relevant information that should be taken into account in the decision-making process. All relevant issues are, therefore, considered equally, whether they are raised by a single person or a majority. A consultation is not a referendum.

Participants vs. comments made

Please note that throughout the report, findings are reported on in terms of the number of participants who made comments, and/or the number of comments made. **It is important to bear in mind that a single participant can make both supportive and opposing comments and also raise concerns in a single response.** When numbers are mentioned, the report makes clear that this is either the number of participants who made comments or the number of comments made. This will explain why for example the number of comments made will generally add up to more than the number of participants who made comments. It is important to bear this in mind when interpreting the consultation findings.

3.4 Defining organisational responses including statutory/non-statutory consultees

Those who responded on behalf of an organisation or group were classified as *stakeholder organisation responses*. This also includes responses from both *statutory consultees*, *non-statutory consultees* and *elected representatives*.

The questionnaire asked participants to indicate whether they were responding on behalf of an organisation/group, or as an individual. Those who said they were responding on behalf of a group or organisation were generally classified as a stakeholder organisation, unless it was clear from their response that they were actually members of the public (for instance, those who stated that the group they represented was their family).

The questionnaire asked stakeholder organisations to indicate the category of organisation they felt best described themselves from a pre-determined list. For the purposes of consistency of reporting, Ipsos MORI has occasionally chosen to reallocate stakeholder organisations to a different category to the one that they self-selected. However, participants' own selections have been largely respected. Stakeholder organisations that responded by email or letter were allocated to categories by Ipsos MORI, to the best of its judgement.

Bus operators are divided between those currently running local bus services in Greater Manchester (statutory consultees) and those not currently doing so (non-statutory consultees).

A full list of the organisations that took part, including statutory consultees can be found in Appendix B.

3.5 General public responses

Those who said they were providing their own response in the online and paper response form were generally classified as members of the public, unless it was clear from their response that they were responding on behalf of a group or organisation (i.e. they self-identified as such on the tick-box question on the response form). Ten participants identifying as stakeholder organisations were reclassified as individual participants as a result. Those who responded by email or letter (i.e. not by use of the online response form) were classified as members of the public, unless it was clear that they were responding on behalf of an organisation or group.

3.6 Organised campaign responses and petitions

Where identically worded responses have been received, or those that contain text that has been centrally supplied by an organisation to be subsequently used in a response (and then sometimes added to), these have been treated as organised campaign responses. One organised campaign response was received and is reported on. In addition, two petitions were received. A petition differs from a campaign response in that it will comprise a single response alongside a number of signatures. Full details of the campaign and petitions received are included in Chapter 15.

4. Summary of overall opinion

This chapter summarises overall opinion towards the Proposed Franchising Scheme and covers the questions at the end of the response form and the reasons underpinning these views (Q45a-45b and Q42-43 of the consultation response form).

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

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?

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.

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

4.1 Overall views on the introduction of the Proposed Franchising Scheme

The overall weight of opinion from those who participated in the consultation was support for the Proposed Franchising Scheme. Most of those who provided a response indicated their support and or provided favourable comments. This was particularly true of those who completed a questionnaire. However, it must be pointed out that some of the large bus operators, particularly those that provide services across Greater Manchester were not supportive of the Proposed Franchising Scheme. Such consultees tended to send their detailed responses via email, letters and reports, and such responses tended to be opposed to the Proposed Franchising Scheme. As detailed throughout this report, some of the bus operators did not support the Proposed Franchising Scheme, but advocated reform in other ways, such as via a partnership option. It is important to bear this in mind when reading the report.

This chapter is set out by first looking at the responses to Q45a on the questionnaire followed by comments received across all response channels (i.e. the questionnaire, email, letters and reports). Table 4.1 shows levels of support and opposition to the introduction of the Proposed Franchising Scheme from those who answered the tick-box question on the questionnaire. As the table shows, most of those who provided a response to the question on the questionnaire were supportive of the introduction of the Proposed Franchising Scheme.

Table 4.1 Overall levels of support or opposition to the proposal

Q45a. To what extent to you support or oppose the introduction of the Proposed Franchising Scheme?	Strongly support	Tend to support	Tend to oppose	Strongly oppose	Net support +/-
All who provided a response (5,978)	3,834	1,102	136	366	+4,434
Statutory consultee (15)	10	3	0	2	+11
Non-statutory consultee (58)	41	9	0	1	+49
Member of the public (5,905)	3,783	1,090	136	363	+4,374

However, not all of those who provided a response to the consultation used the questionnaire. Some participants (particularly organisations), preferred to send their response by letter or reports in the post or by email. Table 4.2 shows the number of favourable and unfavourable comments received from statutory consultees, non-statutory consultees, and members of the public across all response methods (i.e. on the questionnaires, letters and email responses received within the consultation period). As the table shows, there were more favourable than unfavourable comments received about the Proposed Franchising Scheme. However, as the table also shows, half of statutory consultees who responded provided unfavourable comments, including issues or concerns they had about what was being proposed. Some of the large Greater Manchester bus operators in particular tended to provided unfavourable comments about the Proposed Franchising Scheme, preferring a partnership option instead.

Table 4.2 Overall levels of support or opposition to the proposal

Q45b. Why do you say this?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (4,285)	3,820	757	+3,063
Statutory consultee (33)	24	16	+8
Non-statutory consultee (95)	87	16	+71
Member of the public (4,157)	3,709	725	+2,984

The next sections of this chapter first look at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

4.1.1 Statutory consultees

The majority (13 out of 15 statutory consultees) who answered the question on the questionnaire were supportive of the proposal – most indicated strong support.

Of the 33 statutory consultees who provided comments about the introduction of the Proposed Franchising Scheme (including those who made comments by email and letter and on the questionnaire), the majority provided supportive and favourable comments. The following sections break down the responses received by category of organisation.

Bus operators / transport organisations

A mixed picture emerges in that while some of the bus operators and transport organisations supported the Proposed Franchising Scheme, others were opposed to it. Those in support of the proposal included HCT Group which believed that the Proposed Franchising Scheme would be the only way to ensure a comprehensive, affordable and integrated network which serves local residents. Warrington's Own Buses believed that the Proposed Franchising Scheme appeared to offer better value for money to GMCA than what a partnership approach would offer.

However, it was clear from comments received that not all of the bus operators and transport organisations were supportive of the proposal. For example, Stagecoach Manchester suggested that in its opinion, the Proposed Franchising Scheme would provide limited benefits to passengers, especially in South Manchester. Belle Vue (MCR) Ltd believed that the Proposed Franchising Scheme would be unfair to smaller sized bus operators. Rotala PLC was strongly opposed to the introduction of the Proposed Franchising Scheme. The operator called the proposal a "radical solution" that would need significant amount of public expenditure, and that there would be risks for GMCA and bus operators, particularly during the transition period without, in its opinion, any guarantee of success.

"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...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 PLC

While Go North West Ltd stated that it was not opposed in principle to regulatory interventions in bus networks, the operator thought that the Proposed Franchising Scheme would be inappropriate and unworkable in its opinion, and that it would be unreasonable for GMCA to proceed with the Proposed Franchising Scheme as it would be at risk of a legal challenge. The operator supported continued dialogue on how the Proposed Franchising Scheme could be changed to improve it, and to reduce risks. It advocated a variation of the Proposed Franchising Scheme.

"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."

Go North West Ltd

Some of those who provided unfavourable comments about the Proposed Franchising Scheme suggested that a partnership option would be a better option to take forward. Organisations that made comments about this included Stagecoach Manchester and Arriva UK Bus. Arriva UK Bus stated that it would accept the Proposed Franchising Scheme if it were to proceed, however, a partnership option would in its view result in the best outcome. The organisation made reference to its operations in Liverpool and London.

"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. 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."

Arriva UK Bus

One of the statutory consultees (Transdev Blazefield Ltd) indicated that it neither supported nor opposed the proposal but that regardless of whether a partnership scheme or the Proposed Franchising Scheme came into operation, it was committed to continuous improvement for bus users in Greater Manchester.

Local authorities

Local authorities were particularly supportive of the proposal, and this included Salford City Council, Tameside Metropolitan Borough Council, Trafford Council and Wigan Council. It was believed that the proposal would deliver a number of benefits across Greater Manchester, including provision of an integrated bus network, an improvement in standards, and a more simplified ticketing system which passengers would benefit from.

“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 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.”

Trafford Council

While Rochdale Borough Council did not believe that all issues would be addressed by the proposal, it strongly supported the proposal because it felt that under a franchised system, passengers would be more likely to have their needs addressed because GMCA and TfGM would, in its opinion, be more accountable than bus operators.

Bury Council stated that it tended to support the proposal, but would welcome that GMCA take note of its comments and act upon them where appropriate to do so.

As well as local authorities in Greater Manchester, other neighbouring authorities also responded to the consultation. For example, Chorley Council stated that the Proposed Franchising Scheme would be the best option to improve the local bus market in Greater Manchester provided there would be no negative impact on the existing boundary bus services running to and from Chorley.

However, despite many positive and supportive comments from local authorities, Derbyshire County Council raised some concerns about the proposal. The Council was concerned about possible impacts to cross boundary services and requested that GMCA and TfGM have further engagement with it so that in its opinion its legitimate concerns can be taken into account to the satisfaction of both sides.

Other statutory consultees

A small number of other statutory consultees provided comments about the introduction of the Proposed Franchising Scheme. Some of those that provided comments, were very much in favour of the Proposed Franchising Scheme, and this included strong support from three unions: TUC North West, Unison North West and Unite the Union.

“De-Regulation in 1986 was supposed to liberate 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.”

Unite the Union

“The benefits are clearly set out, and the opportunity to better direct services in the interests of Greater Manchester is not to be missed.”

TUC North West

While Transport Focus believed that the Proposed Franchising Scheme would deliver benefits for passengers, the test would be in assessing the delivery of resulting services. However, the organisation raised a few questions about how the Proposed Franchising Scheme would improve customer satisfaction.

“...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.”

Transport Focus

While Bus Users UK believed that the Proposed Franchising Scheme would produce in its words, some “limited benefits for passengers”, the organisation suggested that such benefits could have been much greater if meaningful consultation had been done at an earlier stage. The organisation believed that as the focus of the Proposed Franchising Scheme was on unified branding and not on customer service that it seemed 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.”

Bus Users UK

4.1.2 Non-statutory consultees

The majority of non-statutory consultees who answered Question 45a on the response form were in support of the proposal – just one out of 58 of the non-statutory consultees were opposed to the proposal to introduce the Proposed Franchising Scheme.

In total, 95 non-statutory consultees provided comments about the introduction of the Proposed Franchising Scheme. Most of those that provided comments indicated support and/or provided

favourable comments about the proposals. The following sections break down the responses received by category.

Academic institutions

A number of the institutions including Manchester Metropolitan University, IPPR North, LTE Group, and Royal Northern College of Music were strongly supportive of the proposals for a number of reasons including that change as a result of the proposal could bring benefits that other types of bus market reform could not, that there could be significant benefits of the Proposed Franchising Scheme to Greater Manchester, and that students could benefit from reduced fares, improved accessibility for disabled users, and that an integrated transport network could result in reduced waiting times waiting for 'the right bus'.

"...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. 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."

Manchester Metropolitan University

Others that were also supportive of the introduction of the Proposed Franchising Scheme included the University of Salford, the University of Manchester, Burnage Academy for Boys, and Mobilities Justice.

Action groups

All of the action groups that made comments about the introduction of the Proposed Franchising Scheme indicated strong support. This included Steady State Manchester, Bus4Us, Walk Ride Heaton, and Sale Moor Community. A number of reasons were put forward in support of the proposal and this included that less popular routes would become more viable, and that social need would be more elevated and balanced alongside commercial considerations.

"Franchising is the only option that allows cross subsidy from popular/profitable routes to less busy/unprofitable routes."

Steady State Manchester

Transport stakeholders

Some bus operators that provided comments were supportive of the Proposed Franchising Scheme. For example, RatP Dev, and Abellio (both large operators) and Tower Transit indicated strong support for the proposal, and one (Manchester Airports Group MAG) stated that it tended to support the proposal.

Comments received in support of the proposal included that it appeared to be a more sustainable way to develop a bus network, and that a 'London style' approach of integrated ticketing and interchangeability would be an attractive proposition for passengers, to encourage a modal shift away from private vehicles.

"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...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."

Abellio

Some of the non-statutory consultees raised issues or concerns about the Proposed Franchising Scheme. OneBus stated that it did not support the introduction of the Proposed Franchising Scheme as it believed that a similar result could be achieved through partnership at reduced risk to the taxpayer, and that partnership would in its opinion result in much needed improvements for passengers in a quicker timeframe.

Charity / voluntary sector

As with the views of action groups, there was very strong support for the proposal. Organisations that indicated strong support for the proposal included Greater Manchester Disabled People's Panel, Dunham Massey National Trust, Whalley Range Community Forum, and the Equality and Human Rights Commission. Reasons provided in support of the proposal included that it would lead to a better service, standardisation of services, greater accountability, better connected services, and with improved access for disabled passengers

"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."

Dunham Massey National Trust

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."

The Equalities and Human Rights Commission

Elected representatives

All of the elected representatives who provided comments were in favour of the Proposed Franchising Scheme. Those who indicated their support and who provided favourable comments included Jonathan Reynolds (MP for Stalybridge and Hyde), Jeff Smith (MP for Manchester Withington), Graham Stringer (MP for Blackley and Broughton), and Barbara Keeley (MP for Worsley and Eccles South). Those who made comments described a number of benefits of the Proposed Franchising Scheme, including how they believed it would result in putting the service back in public hands, that the proposal would provide an opportunity to address existing challenges of the bus market, and that air pollution and traffic congestion could be reduced as more people use buses instead of other modes of transport, including private car.

"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 Franchising system can do this, so I would urge that the bus system be reregulated in Greater Manchester."

Graham Stringer, MP for Blackley and Broughton

Environmental, heritage, amenity or community groups

There was also very strong support for the introduction of the Proposed Franchising Scheme from environmental, heritage, amenity and community groups. Non-statutory consultees that provided strong support and favourable comments about the proposal, included Withington Civic Society, Transition Buxton, The Church of England – Diocese of Manchester, and Friends of Patricroft Station. It was believed that the Proposed Franchising Scheme would have a number of advantages, including provision of better co-ordinated fares, that it would be a cost-effective solution to meet the needs of the population of Greater Manchester, and that it would encompass environmental benefits, including helping to make Manchester a carbon neutral city through improved access to and usage of better bus services.

"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. 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."

Church of England – Diocese of Manchester

Other non-statutory consultees

A range of other non-statutory consultees provided comments on the Proposed Franchising Scheme. Most of these organisations including Stockport Metropolitan Borough Council Liberal Democrat Group, Saddleworth Parish Council, Manchester University NHS Foundation Trust, and Altrincham Business

Improvement District were supportive of the proposal for the same or similar reasons provided from other categories of organisation.

"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."

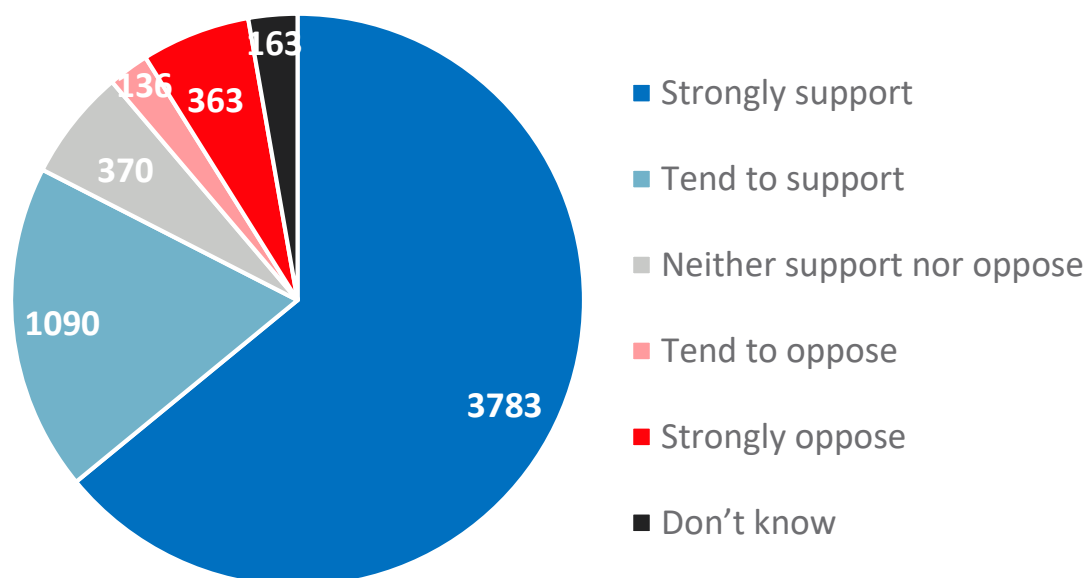
Saddleworth Parish Council

Very few of the organisations were opposed to the introduction of the Proposed Franchising Scheme. The Chartered Institute of Logistics and Transport – North West Policy Group indicated that it tended to oppose the proposal as it believed there could be an increase in congestion with no plans to deal with this issue, and that there could be high financial costs involved which would have to be picked up by the taxpayer.

4.1.3 Members of the public

Of the 5,905 members of the public who completed a response form and who answered Q45a, the vast majority indicated support for the introduction of the Proposed Franchising Scheme. On the other hand, fewer indicated that they were opposed to the Proposed Franchising Scheme.

Figure 4.1 Levels of support for the proposal among members of the public



Base: 5,905 members of the public who answered the question in the questionnaire

Looking at strength of opinion, while approaching two-thirds (64%) of those who answered the question indicated strong support for the proposal, just one in sixteen (6%) indicated strong opposition to the proposal. It was clear that most of those who provided a response were in favour of the Proposed Franchising Scheme and that levels of support were consistent across most key demographic subgroups and by geography.

It is interesting to note levels of support for the proposal depended on whether or not participants were employed by a bus operator, and/or had family members employed by bus operators. Most (84%) of those who had no association with a bus operator supported the proposal, while fewer than half of those who had an association with a bus operator did so.

The following table includes a breakdown of support and opposition to the proposal by key subgroups. It includes the responses from those who answered the tick-box question on the response form (which could not be answered in the same way by those who responded by letter or email).

Table 4.3 Levels of support for and opposition to the proposal among members of the public

Q45a. To what extent to you support or oppose the introduction of the Proposed Franchising Scheme?		Support	Oppose	Net support +/-
All who provided a response		4,936	502	+4,434
Age	16-34 (1,184)	1,013	65	+948
	35-54 (1,897)	1,582	177	+1,405
	55+ (2,664)	2,179	222	+1,957
Gender	Male (3,249)	2,684	342	+2,342
	Female (2,425)	2,037	111	+1,926
Ethnicity	White (5,110)	4,252	416	+3,836
	BME (398)	334	22	+312
Disability	Yes (1,247)	968	119	+849
	No (4,579)	3,849	370	+3,479
Works for a bus company and/or family works for a bus company	Yes (183)	85	84	+1
	No (5,622)	4,735	391	+4,344
Local authority area	Bolton (369)	287	36	+251
	Bury (428)	351	35	+316
	Oldham (348)	274	30	+244
	Rochdale (295)	244	22	+222
	Stockport (771)	635	76	+559
	Tameside (406)	300	64	+236
	Trafford (557)	477	30	+447
	Manchester (1,487)	1,284	101	+1,183
	Salford (563)	487	28	+459
	Wigan (400)	306	45	+261
	Overall within GM (5,624)	4,645	467	+4,178
	Outside of GM (252)	207	29	+178

The next sections examine the favourable and unfavourable comments provided by members of the public across all response channels (including via email and letter in the post, as well as on the questionnaire).

Comments received on the Proposed Franchising Scheme

Overall, 4,157 members of the public provided reasons to justify why they either supported or opposed the Proposed Franchising Scheme. This included 3,709 participants who provided favourable and supportive comments, and 725 participants who provided negative and opposing comments, or raised concerns.

Positive / favourable / supportive comments

The main comments by frequency of response were general support and agreement for the Proposed Franchising Scheme (1,131), that the proposal would result in improvements to bus services throughout Greater Manchester (1,152), that passengers would benefit from reduced fares and ticket prices (651), that what was proposed would result in a more integrated and joined up public transport system across Greater Manchester (618), that bus usage would be encouraged, resulting in fewer people needing to use private cars, leading to less congestion and improved environmental benefits (556), and that there would be a more simplified and straightforward ticketing system.

"We desperately need this to be implemented, the price of journeys that use multiple services is ridiculous, as is the fact that a passenger going a few miles pays as much for a day ticket as a person going from end to end."

Member of the public

Less frequently cited positive comments included that the Proposed Franchising Scheme could encourage the economic growth of Manchester (105), that accessibility, particular for disabled passengers would be improved (47), that there would be a level playing field with improved competition and reduced likelihood of monopolies (41), and that the proposals could address capacity issues, reducing the number of full and overcrowded buses (21).

"I think it has been well thought through and seems to address all my concerns about the current bus service. I think a single transportation service across teams and buses for Greater Manchester will help the city grow and enable better town planning in the future."

Member of the public

Negative / unfavourable / opposing comments

The most common unfavourable comment centred on general opposition to the introduction of the Proposed Franchising Scheme (208). Other negative or unfavourable comments included concern about affordability and value for money (147), that there was a perceived lack of evidence that the proposal could work (113), concern about a failure of GMCA to deliver on its objective of improving services and overall passenger experience (76), concern that the Proposed Franchising Scheme may need to be subsidised by the public purse and the taxpayer (72).

"I cannot see how the proposed arrangements will make the bus services in my area better. They are poor because of topography, road layouts, congestion and demand. The proposals do not address these issues. I do not want to subsidise bus services any more than I do now."

Member of the public

Other, less frequently cited negative comments included concern about the timetable for the implementation of the Proposed Franchising Scheme (41), concern that GMCA may be taking on too much risk and responsibility for the Proposed Franchised Scheme (26), that bus services should not be publicly run (20), and that innovation might be stifled as there would be no advantage for bus operators to be innovative.

"There is genuine potential that a regulated regime may lead to the current innovative, customer focused approach taken by key current operators such as the Go Ahead Group, Stagecoach and Transdev being lost forever and those operators could well leave the region, creating large scale job losses and ensuring greater cost to taxpayers by removing their bus fleets and taking them elsewhere."

Member of the public

General comments

In addition to the receipt of favourable and unfavourable comments, there were also 278 members of the public who made more general comments about the introduction of the Proposed Franchising Scheme. The main comment was a suggestion that consideration should be given to hospital routes and passenger access to hospitals and medical centres (47 comments). Other less frequently cited general comments included an observation that passenger numbers have declined because of trams and the Metrolink (7), and that passenger numbers may have fallen because of roadworks, traffic congestion and poor traffic management (6).

4.2 Comments received about the Assessment

This section of the report provides a breakdown of the comments received from statutory consultees, non-statutory consultees, and members of the public who made comments about the Assessment.

The Assessment concludes that the Proposed Franchising Scheme is the best way to achieve GMCA's objectives to improve bus services. Participants were asked if they had any comments on this, and any other comments they may have had about the Assessment of the Proposed Franchising Scheme. In total, 3,403 participants provided comments on the Assessment, including 2,933 participants who provided favourable comments about the Assessment, and 502 participants who provided unfavourable comments. Table 4.4 shows the number of favourable and unfavourable comments received about the Assessment from statutory consultees, non-statutory consultees, and members of the public

Table 4.4 Favourable and unfavourable comments received about the Assessment

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?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (3,403)	2,933	502	+2,431
Statutory consultee (25)	14	9	+5
Non-statutory consultee (52)	45	9	+36
Member of the public (3,326)	2,874	484	+2,390

4.2.1 Statutory consultees

There were 25 statutory consultees who provided comments in reply to the Assessment. This included 14 statutory consultees who provided favourable comments, a further six who provided favourable comments on condition that the Proposed Franchising Scheme would result in an improved system, and nine who provided unfavourable comments. Please note that some of those who provided comments provided both favourable and unfavourable comments, and this means that the sum of the parts may add to more than the total number of consultees who made comments. The following sections break down the responses received by category.

Bus operators / transport organisations

Of those who made positive comments and/or were in favour, this included HCT Group which suggested that the Proposed Franchising Scheme was not only the best way to achieve objectives, but in its opinion, it was the only way to achieve objectives.

However, as some of the operators that provided a response did not agree with the Proposed Franchising Scheme and as such they did not agree with the conclusion of the Assessment. For example, Arriva UK Bus and First Manchester Ltd believed that a partnership option, and not the Proposed Franchising Scheme would be preferable.

"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."

Arriva UK Bus

Go North West Ltd also did not agree with the Proposed Franchising Scheme and the Assessment's conclusion. They stated that they did not agree that the Proposed Franchising Scheme would be the best way forward for GMCA to achieve objectives, and that GMCA should reconsider a proposal for franchising on a route-by-route basis, and that consideration should also be given to a partnership model.

Stagecoach Manchester was concerned in its opinion about how the Proposed Franchising Scheme would need public funding, with a number of negative associations. They challenged the Assessment and believed that it was based on an incorrect view of the market.

Rotala PLC reiterated its disagreement with the Proposed Franchising Scheme and suggested that a partnership would be able to achieve GMCA's objectives without significant risk to the public purse – it stated that the Assessment was in its words "fundamentally flawed".

"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... Rotala considers that the Assessment is fundamentally flawed on a number of levels. This includes that it is not based on 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."

Rotala PLC

Local authorities

Given that local authorities were largely in favour of the Proposed Franchising Scheme, most of those commenting on the Assessment were agreeable about its conclusion that it would best achieve GMCA's objectives. Those that provided positive comments included Salford City Council and Manchester City Council.

"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."

Salford City Council

While Trafford Council stated that it supported the proposal, and that the information within the consultation documents demonstrates great benefits, that future success of the bus network would depend on other issues being addressed, including securing new infrastructure to help improve reliability of bus services, and to reduce journey times. The Council also emphasised the importance of local plans.

"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."

Trafford Council

Bolton Council also agreed with the proposal provided any risks were mitigated and managed and the benefits shared. While Rochdale Council was in agreement, it stated that more evidence would be required to demonstrate that the proposal would deliver all of the aims as set out in the consultation document to the satisfaction of bus users. Stockport Council also had some concerns too.

"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."

Stockport Council

Despite strong support for the Proposed Franchising Scheme, a particular concern raised among local authorities outside of the Greater Manchester area was how cross-boundary services might be affected. For example, while Chorley Council agreed with the proposal, it stated that there would be concerns with regard to the impact of cross boundary services. Rossendale Borough Council also cited cross-boundary concerns and mentioned that it would welcome ongoing dialogue with GMCA to ensure objectives are aligned with their objectives. Lancashire County Council also made mention of cross-boundary routes

and services and stated that how services operate across boundaries is of great importance for both GMCA residents and those of its neighbours.

However, while Blackburn with Darwen Borough Council mentioned that whilst there are potential implications for cross-boundary services which originate outside Greater Manchester, it agreed with the Assessment's conclusion and welcomed the assertion that GMCA would seek to maintain cross-boundary services working with its neighbours and operators to mitigate any adverse impacts. The Council also made a request so that its residents would benefit from the Proposed Franchising Scheme.

"...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."

Blackburn with Darwen Borough Council

Other statutory consultees

A small number of other statutory consultees also made comments on the Assessment. Some of those who made comments were supportive of the Assessment, while others were opposed and/or provided unfavourable comments or raised some concerns.

Of those who provided supportive and favourable comments about the Assessment, this included trade unions. Unite the Union believed that the proposal would give GMCA more control over services and ticketing.

Bus Users UK also suggested a partnership model, and stated that the Assessment would be better to focus on an analysis of the options rather than trying to find benefits of a Proposed Franchising Scheme. Whilst TUC North West thought there would be resultant benefits for passengers. TravelWatch NorthWest was also supportive.

"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."

TUC North West

4.2.2 Non-statutory consultees

Overall, there were 52 non-statutory consultees who commented on the Assessment. The following sections break down the responses received by category.

Academic Institutions

Academic institutions were largely in favour of the Assessment's conclusion that the Proposed Franchising Scheme would be the best way to achieve GMCA's objectives to improve bus services. Those

in support of the conclusion included Manchester Metropolitan University, Royal Northern College of Music, Mobilities Justice CIC, LTE Group, IPPR North, and the University of Manchester Students' Union.

"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."

Manchester Metropolitan University

While the University of Manchester also provided positive comments about the Assessment, it asked questions about safeguarding and monitoring performance against objectives.

"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 Franchising 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?"

The University of Manchester

Action groups

A small number of action groups provided comments about the Assessment. For the most part, comments received were positive and supportive of the Assessment. For example, Walk Ride Heaton stated that it agreed with the conclusions and was supportive of Franchising as an improvement compared against the current system. Bus4Us also agreed, and while Steady State Manchester stated that it broadly agreed with the Assessment's conclusions and mentioned the potential for the Proposed Franchising Scheme to make things better for passengers, the environment and would provide better value for money than a partnership. However, Sale Moor Community cast doubt that the Proposed Franchising Scheme would come into fruition.

"It will never happen and if it does Stagecoach Arriva etc will just run new companies off the road by putting more of their buses on same routes just like it did with Finglands."

Sale Moor Community

Transport stakeholders

A few of the non-statutory transport stakeholders agreed with the Assessment's conclusion. This included Ratp Dev which stated that it agreed, and that it appeared to be a good way forward. Tower Transit mentioned that Franchising could produce a more coherent, comprehensive, and coordinated bus

service than the current deregulated system. While Abellio stated that it did agree with the Assessment's conclusion provided that GMCA was able to allow open competition.

"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."

Abellio

OneBus also had concerns about how GMCA would be able to deliver on its own objectives to improve bus services, and believed there was no guarantee that objectives would be achieved. They also stated that whilst most of the detail in the Assessment relates to transition, it asked what would happen if funding was unavailable for Phase 2. It also believed that the Assessment had the wrong focus, and that it had failings.

"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."

OneBus

Charity / voluntary sector

Most of the charity and voluntary sector organisations that commented on the Assessment provided positive and supportive comments about it. This included Centre for Cities, Whalley Range Community Forum, Greater Manchester Disabled People's Panel.

However, while others in the sector also supported the Assessment, some of them believed that bus Franchising alone would not solve current issues. For example, while supportive of the Assessment's conclusion, Bolton CVC emphasised the importance of transport and stated that localities across Greater Manchester would need to be given equal opportunity to feed into future proposals and to help shape future transport. Dunham Massey National Trust also stated it would support the proposal and Assessment on provision that improvements could be realised.

"We would support the scheme if it improves: 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)."

Dunham Massey National Trust

Elected representatives

Of the small number of elected representatives who provided comments about the Assessment, all were in support in its conclusions. This included Barbara Keeley (MP for Worsley and Eccles South), Jonathan Reynolds (MP for Stalybridge and Hyde), and Councillor Charlotte Morris (Labour Member for Elton).

"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."

Jonathan Reynolds, MP for Stalybridge and Hyde

Environment, heritage, amenity or community groups

All of the environment, heritage, amenity or community groups that provided comments about the Assessment's conclusions were supportive. This included Transition Buxton, Northern Neighbourhood Forum M22, Withington Civic Society, Chorlton Voice, and Manchester Local Care Organisation.

Other non-statutory consultees

A broad range of other non-statutory consultees also provided comments about the Assessment, with most being supportive of its aims and objectives. Those in support included SE Manchester Community Rail Partnership, Scott-Grant Ltd, Bruntwood, Oxford Road Corridor, The Northern Care Alliance NHS Group, Manchester NHS Foundation Trust, INTU Trafford Centre, and Bryn and Makerfield Rug.

Very few of the organisations disagreed with the Assessment's conclusion, but one of the organisations that did so was an organisation that stated it was a passenger user group without elaborating further. The organisation stated that it disagreed because GMCA in its opinion already had this conclusion before it started any work.

4.2.3 Members of the public

Overall, there were 3,326 members of the public who provided comments about the Assessment. This included 2,874 participants who provided favourable comments, and 484 participants who provided unfavourable comments.

Of those who made favourable comments, the main comments cited by frequency of response were general support for the Assessment's conclusion (1,975), followed by positive comments about how bus services would be improved (261), made more widely available (237), and that ticket prices would be reduced so that passengers would receive better value for money (202).

"I agree, anything that brings a more joined up service to improve bus services is welcome."

Member of the public

"I strongly agree that the Proposed Franchising Scheme is the best way to deliver the GMCA's objectives. It offers significant improvements to the passenger experience and bus market and makes major contributions towards the delivery of Greater Manchester's strategic priorities."

Member of the public

Other, less frequently cited favourable comments included favourable comments about how the Proposed Franchising Scheme would be improved, based on the system in other cities such as London (175), that bus services will be provided for the public's benefit (52), and that newer, cleaner, and more modern buses would be introduced (39).

In addition to the favourable comments received, there were also 182 members of the public who endorsed the Assessment on condition that the Assessment would lead to a new model that would be effective and would meet objectives. Many of the comments received provided support for the Assessment provided that the Proposed Franchising Scheme would be done properly (126 comments). There were also 19 favourable comments on condition that the Proposed Franchising Scheme would lead to a reduction in ticket prices, and nine favourable comments provided the proposal would improve the punctuality of buses so that they could be more reliable than perceived to be at present.

"Only if you can afford it - affordability is clearly a key issue. It's no use Franchising and then having to cut services and increase fares - that's what operators do, and you say you don't like."

Member of the public

Of course, not all made favourable comments. Overall, there were 484 members of the public who raised concerns or made unfavourable comments about the Assessment. While many of these participants were also opposed to the introduction of the Proposed Franchising Scheme, some of those in support of the proposal also raised concerns or made unfavourable comments about the Assessment. The main unfavourable comments by frequency of response were general disagreement with the Assessment (164), concerns about affordability and cost of the Proposed Franchising Scheme (78), concern that the Proposed Franchising Scheme was not proven to work (62), that the Proposed Franchising Scheme did not go far enough (51), and a belief that the Assessment's consultation was that it was not impartial or that it was biased (36).

"From everything mentioned in the consultation documents I fail to see how this can be the case. This is for a number of reasons. It appears to be based on a lot of assumptions. There is no evidence that all alternative options have been considered, i.e. better TfGM ticket products, studies of systems operated by other local authorities where bus usage is increasing. Proposing that areas that currently have some of the worst service provisions are exempt from Franchising initially. Moving the increases in fares over to the public's council tax bills. Further work must be done before GMCA rush into this idea and risk wasting taxpayer's money on an ideal."

Member of the public

Other, less frequently cited unfavourable comments included criticism of the track record of TfGM and or GMCA (30), concerns that the taxpayer would have to fund the Proposed Franchising Scheme (29), concern that the Proposed Franchising Scheme would not deliver an improved customer experience (25), and a belief that a partnership opinion would be a preferred or better option to the Proposed Franchising Scheme (24).

There were also 357 members of the public who made suggestions about the Assessment. A range of different suggestions were made, and these included comments that consideration should be given to reorganising the routes and/or timings of bus services (12), that a trial of pilot should be considered (10), that services should run for 24 hours a day, 7 days a week (7), and that consideration should be given to the introduction of free bus travel (6).

“All buses should run all year round even Christmas Day, Boxing Day and New Year’s Day like it was when it was GM buses. Think of all the people going to work or going to visit family and friends over these 3 days - run a public service 365 days a year and not when they want to run (as) people need to travel on these days.”

Member of the public

It was also notable that 167 members of the public made suggestions about the Proposed Franchising Scheme that had already been considered by TfGM in preparing its assessment. This included a suggestion that consideration should be given to roadworks, congestion and traffic management (43 comments), that disabled, elderly and vulnerable passengers should be considered (22), and that local infrastructure should be improved, including provision of additional bus lanes (19).

As well as favourable and unfavourable comments and suggestions received about the Assessment, there were also 101 members of the public who made general comments about the Assessment. The main comment was whatever was the best option should be the option taken forward (27).

5. Proposed changes to the Proposed Franchising Scheme

5.1 Overall views on proposed changes made to the Proposed Franchising Scheme

This chapter summarises the responses on whether respondents were able to suggest any changes that would improve the Proposed Franchising Scheme (Q46 of the consultation response form) and the likelihood of them supporting the Proposed Franchising Scheme if the changes were made (Q47 of the consultation response form).

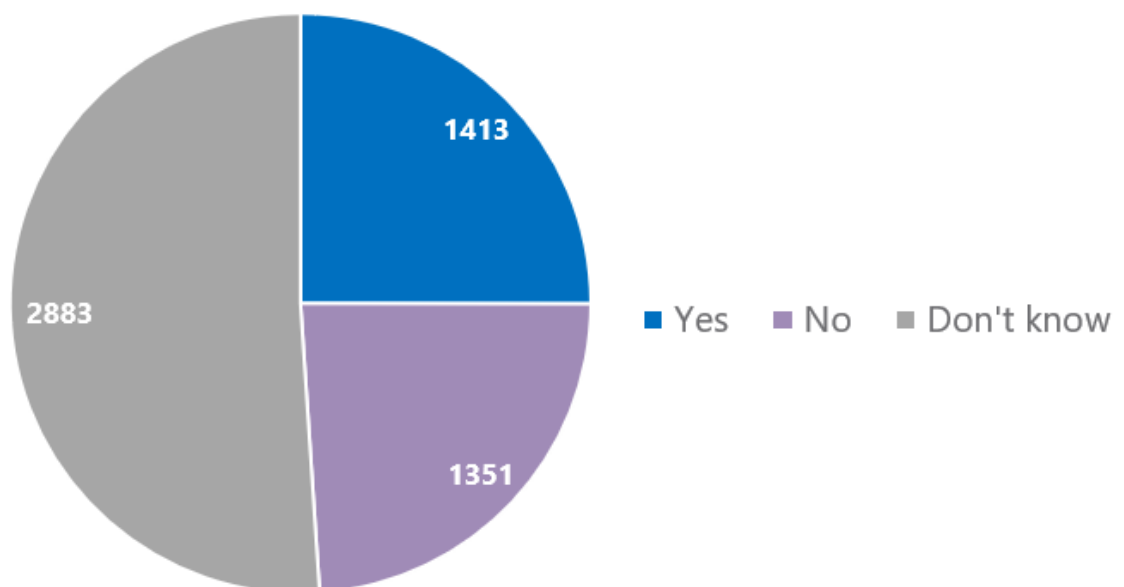
Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

Q46a. Are there any changes that you think would improve the Proposed Franchising Scheme?

- ☐ Yes
- ☐ No
- ☐ Don't know

Q46b. Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.

Figure 5.1 Number of those who had changes which would improve the Proposed Franchising Scheme



5.1.1 Statutory consultees

There were a number of statutory consultees that suggested changes which they thought would improve the Proposed Franchising Scheme. The following sections break down the responses received by each category of consultee.

Bus operators / transport organisations

A number of bus operators and transport organisations provided details on the changes they thought would improve the Proposed Franchising Scheme.

Those who were supportive of the Proposed Franchising Scheme and had changes which they thought would improve it, such as Warrington's Own Buses, suggested that small and medium sized enterprises (SMEs) should be eligible for large franchising contracts. HCT Group on the other hand suggested embedding social value and community transport into the Proposed Franchising Scheme.

Bus operators who were not supportive of the Proposed Franchising Scheme suggested more large-scale changes, with some suggesting alternatives to the Proposed Franchising Scheme itself, such as Stagecoach Manchester and First Manchester Ltd who advocated a partnership led approach. Arriva UK Bus suggested that consideration must be given to ensure operators and their employees are not negatively affected.

"...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."

Arriva UK Bus

Go North West Ltd suggested a number of changes to the Proposed Franchising Scheme with the aim of improving its feasibility, with a particular focus on franchising by routes rather than by sub-area. However, if franchising was to go ahead by sub-area, they suggested there should be time allowed to refine the Proposed Franchising Scheme which will improve the remaining roll-out. Go North West Ltd's other suggested changes included not providing depots for large franchisees and altering the timetable for operators to acquire them in advance of bidding.

Belle Vue (MCR) Ltd suggested that smaller and medium sized operators should be provided with grants or subsidies as they previously expressed that the Proposed Franchising Scheme would be unfair to smaller-sized operators.

Local authorities

While many local authorities were supportive of the proposal, there were some that provided suggestions on how they thought the Proposed Franchising Scheme might be enhanced.

Suggestions from Rochdale Borough Council and Tameside Metropolitan Borough Council revolved around conducting further analysis on current routes to identify issues with the current offer, as well as allowing time after franchising has been implemented so improvements can be identified.

"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."

Tameside Metropolitan Borough Council

Bolton Council suggested that consideration should be given to linking up buses with other modes of transport such as train and tram, which in their view would ultimately reduce reliance on car journeys. There was also a suggestion to focus on sustainable transport modes, such as cycling.

"...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."

Bolton Council

Cheshire East Council's suggestions related to the importance and timing of future GMCA consulting representatives of users on how well the Proposed Franchising Scheme is working; see further responses on this subject in chapter 6 (see section 6.9 covering question 9). In order to better evaluate the Proposed Franchising Scheme, the Council suggested that a consultation should be held *during* and before the expiry of the first franchised contracts as opposed to after those contracts had expired. They also go on to suggest that a consultation should align with the needs of the customers.

"...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...Cheshire East Council attaches high importance to the engagement and consultation with customers and users of services..."

Cheshire East Council

Stockport and Trafford Council both suggested that the locations for bus depots should be agreed with local authorities and impacts on the local area must be considered, such as local traffic levels, air quality and noise disturbance.

“...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.”

Stockport Metropolitan Borough Council

Salford City Council suggested that further information on the residual value mechanism, which would ensure that the appropriate standard for bus fleets are met, would be beneficial as they feel there could be a risk that outdated buses could be reused under the mechanism. The Council also suggested changing Irlam and Cadishead from Zone C to Zone A if the Proposed Franchising Scheme was to go ahead.

“...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 residual value mechanism. There may be a risk that outdated buses and equipment are retained in Greater Manchester through this mechanism...Further information on the mechanism for ensuring that fleets remain current and meet appropriate standards would be beneficial to ensure that passengers are protected.”

Salford City Council

Other neighbouring local authorities, such as West Yorkshire Combined Authority, suggested adopting national standards, such as ‘TransXchange’ and ‘SIRI’ to enable easier communication with neighbouring authorities and non-franchise operators running into the Greater Manchester area. Blackburn with Darwen Borough Council, on the other hand, requested they be part of the decision making process in relation to the granting of service permits.

Other statutory consultees

Among the other statutory consultees, Unite the Union, Transport Focus and Bus Users UK suggested changes they thought would improve the Proposed Franchising Scheme.

Unite the Union suggested implementing protection for bus workers’ pay and their pensions. They went on to suggest that bus workers should have the ability to re-join the Local Government Shared Services (LGSS) or establishing a Greater Manchester bus workers specific pension, which would require franchisees to join and contribute to.

Transport Focus set out a number of changes they would like to see implemented to improve the Proposed Franchising Scheme.

- Investing in a *critical friend* who would be able to *articulate the passenger voice*. This change was echoed by Bus Users UK.

- Setting up a *passenger promise* which would explain the services available to passengers, compensation for delays and disruptions, and rights of passengers (which should comply with EU Passenger Rights Regulations).
- Prioritising infrastructure which would make buses more competitive to cars, such as bus lanes and bus specific traffic light technology.

5.1.2 Non-statutory consultees

There were a number of non-statutory consultees who felt there were changes that would improve the Proposed Franchising Scheme. The following sections break down the responses received by each category of consultee.

Academic institutions

Burnage Academy for Boys suggested that the Proposed Franchising Scheme should provide free travel for young people and that there should be even more competitive pricing than is currently available.

The University of Manchester Students' Union suggested placing more focus on accessibility and sustainability of services. They also suggested further engagement with local communities to ensure that services align with demand. Manchester Metropolitan University on the other hand felt that further developments are needed for the infrastructure of bus services.

"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."

University of Manchester Students Union

Action groups

Bus4Us suggested allowing neighbouring authorities to opt into the Proposed Franchising Scheme for certain routes.

Transport stakeholders

There were several non-statutory transport stakeholders who provided changes which would improve the Proposed Franchising Scheme.

Both RATP Dev and Manchester Airports Group suggest fare integration with other modes of transport such as Metrolink and train, as well as sustainable methods of transport which are becoming more widely available.

"...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."

Manchester Airports Group

Abellio, while supportive of the Proposed Franchising Scheme, suggest implementing a delay in the procurement programme which they feel will ensure equal opportunities for all franchise bidders.

"The ability of GMCA to provide depot premises for large franchises is central to ensuring effective competition in the procurement process...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..."

Abellio

Charity / voluntary sector

The suggested changes by charity and voluntary sector consultees mainly revolved around accessibility features on buses and upholding high standards of services for all age groups.

Whalley Range Community Forum suggested that buses must not exclude access to any age groups. The Proud Trust express similar changes by asking for concessionary passes to be inclusive of even younger age groups.

"£10 for Our Pass¹⁹ is ok, but extend to include under 16's, as LGBT+ youth groups start at 13 years."

The Proud Trust

Friends of Patricroft Station suggested a bigger emphasis on integrated fares and services, including with different modes of public transport.

The Equalities and Human Rights Commission suggested improvements which focus on ensuring that bus services meet legislative accessibility requirements and are equipped with facilities for those with accessibility requirements. The consultee also suggested that those with protected characteristics should have sufficient input into the design of reform (including design of physical infrastructure).

"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...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..."

The Equalities and Human Rights Commission

¹⁹ 16-18 bus pass which allows travel on all buses across Greater Manchester

Other consultees

A number of other non-statutory consultees also suggested changes which they thought would improve the Proposed Franchising Scheme.

The Manchester Local Care Organisation suggested that consideration should be given to providing consistent health & social care worker discount on buses to ensure the labour market can reach as far as possible. Manchester University NHS Trust on the other hand suggested that environmental improvements to the fleet should be fully costed and implemented within the first phase of rollout.

"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... 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."

Manchester Local Care Organisation

Altrincham Business Improvement District highlighted a number of changes which they thought would improve the Proposed Franchising Scheme, including:

- A programme of research which would identify if existing services meet current and future demand. This suggested change is echoed by The Chartered Institute of Logistics and Transport - North West Policy Group.
- Promotional activities which would accompany the Proposed Franchising Scheme with the aim to increase patronage.
- Shuttle buses in town centres, which would operate in a similar fashion to shuttle buses in Manchester City Centre i.e. hop-on, hop-off.
- Consideration being given to future housing developments and creating transport links within them to reduce congestion and car usage.

Other suggested changes included Chorlton Voice who propose that a representative group of passengers who would work with Transport for Greater Manchester to ensure services are meeting customer demand and objectives of the Proposed Franchising Scheme being expanded and developed further once it has been rolled out.

"...We would also expect to see a passenger stakeholder group operating alongside TfGM."

Chorlton Voice

5.1.3 Members of the public

One quarter of the public (25%) who answered the question using the response form suggested changes which they thought would improve the Proposed Franchising Scheme. A slightly smaller proportion (24%) did not have any changes and more than half (51%) were unsure and said they don't know.

The suggestions provided by members of the public across all response channels (including the response form and via email and letter in the post) are set out below.

Suggested changes to the Proposed Franchising Scheme

Overall, 1,110 members of the public provided suggestions which they thought would improve the Proposed Franchising Scheme. There were 399 members of the public who suggested changes to the Proposed Franchising Scheme, 641 who provided suggestions already covered by the Proposed Franchising Scheme and 228 other suggestions. The most cited suggested changes to the Proposed Franchising Scheme include:

- Reducing journey times and providing direct or express services on certain routes (61 responses)

"We need more express routes so that buses have a rapid transit element - this is the only way to increase usage."

Member of the public

- Providing bus passes or subsidised travel to children, students and young people (38)
- Consideration being given to cross-boundary services (38)

"A requirement to join up in some small way with bordering bus operators. For example I live in Orrell, Wigan which borders west Lancashire, and I work 12 miles away in west Lancashire too, but I currently cannot travel easily by bus to work because it crosses borders."

Member of the public

- Bus services being run 24/7, every day of the year (33)
- Allowing cyclists to bring cycles on buses and the provision of more cycle lanes (28)

"I would like to see a focus on cycling integration as well as metro etc. The buses could have bike racks on front and rear where they can provide important hops between bike routes."

Member of the public

Less-often cited suggested changes to the Proposed Franchising Scheme include consideration being given to advertising and marketing to increase bus patronage (25), implementing bus conductors or

ticket inspectors on services (20), introducing 'travel zones' similar to that on the Metrolink (19) and the introduction of free bus travel (17).

Suggested changes to the Proposed Franchising Scheme already included within the Proposed Franchising Scheme

There were 641 members of the public who suggested changes which were already covered by the Proposed Franchising Scheme. The most cited suggested changes include:

- Improving infrastructure for buses such as bus priority measure, bus lanes and bus only routes (118)

"In order to maximise the effects with franchising, local authorities must look at how they can streamline bus journeys, including through the use of red routes, removing car parking spaces, increasing bus lanes, and the introduction of bus gates."

Member of the public

- Consideration being given to:
 - Roadworks, congestion and traffic management (114)
 - The disabled, elderly, or vulnerable passengers (96)

"Local control should be responsive to local voices i.e. concern about local air quality, routes and timing. Elderly people need easy transport or become excluded."

Member of the public

- Reorganising routes and timings of services (53)

Less often cited suggested changes which were already covered by the Proposed Franchising Scheme include free bus passes for the disabled, elderly, or vulnerable passengers (42), and more investment for buses (41).

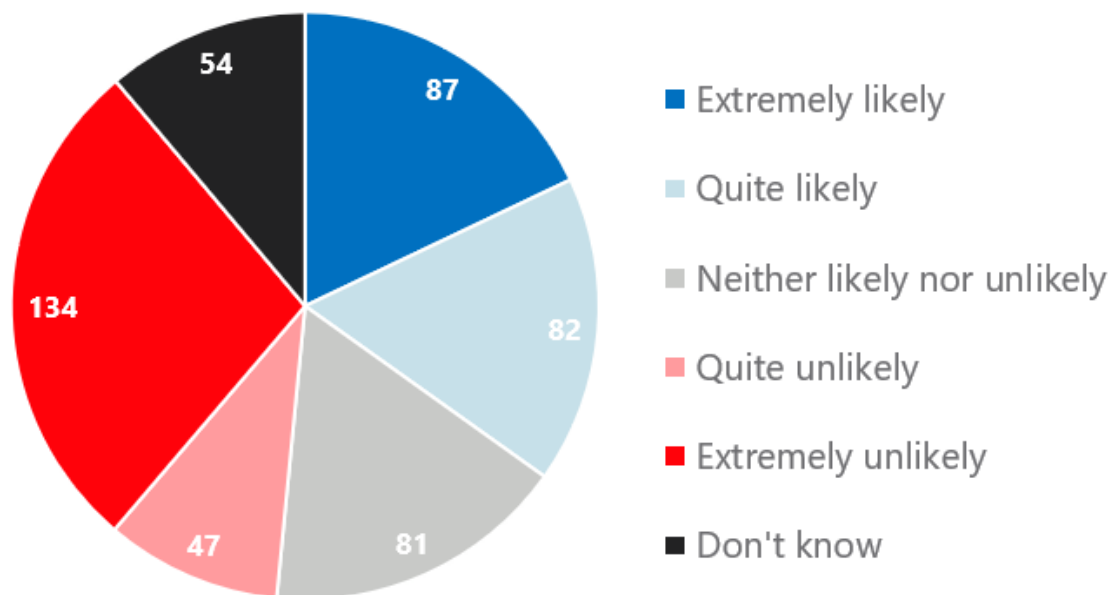
Other suggested changes

In addition to the suggested changes to the Proposed Franchising Scheme and those already covered by the Proposed Franchising Scheme, there were 228 members of the public who suggested other changes. These included bus services being publicly owned and run for public benefit (95) and consideration being given to funding from central government (75). Less frequently suggested changes include nationalising bus services (29), bus services being run by a single TfGM/GMCA owned operator (15) and giving TfGM/GMCA ownership of bus services (12).

5.2 Likelihood of support if suggested changes were made

Those who opposed the introduction of the Proposed Franchising Scheme and responded via the consultation response form were asked how likely they would be to support the Proposed Franchising Scheme if the changes they suggested were made. Of the 485 participants who answered the question, 35% would be likely to support the introduction of the Proposed Franchising Scheme, with 18% saying they would be extremely likely and 17% quite likely. Under two in five (37%) would be unlikely to support the Proposed Franchising Scheme if the changes they suggested were made, with 28% saying they would be extremely unlikely and 10% quite unlikely. Less than one in five (17%) were neither likely nor unlikely to be supportive.

Figure 5.2 Likelihood of support for Proposed Franchising Scheme if suggested changes were made



Base: 485 participants who oppose the introduction of the Proposed Franchising Scheme and answered Question 47 on the response form

Of 482 members of the public who completed the question on the consultation response form, 37% would be unlikely to support the introduction of the Proposed Franchising Scheme if the changes they suggested were made. Slightly fewer would be supportive (35%). There were three statutory and non-statutory consultees who completed the question on the consultation response form. Two non-statutory consultees were extremely unlikely to be supportive of the Proposed Franchising Scheme if their changes were made, whereas one statutory consultee was neither likely nor unlikely to be supportive. The table below summarises the participants who provided a response to this question (combining 'extremely' and 'quite' likely/unlikely).

Table 5.1 Likelihood of support of the Proposed Franchising Scheme if changes were made²⁰

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?	Likely	Unlikely	Net likely +/-
All who provided a response (485)	169	181	-12
Statutory consultee (2)	-	1	-1
Non-statutory consultee (1)	-	1	-1
Member of the public (482)	169	179	-10

²⁰ Excludes 'neither likely nor unlikely' and don't know responses

6. The Proposed Bus Franchising Scheme

This chapter analyses the responses to the questions posed about the Proposed Bus Franchising Scheme at the start of the long version of the response form. It covers the:

- Proposed corrections and changes made to the Proposed Franchising Scheme;
- Proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester;
- Local services which are proposed to be franchised;
- The services which have been excepted from regulation under the Proposed Franchising Scheme;
- Date on which the Proposed Franchising Scheme is currently proposed to be made;
- Dates by which it is proposed that franchise contracts may first be entered into;
- Nine-month period it is proposed will expire between entering into a franchise contract and the start of a service under such a contract;
- Proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working;
- GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme; and 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.

Due to the relatively smaller number of responses to the questions in this section, each sub-section is not always broken down into types of statutory/non-statutory consultees unless necessary.

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

6.1 Overall views on corrections and changes made to the Proposed Franchising Scheme

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.

Consultees were asked if they had any comments on corrections and changes made to the Proposed Franchising Scheme. As Table 6.1 shows, there were 323 consultees who provided comments, and this included 209 who made favourable comments, and 42 who made unfavourable comments.

Table 6.1 Favourable and unfavourable comments received on the corrections and changes made to the Proposed Franchising Scheme.

Q1. Do you have any comments on the corrections and changes made to the Proposed Franchising Scheme?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (323)	209	42	+167
Statutory consultee (5)	4	1	+3
Non-statutory consultee (8)	3	2	+1
Member of the public (310)	202	39	+163

There were also 171 consultees who made suggestions, and eight consultees who made general comments. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public. It should be noted here that many of those who made comments at this question made comments about other matters, rather than about changes and corrections to the Proposed Franchising Scheme.

6.1.1 Statutory consultees

Very few statutory consultees commented on corrections and changes to the Proposed Franchising Scheme. Of those who did provide comments, TravelWatch NorthWest stated that it was happy with the proposal, and Bolton Council stated that it had no objections.

"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."

Bolton Council

Go North West Ltd mentioned that while it had noted some changes, that in its opinion such changes would not have an effect on the Proposal Franchising Scheme, and that it had failed to tackle congestion.

"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...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.'"

Go North West Ltd

6.1.2 Non-statutory consultees

Of the non-statutory consultees who provided comments on the corrections and changes made to the Proposed Franchising Scheme, three consultees provided favourable comments, whilst a further two consultees provided unfavourable comments. Of those who provided favourable comments, they included single comments that bus fares and ticket prices would be reduced, that anything would be an improvement compared to the system at present, and general support for the proposed amendments.

Of those who provided unfavourable comments, these included single comments including a belief that TfGM and GMCA would lack expertise to oversee the introduction of the Proposed Franchising Scheme, concern about employees of bus operators, worry about how standards would be monitored, and a view that there was a lack of evidence as to how successful bus franchising schemes might be.

OneBus mentioned that it had no comments as it had not been given access to the original draft proposal so that it could compare and contrast as to what the changes and amendments were.

6.1.3 Members of the public

There were 310 members of the public who provided comments on changes or corrections made to the Proposed Franchising Scheme. This included 202 consultees who made favourable comments, and 39 consultees who made unfavourable comments.

Of those who made favourable comments, the main comment was about general agreement and support for the proposed changes and amendments. Other, less frequently cited favourable comments tended to merge in with overall support of the Proposed Franchising Scheme, including that it would simplified ticketing and fares (44), that it would allow bus services to be integrated into the wider public transport network (40), support for bus services being run by a single operator (21), that there were too many operators at present (19), and that bus services would be run for the public good, rather than commercial reasons (13).

"I am happy with the corrections and changes made."

Member of the public

There were 38 members of the public who provided unfavourable comments about the proposed changes and corrections to the Proposed Franchising Scheme. Such comments included general opposition (12), that proposals were not ambitious enough (6), and concern about how workable or viable the proposals could be (5).

In addition to favourable and unfavourable comments received, 167 members of the public also made suggestions. Of these, 18 members of the public made suggestions that had not currently been considered by the Proposed Franchising Scheme, including comments about more needing to be done to address empty buses and those not at maximum capacity (5). However, most of those who made suggestions (153 members of the public), suggested aspects already incorporated into the Proposed

Franchising Scheme, including comments about improving bus services (45), improving reliability of services (40), and reducing ticket prices (33).

6.2 Applicability to entirety of Greater Manchester

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.

In total, there were 818 consultees who provided comments about if the Proposed Franchising Scheme should apply to the entirety of Greater Manchester. As Table 6.2 shows, of those who made comments, they included 695 consultees who made favourable comments, and 67 consultees who made unfavourable and comments.

Table 6.2 Favourable and unfavourable comments received on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?

Q2. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (818)	695	67	+628
Statutory consultee (16)	12	5	+7
Non-statutory consultee (24)	18	3	+15
Member of the public (778)	665	59	+606

In addition, there were 261 consultees who made suggestions, and 19 consultees who made general comments. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.2.1 Statutory consultees

Many of the statutory consultees who provided comments made favourable comments in support of the Proposed Franchising Scheme covering Greater Manchester in its entirety. This included TravelWatch NorthWest which stated that it was happy with the approach. Bolton Council believed that complete coverage would ensure consistency in standards.

"The Franchising scheme should apply to the whole of Greater Manchester to ensure consistency in standards."

Bolton Council

However, not all of those who provided comments were supportive of a uniform approach. Go North West Ltd thought that the Proposed Franchising Scheme should not apply to the entirety of Greater

Manchester and should first be trailed in Sub Area A first. Rotala PLC stated that the Proposed Franchising Scheme should not be implemented at all (regardless of whether it is applied to the whole of Greater Manchester or not) and advocated a partnership approach.

“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 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.”

Rotala PLC

“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.”

Go North West Ltd

Stockport Metropolitan Borough Council requested in its words “proper engagement” outside of Greater Manchester for services that cross its southern borders, including High Peak and Cheshire East.

Stagecoach Manchester put forward an alternative approach of a partnership in south of Manchester only.

“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.”

Stagecoach Manchester

6.2.2 Non-statutory consultees

Most of the non-statutory consultees made comments in favour of the Proposed Franchising Scheme covering the entirety of Greater Manchester. Those who made favourable comments included The University of Manchester, Steady State Manchester Collective, Kate Green (MP for Stretford and Urmston), Manchester Friends of the Earth, The Chartered Institute of Logistics and Transport – North West Policy Group, and OneBus.

“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...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.”

The University of Manchester

However, despite being in support of application across the entirety of Greater Manchester, some of the non-statutory consultees who made comments raised issues of concern. For example, Steady State Manchester Collective thought that as only Mayor-led metropolitan authorities are able to take the Franchising option, it could make it difficult to plan effectively for routes into and out of the conurbation. Others, including Manchester Friends of the Earth also raised concerns or questions about cross boundary services, even if as acknowledged this was outside of the scope of the consultation.

"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."

Manchester Friends of the Earth

6.2.3 Members of the public

Of 778 members of the public who provided comments on the proposal that the Proposed Franchising Scheme should apply to the entirety of Greater Manchester, the majority (665) made favourable comments about this proposal, while 59 made unfavourable comments.

The main favourable comment received were general comments in support of the proposal (600). Other, less frequently cited favourable comments were that application to the entirety of Greater Manchester would result in better coordination and integration of bus services into the wider public transport network (83), that a more simplistic ticketing system could be introduced (50), and that bus services across the entire city region could then be run by a single operator (35).

"Given the nature of the areas that bus passengers travel between for both work and leisure it's essential that the Franchising Scheme covers the whole of Greater Manchester."

Member of the public

Of those who made unfavourable comments they included general opposition or disagreement with the proposal (16), concerns about cost and affordability of the proposal (8), that reform was not required as bus services were performing well (6), and a view that Manchester would be too diverse to have a uniform system across the entire region (5).

Of those who made suggestions about the proposal, these included that there should be consideration for cross-boundary services (57 comments), that the Proposed Franchising Scheme should be extended beyond the boundary of Greater Manchester (18). Other suggestions already being considered were that bus services across the region should be improved (35), that ticket prices should be reduced (26), and reliability of the service should be improved (26).

"I think it should apply entirely within Greater Manchester with connecting services running out of the region to border towns."

Member of the public

6.3 Local services proposed to be franchised

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.

Consultees were asked to comment on local services that are proposed to be franchised. As Table 6.3 shows, there were 512 consultees who provided comments on this, including 293 who provided favourable comments, and 76 who provided unfavourable comments.

Table 6.3 Favourable and unfavourable comments received on local services that are proposed to be franchised

Q3. Do you have any comments on the local services that are proposed to be franchised?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (512)	293	76	+217
Statutory consultee (14)	8	6	+2
Non-statutory consultee (14)	9	1	+8
Member of the public (484)	276	69	+207

There were also 270 consultees who made suggestions, and 16 consultees who made general comments. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.3.1 Statutory consultees

Of the 14 statutory consultees who provided comments about local services proposed to be franchised, eight provided favourable comments, and six provided unfavourable comments. Of those who made favourable comments, this included comments in general support of this aspect of the proposal (4), about how bus services could be integrated into the wider public transport network (2), and about how bus services would be run for the public good as a result of the proposal (2).

Unfavourable comments included two comments concerning costs and affordability issues, and two comments about services that would be excluded. Go North West Ltd was particularly concerned about exclusion of services operating from Queens Road depot.

"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."

Go North West Ltd

Of those who made suggestions, they included a belief that inclusion of cross-boundary services would be essential to maintain a regular and continuous service, and to protect revenue of bus operators.

6.3.2 Non-statutory consultees

There were also 14 non-statutory consultees who made comments on local services that are proposed to be franchised. These included nine consultees who made favourable comments, and one consultee who made unfavourable comments. Of those that made favourable comments, they included four comments in support of including as many local services as possible, and three comments in general agreement with the proposal. On the other hand, the consultee who made unfavourable comments raised concerns about accessibility issues, and worried about failure to deliver an improved customer or passenger experience.

6.3.3 Members of the public

There were 276 members of the public who made favourable comments, while 69 members of the public made unfavourable comments.

The main favourable comments received were comments in general agreement with the proposal to franchise local services (128). This was followed by comments supporting the franchising of as many local services as possible (69), that services would then be joined up and integrated into the wider public transport network (40), and that bus services would be controlled by a single operator (21).

"I agree that all local bus services should be included in the franchise scheme."

Member of the public

Of those who made unfavourable comments, they included general disagreement or opposition to the proposal (18), concerns about affordability and cost (9), unfavourable comments about services that might be excepted (9), and a view that the proposals did not go far enough, or were not ambitious enough (6).

"Local services should not be franchised, as it removes any possibility of entrepreneurs entering the market, not just other large group subsidiaries."

Member of the public

As well as favourable and unfavourable comments received, 255 members of the public made suggestions. These included suggestions that consideration should be given to cross-boundary services (14), and that consideration should be given to reducing journey times, such as through the introduction

of direct or express services (12). Others who made suggestions included what was already considered as part of the proposal, including to make services more reliable (62 comments), to improve local bus services (48), and that bus services should be reformed (42).

6.4 Sub-areas

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.

Consultees were asked to comment on the proposal that the Proposed Franchising Scheme is split into three sub-areas and on other arrangements proposed for the purposes of transition. As table 6.4 shows, there were 506 consultees who provided comments about this, including 192 who made favourable comments, and 173 who made unfavourable comments.

Table 6.4 Favourable and unfavourable comments received 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

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?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (506)	192	173	+19
Statutory consultee (15)	8	7	+1
Non-statutory consultee (24)	10	14	-4
Member of the public (467)	174	152	+22

There were also 220 participants who made suggestions, and 43 consultees who made general comments. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.4.1 Statutory consultees

There were 15 statutory consultees who made comments about this aspect of the proposal. They included eight consultees who made favourable comments, and also seven consultees who made unfavourable comments. In terms of favourable comments received, each of the eight comments were in general agreement with the proposal, with three comments adding that the proposed transition would ensure that any teething issues in one area could then be resolved for the other two areas.

“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.”

Bolton Council

While Manchester City Council stated that it understood the rationale for the approach, it requested that TfGM continue to consider how the transition could take place in a way that minimises disruption to bus users in the city.

While Go North West Ltd believed that in order for risk to be managed, and disruption minimised that it would be very important that any Proposed Franchising Scheme be implemented in a staged manner, the consultee believed that the timetable for each sub-area did not, in its opinion, represent a genuine trial. Go North West Ltd advocated route-by-route franchising which it believed would be more effective than sub-area by sub-area franchising.

“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...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.”

Go North West Ltd

Of other statutory consultees who made unfavourable comments about this aspect of the Proposed Franchising Scheme, it included five comments concerning timescales for implementation, three comments in general opposition to having sub-areas, and two comments about how the proposal might make things more complicated than might otherwise have been needed. Those who raised specific concerns or issues included Stockport Metropolitan Borough Council.

“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.”

Stockport Metropolitan Borough Council

6.4.2 Non-statutory consultees

There were 24 non-statutory consultees who made comments about the proposal to split the Proposed Franchising Scheme into three sub-areas. They included ten consultees who made favourable comments, and 14 consultees who made unfavourable comments. Of those that made favourable comments, seven were in general support of the proposal, and two comments about how issues arising in one of the areas could be ironed out and implemented in the other areas.

"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."

The University of Manchester

OneBus believed that while it was sensible to have sub-areas, that it would increase some challenges and introduce some complications.

"...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."

OneBus

Of those who made unfavourable comments, they included seven comments raising concerns about timescales and the length of the implementation period, three comments about how sub-areas could be unfair, and two comments about the timescale for delivery.

"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."

Manchester Friends of the Earth

In total, there were 12 non-statutory consultees who made suggestions about sub-areas. However, just four non-statutory consultees made suggestions that had not been considered in the proposals. For example, Kate Green, MP for Stretford and Urmston stated that while she understood the need for sub-areas, she did not wish to see some residents disadvantaged – she suggested that a form of compensation should be considered.

"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."

Kate Green, MP for Stretford and Urmston

6.4.3 Members of the public

There were 174 members of the public who made favourable comments about the Proposed Franchising Scheme being split into three sub-areas, and 152 members of the public who made unfavourable comments

The most frequently cited favourable comments were general agreement and support for the proposal (149), that it would allow time for bedding in and the resolution of teething problems (24), and that the proposal should be enacted as soon as possible given for some that bus service reform was long overdue (9).

"I believe this phased approach is the only way to ensure there is a smooth transition."

Member of the public

Of negative comments received, this included general opposition and disagreement with the proposal (54), concerns about timescales (31), a view that it would be unfair to make the changes to one area first before rolling it out to other areas (28), and that the proposal was complicated or made it more difficult that it might otherwise have needed to be (25).

"No, I don't think this should happen just get on with it the whole of Greater Manchester should be treated as a whole and equally and by setting up sub-areas that just leaves it open for delays and potential unfair treatment of different areas."

Member of the public

In total, 202 members of the public made suggestions about the proposal. A common suggestion (83 comments) was that the Proposed Franchising Scheme should be uniformly introduced across Greater Manchester with no split at all. Other suggestions made included that consideration should be given to cross-boundary services (14), that travel zones should be introduced (4), and/or that priority should be given to children and young people (4). While many other suggestions were also made, such suggestions tended to be aspects already considered and covered by the proposal, including the better coordination and integration of bus services into the wider local public transport network (9).

6.5 Services excepted from regulation

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.

Consultees were asked to comment on services which would be excepted from regulation under the Proposed Franchising Scheme. As Table 6.5 shows, there were 249 consultees who provided comments about this, including 105 who made favourable comments, and 52 who made unfavourable comments.

Table 6.5 Favourable and unfavourable comments received on the services which have been excepted from regulation under the Proposed Franchising Scheme

Q5. Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (249)	105	52	+53
Statutory consultee (9)	3	4	-1
Non-statutory consultee (8)	3	4	-1
Member of the public (232)	99	44	+45

There were also 131 consultees who made suggestions, and a further seven consultees who made general comments. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.5.1 Statutory consultees

There were nine statutory consultees who provided comments about services to be excepted from regulation under the Proposed Franchising Scheme. They included three consultees who provided favourable comments, and four consultees who provided unfavourable comments. Two of the statutory consultees who provided favourable comments offered general support for the proposal, and one of the statutory consultees was in agreement with the proposal that the Scholar's Service would be excepted.

Of those who provided unfavourable comments, they included single comments about timescales for delivery, and opposition to having the Scholars Service excepted from the Proposed Franchising Scheme. Go North West Ltd also queried how services would operate between sub-areas during the transition period.

"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."

Go North West Ltd

6.5.2 Non-statutory consultees

There were eight non-statutory consultees who provided comments about services excepted from regulation under the Proposed Franchising Scheme. These included three consultees who provided

favourable comments, and four consultees who provided unfavourable comments. Of those who provided favourable comments, they included two comments in favour of the exception of the Scholars Service, and single comments in support of the proposal and also support of services temporarily excepted, but to be included at a later date.

"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."

The University of Manchester

Of those that provided unfavourable comments, they included two comments raising concerns about services or routes being cut, and single comments raising concerns about increases in bus fares, reduction in the quality or service, and/or that not enough routes or services had been excepted.

6.5.3 Members of the public

There were 99 members of the public who made favourable comments about services excepted from regulation under the Proposed Franchising Scheme, and 44 members of the public who made unfavourable comments.

Of those who made favourable comments, the main comments were general comments in support of the proposal (58), followed by support for the Scholar's Service (20), and support for services temporarily excepted, but to be integrated at a later date (13).

"I don't see how there is any other sensible way to manage the transition that adopting the proposal. I would expect that the sub-areas have been considered sufficiently that these 'crossing over' services are minimised to avoid confusion and advertised appropriately during the transition to avoid people having the wrong ticket."

Member of the public

The main unfavourable comments were general disagreement or opposition to the proposal (13), and a view that the Scholars Service should not be excepted (11). Other, less frequently cited unfavourable comments included concerns about over-complicating the introduction of the Proposed Franchising Scheme (4), and concerns over the timetable (3).

"Although not serving the general public, 'Scholars' Services' must still be regulated in some way to ensure they offer affordability to families with school-age children. It is important that taking the bus to school is seen as a cheaper and more attractive option than driving, given the issues with air pollution and illegal parking around schools."

Member of the public

Overall, 121 members of the public made suggestions about services that would be excepted. A main comment here was that all bus services should be included in the Proposed Franchising Scheme, with no exceptions (60). A range of other suggestions were made, many of which already considered by the Proposed Franchising Scheme, including making services more reliable.

6.6 Date of implementation

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.

Consultees were asked to comment on the date on which the Proposed Franchising Scheme is currently proposed to be made. As Table 6.6 shows, there were 435 consultees who made comments about this, including 347 who made favourable comments, and 69 who made unfavourable comments.

Table 6.6 Favourable and unfavourable comments received on the date on which the Proposed Franchising Scheme is currently proposed to be made?

Q6. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (435)	347	69	+278
Statutory consultee (10)	3	4	-1
Non-statutory consultee (13)	7	5	+2
Member of the public (412)	337	60	+277

There were also 39 consultees who made suggestions about the proposed date of implementation. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.6.1 Statutory consultees

There were ten statutory consultees who provided comments about the date on which the Proposed Franchising Scheme is currently proposed to be made. These included three statutory consultees who provided favourable comments, and four statutory consultees who provided unfavourable comments. All three of those who made favourable comments were in general support of the proposed date of implementation. For example, Bolton Council stated that it had no objections to the date being proposed.

On the other hand, of those who provided unfavourable comments, they included four comments that it would be too soon to implement the Proposed Franchising Scheme, and a single comment about concerns regarding the impact of the proposal on quality of service.

“GNW has two major concerns about GMCA's proposed timetable for making the Scheme. 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... Secondly, GMCA does not appear to have taken into account the obligations and associated timescales for Greater Manchester bus operators to comply with CAZ.”

Go North West Ltd

6.6.2 Non-statutory consultees

There were 13 non-statutory consultees who provided comments about the date on which the Proposed Franchising Scheme is currently proposed to be made. These included seven consultees who provided favourable comments, and five consultees who provided unfavourable comments. Of those who provided favourable comments, they included five comments in support of the implementation of the Proposed Franchising Scheme as soon as possible, and two comments in general support of the proposed date of implementation.

Of those who made unfavourable comments, they included two comments about the proposed timescale to implement the Proposed Franchising Scheme, and single comments about general opposition to the proposal, and that it would be too soon, without enough time to prepare fully.

“This date seems very ambitious and we appreciate the references to it likely to change for various reasons as explained within the Assessment.”

OneBus

6.6.3 Members of the public

Most of those who made comments made positive comments about the proposed date of implementation of the Proposed Franchising Scheme. In total, 337 members of the public made favourable comments, while 60 made unfavourable comments.

Of those who made positive comments, a main comment was about general support for the introduction of the Proposed Franchising Scheme, including a view that it was long overdue (246). There were also 108 favourable comments in general support of the proposed date.

“I am surprised and excited that the date is closer than I expected. Given that the proposed franchise scheme is expected to be completely rolled out by 2023, this date seems well planned.”

Member of the public

Of those who made unfavourable comments, the main comments received were that the introduction of the Proposed Franchising Scheme would be too soon, and that there would not be sufficient time to properly prepare (19), general disagreement with the proposal (12) and concerns about delays to implementation (9).

"Ridiculously early. As usual, public transport decisions in this country are rushed for political purposes. Don't show us up by a rushed, half-baked half-arsed political stunt. If this is so important, and it is, why rush? This is what has caused some of the problems in mass public transport. No plan, just get it done. This council couldn't organise an egg hunt by March 2020, let alone this. Not realistic- if it gets delayed, we all look daft. If it doesn't, it will be daft."

Member of the public

There were 36 members of the public who made suggestions about the proposed date of implementation. A range of suggestions were made including that consideration should be given to cross-boundary services (3). However, many of the suggestions made were already covered as part of the Proposed Franchising Scheme, including comments about improving and reforming bus services (11), reducing ticket prices (5), and encouragement of bus usage (4).

6.7 Date contracts may first be entered into

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.

Consultees were asked to comment on the dates by which it is proposed that franchise contracts may first be entered into. As Table 6.7 shows, there were 363 consultees who provided comments, including 271 who made favourable comments, and 81 consultees who made unfavourable comments.

Table 6.7 Favourable and unfavourable comments received on the dates by which it is proposed that franchise contracts may first be entered into?

Q7. Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (363)	271	81	+190
Statutory consultee (11)	5	6	-1
Non-statutory consultee (9)	3	3	0
Member of the public (343)	263	72	+191

In addition, 47 consultees made suggestions about this aspect of the proposal. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.7.1 Statutory consultees

In total, there were 11 statutory consultees who provided comments about the dates franchise contracts may first be entered into. These included five who provided favourable comments, and six who provided unfavourable comments. Of favourable comments, these included four comments in general support of this aspect of the proposal.

"We accept the need for staging over that period of time."

TravelWatch NorthWest

Of those who provided unfavourable comments, these included four comments about timescales to deliver, and single comments about there not being enough time to fully prepare, and general opposition to the proposal.

"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 mid-1990s. The timetable proposed in the consultation does seem very quick considering the number of services involved."

Derbyshire County Council

"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."

Go North West Ltd

6.7.2 Non-statutory consultees

There were nine non-statutory consultees who provided comments about the dates by which it is proposed that franchise contracts may first be entered into. They included three consultees who made favourable comments, and three consultees who made unfavourable comments. Of favourable comments received, they included two comments about having the proposal brought forward as much as possible as it was believed reform was long overdue, and one comment in general support of what was being proposed. Of the two consultees who made unfavourable comments, they included one who was generally opposed to the proposal, and one who was concerned about timescales and the proposed transition period.

6.7.3 Members of the public

There were 263 members of the public who made favourable comments about the dates by which it is proposed that franchise contracts may be first entered into, and 72 members of the public made unfavourable comments.

Of those who made favourable comments, the main comments were in general support of the proposals, including a view that the dates should be brought forward as far as possible (203). Other favourable comments received included general support for this aspect of the proposal (63).

"These dates are appropriate. I believe the contracts should be entered into at the earliest possible opportunity."

Member of the public

Of those who made unfavourable comments. This included concerns about timescales for delivery and implementation (27), the length of the transition period (17), general disagreement or opposition (16), and a view that there would not be enough time to properly prepare (10).

There were also 41 members of the public who made suggestions. A number of suggestions were made, and these included that consideration should be made to cross-boundary services (3), and that Area A should be prioritised (2). Other suggestions were made about the proposal, but already incorporated, including about simplifying ticketing and reducing fares (4).

6.8 Nine-month period between entering in a franchise contract and start of 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?

For more information see paragraph 3.22 of the Consultation Document.

Consultees were asked to comment on the nine-month period it is proposed will expire between entering into a franchise contract and the start of service under such a contract. As table 6.8 shows, there were 457 consultees who provided comments about this, including 110 who made favourable comments, and 55 who made unfavourable comments.

Table 6.8 Favourable and unfavourable comments received 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

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?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-

All who provided a response (457)	110	55	+55
Statutory consultee (17)	10	6	+4
Non-statutory consultee (12)	3	3	0
Member of the public (428)	97	46	+51

In addition, 318 consultees made suggestions about this aspect of the proposal. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.8.1 Statutory consultees

In total, there were 17 statutory consultees who provided comments on the nine-month period it is proposed that will expire between entering into a franchise contract and that start of service under such a contract. These included 10 consultees who made favourable comments, and six consultees who made unfavourable comments. Of those who made favourable comments, they included seven comments in general support of the proposed time period, two comments about how the time period would allow operators to procure new vehicles, and two comments about how the time period would allow operators to recruit new staff.

"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)."

Tameside Metropolitan Borough Council

Of those who made unfavourable comments, they included two comments raising concerns about costs and affordability, two comments about the period being too short to allow full promotion and encouragement of increased bus usage and reduced car usage, two comments concerning timescales to deliver, and single comments about lack of transparency and openness, and that a partnership option would be a better solution.

"Rotala PLC 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."

Rotala PLC

Some of those who provided comments made observations and/or suggestions about this aspect of the proposal. For example, West Yorkshire Combined Authority believed that the nine-month period might need to be extended to give operators sufficient time to ensure their fleet could be as environmentally

sustainable as possible, and that operators should have engagement to ensure fleet commitments are attainable.

“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...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.”

West Yorkshire Combined Authority

Manchester City Council stated that if the Proposed Franchising Scheme went ahead, it would be keen to discuss the detail of transitional arrangements further as the process develops and to offer assistance in informing residents of the proposed transition process and in minimising any disruption during the period. And Arriva North West suggested that a longer period may be necessary.

“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.”

Arriva North West

6.8.2 Non-statutory consultees

There were 12 non-statutory consultees who made 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. These included three consultees who made favourable comments, and three consultees who made unfavourable comments. All three of those who made favourable comments made comments in general support of this particular aspect of the proposal. On the other hand, of those who made unfavourable comments, these included single comments raising concerns about the period being too short or too long, that it could inhibit competition, and general opposition to the proposal.

“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.”

Steady State Manchester Collective

6.8.3 Members of the public

There were 97 members of the public who made favourable comments, and 46 members of the public who made unfavourable comments. Most of those who made favourable comments made general comments in support of this aspect of the Proposed Franchising Scheme (96 comments).

“This should allow enough time for operations to be setup and the process to be finalised before the contract begins.”

Member of the public

In addition, there were 12 members of the public who provided favourable or supportive comments on condition that the proposal would be properly executed, that it would have rigorous checks and appropriate legal scrutiny, and that there would be openness, honesty and transparency.

In terms of unfavourable comments received, the main comments by frequency of response were about general opposition and disagreement (19), concerns about the quality of service (11), concerns about accessibility and that unprofitable routes may still be cut or reduced (6), and concerns about the timescale for delivery (5).

“Too long. Put the travelling public at the heart of this strategy. The bus companies need to get on board with this, we are not re-inventing the wheel here. All of this was done years ago in London.”

Member of the public

As well as favourable and unfavourable comments received, there were 301 members of the public who made suggestions about this aspect of the proposal. Such suggestions included that an extension should be allowed if it was needed (5), but conversely that an extension should not be allowed (5). However, the main suggested comment was that the nine-month period should be shorter, receiving 202 comments. There were also 40 suggested comments that the period should be six months (40), and 15 comments that the nine-month period should be longer.

6.9 Consulting on performance

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

For more information see paragraphs 3.23 to 3.24 of the Consultation Document.

Consultees were asked to comment on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme was working, once it had become operational. As Table 6.9 shows, there were 397 consultees who provided comments about this, including 99 who provided favourable comments, and 64 who provided unfavourable comments.

Table 6.9 Favourable and unfavourable comments received on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working

Q9. Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (397)	99	64	+35
Statutory consultee (23)	3	6	-3
Non-statutory consultee (26)	5	5	0

Member of the public (348)	91	53	+38
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In addition, 254 consultees made suggestions, and 20 consultees provided general comments about how performance could be evaluated. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.9.1 Statutory consultees

In total, there were 23 statutory consultees who provided comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working. These included three consultees who provided favourable comments, and six consultees who provided unfavourable comments. There were three favourable comments in general support of what was being proposed, and one favourable comment about how this would lead to increased accountability. On the other hand, unfavourable comments included four comments in disagreement with the proposed timeframe for evaluation, two comments about cost and affordability, and two comments about the proposed timescales for evaluation of the Proposed Franchising Scheme.

"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."

TravelWatch NorthWest

Some of those who provided comments raised questions about how the consultation would be effective.

"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."

Bolton Council

There were 22 statutory consultees who made suggestions about how GMCA should consult on how well the Proposed Franchising Scheme is working. For example, Arriva North West suggested 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. Cheshire West and Chester Council also considered it to be more appropriate to undertake consultation during the franchised contacts, prior to expiry. The Council believed that this would ensure that any requisite alterations and/or improvements could be addressed in successor franchised contracts.

"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."

Cheshire West and Chester Council

6.9.2 Non-statutory consultees

There were 26 non-statutory consultees who provided comments about proposals to consult on the performance of the Proposed Franchising Scheme. These included five consultees who provided favourable comments, and five consultees who provided unfavourable comments. Of those that provided favourable comments, four consultees were in general agreement with the proposal. On the other hand, of those that provided unfavourable comments, these included two comments in opposition to the proposed timescale for evaluation of performance, and single comments in belief that nothing would change, concern about timescales, and an assertion that TfGM and GMCA have a poor track record, and that it would be best leaving the operation of the Proposed Franchising Scheme to operators themselves. Others made suggestions or raised questions about this aspect of the proposal.

"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."

Chartered Institute of Logistics and Transport – North West Policy Group

"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."

Manchester Friends of the Earth

6.9.3 Members of the public

There were 348 members of the public who provided comments about how GMCA should consult on and evaluate performance of the Proposed Franchising Scheme once it had become operational. They included 91 members of the public who provided favourable comments, and 53 members of the public who made unfavourable comments.

Of those who made favourable comments about how the Proposed Franchising Scheme should be evaluated, the main comment received was in general support of how GMCA had proposed to achieve this objective. There were also a small number of comments about accountability and that evaluation would make things better.

"Consulting is a good thing to do and I think that you will find that if it is not working properly then feedback will make decisions about routes better."

Member of the public

Of those who made unfavourable comments about evaluation, they included proposals would be a waste of time or money and would be bureaucratic (14), disagreement with the proposed timeframe for

monitoring and evaluation (11), that monitoring would not achieve anything (7), and that evaluation and monitoring would not happen (7).

"I am not overly concerned about being consulted on how the Franchising is working. I am not consulted on how the buses currently work, nor does the model matter to me and much as the buses running the right routes, consistently and on time. I think this should be contract managed, and don't see the benefit of costly consultation for this."

Member of the public

As well as favourable and unfavourable comments received, there were also 210 members of the public who made suggestions. Suggested comments received included that a consultation should be carried out with service users (66), that groups that represent the public should be consulted (21), that monitoring and evaluation outcomes should be made public (20), and that there should be regular performance review carried out (18).

6.10 Opportunities for small and medium sized operators

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?

For more information see paragraphs 3.25 to 3.27 of the Consultation Document.

Consultees were asked to comment on GMCA's plans to allow small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme. As Table 6.10 shows, there were 714 consultees who provided comments on this, including 409 who provided favourable comments, and 101 who provided unfavourable comments.

Table 6.10 Favourable and unfavourable comments received on GMCA's plans for allowing small and medium sized operators the opportunity to be involved in the Proposed Franchising Scheme

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?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (714)	409	101	+308
Statutory consultee (19)	15	3	+12
Non-statutory consultee (25)	18	4	+14
Member of the public (670)	376	94	+282

There were also 183 consultees who made suggestions, and 42 consultees who made general comments. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.10.1 Statutory consultees

There were 19 statutory consultees who provided comments on GMCA's plans for allowing small and medium operators the opportunity to be involved in the Proposed Franchising Scheme. These included 15 consultees who provided favourable comments and three consultees who provided unfavourable comments. Of those who provided favourable comments, they included 10 comments in general support of this aspect of the proposal, and nine comments that the proposal would allow for a level playing field.

"This seems a reasonable way to protect the smaller operators and possibly introduce some elements of sensible competition and efficiencies."

TravelWatch NorthWest

On the other hand, unfavourable comments included two comments raising concerns about the financial viability of smaller operators, two comments about a perceived failure to allow competition, and single comments about concern for employees of bus operators, a view that smaller operators may be less likely to provide the breadth of service needed, and a belief that smaller operators may not have the required expertise to be part of the Proposed Franchising Scheme and to make it a success.

"GNW supports initiatives to promote competition in the market at all levels...(but) 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."

Go North West Ltd

6.10.2 Non-statutory consultees

In total, there were 25 non-statutory consultees who provided comments on GMCA's plans for allowing small and medium operators the opportunity to be involved in the Proposed Franchising Scheme. These included 18 consultees who provided favourable comments, and five consultees who provided unfavourable comments. On those who provided favourable comments, 13 comments were made in general support of this aspect of the proposal, seven comments about how the proposal would allow competition and a level playing field, and two comments believing that smaller operators would provide a better service compared to larger operators. Of those who made unfavourable comments, they included two comments in general opposition to this aspect of the proposal, and two comments raising concern about how the proposals might not lead to increased competition and a level playing field.

"Manchester Friends of the Earth support the proposals to allow small and medium sized operators to be involved in the Proposed Franchising Scheme."

Manchester Friends of the Earth

"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?"

OneBus

6.10.3 Members of the public

Overall, there were 670 members of the public who provided comments about allowing small and medium operators the opportunity to be involved in the Proposed Franchising Scheme. These included 376 members of the public who made favourable comments, and 94 who made unfavourable comments.

The main favourable comments by frequency of response were general support and agreement for the inclusion of smaller operators (302), followed by a view that smaller operators could drive competition and prevent a monopoly (81), and that smaller operators could provide a better service than larger operators (22). Other less frequently made comments included that small operators could provide jobs and help the economy (15), that accessibility would be improved as smaller operators might cover areas where larger operators would not or could not (12), and that it would support the economic growth of Manchester (7).

"This would be good and allow smaller/independent/local companies, who may know the local market better, to compete."

Member of the public

As well as favourable comments, there were also 195 members of the public who made favourable comments on condition that one or more things would be improved or achieved. These included 67 comments about support provided the proposal would improve standards and quality of service, 28 comments that the service would become more reliable, and 18 comments in support, provided operators would be regulated and held to account if services fell below an agreed standard of acceptability.

"I think this is good and fair. As long as the operators meet the necessary standards, obviously."

Member of the public

The main unfavourable comments received were general opposition to inclusion of smaller and medium sized operators and that only larger operators should be included (22), concerns about how smaller operators might not be as reliable as larger operators (21), opposition in general to the proposal (19), and concern that smaller operators might be less stable financially, and at greater risk of insolvency (15).

"In all honesty - Manchester needs large operators who are used to running services in large cities who are less likely to go bump and who have enough employees to cover when Joe the driver can't get out of bed on time. If you want more people on public transport it must be reliable."

Member of the public

There were also 166 members of the public who made suggestions about the inclusion or involvement of small and medium size operators in the Proposed Franchising Scheme. Most of those who made suggestions here had already been included as part of the Proposed Franchising Scheme, including that consideration should be given to all operators, regardless of their size (70 comments), that consideration should be given to local operators who would have local knowledge of the routes (21), and support and inclusion of smaller operators (9).

6.11 Depots

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?

For more information see paragraph 3.28 of the Consultation Document.

Consultees were asked for 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. As Table 6.11 shows, there were 512 consultees who provided comments. This included 270 consultees who provided favourable comments, and 127 consultees provided unfavourable comments.

Table 6.11 Favourable and unfavourable comments received 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?

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?	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Net +/-
All who provided a response (512)	270	127	+143
Statutory consultee (19)	9	9	0

Non-statutory consultee (16)	10	4	+6
Member of the public (477)	251	114	+137

There were also 69 consultees who made suggestions, and 72 consultees who made general comments about this proposal. The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

6.11.1 Statutory consultees

There were 19 statutory consultees who provided comments on the proposal for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme. These included nine consultees who provided favourable comments, and also nine consultees who provided unfavourable comments. Of those who provided favourable comments, these included six comments in general support of the proposal, two comments that it would give TfGM and GMCA control over depots, two comments that it would prevent operators with existing depots from having an unfair advantage, and two comments that it would level the playing field.

Of those who made unfavourable comments, these included four comments about concerns about affordability and cost control, three comments that it would not be right to offer operators an incentive to bid, three comments that depots should remain the responsibility of operators, and two comments in favour of the utilisation of existing rather than new depots, and/or that money would be better spent on service improvements rather than on property.

"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."

TravelWatch NorthWest

Bus operators in particular tended to be more negative about the proposal, or had reservations about it. For example, Rotala PLC believed that operators should own depots, and any sale of such infrastructure could have implications for the local bus market. Go North West Ltd did not believe it would be necessary for GMCA to provide depots, and Transdev Blazefield Ltd called for a consistent approach.

"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."

Rotala PLC

“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.”

Go North West Ltd

“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.”

Transdev Blazefield Ltd

Some of the other statutory consultees who provided comments raised questions, and this included Liverpool City Region Combined Authority (LCRCA), which stated that it would be interested in how the proposal to provide depots progresses in practice. While LCRCA believed that local control of local bus depots may be an appropriate course of action under a variety of different models in order to support zero emissions bus fleets, it said that it would be particularly interested in where GMCA may have identified potential depot locations close to the LCR boundary.

A small number of statutory consultees also mentioned that depots should have appropriate facilities, including to accommodate electric bus infrastructure and/or referenced having electric buses in the future, with the inference being that there needed to be the appropriate infrastructure in place to facilitate this.

“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. 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.”

Tameside Metropolitan Borough Council

While Arriva North West believed this aspect of the proposal could be beneficial for some operators, it suggested that such depots should need to be future-proofed.

"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."

Arriva North West

6.11.2 Non-statutory consultees

There were 19 non-statutory consultees who provided comments on the proposal for GMCA to provide depots to facilitate the letting of large franchise contracts under the Proposed Franchising Scheme. These included 10 consultees who provided favourable comments, and four consultees who provided unfavourable comments. Of those who provided favourable comments, such comments included seven comments with general support for this aspect of the proposal, two comments that the proposal would facilitate a good working relationship between TfGM, GMCA and operators, and two comments that it would help to level the playing field and to prevent a monopoly.

Of those who provided unfavourable comments, these included single comments about utilisation of existing depots rather than newly built depots, that depots should be the responsibility of operators and not TfGM or GMCA, concern about employees of operators, and worry about reliability of the service.

6.11.3 Members of the public

There were 477 members of the public who provided comments on the proposal to provide depots to facilitate the letting of large franchise contracts. Of those who made comments, they included 251 participants who made favourable comments, and 114 who made unfavourable comments.

Of those who made favourable comments, the main comments were general comments in support of this proposal – there were 203 members of the public who agreed or thought that this would be a good idea. Other, less frequently cited favourable comments about the proposal included that TfGM and GMCA would have more control (19), a view that existing large depots would be used for this purpose (16), and that it would help franchisees (13).

"This makes perfect sense and would allow for continuity of provision in the event of another service provider being awarded a franchise in later years."

Member of the public

There were also 84 members of the public who provided favourable comments with conditions. These included support for the proposal provided TfGM and/or GMCA would own the depots (21), provided that operators would pay rent and contribute to maintenance costs (16), and that TfGM and/or GMCA would have overall control of depots (11).

Of those who made unfavourable comments, the main comments by frequency of response were concerns about costs, affordability and value for money (33), general disagreement or opposition to the proposal (30), a view that depots should be the responsibility of operators of franchises (23), and that operators should use existing depots rather than new depots (14).

“Depots should be provided by the operating companies as per in London. GMCA does NOT need to own depots. Let the operating companies sort these things out themselves”.

Member of the public

There were 55 members of the public who made suggestions about the proposal. The main suggestion was that smaller operators should be facilitated with provision of depots (21). Other suggested comments not specifically relating to the topic, but submitted at this question included that operators should be held to account (5), that bus services should be for the public benefit (5), and that they should not be run for profit (4).

Of the 59 members of the public who made general comments, the main comment was that consideration should be given to the location of depots (31). Other comments included that consideration should be given to the sharing of depots (8), and that operators could continue to use their own/existing depots (5).

7. The Strategic Case

This chapter examines views on reforming the local bus market, including how such changes could meet GMCA's objectives for future provision of bus services, the contribution of the Proposed Franchising Scheme to the achievement of GMCA's objectives, and how a partnership option as opposed to a Franchising model could meet objectives.

The question sequenced was deliberately set by TfGM when designing the response form. It sought responses which asked:

- Firstly, the challenges facing the local market and the conclusion that it is not performing as well as it could (Q12);
- Secondly, that reforming the bus market is the right thing to do to address these challenges (Q13a);
- Thirdly, what GMCA and TfGM are trying to achieve and its objectives (Q14); and
- Finally, seeking feedback on the Proposed Franchising Scheme and alternative partnership options.

When responding, participants did not follow the intended sequencing of questions and make different comments against each element in the logical order intended. Therefore, responses to Q12 and Q13 were similar in their content, and therefore analysis combined the issues raised within the two questions. The analysis presented in this chapter is therefore reflective of participants not setting out their views as per the intended sequencing, but represents a summary of the key issues raised within each.

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

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.

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
- ☐ Don't know

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?

For more information see paragraph 4.22 of 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?

For more information see paragraphs 4.29 to 4.37 of 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?

For more information see paragraphs 4.29 to 4.37 of the Consultation Document.

7.1 Overall views on the Strategic Case

Those who completed the questionnaire had the opportunity to select a tick-box to indicate the extent of agreement or disagreement with reform of the bus market as the right thing to do. As Table 7.1 shows, 6,032 participants who completed the response form indicated their level of agreement, with the majority being in agreement that reform was the right thing to do. As the table also shows, most statutory consultees, non-statutory consultees and also members of the public who answered the question agreed that reforming the bus market was the right thing to do.

Table 7.1 Levels of agreement for 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	Tend to agree	Tend to disagree	Strongly disagree	Net agree +/-
All who provided a response (6,032)	4,456	942	84	271	+5,043
Statutory consultee (16)	9	6	0	1	+14
Non-statutory consultee (59)	45	11	0	1	+55
Member of the public (5,957)	4,402	925	84	269	+4,974

Participants were also asked for their comments on a Strategic Case for reform of the bus market across Greater Manchester based on a view that it was not performing as well as it could do, and that reform would be the right thing to do. In total, 5,638 participants provided comments on these questions, with the majority of comments being in favour of reform. In total, there were 5,299 participants who provided favourable comments, and 542 participants who provided unfavourable comments.

Table 7.2 sets out the number of participants by category of participant who provided favourable and unfavourable comments. This included those who not only completed a response form, but also those who sent their response via email or letter and commented on their agreement or disagreement with the proposal to reform the bus market in Greater Manchester.

Please note that not all of those who made comments made favourable or unfavourable comments, as some of those who provided comments made more general points, or suggestions. It is also possible for a participant to make both favourable and unfavourable comments in a single response, hence why the sum of parts may add to more than the total number of participants who made comments overall.

Table 7.2 Number of participants overall who provided favourable and unfavourable comments

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?

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...why do you say this?

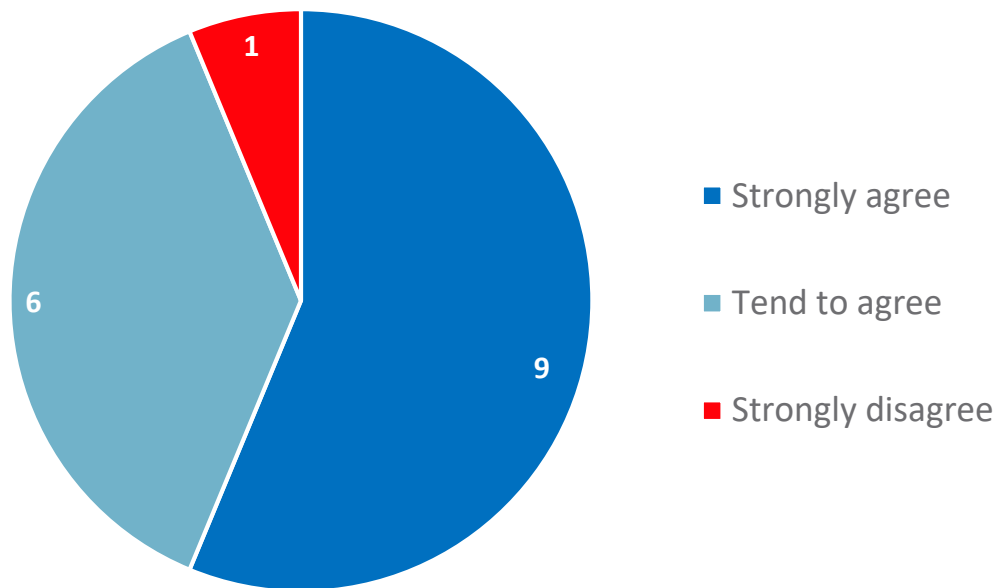
	Number of participants who made favourable comments (Q12/Q13 combined)	Number of participants who made unfavourable comments (Q12/Q13 combined)
All who provided a response (5,638)	5,299	542
Statutory consultee (39)	35	20
Non-statutory consultee (101)	99	15
Member of the public (5,498)	5,165	507

The next sections of this chapter first look at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public. Question 12 on the questionnaire asked participants about existing challenges facing the local bus market, while Question 13 asked for comments on reform of the local bus market as being the right thing to do. As the majority of participants who made comments on this made very similar comments at both questions, it was decided to combine the two questions and summarise the response together, rather than to repeat very similar responses made at both questions.

7.1.1 Statutory consultees

Of the 16 statutory consultees who completed the tick-box question on the questionnaire, all but one of them agreed that reform of the bus market would be the right thing to do to address existing challenges.

Figure 7.1 Levels of agreement with reform among statutory consultees



Base: 16 statutory consultees who answered question 13a on the response form

Statutory consultees also provided comments on the questionnaire and via email and letter about the Strategic Case. The following sections break down the responses received by category of organisation. In total, there were 39 statutory consultees who provided comments about the Strategic Case for change - most, but not all were in agreement that there was a case for change and that reform would be necessary.

Bus operators / transport organisations

As with comments received about other questions/topic areas covered in the consultation, a mixed picture emerges when the views of bus operators and transport organisations are examined. Some consultees, including HCT Group, strongly agreed that reform was necessary to address shortcomings in the current system, while others disputed this assertion. HCT Group cited several current issues including declining passenger numbers, increasing fares, routes being cut and so on and that the Proposed Franchising Scheme would be an effective solution to resolving such issues. HCT Group also believed that while a few operators remain opposed to Franchising, they would reluctantly concede that the bus market isn't performing well, and that they may look to lay the blame for this on externalities.

“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.”

HCT Group

While it was generally agreed and acknowledged that the bus market was in need of reform, comments from some of the operators, including from Arriva UK Bus and First Manchester Ltd were that a partnership option, rather than a Proposed Franchising Scheme would be the optimum way to make necessary changes.

However, some of the operators that provided comments about the Strategic Case did not agree that the current bus market was underperforming. For example, Stagecoach Manchester did not agree with the challenges set out in the Strategic Case, and questioned GMCA’s analysis.

“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.”

Stagecoach Manchester

Rotala PLC suggested that it would be better to focus on issues such as pollution, and congestion.

“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.”

Rotala PLC

However, Belle Vue (MCR) Ltd stated that it strongly disagreed with the proposed changes. The organisation believed that reform would serve only to benefit the largest of bus operators, with small and medium sized operators being unable to compete given they do not have the resources or financial backing.

Greater Manchester local authorities

Local authorities concurred with the existing shortcomings of the current bus market as set out in the Strategic Case, and were in agreement that reform of the bus market was the right thing to do to address issues. Those in strong favour of change included Salford City Council, Stockport Metropolitan Borough Council, Wigan Council, Tameside Metropolitan Borough Council, and Trafford Council.

Trafford Council mentioned a number of areas it believed to be poorly served by buses at present, including Partington, Sale West, and rural areas of Carrington, Warburton and Dunham Massey. The Council strongly agreed that change was needed and supported the Proposed Franchising Scheme, and made a suggestion to help ensure opportunities of the Proposed Franchising Scheme could be maximised.

“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.”

Trafford Council

Bury Council stated that it recognised the challenges as outlined in the consultation document, and that congestion was a particular issue for Bury, especially in the town centre and with knock-on effects in terms of air pollution in areas such as Bolton Street. The Council also stated that the current bus market is less adaptable to change in social infrastructure, and that a Proposed Franchise model would more proactively address such challenges.

Stockport Council stated that it was supportive of the opportunity to address supply issues facing bus users in Stockport borough and wider conurbation. It was also supportive of opportunity to ensure that there are bus provisions that support Greater Manchester’s aging population, as well as desires to address congestion issues and encourage sustainable travel. The Council also mentioned the importance of the future of public transport and how it a prerequisite of regeneration.

“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.”

Stockport Council

Wigan Council was one of a number of local authorities that also mentioned a number of existing issues with the current bus market, how the Proposed Franchising Scheme would have potential to improve bus patronage, and to reduce car ownership and congestion in Greater Manchester.

Tameside Metropolitan Borough Council stated that the proposed reforms of the bus market as set out within the Strategic Case would help to address many of the challenges currently faced by the local bus market. In the opinion of the Council, this would include increasing the number of trips made by public transport, reduce congestion, introduce affordable fares, and provide services based on social and economic need, but which could not be provided within a deregulated bus market. However, the Council also mention that there were a number of other factors which had not been mentioned in the Strategic Case, including changes to where people live in Greater Manchester, and changes in location of public services which it believed should also be factored in.

Salford City Council stated that while there would still be external challenges for the bus market regardless of the model of operation, under a franchised model the negative impacts of challenges as set out in Section 4.16 of the consultation document would be the responsibility of GMCA to manage.

Examples given for more 'tepid' agreement included from Rochdale Borough Council which suggested that radical reform was required to address issues, but that even more intervention and in its words "imagination" would be required through the Proposed Franchising Scheme.

Other local authorities

Some of the other local authorities that provided comments also supported the need for change, but it was notable that such local authorities, including Rossendale Borough Council and Chorley Council indicated that they tended to agree that reform of the bus market was the right thing to do, rather than indicating strong support for such change. Chorley Council wanted more clarity in terms of how cross-boundary services could be affected by the Proposed Franchising Scheme.

While supportive of change and reform, some local authorities also raised some concerns. For example, Chorley Council was concerned about impacts on cross-boundary services.

"...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."

Chorley Council

The potential for negative impacts on cross-boundary services was also an issue of concern for Cheshire East Council.

"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."

Cheshire East Council

Other statutory consultees

There were also comments received from a range of other statutory consultees. For example, Transport Focus mentioned from its perspective that the key challenge would be whether the proposal would reflect the needs and priorities of both existing and potential passengers. The organisation believed that

the closer the specifications and targets reflect people's needs, the better the chance they will have to deliver the type of services that people value, and to increase bus patronage with new users too.

While TravelWatch NorthWest agreed that reform was necessary, and that there would be benefits of doing this (e.g. cheaper fares and better ticketing), it stated that such reform should be accompanied by improvements in infrastructure.

"...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."

TravelWatch NorthWest

Both of the unions that provided comments strongly agreed that reform of the bus market as set out in the Strategic Case was the right thing to do. UNISON North West mentioned that it was involved in the Better Buses for Greater Manchester campaign, and support GMCA's proposals. Unite the Union stated that re-regulation would bring back a form of local control and accountability to how and where services are run, and that the current system of de-regulated services was not working for passengers and communities across Greater Manchester.

Peak District National Park stated that while it recognised desire from GMCA to provide the best possible public transport system across Greater Manchester, the organisation raised some concerns about possible impacts to cross-boundary services.

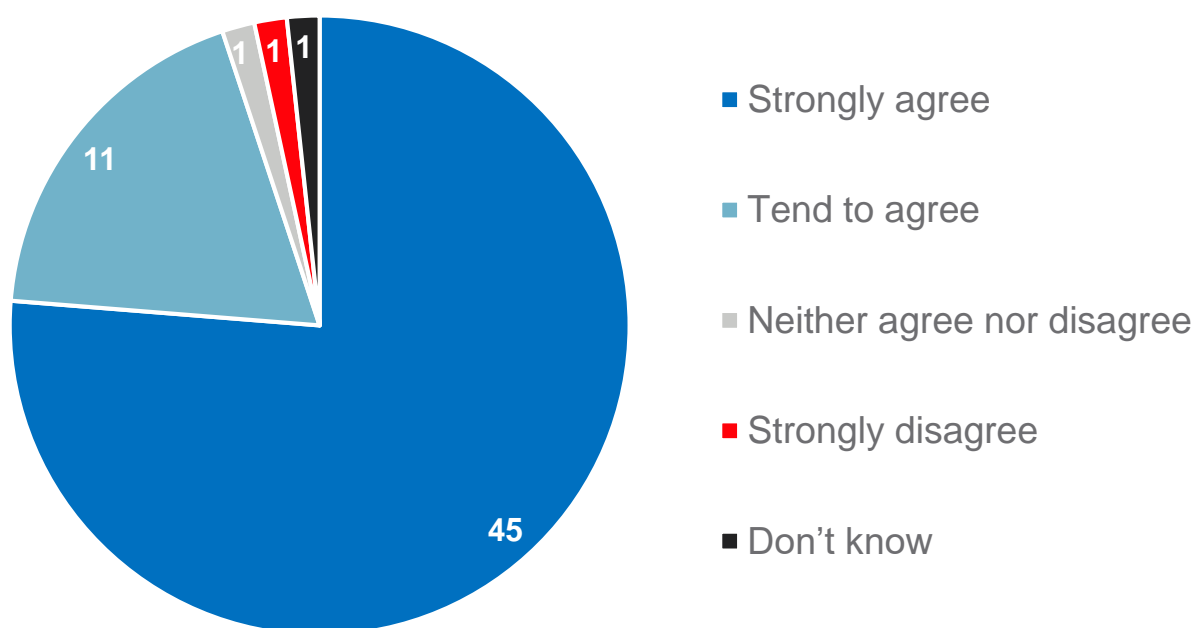
"...we are concerned to ensure that existing cross-boundary services continue to operate effectively. This is particularly important where the loss of such services could generate additional car journeys to and from the National Park; and on cross-Park routes. Such additional journeys would result in 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."

Peak District National Park

7.1.2 Non-statutory consultees

As is shown in the chart, most of the non-statutory consultees who answered the tick-box question on the response form were in agreement that reform of the bus market would be the right thing to do to address existing challenges.

Figure 7.2 Levels of agreement with reform among non-statutory consultees



Base: 59 non-statutory consultees who answered question 13a on the response form

The next section covers the comments and feedback received from a range of non-statutory consultees through the questionnaire, email and letter that made reference to the challenges as set out in the Strategic Case for reform, and if reforming the bus market would be the right thing to do to address the challenges.

Academic institutions

Academic institutions were largely in favour of reforming the bus market to address challenges. Those that indicated strong agreement for this included Royal Northern College of Music, Manchester Medical School, Manchester Metropolitan University, Mobilities Justice CIS, LTE Group, IPPR North, and the University of Manchester. It was believed that reform would result in benefits for passengers, including greater and easier mobility for students, more uniform coverage, reduced/cheaper fares, improvements in disabled access, and integration of the bus network into the wider transport network so that it would be more joined up. It was also believed that resultant changes from the Proposed Franchising Scheme would reduce car journeys across Greater Manchester, and as such there would be environmental benefits with reduced pollution.

"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."

LTE Group

Some of the academic institutions that answered the question stated that they tended to agree, rather than strongly agree, that reform was the right thing to do to address existing challenges. Such institutions included Burnage Academy for Boys, and the University of Manchester Students' Union. When few reasons were given for this level of agreement, it was considered the proposed reform could not resolve every issue.

"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."

The University of Manchester Students' Union

Action groups

Action groups were strongly in favour of reform of the bus market as being the right thing to do. This included Bus4us, Steady State Manchester, Walk Ride Heatons, and Sale Moor Community. For the action groups that provided comments, they saw reform as a best way of improving bus services for local people across Greater Manchester. As with other categories of organisation that agreed with reform, perceived or actual benefits included having a more integrated bus network, cheaper fares, and a more straightforward ticketing system.

"...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."

Bus4us

"Walk Ride Heatons 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."

Walk Ride Heatons

Transport stakeholders

All of the transport stakeholders that provided comments agreed that reform was needed to address existing challenges. This included Ratp Dev, Tower Transit, Manchester Airports Group (MAG), and Abellio.

OneBus stated that any successful business could not survive by failing to meet objectives as covered by the Strategic Case. OneBus believed that while the Strategic Case recognised the value of buses, and that while reform was needed, that the Strategic Case wrongly blamed the decline in bus use on the current deregulated system.

"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?"

OneBus

Charity and voluntary sector consultees

Charity and voluntary sector consultees were in strong agreement that reform of the bus market was the right thing to do to address existing challenges. This included Age Friendly Manchester Older People's Board, Whalley Range Community Forum, Dunham Massey National Trust, Bolton CVS, Centre for Cities. There was strong support for the reform which it was believed would lead to standardisation in services, an integrated network, better accessibility, cheaper fares, and elimination of multi-operator tickets to simplify the system for passengers.

"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."

Centre for Cities

"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..."

Age Friendly Manchester Older People's Board

As well as perceived or actual benefits for passengers as noted above, Better Buses for Greater Manchester also believed that a regulated bus market would also be beneficial to drivers. Some of those who provided comments also made suggestions about proposed reforms. For example, while Guide Dogs for the Blind Association stated that it did not take a view on the merits of Franchising, it suggested

that if Franchising is adopted, that TfGM and GMCA would need to adopt a standards framework for buses operating under the Proposed Franchising Scheme.

"If Franchising is adopted across Greater Manchester, TfGM and the GMCA will need to adopt a standards framework...existing and new buses should have audio-visual (AV) next stop and final-destination announcements...all drivers should receive equality and diversity training. Accessible ticketing should be introduced."

Guide Dogs for the Blind Association

Elected representatives

Most elected representatives who provided comments about the Strategic Case for reform were in agreement and supportive of the proposed approach. For example, Graham Stringer (MP for Blackley and Broughton) referenced how London benefits from a franchised model which he believed had doubled the number of passengers there compared to a decline in passenger numbers in Greater Manchester as a consequence of having a deregulated system where in his words operators had "cherry-picked" their preferred routes. Others who agreed to reform included Jonathan Reynolds, (MP for Stalybridge and Hyde), Jim McMahon (MP for Oldham West & Royton), Kate Green (MP for Stretford and Urmston), Barbara Keeley (MP for Worsley and Eccles South), Cllr Eddie Newman (Labour Councillor for Woodhouse Park), Councillors for the North Ward of Stalybridge, and Cllr Tafheen Sharif (Elected Representative for Mossley).

"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."

Cllr Charlotte Morris, Labour Member for Elton

"I receive many complaints from constituents about bus services. These are complaints about buses being late, buses that are not accessible and bus services 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...I believe that my constituents deserve a bus service that is reliable, punctual, has frequent services on route that help to connect people to all town and city hubs and which provides value for money."

Kate Green, MP for Stretford and Urmston

The City Mayor of Salford mentioned that there were limitations with existing bus provision, and that in a situation where multiple operators compete for business, this is detrimental to passengers. He suggested that given the right conditions, current problems could be resolved, with several benefits arising.

"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... 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..."

City Mayor of Salford

Environment, heritage, community or amenity groups

Environment, heritage, community or amenity groups were also in agreement that reform of the bus market was the right thing to do to address existing challenges. Most of those who provided comments indicated strong agreement for reform, and this included Northern Neighbourhood Forum M22, Transition Buxton, Chorlton Voice, Withington Civic Society, Walkride Greater Manchester, and Friends of Patricroft Station. It was considered that reforms would be in the interest of passengers rather than bus operators, and that as there would be service improvements, people would be more likely to leave their cars and use bus instead. It was believed that there would be direct environmental benefits and reductions in carbon emissions.

"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."

Transition Buxton

Other non-statutory consultees

A small number of non-statutory local authorities provided comments about the challenges the current bus market is facing as set out in the Strategic Case, and on the need for reform. This included Saddleworth Parish Council which agreed that the current bus market was not performing at an optimum level.

Tameside Council's Place and External Relations Scrutiny Panel was also in favour of a regulated and more integrated bus market across Greater Manchester. However, the organisation believed that the feasibility of delivering a system-wide public transport system would require a significant amount of research and planning, and made a number of suggestions about the proposed reform. Such suggestions included that Tameside becomes part of a simplified integrated public transport system which concentrates more on the needs on an individual journey rather than the service operator of transport type; that a regulated bus network becomes accessible, reliable, affordable and consumer

focussed; and, that where income is generated from financially sustainable parts of the network, that such income is used to support expansion into areas where a bus service would be essential for social reasons. It also suggested that there could be a need for a community needs Assessment for each local authority area across Greater Manchester.

A range of other non-statutory consultees also provided comments on the Strategic Case for reform. The vast majority of those who provided comments indicated strong levels of agreement for the necessity of proposed reform to address existing challenges in the existing bus market. This included South East Manchester Community Rail Partnership, Bruntwood, Altrincham Business Improvement District, Oxford Road Corridor, The Christie NHS Foundation Trust, INTU Trafford Centre and Bryn and Makerfield RUG. Reasons given in support of reform included a belief that the Proposed Franchising Scheme would address current inadequacies in the present system, including improving bus routes, reducing fares, and streamlining the ticketing system. There was also a belief that changes would be a prerequisite for the future growth and success of the Greater Manchester City region.

"We really struggle to attract & retain employees who aren't able to drive as there are limited bus services to our head office (in Pendlebury) and these are often unreliable."

Nycomm Ltd

Northern Powerhouse Partnership was also in favour of change.

"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."

Northern Powerhouse Partnership

While very few of the non-statutory consultees that provided comments were against the proposed reform, one organisation that was critical of the proposed changes drew parallels with other industries.

"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?"

Passenger User Group

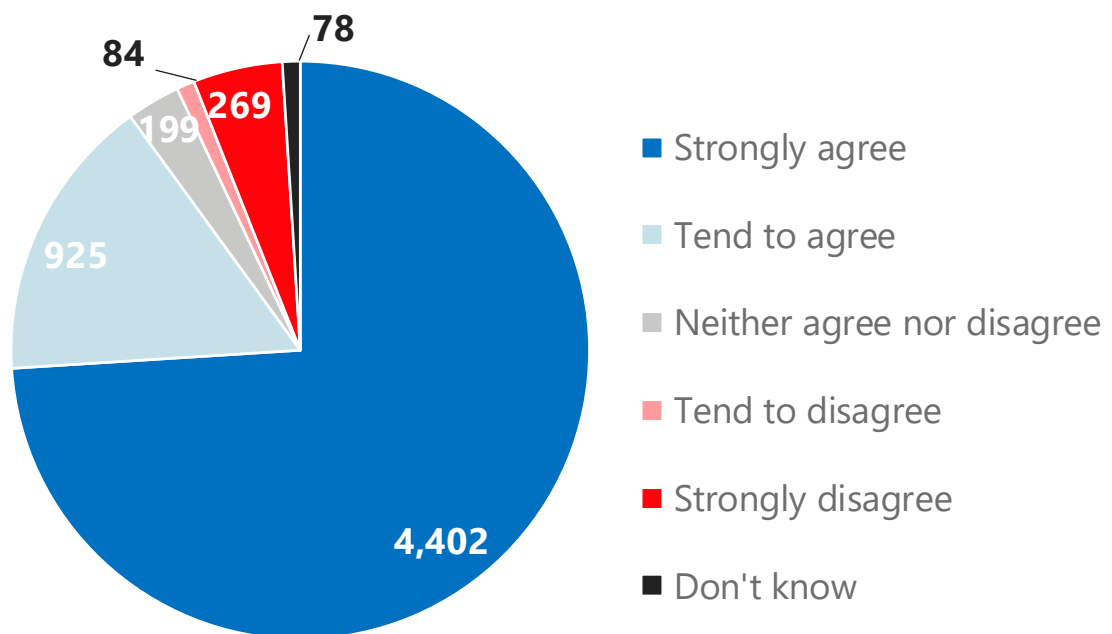
The Chartered Institute of Logistics and Transport – North West Policy Group believed that while there was a need to improve the reliability and punctuality of bus services, it believed there was no evidence that the Proposed Franchising Scheme would improve these aspects. The organisation believed that

proposed reform could lead to a worsening service in terms of the frequency of journey times, and advocated a partnership approach which it believed would be better to achieve what matters most to passengers. It did not elaborate as to what these aspects were.

7.1.3 Members of the public

As Figure 7.3 shows, most of those who answered the tick-box question on the response form were in support of reforming the bus market as the right thing to do to address the existing challenges. The majority (89%) who provided a response agreed, including three-quarters (74%) who strongly agreed. A minority (6%) disagree with the proposed reform of the bus market.

Figure 7.3 Levels of agreement with reform among members of the public



Base: 5,957 members of the public who answered Question 13a on the response form

As well as completing a questionnaire, participants could provide comments via email and letter. Of the 5,498 members of the public who provided comments, 5,165 provided favourable comments, while 507 provided unfavourable comments. There were also a further 50 participants who provided favourable comments on condition that the proposed reform would result in an improved service.

Looking at favourable comments, the most common comments made by frequency of response were that bus services would be more reliable than at present (1,908), that passengers would receive better value for money with cheaper tickets (1,489), that the bus service would be reformed or changed for the better (1,438), general support for the proposal (1,300), and that as the passenger would be at the heart

of the changes, bus services would be made better and made more widely available, such as having a good service on unprofitable routes, in the evenings, and at weekends (1,130).

"Part of the problem with the bus scheme is the weak and expensive interlink between different companies. Franchising this would be perfect as it gets rid of the different operators, different tickets, different prices and disjointed timetables."

Member of the public

Other, less frequently cited favourable comments included a view that the reform would encourage increased bus usage, reducing the number of cars on roads, and thus reducing congestion and improving environmental benefits at the same time (1,084), that services would be run more for public benefit rather than based on profit (516), that the reforms would lead to a more consistent service across Greater Manchester (279), and that as operators would be relegated, they would be held to account if services fall below an acceptable standard (222).

There were also 50 members of the public who provided favourable comments on condition that the reform would make a difference, this included 24 comments that reform would be good provided it was done properly, seven comments in agreement provided the change process was open and transparent, and a further six comments on the condition that bus services would be more reliable than at present.

Of course, as with responses to other questions, some participants made unfavourable comments. Of the 507 members of the public who made unfavourable comments about the proposed reform, the main comment received was that the Strategic Case for reform was unnecessary, including that bus services are performing well at present (169). Other, less frequently cited unfavourable comments included concerns about the cost and affordability of the reform (69), concerns about employees of bus operators in terms of their job security, pay and conditions, and their livelihoods (64), concerns about the cost of change on the tax payer and public purse (49), and general disagreement with the proposed changes (41).

"...the most viable solution to me involves you dipping into my council tax. I chose to work at home to reduce my carbon footprint. I won't benefit (one) bit (and) will have to pay yet again. Just like older pensioners who are struggling to cope financially. Funding needs not to involve charging people who can't afford it or don't use it."

Member of the public

As well as favourable and unfavourable comments received, some of those who provided comments made general comments, and others made suggestions about the proposed changes. Overall, 687 members of the public made general comments, including comments about a perceived or actual fall in passenger numbers because of congestion and roadworks (81), or because of the trams and Metrolink in Manchester (64).

Of the 1,801 members of the public who made suggestions about the proposed change to the bus market, it was considered that 924 had made suggestions not currently under the Proposed Franchising

Scheme, and 1,095 had made suggestions that had already been considered. Of the suggestions made that were not currently considered as part of the reform, this included 334 comments that consideration should be afforded to reorganising the routes and/or timings of bus services, and 246 comments that consideration should be given to reducing journey times through having express services.

Of suggestions already considered as part of the proposed reform, this included 336 comments that the disabled, elderly and vulnerable passengers should be considered, 293 comments that consideration should be given to roadworks, congestion and traffic management, and 144 comments suggesting that bus infrastructure should be improved.

7.2 GMCA's objectives

Overall, there were 493 participants who provided comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case. Participants were also asked to comment on how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services also set out in the Strategic Case, of which 349 participants did so. Table 7.3 sets out the number of participants who provided favourable and unfavourable comments overall, and by type of consultee. As the table shows, there were more participants who provided favourable comments than unfavourable comments.

Table 7.3 Number of participants who provided favourable and unfavourable comments about achievement of GMCA's 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?

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?

	Question 14		Question 15	
	Number of participants who made favourable comments	Number of participants who made unfavourable comments	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (Q14 base is 493 and Q15 base is 349)	355	95	248	80
Statutory consultee (Q14 base is 18 and Q15 base is 14)	15	8	10	5
Non-statutory consultee (Q14 base is 25 and Q15 base is 21)	18	8	17	5
Member of the public (Q14 base is 450 and Q15 base is 314)	322	79	221	70

The next sections of this chapter first look at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public

7.2.1 Statutory consultees

Comments received from statutory consultees about GMCA's objectives for the future provision of bus services included from Bolton Council that was supportive of GMCA's objectives, and believed these should be expanded to include sustainable improvements that could be measured over time. If this was not included as an objective, the Council questioned the rationale for paying more through a levy and one-off funding for what it believed would be the same services. Derbyshire County Council suggested that consideration should be given in the objectives to the provision of services to areas outside of the franchise zone. TravelWatch NorthWest stated that it broadly agreed with the content.

While Transdev Blazefield Ltd called the objectives "logical", the bus operator raised some concerns about how integrated and simplified fares balanced with offering value for money could 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..."

Transdev Blazefield Ltd

In terms of how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services as set out in the Strategic Case, Rotala PLC was concerned that as there were in its opinion no committed funds or a timescale to Phase 2, and that this would contribute a sizeable risk when there was no guarantee of Phase 2. The organisation was concerned that there was no specific plan for a more enhanced network, no proposal for greener buses, no investment to improve bus quality, and no planned or budgeted measures to tackle congestion and deliver faster or more reliable journeys. West Yorkshire Combined Authority mentioned that while GMCA could specify fleet standards, funding opportunities would need to be available to support the delivery of the Clean Air Plan.

7.2.2 Non-statutory consultees

A number of non-statutory consultees provided comments on GMCA's objectives for the future provision of bus services, and how a Proposed Franchising Scheme might contribute to these objectives.

Steady State Manchester believed that GMCA's objectives were good, that they could be more ambitious. The action group was concerned that there was nothing on achieving modal shift from private vehicle to collective forms of transport, and active travel.

Manchester Friends of the Earth welcomed GMCA's objectives, but believed they did not go far enough in encouraging a significant modal shift from private motor vehicle use to active travel and public transport.

The University of Manchester stated that it agreed with the Strategic Case for the Proposed Franchising Scheme and that it would support rapid transition to decarbonisation. The University of Manchester suggested that an app would be welcomed as this would support staff and student timely travel to the university. It believed that functionality of such an app would outperform existing offers and would be accessible by all, but that the current proposal does not meet this criterion.

The Chartered Institute of Logistics and Transport – North West Policy Group believed that a partnership option would be better able to achieve service quality and environmental standards at lower cost and risk to the public purse.

In terms of how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services, comments received from non-statutory consultees included from the University of Manchester which believed that there would be a number of benefits, including a single network, simplified fare structure, smart ticketing, and the promotion of increased bus usage which would chime with the university's sustainability objectives. The Church of England (Diocese of Manchester) stated that it was hoped that the Proposed Franchising Scheme would improve levels of service, especially on Sunday mornings at times when people are seeking to reach their church services.

OneBus believed that the Proposed Franchising Scheme would fall short of GMCA's objectives. The organisation suggested that the objectives as set out in the consultation document could be delivered by the Proposed Franchising Scheme, but also at lower cost to the public purse under a partnership scheme. However, the organisation was concerned that the network would not be built around the needs of passengers but with a degree of political influence. In terms of objectives to improve customer experience, OneBus believed that only a partnership model would include new buses from day 1. It queried why economic benefits linked to customer improvements from a partnership proposal had not been included in the Assessment. The organisation also had concerns about how political intervention in the Proposed Franchising Scheme could reduce forecast fare rises which could then lead in its opinion to the franchising proposal failing.

7.2.3 Members of the public

GMCA's objectives for future provision of bus services

There were 450 members of the public who provided comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case. This included 322 participants who made favourable comments and 79 participants who made unfavourable comments.

Looking at favourable comments received by frequency of response, these were general agreement or support with GMCA's objectives (202), that bus services would be better co-ordinated than at present, and integrated with the rest of the public transport network (55), that ticketing would be more simplified with resultant reductions in fares (47), and linked to this, a belief that as bus fares were currently too expensive, that the reform would provide better value for money for passengers (43).

"I agree with all the points especially making it easy to use and affordable."

Member of the public

Of those who provided unfavourable comments about GMCA's objectives for the future provision of bus services, the main comments received by frequency of response were concerns around affordability and cost control (17), and a view that objectives were not extensive enough (16).

"It doesn't add up financially. Our roads will be overwhelmed because buses don't run on time."

Member of the public

In addition, there were 192 members of the public who made suggestions. This included 42 participants who made suggestions not currently considered as part of the Proposed Franchising Scheme, and 150 participants who made suggestions that had already been considered by GMCA as part of the Proposed Franchising Scheme. Of comments received about suggested measures not currently considered, this included seven comments that consideration should be given to direct services such as an express service, and five comments suggesting that routes and timings of services should be reorganised or changed.

Of suggested comments made that are already under consideration as part of the Proposed Franchising Scheme, this included a suggestion that bus services should be more reliable (35), that GMCA should encourage increased usage of buses and have fewer cars on the road (34), that bus services should be improved (32), and that the Proposed Franchising Scheme should be based on a franchising model in other cities, such as the London model (27).

How the Proposed Franchising Scheme might contribute to GMCA's objectives

As well as comments received about GMCA's objectives for the future provision of bus services, 314 participants also made comments about how the Proposed Franchising Scheme might contribute to GMCA's objectives. This included 221 participants who made favourable comments, and 70 participants who made unfavourable comments.

The most commonly made favourable comments included general agreement or support for the Proposed Franchising Scheme (150), that ticketing would be simplified (37), and that services would be better coordinated as they would be run by a single operator under the Proposed Franchising Scheme (15).

"I hope a simpler fare system can be achieved, with seamless transfer between modes and between operators."

Member of the public

There were also 70 members of the public who made unfavourable comments about how the Proposed Franchising Scheme might contribute to GMCA's objectives. The main comments received here centred on affordability and value for money issues (16), general disagreement with objectives (16), worry about how the Proposed Franchising Scheme would work (10), and concern about how the Proposed Franchising Scheme might need to be subsidised from the public purse (8).

There were also 125 members of the public who made suggestions about how the Proposed Franchising Scheme might contribute to GMCA's objectives for bus services. This included 22 participants who made suggestions not currently considered under the Proposed Franchising Scheme, and 115 participants who made suggestions that have already been incorporated into the Proposed Franchising Scheme. Of suggested comments made that have not been considered under the Proposed Franchising Scheme, this included that consideration should be given to the reorganisation of bus routes and timings (5), that travel zones should be introduced (3), and that direct services and expressways should be considered (2).

"Journey speed could be improved by running small buses round estates and big buses on the main roads. Having a bus route doing laps of every estate along its route really slows it down."

Member of the public

Of suggestions made that have already been considered under the existing Proposed Franchising Scheme, these included a suggestion that ticket prices should be reduced (31), that bus services should be improved to encourage usage (20), and that reliability of bus services should be improved (19).

7.3 Partnership options

Participants were asked for comments on how a partnership option might contribute to GMCA's objectives for bus services as set out in the Strategic Case. In contrast to comments received about the introduction and objectives of the Proposed Franchising Scheme, it was noticeable that there were more participants who provided unfavourable comments than favourable comments on a partnership option. Table 7.4 provides a count of the number of participants overall and by category of consultee who provided favourable and unfavourable comments about a partnership option.

Table 7.4 Number of participants who provided favourable and unfavourable comments about a partnership option

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?

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (461)	122	290
Statutory consultee (17)	8	11
Non-statutory consultee (25)	4	18
Member of the public (419)	110	261

The next sections of this chapter first look at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

7.3.1 Statutory consultees

A mixed picture emerges in that some of those who provided comments favoured the Proposed Franchising Scheme, while others preferred a partnership option.

TravelWatch NorthWest thought that the Proposed Franchising Scheme would seem to secure the maximum network and integrated benefits for passengers, and that it was always sceptical about practical benefits to passengers when some routes are monopolised by single operators. Bolton Council also advocated the Proposed Franchising Scheme over a partnership model.

"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."

Bolton Council

On the other hand, some statutory consultees were in favour of a partnership option. Stagecoach Manchester was concerned that a Proposed Franchising Scheme would in its view absorb a considerable amount of public money. It believed that such money could be put to better use on other projects, and

that a solution could deliver a world-class service for users and value for money for the taxpayer in Greater Manchester Rotala PLC also advocated a partnership approach.

“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. ”

Rotala PLC

Transdev Blazefield Ltd believed that GMCA’s objectives could be achieved through either the Proposed Franchising Scheme or a partnership option. While it stated there are strengths and weakness in both options, the organisation believed though that the appraisal of the partnership option would be somewhat more negative.

7.3.2 Non-statutory consultees

As with the views and opinions of statutory consultees, some of the non-statutory consultees who provided comments favoured the Proposed Franchising Scheme, while others preferred a partnership approach. Those who preferred the Proposed Franchising Scheme included the University of Manchester who did not think that a partnership option could meet objectives, and that a partnership would be less transparent. It also believed that the partnership option would restrict GMCA’s ability to make improvements. Steady State Manchester also concurred with this and believed that a partnership would result in too much power with bus operators.

“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.”

The University of Manchester

Some of the non-statutory consultees who provided comments favoured a partnership option over the Proposed Franchising Scheme. OneBus believed that a partnership option would contribute to most of the objectives, but much sooner than the Proposed Franchising Scheme without any risk to the public purse, or inconvenience to customers in its opinion. Similarly, the Chartered Institute of Logistics and Transport – North West Policy Group which believed a partnership would address concerns it had about the Proposed Franchising Scheme, and at lower cost. The Confederation of Passenger Transport UK (CPT) also believed that improvements could be more quickly realised under a partnership option.

"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."

The Confederation of Passenger Transport UK (CPT)

Those who preferred the Proposed Franchising Scheme included the City Mayor of Salford who believed that a partnership option would not be able to deliver an integrated solution, and would be unable to realise the full range of benefits to the public.

7.3.3 Members of the public

There were 110 members of the public who made favourable comments about a partnership option, and 261 who made negative comments about such an option. The most commonly cited favourable responses provided by members of the public were about general agreement with a partnership approach (52), that a partnership could provide more benefits and higher returns than the Proposed Franchising Scheme (18), and that a partnership would result in bus operators, TfGM and GMCA working together with none having an advantage over the other (16).

"A Partnership scheme would vastly improve working between GMCA/TfGM and operators while ensuring taxpayer subsidy is kept to a minimum. Yes, some operators' decisions might not be wanted but when all said and done, buses run for when passengers use them. They don't run 20 minutes out the way for little Doris to go 3 stops up the road."

Member of the public

Of those who provided unfavourable comments about a partnership option, the main comments received by frequency of response were about general disagreement with partnerships (90), that a Proposed Franchising Scheme would be a better option than a partnership (52), that a partnership would not result in objectives being realised (41), that it would be too similar to the present system (37), and concerns about regulation and lack of accountability (15).

"I don't feel partnerships will offer the best value for buses as operators still dictate routes, fares etc."

Member of the public

There were also 146 members of the public who made suggestions about partnership options. This included eight members of the public that made suggestions that had not been considered, and 98 members of the public who made suggestions that had already been considered. The main suggested comments already considered were about how bus services should be run by a single operator (35), and that bus services would need to be changed or reformed (20).

8. The Economic Case

This chapter summarises questions on the Economic Case, its conclusion that the Proposed Franchising Scheme provides the best value for money (Q17 in the consultation response form).

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

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.

Overall there were 2,693 participants who provided comments about the conclusion of the Economic Case. Most comments (2,147) were favourable, whilst 480 participants provided unfavourable comments. The most frequently cited favourable comments were general support/agreement with the conclusion of the Economic Case (1,119).

Table 8.1 Number of participants who provided favourable and unfavourable comments about the conclusion of the Economic Case

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (2693)	2,147	480
Statutory consultee (22)	16	13
Non-statutory consultee (45)	40	8
Member of the public (2626)	2,091	459

8.1 Overview

Participants tended to reiterate comments made elsewhere in the consultation which focused on the outcomes which the Proposed Franchising Scheme would deliver, with cheaper and better value bus fares one of the most commonly mentioned positive outcomes (266). Specific to the Economic Case, the opinion that bus services should serve the public benefit and not be run for profit (133) and that the Proposed Franchising Scheme provides best value for money of the options presented (130) were other commonly cited favourable comments.

On the other hand, of the 480 participants providing unfavourable comments, 139 disagreed with the conclusion of the Economic Case. The main reasons for this included concern about the costs and associated affordability of it the Proposed Franchising Scheme (110) and the lack of evidence to support the conclusion (97).

A total of 63 participants made suggestions within their response to the conclusion of the Economic Case which concerned potential changes to the Proposed Franchising Scheme. These concerned the importance of subsidised travel for young people (10), free bus travel (7) and that bus services should run 24/7, 365 days per year (5). A total of 366 participants made suggestions within their response to the conclusion of the Economic Case which are already proposed/covered in the Proposed Franchising Scheme. The main suggestions made included the importance of considering more than just economic value or the cheapest bid (79), that quality of service should be prioritised (46) and that the impact of congestion and effective traffic management to enable any future bus network to operate more efficiently should also be considered (41).

8.2 Statutory consultees

Responses from statutory consultees tended to engage with the conclusions of the Economic Case in some detail, often offering a balanced appraisal of the detail and associated arguments contained within it.

The majority of the statutory consultees which provided a comment in response to the Economic Case made a favourable comment about it. Some of these comments offered general agreement with its conclusion, whilst other comments identified the benefits of reform in terms of the co-ordination/integration of the network with other transport modes and how reliability could be improved.

Local authorities

Manchester City Council, West Yorkshire Combined Authority, Trafford Council, Stockport Council and Tameside Metropolitan Borough Council all provided comments which were broadly supportive of the conclusion of the Economic Case.

Four local authorities (Tameside Metropolitan Borough Council, Wigan Council, Manchester City Council and Cheshire East Council) referenced the positive value for money which the Proposed Franchising Scheme offered, compared to the other reform options presented. Bolton Council trusted the model utilised by TfGM to calculate value for money.

On the whole commentary from local authorities accepted the methodology used to arrive at the Economic Case conclusion without challenge and in line with best practice.

“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.”

Blackburn with Darwen Council

The future ridership forecasts did represent a concern from some of the local authorities, although the Proposed Franchising Scheme was projected to minimise this decline compared to the other options. There was an acknowledgment and acceptance amongst most local authorities that further intervention (either at local authority or combined authority level) would be necessary to further arrest the projected decline whatever the proposed reform option. This would still present a challenge in the long-term. Linked to this, Rochdale Borough Council felt that a stronger focus should be placed on the Proposed Franchising Scheme providing a solid baseline for further (Phase 2) intervention.

Some local authorities went on to make specific representations in response to the Economic Case:

- Stockport Council expected costs to be revisited as the Proposed Franchising Scheme develops to enhance the realisation of potential and actual benefits;
- Tameside Metropolitan Borough Council acknowledged that the Proposed Franchising Scheme had the highest costs (although the best value for money);
- Blackburn with Darwen Council was positive towards the greater expected passenger, environmental and societal benefits of the Proposed Franchising Scheme;
- Wigan Council, whilst supporting the economic value element, also acknowledged that the two partnership options have better cost-benefit ratios given their lower costs;
- Manchester City Council was concerned about the lack of transparency about overall value for money to the public sector under current arrangements. It concluded that the Proposed Franchising Scheme would provide this strategic control and therefore visibility.

“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.”

Manchester City Council

- Cheshire East Council expressed concerns about the potential for the Proposed Franchising Scheme to distort the landscape for future investment decisions, and referred to precedents in Greater London which informed this concern. It posed a question: *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?*

Bus operators/transport organisations

Seven statutory bus operators made detailed representation in response to the Economic Case.

Stagecoach Manchester (and other bus operators) noted GMCA's refusal to provide the models used to prepare the GMCA Assessment, which restricted their ability to comment on the Economic Case. Specifically, Stagecoach Manchester criticised the lack of visibility of the Demand and Revenue Model (and the refusal to provide it to OneBus under the Freedom of Information Act) which they say has prevented detailed interrogation of the model. It also highlighted the low level of risk/contingency values allocated to revenue.

The response from Go North West Ltd (also echoed by Stagecoach Manchester) countered that the Economic Case does not meet the statutory criteria, which it believed must be demonstrated in order for GMCA to proceed with the Proposed Franchising Scheme.

"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."

Go North West Ltd

Go North West Ltd shares the view of Stagecoach Manchester that necessary detail has not been provided. It also highlighted the risk of the Proposed Franchising Scheme compared to the partnership models concerning NPV. Concern was also raised as to the perceived inflation of the benefits of the Proposed Franchising Scheme, which it considered as optimistic. Another concern was expressed around the adequacy of the sensitivity testing applied to key outputs. Go North West Ltd also believed that modelled analysis based on London was flawed given the material differences between the two cities. Finally, its criticism of the Economic Case also centred around what it considered to be out of date views of the prospects of the bus market in Greater Manchester (informed by their own, in-house data).

Arriva Bus UK identified that a benefit of the Proposed Franchising Scheme was a consequence of reduced congestion, but that projected falling patronage under the Proposed Franchising Scheme would in fact lead to more travelling by car, thus causing an increase in congestion.

First Manchester Ltd questioned the economic analysis in the table at paragraph 4.60 of the Consultation Document. It argued that the Proposed Franchising Scheme essentially continues to deliver the market status quo, with patronage falling and no infrastructure measure which will deliver a more efficient bus

operation. The response also questioned the ‘time savings’ figure presented in the analysis. The operator felt that costs would fall to the local taxpayer, or that the Proposed Franchising Scheme would have a negative impact on investment in improvements in the wider transport network in Greater Manchester. It did not therefore agree that the Proposed Franchising Scheme offers the best value for money.

Rotala PLC also did not accept the Economic Case conclusion, and pointed to what they considered to be a number of flaws. These included the Economic Case being skewed in favour of the Proposed Franchising Scheme, the high fare increases underpinning the Economic Case which are incorrect, the under-estimation of associated risks and its unaffordability.

The HCT Group supported the Economic Case, which it acknowledged costs more but warranted the investment due to the benefits it would accrue and the NPV.

Other statutory consultees

A further six statutory consultees made comments in response to the Economic Case conclusion.

Whilst some of the bus operators felt that they weren’t provided with sufficient methodological information in relation to the Economic Case, there was also some confusion amongst other consultees as to the economic calculations which underpin the conclusion. For example, TravelWatch NorthWest referred to the time savings associated with the Proposed Franchising Scheme and how they did not understand how the figure had been arrived at. Bus Users UK also criticised the presentation of the Economic Case and how it 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”

Bus Users UK

The trade unions responding to the Economic Case conclusion were supportive of the Proposed Franchising Scheme. Unite the Union emphasised that the Proposed Franchising Scheme should not be delivered to the detriment of existing employees’ pay, terms and conditions whilst UNISON North West felt that public control would also lead to busy routes cross-subsidising those routes which are not profitable but yet necessary for the public good. Overall, they thought the franchising will lead to a better bus network.

8.3 Non-statutory consultees

Transport stakeholders

OneBus stated that the high ratio of benefits to the cost to GMCA was misleading, with partnership presenting a better benefits to cost ratio than the franchising proposal. It also questioned the lack of

evidence underpinning the Economic Case conclusion that franchising provides the most economic value (i.e. Net Present Value, or NPV) and creates the best platform.

"There is no evidence to prove this conclusion as the key issues affecting the delivery of good bus services have not been answered."

OneBus

Academic institutions

A number of academic institutions made comments in response to the Economic Case conclusion (15 responded via the response form). On balance most academic institutions were supportive of the Economic Case, in the main for its wider societal and economic benefits for Greater Manchester. Of particular support is the greater NPV of the Proposed Franchising Scheme compared to the alternative reform options presented (despite the lower benefits to cost ratio).

"Although the benefits to cost ratio 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"

The University of Manchester

Other non-statutory consultees

Other non-statutory consultees expressed support for the conclusion of the Economic Case which identified franchising as the best value for money bus reform option of those presented. There was support for the principle of the financial benefits being re-invested by GMCA to the benefit of Greater Manchester (rather than private operators). There was broad acceptance of the greater, upfront cost to establish a franchising model, but this was considered a price worth paying given the better value for money and other societal benefits.

"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"

Manchester University NHS Foundation Trust

8.4 Members of the public

Overall, a total of 2,626 members of the public provided a comment in response to the conclusion of the Economic Case.

Overall, 2,091 members of the public made favourable comments. Of these, 1,100 were comments which reiterated general support

"I am strongly persuaded by the economic case."

Member of the public

"Seems well thought through."

Member of the public

Other comments went into more detail about specific aspects of the Economic Case conclusion which they supported, specifically:

- That the Proposed Franchising Scheme would lead to better value ticket prices (257)

"If this affects bus fares being fairly assessed then yes passengers would get best value."

Member of the public

- The model for Greater Manchester would bring the city into line with integrated transport networks in other major cities, including London (144)

"I agree that the Proposed Franchising Scheme offers the best way forward. I know the London Transport system reasonably well as a consumer. This offers an integrated and value for money fare structure across the various transport options - bus, rail, tube."

Member of the public

- The impact of the Proposed Franchising Scheme on promoting and encouraging bus use instead of other modes of transport (usually private cars), which could lead to a cut in congestion levels (137)

"The benefits to wider society from increased efficiency of transport system and reduced congestion are important. Shift from car to public transport use is essential."

Member of the public

- 135 participants who thought that the Proposed Franchising Scheme would lead to an improvement in bus services
- A number of comments which supported the operation of buses to serve the public benefit rather than be run for profit (131)
- That the Proposed Franchising Scheme provides the best value for money (115)

"The partnership options first and foremost are concerned with profit. The evidence for this is uncontested. The proposed Franchising scheme aims to improve services and provide best value."

Member of the public

- Integration of bus services with the wider public transport network (120)

- Improved reliability and therefore frequency of buses (117)
- A simplified ticketing system, which would introduce a single fare across different routes (119)
- That bus services would service the public benefit under the Proposed Franchising Scheme (106) and will no longer be under the control of the commercial sector (50)

"The transport system needs to be run for users and provide the best value for both customers and GMCA."

Member of the public

One fifth of members of the public responding to the consultation (459) commenting on the conclusion of the Economic Case made unfavourable comments in response, specifically:

- A number of those comments (131) did not agree with the conclusion of the Economic Case, without elaborating on their reasoning to underpin this view
- The main concern cited was around the cost element, with many questioning the affordability and value for money of the Proposed Franchising Scheme (102), whilst a small number felt that it was a misuse of public funds/taxpayer subsidies (36) and others did not consider that council tax should be increased to pay for it (43)

*"Franchising does not necessarily provide the best value for money for two reasons:
1) The money has to come from somewhere - and that somewhere has to be the taxpayer. The Mayoral precept (and any planned increase) will still be a tax increase.
2) Look at Transport for London's current deficits for running the bus network (over £900m per year). That has led to large service cuts to avoid tax increases."*

Member of the public

- The absence/lack of evidence to substantiate the conclusion of the Economic Case (92)
- A preference for a partnership option, which would deliver a better solution from a value for money perspective (42)
- Other concerns around the failure to encourage bus use (i.e. a decrease in patronage) (14), plus a failure to deliver an improved passenger experience as a result (16)

A small number of comments were received by members of the public which offered conditional support for the conclusion of the Economic Case. A total of 58 participants supported it provided it is executed well, whilst for others their support was conditional on no increase to fares (13), provided there is adequate investment (5), whilst a further five wanted to see bus operator employees' jobs, contracts and terms and conditions (5).

Suggestions concerning the conclusion of the Economic Case

A total of 63 participants made suggestions within their response to the conclusion of the Economic Case which concerned potential changes to the Proposed Franchising Scheme. These included:

- Consideration should be given to subsidised travel for young people (10)
- Free bus travel should be introduced (7)
- Bus services should run 24/7, 365 days per year (5)
- The operation of school buses services should be considered (4)
- Improving the negative image of bus travel, and the stigma attached to using them (4)
- More cycle lanes should be introduced, with a priority given to cycle lanes and bikes allowed on buses (3)
- Bus conductors should be re-introduced (1)

A total of 366 participants made suggestions within their response to the conclusion of the Economic Case which are already proposed/covered in the Proposed Franchising Scheme. These included:

- Consideration should be given to more than just economic value or the cheapest bid (79)

"I would caution prioritising just money and value for money over all the other benefits, for e.g. more sustainable transport, cleaner and safer buses, efficient timetables, introducing faster (non-stop) services on busy routes, etc. I would pay the same if not more than I do currently to get the full range of benefits listed above."

Member of the public

- The quality of service should be a priority (46)
- Consideration should be given to the impact of congestion and effective traffic management to enable any future bus network to operate more efficiently (41). Linked to this, the need for an improved bus infrastructure (bus priority measures) should also be considered a priority (28)
- Further consideration should be given to the environmental value (31)
- Consideration should be given to the needs of vulnerable passengers (e.g. elderly, disabled) (25) with the need for services to be subsidised (25)
- Ensuring that the bus market is not determined by market forces and/or bus operators (18)
- The reorganisation of routes and timetables (17)

- A suggestion to not base the Proposed Franchising Scheme on the London model (15) because of the operational deficit which that system suffers from.

"It does not represent the best value for money if you were to follow TfL example which is propped up by hundreds of millions every year from the Mayor's budgets.....money can be better spent!"

Member of the public

A total of 72 participants made other suggestions in their response to the conclusion of the Economic Case. The principal suggestion concerned the preference to take the bus network in Greater Manchester into public ownership (37). A small number of other suggestions preferred the re-nationalisation of the network altogether (17).

There were other, more general comments made in response to the conclusion of the Economic Case – 158 participants in total. The main comment concerned the priority given to social value within the Proposed Franchising Scheme, and the need to focus on the contribution of the bus network to community cohesion (56). A further 47 participants did not hold an opinion as to which bus reform option was best, and would support whichever provided the most effective solution and best value for money.

9. The Commercial Case

This chapter analyses the responses to the questions posed about the Commercial Case. It covers the:

- Packaging strategy for franchising contracts under the Proposed Franchising Scheme;
- Length of franchise contracts under the Proposed Franchising Scheme;
- Proposed allocation of risk between GMCA and bus operators under the Proposed Franchising Scheme;
- Potential impact of the Proposed Franchising Scheme on the employees of operators;
- Approach to depots under the Proposed Franchising Scheme;
- Approach to fleet under the Proposed Franchising Scheme;
- Approach to Intelligent Transport Systems under the Proposed Franchising Scheme;
- GMCA's approach to procuring franchise contracts under the Proposed Franchising Scheme;
- Impacts of the options on the achievement of the objectives of neighbouring transport authorities;
- Commercial Case conclusion that GMCA would be able to secure the operation of services under franchise contracts;
- Assessment of the commercial implications of the partnership options; and the
- Potential impact of the partnership options on the employees of operators.

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

9.1 Commercial Case: Proposed packaging strategy²¹

Those who responded to the consultation were asked if they had any comments on the proposed packaging strategy. The question on the consultation response form was as follows:

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.

A total of 224 consultees responded to this question. Of these 114 gave favourable comments, whilst 51 expressed unfavourable views.

²¹ by which routes are grouped together for the purpose of offering them for tender

Table 9.1 Number of consultees who provided favourable and unfavourable comments about the proposed packaging strategy

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (224)	114	51
Statutory consultee (16)	9	3
Non-statutory consultee (16)	9	2
Member of the public (192)	96	46

9.1.1 Statutory consultees

Statutory Consultees that provided comments in response to the proposed packaging strategy were generally favourable towards the proposal.

Of the favourable comments, some offered general agreement with the proposed strategy, while others identified the fact that the proposals would offer opportunities to level the playing field for market competition, and allow for letting of contracts to both small and large operators. Other favourable comments surround the view that the proposed packaging of services will have a positive impact on delivery, in terms of performance standards and service delivery.

Bus operators / transport organisations

Rotala PLC also stated that the packaging proposals weigh in favour of the larger existing companies currently residing in the market.

Similarly Go North West Ltd stated that route-by-route packaging would be a better approach, to encourage better quality of competition.

"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."

Go North West Ltd

Stagecoach Manchester stated that they felt the implementation of the proposed approach was set within an unrealistic timeframe. Bus operator Transdev Blazefield Ltd made similar comments to other companies concerning a more localised packaging system, which it felt would be better than the proposals outlined in the Proposed Franchising Scheme.

"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."

Transdev Blazefield Ltd

Local authorities

Some statutory consultees voiced concern over the proposed packaging strategy, particularly when compared to a route-by-route system. Derbyshire County Council stated that the decision lay with GMCA but was concerned that the proposed packaging strategy would continue to benefit the larger companies.

"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 depots 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."

Derbyshire County Council

9.1.2 Non-statutory consultees

There were a small number of non-statutory consultees that responded with comments to the proposed packaging of franchises, with many of these being generally supportive without providing great detail of specification as to why.

The University of Manchester communicated a favourable view toward the packaging proposal, citing the opportunities it might bring to smaller operators.

Very few non-statutory consultees were unfavourable, but those who did respond commented on concerns around job security for operator employees, and a lack of transparency over how the contracts are awarded.

9.1.3 Members of the public

Of the 192 members of the public who commented on the proposed packaging of services, 96 indicated they were favourable, while 46 gave unfavourable views. Others gave conditional or general comments such as the need for the packaging to be executed properly. These views are fairly consistent across different sub-groups.

Those who made favourable observations generally reflected those given by statutory and non-statutory consultees, namely that it will allow different size operators to compete for contracts (13), and that it will drive competition across the market (6).

“Happy with this: the larger providers bring with them an economy of scale (but not to the detriment of passengers and services) but smaller providers can help bring new ideas and thinking.”

Member of the public

Many of the 46 unfavourable comments made by members of the public were general comments in opposition to the proposed packaging of services (18), while specific comments concerned employee and job security (6) or that the proposals are particularly complicated to understand and lack simplicity of explanation (5).

“What will happen to workers pay and conditions, pensions, hours of work, driving portions, if 1 company loses a franchise, they must have the minimum standards of bus drivers for all companies to adhere too, not undercut the big companies to save money, as that will be to the detriment of drivers, not improve the franchise”

Member of the public

9.2 Commercial Case: Length of Franchise Contracts

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.

Consultees were invited to share any comments on the proposed length of franchise under the Proposed Franchising Scheme. It is proposed that larger contracts are to be let for five years with an optional two-year extension, while smaller franchises and school services would have three to five-year contracts. There was a total of 382 consultees that made comments on this question, of which 159 voiced favourable views and 145 were unfavourable. Others gave conditional comments (112) and a small number made other general or miscellaneous comments.

Table 9.2 Number of consultees who provided favourable and unfavourable comments about the proposed length of franchise contracts

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (382)	159	145
Statutory consultee (15)	11	6
Non-statutory consultee (16)	6	5
Member of the public (351)	142	134

9.2.1 Statutory consultees

Statutory consultees responding to the proposals of contract length were generally supportive, citing favourability to the five-year let for large operators and deeming the proposed differences between contract types to be sensible and appropriate. Others stated that offering different franchising contract lengths would mean it is an attractive proposition for different types of operators, not just those who can commit to longer (or smaller) lengths.

Fewer statutory consultees made unfavourable comments on the proposed length of franchising contracts. Those who did commented that the length might be too short, or the cost implications of the contract lengths – as reflected below in verbatim comments from bus operators / transport organisations.

"Rotala PLC 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."

Rotala PLC

"...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."

Stagecoach Manchester

Go North West Ltd offered favourable comments on the large franchise contracts, but said it was important to consider the practicalities when allocating bus fleet:

"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."

Go North West Ltd

9.2.2 Non-statutory consultees

Non-statutory consultees responding to the proposed contract lengths of franchises gave a more mixed response. Reasons given for support and oppose were similar to those given by the statutory consultees.

The Confederation of Passenger Transport UK (CPT) voiced a concern that shorter contracts could lead to focus on short term goals for operators.

“...these shorter contracts lead to short term thinking and prevent long term investment decisions which are needed to deliver improved services for passengers.”

Confederation of Passenger Transport UK (CPT)

9.2.3 Members of the Public

A total of 351 members of the public commented on the proposed contract length of franchises. As with statutory and non-statutory consultees, members of the public were split across a range of views - 142 made favourable comments and 134 made unfavourable comments. There were also 21 conditional comments and a small number of general comments.

Of the 142 that gave favourable views, 83 provided general support without elaborating on their particular reasons. Other more commonly cited reasons included support for the larger contracts (5 year (25) and 7 year (21) options), the fact they are attractive for different size operators (7), and the flexibility given to GMCA in awarding different types of contracts (6).

“The proposed lengths of franchise contracts are sensible and appropriate. They provide GMCA and TfGM with appropriate flexibility and will be attractive to operators.”

Member of the public

Members of the public who stated they were unfavourable primarily took issue with proposed length of the larger franchising contracts. More specifically these comments related to the proposed five years (+2) for large contracts would be either too long (27), or too short (23).

9.3 Commercial Case: Allocation of risk between GMCA and bus operators

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.

All consultees answering the consultation were asked if they had any comments relating to the allocation or risk between GMCA and the bus operators. A total of 273 consultees gave feedback to this question, 124 of which were favourable. Conversely, 88 gave unfavourable responses and 47 made conditional comments and a small number of other types of general comments were also made.

Table 9.3 Number of consultees who provided favourable and unfavourable comments about the proposed allocation of risk between GMCA and bus operators

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (273)	124	88
Statutory consultee (17)	9	8
Non-statutory consultee (16)	7	4
Member of the public (240)	108	76

9.3.1 Statutory consultees

Some of the statutory consultees who responded voiced favourable comments to the proposed allocation of risk. Many of these favourable comments were that of general agreement with the proposal, while specific feedback included favourability towards the proposal giving more authority over risk to GMCA / TfGM.

Other statutory consultees responding to the question were unfavourable, with many of these comments coming from bus operators / transport organisations. The most common issue cited was around the risk allocation being too heavily placed under the responsibility of GMCA. For example, Rotala PLC expressed concern that removing some commercial risks from operators may drive down motivation to innovate amongst operators:

“Rotala PLC 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.”

Rotala PLC

Go North West Ltd stated concern around GMCA’s ability to take on risks around defining and specifying 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.”

Go North West Ltd

Stagecoach Manchester expressed concern that the approach to transfer risks might happen too quickly, and that a better approach would be a more transitional phasing of risks:

“...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.”

Stagecoach Manchester

Bus operator Transdev Blazefield Ltd also voiced concern around the balance of risk under the franchising proposal, in terms of the amount of risk GMCA would incur compared to the operators.

“...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.”

Transdev Blazefield Ltd

9.3.2 Non-statutory consultees

Of the non-statutory consultees who commented on the proposed allocation of risk and gave supporting comments, many indicated that they were generally favourable. Specific reasons cited included the fact GMCA would secure a level of responsibility of risk around revenue and patronage, in and this would be in the interest of delivering simpler fares / tickets.

Some other non-statutory consultees that responded were unfavourable. The top cause for concern was the fact that GMCA retains too much risk or responsibility under the Proposed Franchising Scheme.

The Confederation of Passenger Transport UK (CPT) commented that the proposal allocates the risk with underwriting shortfalls to GMCA, and therefore the taxpayer, rather than the operators, taking the view that if the operators took on this risk it would drive up service quality.

“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.”

Confederation of Passenger Transport UK (CPT)

The University of Manchester made a comment that it was unclear what the repercussions would be in the event of risk factors being realised.

“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.”

The University of Manchester

9.3.3 Members of the Public

A total of 240 members of the public commented on the proposed allocation of risk under the Proposed Franchising Scheme, with 108 expressing favourable views. Most of the favourable comments were in general support of the proposal (81), while more detailed favourable comments included the fact GMCA would retain revenue / patronage risk in the spirit of maintaining simpler fares and tickets (8), and retain more authority over services (9). Others were favourable to risk being retained by operators to maintain performance (7).

“Seems sensible for CA to have revenue risk and responsibility to define network. Operators should have to comply with performance measures.”

Member of the public

A total of 76 members of the public that responded to this question made unfavourable comments. Specifically, these comments tended to relate to the fact GMCA will retain too much risk or responsibility (18), and that operators should retain a higher allocation of risk (14). Others voiced concerns about the fact that GMCA retaining monetary risk could mean the taxpayer may have to foot the bill, which could result in an increased financial deficit.

“It could result in a large financial deficit as seen in London, which may have to be recovered via cuts or tax/fare increases.”

Member of the public

A further 43 members of the public made conditional comments, and there were also a small number of other more general or miscellaneous comments.

9.4 Commercial Case: Impact of the Proposed Franchising Scheme on the employees of 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?

For more information see paragraphs 4.78 to 4.83 of the Consultation Document.

The Commercial Case of the Proposed Franchising Scheme sets out a section on the implications for employers of incumbent bus operators that will be affected. A total of 398 consultees responded to this question in total, with 183 favourable views, and 151 unfavourable. There were also a small number of conditional or general comments.

Table 9.4 Number of consultees who provided favourable and unfavourable comments about the impact on employers of operators

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (398)	183	151
Statutory consultee (13)	6	9
Non-statutory consultee (12)	6	6
Member of the public (373)	171	136

9.4.1 Statutory consultees

Statutory consultees gave mixed views on the proposals in terms of favourability. Amongst the few favourable comments, it was felt by some statutory consultees that the proposal will protect employees or uphold their legal rights through TUPE.

Bus operators / transport organisations

Go North West Ltd submitted a detailed response to this question, commenting that the legislation around TUPE and whether an employee's employment is principally connected with a local service must be upheld if an agreement with operators is not reached. They also voiced feedback in opposition to the proposal, making three key points:

- Concern about new entrants offering less favourable working conditions and pay than existing operators, due to undercutting on price in order to win contracts;
- The possibility of tighter scheduling demands on employees, and lower wages more generally across the market as operators are forced to cut costs; and
- The possibility that any employees made redundant under the Proposed Franchising Scheme would not re-enter the job market as many are unskilled or not trained in other markets.

"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."

Go North West Ltd

Stagecoach Manchester also submitted a detailed response to the proposal, first stating that the proposed impact on employers is likely to result in legal challenge from both operators and employees of operators. Stagecoach Manchester also gave some specific unfavourable feedback in response to the sections of the proposal concerning pension funding.

"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."

Stagecoach Manchester

Rotala PLC also provided a detailed response, primarily voicing concern about the impact on job security and a lack of stability given that contracts are proposed to be retendered every 5-7 years. They also left a comment regarding the role of the employee changing under the Proposed Franchising Scheme (to a more limited and less rewarding role).

Local authorities

Bolton Council was generally in favour of the proposals, stating that the authorities were in the best position to handle the impact of franchising on operator employees, provided favourable conditions were assured.

"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."

Bolton Council

Other statutory consultees

Similarly, UNISON Greater Manchester Transport Branch expressed that while they were generally supportive of the Proposed Franchising Scheme, they would like to be part of discussions about the impact on employees.

"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."

UNISON Greater Manchester Transport Branch

For those who voiced an unfavourable view, the main concerns were around the threat to job security under the Proposed Franchising Scheme, such as wages and contracts, while others made a comment around the concern that employees would be treated fairly and have their legal rights protected. Some felt that a partnership option would be a better solution.

9.4.2 Non-statutory consultees

Transport stakeholders

OneBus also gave a detailed response, voicing some concerns that costs and employment needs under the proposed allocation of contracts have been underestimated. They primarily considered that 1) there will need to be a greater number of new staff to manage the transition of contracts (and the added responsibility this would place on TfGM) and the transition of data sharing, and 2) the risk of employees leaving the job market if they are forced to relocate or travel further to take different routes. OneBus also commented that representatives of employees (such as local trade unions) are likely to demand agreements to be put in place for parity of pay and working conditions.

"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."*

OneBus

Action groups

Of those that commented, there was a split in terms of favourability of proposed employee terms amongst non-statutory consultees. The favourable comments given can be summarised as similar to that of those given by supporting statutory consultees: that the proposals will protect employees and provide job security. For example, action group Steady State Manchester Collective gave supportive comments around the improvement of worker conditions.

"... 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."

Steady State Manchester Collective

Unfavourable comments mostly centred around concern for the potential impact on job security in light of the possible terms for franchised contracts.

Furthermore, there was some specific feedback that mirrors quite closely themes raised by statutory consultees, relating to underestimation of costs related to new staff required to fulfil the role that TfGM will play and the potentially negative impact on current employees (i.e. having to relocate, change or reduce their role), and the risks in service delivery during the transition phase. Amongst those to leave a critical comment were the Chartered Institute of Logistics and Transport- North West Policy Group.

9.4.3 Members of the public

A total of 373 members of public responded to the proposed impact on operator employees and 171 gave favourable comments, while 136 left unfavourable comments.

General support for the proposal was the most commonly given response (65), while other commonly cited reasons for support included that the proposal will protect employees and treat them fairly (60), that it will protect job security (24) and protect pensions (21).

"Employees should benefit from this arrangement and there should be no job losses as a result of this (there should indeed be vacancies as more services will run)."

Member of the public

Those who were unfavourable gave comments that were generally reflective of the concerns voiced by statutory and non-statutory consultees: that it might pose a threat to job security, wages, contracts (102) and/or legal rights (24).

"How will the terms and conditions of the workforce be managed when transferring over. Is there anything to prevent a race to the bottom scenario (i.e. cut employee costs) to win a franchise bid. Whilst some aspect of this is required in normal business to maintain the safety and quality of the services there should be some form of protections to the employees or minimum standards from GMCA (with trade union approval)."

Member of the public

9.5 Commercial Case: Approach to depots

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.

A total of 262 consultees left comments to this question with 143 leaving favourable comments, and 69 leaving unfavourable comments. There were also a small number of conditional and general comments (please also see Section 6.11).

Table 9.5 Number of consultees who provided favourable and unfavourable comments about the proposed approach to depots

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (262)	143	69
Statutory consultee (12)	4	7
Non-statutory consultee (10)	6	5
Member of the public (240)	133	57

9.5.1 Statutory consultees

There was a mix of favourable and unfavourable responses from statutory consultees with regards to the proposed approach to depots.

Favourable comments included general support for GMCA issuing Compulsory Purchase Orders (CPOs) to take ownership of the depots, while unfavourable comments tended to argue against this – citing concern about the affordability of the approach, unrealistic timescales, or the general principal that depots should remain under the ownership of bus operators.

Bus operators/transport organisations

Unfavourable comments tended to derive from bus operators. Go North West Ltd commented that they oppose the proposal as part of their wider opposition to the Commercial Case, stating that a route-by-route approach would be a preferable option.

“With respect to large franchise contracts, see answer to Q11²² 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.”

Go North West Ltd

Stagecoach Manchester voiced concern over whether the acquisition of depots has been sufficiently costed, or financially viable for GMCA given other infrastructure challenges, as well as questioning the available resources and timescales that have been set out.

²² Please see section 6.11.1

"The recommended approach of procuring strategic depots places a further debt burden on TfGM and 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 infrastructure, alongside the added challenge of Brexit, we do question the legitimacy and value of utilising local government resource in this way."

Stagecoach Manchester

Transdev Blazefield Ltd stated that the proposition could be unfair to certain operators, due to the fact there is no guarantee that all depots in Greater Manchester would be purchased by GMCA, and that their preference would be to operate on a route-by-route system whereby operators can bid for routes and depots that are commercially viable.

"...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."

Transdev Blazefield Ltd

9.5.2 Non-statutory consultees

Non-statutory consultees that responded to the proposed approach to depots gave similarly mixed favourable and unfavourable views. A slight difference in favourable comments included the hypothesis that the depot proposals will drive competition or level the playing field for smaller operators.

Transport stakeholders

Unfavourable comments also flagged concern around the costs and timescales required to deliver the depot acquisition, as voiced by OneBus:

"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 to carry greater costs."

OneBus

Academic institutions

The University of Manchester voiced that the proposal offers an opportunity to ensure depots are run in a sustainable way moving forward.

“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.”

The University of Manchester

9.5.3 Members of the public

A total of 240 members of the public provided comments on the proposed approach to depots, 133 of which were favourable. The majority of favourable comments were that of general support for the proposals, while others voiced support for GMCA’s proposed CPOs of depots (30), and 14 stated they support GMCA taking over depots. Another 11 members of the public left favourable comments regarding GMCA building new depots.

“Think there should be a series of new, environmentally credible depots constructed as part of the plan, instead of the mixed, generally old depots retained.”

Member of the public

A total of 57 members of the public commented with unfavourable views – citing general disagreement / feeling that depots should remain with the operators (13), while others expressed that it would be better to use existing depots (as opposed to building new ones) (11) or questioned the affordability of purchasing depots (10).

“Operators need to be left to build/own and run their own depots. Specific operators run things very differently and so they need to build the depots to suit them. There is no need to own the depots as well unless as stated before you are power mad. Owning the depot is just extra costs for you and absolutely useless. It provides no operational benefit.”

Member of the public

9.6 Commercial Case: Proposed approach to management of the fleet

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 Commercial Case for franchising proposes that operators would continue to own or lease bus fleet. A total of 327 consultees responded to this question, with 97 favourable comments, and 69 unfavourable. There were also 73 general comments made by members of the public.

Table 9.6 Number of consultees who provided favourable and unfavourable comments about the proposed approach to fleet

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (327)	97	69
Statutory consultee (19)	5	7
Non-statutory consultee (16)	5	8
Member of the public (292)	87	54

9.6.1 Statutory consultees

Of the statutory consultees which left a comment on the proposed management of bus fleet, there were a mix of favourable and unfavourable views. Many of the favourable comments were in general support, without further explanatory reasons provided.

Unfavourable comments tended to surround the issue of affordability of the proposal, or the fact that the responsibility for the value of fleet should remain with the operators.

Bus operators / transport organisations

Go North West Ltd responded with a detailed response that recognised the approach to be reasonable once operational. However, it also voiced concern about the transition period due to likely disputes about what is to be included in the Residual Value (RV) mechanism, and the need for a clear specification on assets to be included under the proposal.

"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."

Go North West Ltd

Rotala PLC left an unfavourable comment relating to the likely cost incurred by operators under a franchising system, due to the fact that under current conditions large operators are able to negotiate their own (lower) prices.

"Rotala PLC 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 price."

Rotala PLC

Transdev Blazefield Ltd left a detailed comment, and while not sharing direct opposition to the proposals, they did raise a number of questions which were deemed to be unclear in the consultation document, summarised below:

- 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 operator of the second franchise wish 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 second operator needs to bear?

Local authorities

Cheshire West and Chester Council, along with Cheshire East Council, left separate responses to the fleet proposal. While generally favourable of the approach, these local authorities commented that the franchising proposal should work with other authorities to ensure that environmental considerations are central to future decision on bus fleets.

"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."

Cheshire West and Chester Council

Similarly, West Yorkshire Combined Authority left a comment about the need to ensure franchising works in tandem with the Clean Air Plan and engage with operators on this to ensure the target of a zero-emission fleet is realised.

Derbyshire County Council commented that the proposal may stifle opportunities for bus operators to come forward with new proposals or approaches to the fleet.

Other statutory consultees

TravelWatch NorthWest voiced their support for the franchising proposal in relation to the fleet, particularly around the commitment to low emission buses.

"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."

TravelWatch Northwest

9.6.2 Non-statutory consultees

Favourable comments left by non-statutory consultees in relation to the proposed management of fleet were mostly of general agreement, while once again specific positive comments concerned future environmental considerations.

Transport stakeholders

OneBus identified concern about the requirement for operators who may be incumbent but lose out under franchising to sell their fleet, and could charge more to winning operators. They also commented that the Clean Air Plan not being included in the proposal could mean that it may not be delivered.

Academic institutions

The University of Manchester also indicated favourability toward the Proposed Franchising Scheme in terms of its environmental benefits.

"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."

The University of Manchester

Other non-statutory consultees

Ryse Hydrogen Ltd, a company that specialises in renewable-powered fuel for buses, voiced their support for the proposals, particularly around GMCA having authority over emissions standards.

"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 is ensuring wider clean air objectives can be better met."

Ryse Hydrogen Ltd

Friends of Walkden station left a detailed response, outlining several benefits of the Proposed Franchising Scheme, but also some conditional comments for consideration. Their comments related specifically to the fleet and included some positive feedback about the environmental opportunities that franchising could offer.

Unfavourable comments included concern about the cost / affordability, failure to align with environmental objectives, and the fact operators will require incentives to provide services.

9.6.3 Members of the public

A total of 292 members of the public left a comment regarding the proposed approach to fleet management. Within these, 87 left favourable comments, and 54 responses were unfavourable. There were also 73 general comments made by the public, most of which considered to be out of scope in relation to this question.

A number of the favourable comments (72) were that of general agreement with the Commercial Case. Unfavourable comments were similar to those given by statutory and non-statutory consultees, including affordability (17), or that the responsibility for managing the fleet should be on the operators (8). A small proportion voiced concern about the use of public funds in relation to upkeep or new fleet (7).

"I can only imagine you would like an eco-friendly fleet, the cost of which would probably also fall to the taxpayer which I do not agree with. Operators in my area are constantly upgrading at their own expense so why change that."

Member of the public

9.7 Commercial Case: Intelligent Transport Systems (ITS)²³

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.

A total of 403 consultees left responses to the Intelligent Transport System (ITS) Proposal, 241 of which were favourable. Just 62 were unfavourable, while there were also a small number of conditional and general comments made by consultees.

²³ such as ticketing, vehicle location and driver communication systems

Table 9.7 Number of consultees who provided favourable and unfavourable comments about the proposed approach to Intelligent Transport Systems (ITS)

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (403)	241	62
Statutory consultee (16)	9	3
Non-statutory consultee (19)	14	3
Member of the public (368)	218	56

9.7.1 Statutory consultees

Bus operators/transport organisations

Bus operator Go North West Ltd also indicated favourability towards the proposal for ITS implementation, but flagged that CCTV should not be a part of the services included.

"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."

Go North West Ltd

Of the few unfavourable comments, it was raised that the timescales required to implement ITS may be unrealistic, while other responses voiced concern around the affordability of the proposals.

Local authorities

Responses to the proposed ITS section included mostly favourable comments from statutory consultees, typically general agreement with the proposal. For example, there were favourable comments made by Bolton Council offering their support for the proposal which was deemed to improve customer experience.

"The Council supports GMCAs 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."

Bolton Council

9.7.2 Non-statutory consultees

Non-statutory consultees who responded to the case for ITS voiced similar sentiment to that of the statutory consultees, in particular how it would improve overall customers experience, with many leaving favourable comments. Aside from general favourability, there was also some mention of the fact new technologies are long overdue and should be introduced as soon as possible. Others mentioned the need to improve bus services for customers, including accessibility for those with disabilities.

Transport stakeholders

OneBus shared the view that timings would be unrealistic and that franchising is likely to start before proposals for ITS are implemented, therefore there should be something else in place in the meantime. The Chartered Institute of Logistics and Transport shared a similar view, and also sought information around contingencies if implantation of ITS proves to be a long process and/or costly.

"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?"

The Chartered Institute of Logistics and Transport

Elected representatives

Amongst those that share this view was Kate Green, MP for Stretford and Urmston.

"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."

Kate Green, OBE MP

There were minimal unfavourable comments, and those left were also similar to those given by statutory consultees, including the perception that implementation of ITS is overly ambitious within the timeframes, or could be costly.

9.7.3 Members of the public

A total of 218 out of 368 members of the public who responded to the proposed ITS project gave favourable comments, the majority of which were expressions of general agreement (197). Other more specific feedback included favourability towards the prospect of vehicle location display systems (13).

“Having experienced the benefits of these types of system in other parts of the UK and abroad it is essential that such systems be adopted as a matter of priority within the franchised services.”

Member of the public

A total of 56 members of the public who responded to the ITS proposal gave negative views. Beyond general opposition, others voiced concern about affordability or cost control (15), or that it will not work due to GMCA/TfGM lacking the expertise to implement such systems that might be better left for the operators to deal with (10).

“Local authorities, the Greater Manchester Police and some government departments have a bad record with regard to the procurement and operation of IT systems. I think this could cause innumerable, unnecessary and avoidable problems.”

Member of the public

There were also a small number of conditional or general comments made by the public, these tending to be quite balanced views or out of scope in relation to the question.

9.8 Commercial Case: Approach to procuring franchise contracts

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.

A total of 160 consultees responded to this question, with 59 making favourable comments, and 45 unfavourable. There were also a small number of conditional or general comments.

Table 9.8 Number of consultees who provided favourable and unfavourable comments about the proposed approach to procuring franchising contracts

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (160)	59	45
Statutory consultee (12)	7	6
Non-statutory consultee (10)	4	1
Member of the public (138)	48	38

9.8.1 Statutory consultees

Many of the statutory consultee responses to the approach for procuring franchise contracts were positive. Reasons given tended to be general agreement, while a small number of responses were favourable because of the likelihood that it will drive up competition between operators.

Bus operators / transport organisations

Go North West Ltd left a detailed, critical response to the proposed approach to procuring contracts. Rotala PLC also left an unfavourable comment that due to the fact many operators oppose franchising, this may drive down competition for tendering.

"...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."

Rotala PLC

Transdev Blazefield Ltd voiced concern over the fact there is a lack of middle ground in the shape of contract procurement for medium size (51-100 buses) franchises.

Local authorities

Within the unfavourable comments, there were a range of reasons given, including the timescales and consideration that a route-by-route approach would be better. This point was made by Derbyshire County Council.

"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."

Derbyshire County Council

9.8.2 Non-statutory consultees

Comments left by non-statutory consultees tended to be similar to those of statutory organisations, with a number generally agreeing with the proposals in terms of them being fair and accessible for operators and the likelihood of it driving up competition between competitors.

Transport stakeholders

Some specific unfavourable comments were left by non-statutory consultees, including OneBus. They made a comment around the timescales of each tranche appearing to be over ambitious or unrealistic, with particular focus on the time between tranches not actually allowing time for lessons learnt, and the assumptions depots will be available for new bidders within the timeframe of procurement.

Academic institutions

Amongst those favourable were The University of Manchester, who praised the procurement process as reasonable for operators to make bids.

"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."

The University of Manchester

9.8.3 Members of the public

A total of 138 members of the public provided comments regarding the proposed procurement of contracts. A total of 48 made favourable comments, the majority of which (45) were generally favourable without giving specific reasons.

A total of 38 consultees were unfavourable, the most commonly cited reason was general disagreement (11), followed by worries about the costs/affordability (8).

"I hope it proves simple for all the potential operators, so that unsuccessful ones haven't wasted much money."

Member of the public

There were also a small number of conditional and general comments made by members of the public, giving either balanced views or comments considered to be out of scope for this question.

9.9 Commercial Case: Impact on objectives of neighbouring transport authorities

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.

A total of 240 consultees responded to this question. Within this, 121 made favourable comments, and 46 were unfavourable. There were also a small number of conditional or general comments made by consultees.

Table 9.9 Number of consultees who provided favourable and unfavourable comments about the impact of the options on the achievement of the objectives of neighbouring transport authorities

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (240)	121	46
Statutory consultee (25)	16	9
Non-statutory consultee (15)	10	4
Member of the public (200)	95	33

9.9.1 Statutory consultees

There were a number of comments left by statutory consultees regarding the impact on neighbouring transport authorities, including:

- Support for bus services working together with neighbouring authorities;
- Maintenance of cross-boundary services; and
- Support for the introduction of a cross-boundary ticketing system.

Unfavourable comments included concern about the impact on customers travelling from neighbouring authorities, the asserted failure to promote bus usage as opposed to travelling into Greater Manchester by car, and concerns around the affordability of the proposed approach to addressing the objectives of neighbouring transport networks.

Bus operators/transport organisations

Bus operators responding to the consultation on neighbouring authority impacts were concerned over the impact on service quality and passengers. Go North West Ltd issued a detailed comment to this effect (i.e. that outside services will not be included in the Proposed Franchising Scheme). Specifically, they stated that cross-boundary routes should be included in the Proposed Franchising Scheme in co-operation with transport authorities outside of Greater Manchester, and if it doesn't it would risk a reduction of services and reduced competition amongst operators.

"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."

Go North West Ltd

Stagecoach Manchester left a less detailed response along similar lines and identified the potential detrimental impact on services and communities that use transcending networks.

Bus operator Transdev Blazefield Ltd recognised support for a permit-based system that allows for services to work alongside franchised services, but did share concerns about the abstraction of specific services.

Local authorities

Local authorities, including those which considered themselves to be affected, left detailed feedback, some of which pertained to specific local routes and services, or suggestions put to GMCA. West Yorkshire Combined Authority (WYCA) acknowledged that the impact on neighbouring authorities has been considered in the Commercial Case, but made the following points in their detailed response:

- WYCA would welcome further discussions on the role local authorities can play in the service permit regime, such as ensuring cross boundary services are maintained and others are not being prevented from being established;
- A collaborative approach to marketing and cross boundary ticketing; and
- Greater interoperability to support the overarching transport strategy objectives to enhance connectivity and creating a more integrated public transport system.

Lancashire County Council also provided a detailed response outlining concern about the permit scheme should it place restrictions on services between Lancashire and Greater Manchester and would seek assurances that GMCA will ensure services are maintained.

"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."

Lancashire County Council

Derbyshire County Council submitted similar concerns about the potential negative impact on neighbouring services and made a comment that the proposals lack sufficient detail or consideration over specific services that will be affected.

"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."

Derbyshire County Council

9.9.2 Non-statutory consultees

There was a similar level of mixed response to the proposed impact on neighbouring authorities from non-statutory consultees. Many of those which gave favourable comments cited that it is important that other authorities are considered, and that cross-boundary services are being factored into the planning for a franchising model.

Similarly, those who commented with unfavourable views responded with comments concerning the complex nature of the impacts on cross-boundary services, the potential cost implications, and impact on passengers reliant on crossing between area boundaries.

Operator representative OneBus also commented with concern around potential cost implications and risk of services being withdrawn if neither operators nor neighbouring authorities are willing to account for the services.

“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.”

OneBus

9.9.3 Members of the public

A total of 200 members of the public responded to the proposed impact on the objectives of neighbouring local authorities, with 95 leaving favourable comments and 44 gave general support. Specific comments identified the importance of working in partnership to maintain cross-boundary services (35), bus services working closely together with neighbouring authorities (20) and establishing a cross boundary ticketing system (5).

A total of 33 members of the public were unfavourable towards the proposed impact on local authority objectives, primarily voicing general opposition(11) , concerns around routes and services outside of Greater Manchester that are expected to be maintained (9), or the lack of evidence to support the approach (5). There were also a very small number of conditional or general comments made by members of the public.

9.10 Commercial Case: GMCA's ability to secure the operation of services under franchised contracts

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.

A total of 194 people responded to this question with a comment, 118 of which were favourable and 68 were unfavourable. A small number of other comments were made considered to be miscellaneous or general.

Table 9.10 Number of consultees who provided favourable and unfavourable comments about the conclusion that GMCA would be able to secure the operation of services under franchise contracts

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (194)	118	68
Statutory consultee (11)	5	5
Non-statutory consultee (10)	5	6
Member of the public (173)	108	57

9.10.1 Statutory consultees

Of the statutory consultees providing a response, there was a mix of favourable and unfavourable comments. The favourable comments were typically in general agreement with the conclusion.

Bus operators / transport organisations

Go North West Ltd submitted a detailed response, the crux of which was unfavourable to the conclusion made by GMCA, specifically:

- The risk involved for passengers and GMCA during transition;
- GMCA's assumption it will acquire all depots is unrealistic; and
- The tendering process is likely to take longer than the timescale GMCA has allowed.

Rotala PLC also left a critical comment, first ascertaining that there is not an appetite for franchising amongst operators, and that the Greater Manchester-wide tendering process would not be suitable for Rotala PLC. They also commented about the potential for large operators to withdraw from the market, and overall stated a preference for the partnership option.

“...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.”

Rotala PLC

Transdev Blazefield Ltd commented that the proposals should offer flexibility in contract size, depot provision and fleet provision.

Other statutory consultees

TravelWatch NorthWest offered positive comments, concluding that not all operators would oppose franchising 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.”

TravelWatch NorthWest

Unfavourable comments were mostly around concern about there being sufficient incentive for operators to bid for contracts or provide services under a Proposed Franchising Scheme.

9.10.2 Non-statutory consultees

There were a limited number of responses from non-statutory consultees on the conclusion that GMCA would be able to secure the operation of services under franchise contracts, and similarly a split of favourable and unfavourable comments.

Transport stakeholders

OneBus commented that a partnership option would be the preferred outcome for many bus operators, citing the need for a system that offers quality services and allows access to the market for small and medium operators, the final costs meaning it may be difficult to attract new operators to the market, and that the partnership model would be faster and cause less customer inconvenience.

9.10.3 Members of the public

A total of 173 members of the public responded to the conclusion that GMCA can secure franchise contracts. Of these 108 made favourable comments, the vast majority of which were that of general support (103). A total of 57 responded with unfavourable comments. Beyond just generally negative views (15), the most common reasons given that were unfavourable included:

- Concerns about operators requiring incentives or profits in order to bid / provide services (16) and;
- The affordability / cost control or value for money of the proposal (8)

“The franchise needs to be made attractive to a company to bid however the attractiveness is the downfall of the cases if too attractive it will fail due to low bids this needs to be made clear from the start the implications and costs to any potential bidder to ensure no offer is attractive to fail.”

Member of the public

9.11 Commercial Case: Implications of the partnership options

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.

A total of 166 consultees left a comment regarding the implications of the partnership options as set out in the Commercial Case. Of these, 49 consultees were favourable towards partnership options, and 92 were unfavourable. There were also a small number of conditional or general comments made by consultees.

Table 9.11 Number of consultees who provided favourable and unfavourable comments about the assessment of the commercial implications of the partnership options

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (166)	49	92
Statutory consultee (12)	5	8
Non-statutory consultee (13)	6	11
Member of the public (141)	38	73

9.11.1 Statutory consultees

There were a limited number of comments left by statutory consultees – most were unfavourable.

Those who left favourable comments tended to be supportive of the proposed partnership option, either generally or relating to the Voluntary Partnership Agreement (VPA) proposed by operators.

Bus operators / transport organisations

Bus operators responding to the assessment of the proposed partnership model tended to argue against the limited benefits as set out in the consultation document. Go North West Ltd commented that the Partnership Plus model could deliver equal or better benefits, and also that it would allow flexibility to deliver services on a route-by-route basis.

"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."

Go North West Ltd

Rotala PLC also stated that a Partnership Plus option would bring benefits to meet GMCA's objectives, citing the speed with which this option could be delivered.

Stagecoach Manchester suggested an alternative partnership arrangement. They also challenged the statement that GMCA would be in a similar position to operators in the current market in needing to adapt, because they feel operators could adapt more quickly, and reallocate resources faster to the benefit of passengers.

Transdev Blazefield Ltd also left a comment in favour of the proposed partnership options, stating not only does it offer a lower risk for operators and passengers, but also for local authorities and transport bodies.

"We believe the 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 publicly funded infrastructure improvements."

Transdev Blazefield Ltd

Local authorities

Bolton Council left an unfavourable comment towards the proposed partnership options as stated in the Commercial Case, stating that the options do not offer the same benefits of a Proposed Franchising Scheme.

"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."

Bolton Council

9.11.2 Non-statutory consultees

As with the statutory consultees, non-statutory consultees held mixed views on the assessment of partnership options as stated in the Commercial Case. Bus operators responded in support of the

proposed partnership options, contesting the assertion that the Proposed Franchising Scheme would bring greater benefits.

Transport stakeholders

OneBus opposed the statement around interoperability benefit being reduced under a proposed partnership scheme, as part of a detailed response.

“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.”

OneBus

Other non-statutory consultees

Others, including The Chartered Institute of Logistics and Transport-North West Policy Group, and Steady State Manchester Collective made unfavourable comments towards the proposed partnerships models (and in favour of the Proposed Franchising Scheme).

“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.”

Steady State Manchester Collective

9.11.3 Members of the public

A total of 141 members of the public left comments on the commercial implications of partnership options, of which 38 gave favourable views, with 25 voicing general favourability towards partnership options. Others mentioned support for the EPS / Enhanced / Ambitious Partnership, while slightly fewer indicated favourability towards the VPA / Operator Proposed Partnership.

A total of 73 members of the public left unfavourable comments, with quite a mix of different reasons given, including:

- General disagreement with partnership options (19);
- Stating that the partnership model is flawed (21);
- Preference for the Proposed Franchising Scheme (15); and
- Concern around costs / affordability related to partnership options (7).

"Commercial considerations should come after a new GMCA franchise system. We, the travelling public, should not be beholden to private companies profit margins or their shareholder dividends...the private bus companies will make a fair profit [hopefully] but will no longer be able to dictate who or when or at what price, the general public can travel. Obviously the companies will need paying a fair price for their services, but under the Franchise system we will be paying them to provide a public service [not a private service] and we [the passengers] will expect fair fares, regular services and efficient timetables."

Member of the public

A small minority of the general public that responded made general or conditional comments such as the proviso the proposal is executed properly.

9.12 Commercial Case: Impact of the partnership options on the employees of operators

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.

A total of 174 consultees responded to this question - 46 made favourable comments, while 92 made unfavourable comments. There were also a small number of conditional or general comments made by consultees.

Table 9.12 Number of consultees who provided favourable and unfavourable comments about the potential impact of the partnership options on the employees of operators

	Number of consultees who made favourable comments	Number of consultees who made unfavourable comments
All who provided a response (174)	46	92
Statutory consultee (8)	6	2
Non-statutory consultee (6)	3	3
Member of the public (160)	37	87

9.12.1 Statutory consultees

Many of the statutory consultees responding to this question around the effect on employees made favourable comments, agreeing that the partnership model would not impact employees and would keep jobs secure.

Bus operators/transport organisations

Rotala PLC provided more detail on this in support of the assumption and the importance of employee welfare.

"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."

Rotala PLC

Similarly, Go North West Ltd responded with a favourable comment, stating that partnership approaches would have a more positive impact than a Proposed Franchising Scheme, due to the lack of disruption on employees.

9.12.2 Non-statutory consultees

There were a limited number of non-statutory responses to the impact on employees under a partnership model, but similarly supportive comments tended to come from responding transport stakeholders including OneBus.

Steady State Manchester Collective had an unfavourable view, stating that the current market does not benefit employees.

"The partnership options would mean no improvement for employees who are caught in the race to the bottom of the free market."

Steady State Manchester Collective

9.12.3 Members of the Public

A total of 160 members of the public responded with comments on the proposed impact of the partnership options on employees, with 37 responses being favourable, and 87 being unfavourable. A small number gave conditional or general comments.

Those who were favourable tended to generally agree with the statement (31), or state in further detail that they agree it will have no impact or effect on employees (6).

Members of the public who were unfavourable mostly expressed concern about employees' job security under a partnership approach (69).

"Under a partnership scheme, employees would still be subject to the bus operator's commercial whims. If one of the operators pulls out of bus operations, there wouldn't be the same safeguards you get from transitioning to another operator, as under a franchised structure."

Member of the public

10. The Financial Case

This chapter summarises questions on the Financial Case, its conclusion that GMCA could afford to introduce the Proposed Franchising Scheme and GMCA's proposal as to how it would fund its introduction. It also summarises responses to Q31 on the affordability of the partnership options.

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

10.1 Affordability of the Proposed Franchising Scheme

The question on the consultation response form was as follows:

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.

The table below summarises the participants who provided a response to this question.

Table 10.1 Number of participants who provided favourable and unfavourable comments about the conclusion of the Financial Case

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (1986)	1411	499
Statutory consultee (19)	8	15
Non-statutory consultee (38)	26	8
Member of the public (1929)	1377	476

10.1.1 Statutory consultees

Local authorities

One of the main concerns expressed by some local authorities within Greater Manchester was the uncertainty over the financial implications on them to successfully implement bus reform. Whilst most local authorities acknowledged that this was a one-off financial contribution, a question remained about clarification of their individual share of the one-off increase in the statutory contribution. There was also uncertainty over any potential ongoing contribution which might be expected from Greater Manchester

local authorities, and which could impact on the delivery of other public services, and how this might be split between the 10 Greater Manchester local authorities. Linked to this, Bolton Council also emphasised the importance of the Proposed Franchising Scheme being fully funded by GMCA/TfGM, without the need for ongoing financial recourse for local authorities.

"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."

Tameside MBC

"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."

Salford City Council

Stockport Council and Salford City Council expressed concern towards the timing of the proposed precept for residents. Stockport Council were concerned that this would be levied before its residents have experienced the benefits of the Proposed Franchising Scheme, whilst Salford City Council wanted further detail on the impact of using the precept (and Mayoral 'earn back' funds) on future projects and programmes.

"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."

Salford City Council

Both Tameside MBC and Bolton Council identified a potential risk as to whether future fare contribution would be sufficient to part-fund the Proposed Franchising Scheme. They questioned what would happen if there was a shortfall. Tameside MBC felt that the level at which fares would be set at the start of the franchise process would impact on the additional financial support which might be expected. Both local authorities identified this area of the Financial Case as a significant risk.

Some local authorities also questioned the role of central government in contributing to the funding, with Rochdale Borough Council concerned that central government's ongoing reduction of local authority funding would make the council's contribution particularly challenging. Stockport Council also hopes that government would be able to make a greater financial contribution to the Proposed Franchising Scheme.

Salford City Council made further comment about 'farebox revenue'²⁴ and other complementary funding sources and identified that the projected downward trend in patronage could require a mitigation strategy which might involve reduced service availability and/or raise fares. The council considered this

²⁴ Farebox revenue is the money paid by passengers to use the mode of transport

potential scenario to be challenging when put to the public, particularly when their aspirations have been raised through the franchise proposal.

Manchester City Council re-affirmed its commitment to work with GM treasurers to ensure that there is transparency on the financial implications.

Bus operators/transport organisations

The bus operators questioned the costs identified in the Financial Case to introduce and operate a Proposed Franchising Scheme, which is seen currently in London.

“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.”

Arriva UK Bus

Several bus operators did not accept the accuracy of the Financial Case or the costs included in the Assessment to introduce and operate the Proposed Franchising Scheme:

- Go North West Ltd made reference to what it considered several under-estimations concerning:
 - Farebox revenue, which it felt GMCA had over-estimated the amount which could accrue from ‘soft factor’ benefits’
 - The Bus Services Operator Grant²⁵, which could be reduced and would have a significant impact on costs.
 - Additional funding from Greater Manchester’s local authorities and the Mayor, which are unrealistic given residents may perceive that bus services are currently adequately provided at lower risk.
 - Lack of contingency relating to the fall-back position if funding from identified sources (i.e. local authorities, the Mayor and central government) did not materialise.
 - The perceived inadequacy of the sensitivity testing.

The operator also reiterated the potential for legal challenge as the Proposed Franchising Scheme does not appear to meet the statutory test for value for money.

- Stagecoach Manchester also referenced flaws in the assessment and audit:
 - It did not think that GMCA has complied with the requirements set out in the Transport Act 2000 and in the relevant Department for Transport guidance.
 - The significant expenditure taken to invest to set up bus franchising would be better spent elsewhere.
 - No change to labour models, which is at odds with the views of key stakeholders as to labour costs.

²⁵ BSOG is paid to operators of eligible bus services and community transport organisations to help them recover some fuel costs. The amount each bus operator receives is based on their annual fuel consumption.

- The reduction of revenue protection officers from 30 initially to 13 (Full Time Equivalent FTE) in 2026/27, which could have a negative impact on the fare box revenue.
- The Financial Case does not include impact for the Our Pass²⁶ scheme, which could be an oversight in the assessment.
- The statement at paragraph 42.1.10 provides £96m of benefits to franchising though the reallocation of central government funding, which in reality will just be reallocated to cover the costs of concessionary schemes and therefore should be not claimed as a benefit.

"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."

Stagecoach Manchester

- Rotala PLC referenced the potential risk to bus operators, in terms of the significant financial detriment to, and in some cases, closure of their business in the event of being unsuccessful in winning one or more franchises. No compensation has been included as part of the Proposed Franchising Scheme and there is no provision for the cost of potential litigation when assessing the affordability of the Proposed Franchising Scheme.

Views of elected members

Bury Council collated views of elected members about the conclusion of the Financial Case. These sought additional clarifications about the one-off funding of £17.8m and how it would be split, further detail on the revenue funding, the implication of franchising on the future infrastructure improvement works, risk identification and mitigation and the potential for zonal pricing to be introduced.

Trade unions

UNISON North West considered the £14 increase in council tax was a price worth paying for an improved bus network. Unite the Union re-emphasised the importance of buses within Greater Manchester and the impact on reducing congestion and pollution.

Other statutory consultees

Bus Users UK questioned the need for ongoing taxes to fund the Proposed Franchising Scheme, above and beyond the one-off levy to introduce it. It also referenced the London model which shows that reinvestment to keep the vehicles up to date would use any surplus.

²⁶ Our Pass is for 16-18* year olds who live in Greater Manchester to travel across Greater Manchester via bus

“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.”

Bus Users UK

10.1.2 Non-statutory consultees

Transport stakeholders

OneBus considered that the cost of transition and the ongoing annual costs are grossly underestimated. It also accepted in principle that GMCA could afford to introduce the Proposed Franchising Scheme but also did not accept the accuracy of the Financial Case.

Academic organisations

The University of Manchester Students' Union expressed concern as to where franchising would sit in the list of priorities, given the likely funding cuts to local councils. The University of Manchester hoped there were plans to mitigate against significant change occurring mid-franchise, including the financial implications of low uptake, which it did not think was clear from the documentation.

Other non-statutory consultees

Better Buses for Greater Manchester considered the increase in council tax to be a price worth paying for the average household to have a better bus network. It identified the better value for money which would be an outcome from the Proposed Franchising Scheme compared to the current situation.

Other non-statutory consultees also agreed that the costs associated with the Proposed Franchising Scheme would be a good investment. Manchester Friends of the Earth identified its importance in the context of tackling the impact and costs from the transport sector on public health and climate change emissions.

Bruntwood suggested new ways of funding such a change, specifically concerning the devolution of road tax, or charges related to air quality or carbon taxes which could be further diverted.

The Christie NHS Foundation Trust could not find a reference to any cost for fleet improvement, whilst Manchester Airport Group warned against pursuing bus franchising instead of other transport investment priorities which have also been identified.

10.1.3 Members of the public

Overall, a total of 1,929 members of the public provided a comment in response to the conclusion of the Financial Case.

There were 1,377 members of the public who made a favourable comment towards the Financial Case conclusion. Of these, just over a third (703) made general comments in agreement with the conclusion, or offered their support to it. A smaller proportion of participants reiterated the positive outcome, which would be a reformed and improved bus service, whilst a similar number of participants (91) considered it was long overdue and reform should not be delayed any longer.

Other participants went into more detail about specific elements of the Financial Case. Throughout the consultation, a demand for cheaper ticket prices has been expressed, and participants reiterated this support in responses to this question (109). The positivity towards other outcomes was also evident in a similar number of other responses – the measures were seen as being ultimately necessary to encourage bus use and could lead to fewer cars on the road (101).

Some participants made specific comments in response to specific details of the Financial Case. The reform was seen as money well spent (69), whilst others felt a rise in council tax was a modest subsidy to spend to reform the market (80). A further 22 participants agreed that the taxpayer should pay a modest subsidy given the benefits of a reformed bus network which they would benefit from.

"I agree with the conclusion, and would be happy to pay higher council tax if it meant public transport was improved."

Member of the public

"The suggested raise in council tax of about 14 pounds is reasonable. This investment will be excellent for improving transport in GM."

Member of the public

Whilst the initial financial investment appears to be high to establish the Proposed Franchising Scheme, there was belief that the long-term benefit would reward this upfront cost (54). In particular, the resulting strategic co-ordination of the bus network with the wider public transport network was identified as a particularly positive outcome (55).

A number of participants supported the proposed funding sources identified for the Proposed Franchising Scheme, including projected funding from central government (40), from Greater Manchester's local authorities (14) and from Mayoral funds (1).

"It would have to be subsidised and funded from both local and central government to work."

Member of the public

Other favourable responses which were made in response to the Financial Case included:

- The importance of the Proposed Bus Franchising Scheme and how it would contribute to social value/the creation of a sense of community in Greater Manchester (37);
- Bus services will be more widely available (30), particularly at evenings and weekends (24), and will serve the public benefit and no longer run for profit (35);

- The importance of GMCA delivering a cost neutral service (i.e. not for profit) which meant any surplus revenue would be re-invested (26);

"The current system directly costs money already through subsidies required on routes operators wouldn't otherwise provide, these could be offset against fares on more popular routes and an increase of fare box income."

Member of the public

- The numerous operators currently in the market, and how bus franchising would resolve the fragmentation of service by bringing it under central control (16). Others identified the competition on profitable routes as a major problem which would also be resolved (11); and
- Introduction of a more modern, comfortable fleet would overcome many of the quality issues which prevent greater usage of bus at the moment (14).

A total of 476 members of the public made unfavourable comments about the conclusion of the Financial Case.

A total of 57 participants expressed general opposition to the conclusion of the Financial Case. The principal concern was around the affordability of the Proposed Franchising Scheme, particularly concerning the control of costs and associated value for money (161).

"I fail to see how current plans will not incur further cost to residents in the future. There is continued reference to cities such as London which are already subsidised but also benefit from higher tourist rates and higher numbers of travellers in addition. This is not a culture that exists in Manchester."

Member of the public

"I have concerns about the high initial costs of the PFS. Particularly, I wonder whether this cost would rise significantly as the project gets underway."

Member of the public

The use of taxpayer subsidies and other public funds was another common concern (89), with specific concerns about the increase to council tax (or the Mayoral precept) mentioned by a similar proportion to explain why they were unfavourable towards the Financial Case conclusion (93).

"No subsidies. The Mayoral precept is growing each and every year. I do not want to pay any more tax. I see my council tax bill and note that the Mayoral precept is growing year on year -no more, it has to stop."

Member of the public

There was concern about the lack of evidence to support the Proposed Franchising Scheme, mainly because it is a largely unproven concept in the UK (aside from London) (30), whilst doubt was expressed as to whether GMCA (and by extension TfGM) had the expertise to deliver (20).

"A contracting system involves considerable transaction costs and the ability of the franchisor to assess the relative merits of different bids by potential franchisees. There is no evidence that this ability resides in TfGM, while the use of external consultants can be expensive."

Member of the public

A handful of other comments were raised by members of the public, including:

- Concern regarding the risk being carried by GMCA (18);
- Bus reform in itself is unnecessary, because it was felt they are actually performing well (13);
- The assessment was perceived by a few as favouring a pre-determined option and is not impartial (10).

"Financial cases can easily be made for anything - the Financial Case should be independently examined and the assumptions made risk assessed."

Member of the public

A number of comments (151) were received by members of the public which offered conditional support for the conclusion of the Financial Case. The majority of these (41) would show support provided that the conclusion of the Financial Case is affordable, whilst some would support it provided it delivers against its objectives of improving the bus service (20) or if it leads to greater reliability (18).

"I think that the franchising scheme should go ahead should the consultation process and the financial situation prove the case."

Member of the public

Others wanted a guarantee that bus fares and associated ticket prices would not rise (29). There was a call for greater openness and transparency concerning the process (18), with a call for greater due diligence and legal scrutiny being requested by others (10). A small number of participants were opposed to the increase in council tax and would support it only if this was ruled out (10).

A total of 235 members of the public made a suggestion within their response to the conclusion of the Financial Case which concerned potential changes to the Proposed Franchising Scheme. The principal suggestions were that consideration should be given to subsidised travel for young people (6), to prioritise cycle lanes and allowing bikes to be carried onto buses (3), that consideration should be given to free bus travel (4) and that the image of buses should be improved to remove the stigma of travelling on them (3).

"Buses need a complete overhaul to shake bad reputations. Friends of mine who drive say they could never take a bus, the old opinions that they smell of urine and are full of crazy people still stand strong. Invest in shaking this reputation through marketing and actually improving the services."

Member of the public

A total of 150 members of the public made suggestions within their response to the conclusion of the Financial Case which are already proposed/covered in the Proposed Franchising Scheme.

These included:

- The consideration which needs to be given to roadworks, traffic congestion and any mitigatory traffic management measures (24);
- Consideration which should be given to farebox funding, so the Proposed Franchising Scheme can be self-funding (18);

“Concerned that the proposed funding could put more pressure on household budgets to provide something which ought to be self-funding.”

Member of the public

- The needs of disabled, elderly and vulnerable passengers (12);
- The need to consider environmental value (14);
- The need to provide improved infrastructure for buses, including bus priority measures (10);
- Reorganisation of the bus routes and timetables (12).

There were some other, general comments submitted concerning the conclusion of the Financial Case (70). A number of these comments were neutral and would be in favour of whichever option would be the most beneficial and best value for money (16).

“As long as it's efficient to move people quickly from point A-B and it doesn't cost more than the current options, don't think the people will mind too much if it's a franchise or not.”

Member of the public

There were also a small number of comments to consider social value and the importance of any bus reform to the community (12).

10.2 Affordability of the partnership options

This section summarises a question about the affordability of the partnership options.

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.

A total of 203 participants made comments about the affordability of the partnership options. The table overleaf summarises the participants who provided a response to this question.

Table 10.2 Number of participants who provided favourable and unfavourable comments about the affordability of the partnership options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (203)	67	96
Statutory consultee (10)	5	5
Non-statutory consultee (8)	2	5
Member of the public (185)	60	86

10.2.1 Statutory consultees

A total of 10 statutory consultees made comments in response to question concerning affordability of the partnership options. The main issues raised in these comments included:

- A need to ensure that any additional costs are not covered by Greater Manchester local authorities;
- Concern that the partnership options would mean bus operators retain the farebox revenue;
- The issue of risk was also raised by Rotala PLC, which questioned why staffing risk had not been applied to the Proposed Franchising Scheme given the proposal requires new staff, and therefore should be as great as that applied to the partnership options;
- Concern as to the origin of the costs included in the proposed partnership options in the assessment, specifically the costs for partnership options were considered excessive (Rotala PLC);
- Go North West Ltd referenced a bond concerning the terms of the Partnership Plus model, which would give a guarantee to GMCA concerning operator funding. This bond would financially penalise any operator seeking to withdraw from the contract and would provide assurance of delivery to GMCA.

10.2.2 Non-statutory consultees

A total of eight non-statutory consultees provided a comment in response to the question concerning affordability of the partnership options. The main issues identified included:

- A difference in cost assumptions relating to the partnership options between bus operators and GMCA. Operators have assumed no additional costs associated with managing the partnership, which have been assumed in the assessment. OneBus have therefore disputed the cost assumptions included in the assessment;

"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."

OneBus

- Partnership options require less taxpayer funding (1);
- Concerns about affordability and value for money (1);
- Partnership options do not provide the best value for money (2);
- There is a lack of evidence in support of the partnership options (1).

10.2.3 Members of the public

Overall, a total of 185 members of the public provided a comment in response to the conclusion of the Financial Case about the affordability of the partnership options.

A total of 60 members of the public made comments in favour of the affordability of the partnership options. The majority of these (43) provided general agreement and support for the conclusion of the Financial Case about the affordability of the partnership options. There were an additional two members of the public who supported the Ambitious Partnership model.

A handful of participants agreed that the partnership options provide better value for money than the Proposed Franchising Scheme (6), whilst others felt they posed less risk (4).

“Much better value for money than franchising and certainly worth trying before we even think about franchising.”

Member of the public

The lower levels of funding required from the taxpayer for the partnership options was also positive for some (3).

There were 86 members of the public who submitted an unfavourable comment about the affordability of the partnership options. The main concern was about the value for money and affordability of the partnership options (17).

“The conclusion is disturbing because the benefits claimed are, at best, marginal. It is a lot of money for rather little meaningful return and exposes GMCA to a great many needless, potential risks.”

Member of the public

“The partnership options seem to involve money being thrown at private bus companies with little or no return.”

Member of the public

A number of those not supporting the conclusion regarding the partnership options considered the Proposed Franchising Scheme to be better than either of the partnership options (16). Partnership options were not providing the best value (17), particularly when it comes to the use of taxpayer subsidies and other public funds (17). A further 18 participants made comments which generally disagreed with the partnership options (18).

Other, less common responses cited the lack of evidence to underpin the conclusion concerning the affordability of the partnership options (7) and that the conclusion is actually biased and not impartial (4).

Twelve participants made comments which were supportive of the Financial Case conclusion concerning the affordability of the partnership options but were conditional on certain things. For example, four participants would support the options if additional due diligence and legal scrutiny was applied to the conclusion. Other responses cited support for whichever option proved to be the best value for money (2), as long as the options provided more bus lanes/priority routes (3) and that they result in improved customer/passenger experience (2).

A total of 61 members of the public made a suggestion within their response concerning the affordability of the partnership options which concerned potential changes to the Proposed Franchising Scheme. These cited the potential consideration of a reserve contingency plan (2), consideration for cyclists and bikes to be allowed on buses (1) and the need to use double decker buses to address capacity issues (1).

A total of 46 members of the public made suggestions within their response concerning the affordability of the partnership options which are already proposed/covered in the Proposed Franchising Scheme.

A number of these comments concerned general outcomes for the future of the bus network in Greater Manchester, including the need to reform or change the current arrangements (8) and also improve the reliability and punctuality of the buses (6). Alternative suggestions were also made around the improvement in bus services necessary to reduce the cars on the road (5).

There was a suggestion that all bus services should be run by a single operator and controlled by GMCA (5), whilst some participants pointed to the London model and wanted Greater Manchester's model to be based on it (5). Financially, there were suggestions to consider more than simply economic value (4).

11. The Management Case

This chapter summarises responses to the Management Case of the consultation (Q32-34 in the consultation response form). The Management Case set out:

1. How the different options would be implemented and managed;
2. How risks would be managed; and
3. How transition would be managed for the different options.

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

11.1 Management Case: Managing franchised operations

The table below summarises the participants who provided a response to 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?

For more information see paragraphs 4.150 to 4.157 of the Consultation Document.

Table 11.1 Number of participants who provided favourable and unfavourable comments

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (183)	73	56
Statutory consultee (14)	6	6
Non-statutory consultee (9)	5	3
Member of the public (160)	62	47

Those who responded to the consultation were asked if they had any comments on the approach to managing franchised options under the Proposed Franchising Scheme. Overall there were 183 participants who provided comments to this question. Most comments were favourable (73), whilst 56 participants provided unfavourable comments. A total of 83 suggestions were made in response to the management of franchised operations under the Proposed Franchising Scheme.

11.1.1 Statutory consultees

Responses from statutory consultees, although relatively few, tended to focus upon the costs and difficulties associated with securing sufficiently qualified staff for the relevant core and support teams. There was also concern raised around the risks associated with additional management costs.

Bus operators/transport organisations

Most bus operators responding to the consultation provided comments regarding the management of the Proposed Franchising Scheme. Generally, these comments were unfavourable, particularly from those operators whose responses focused upon concerns around the stated requirement to employ approximately 57 more full-time employees. HCT Group did provide a favourable response here, stating that they thought the proposals to be logical and sensible.

Overall, operators generally agreed that the additional required full-time employees would be costly to attract, recruit and train and would ultimately not be sufficient to cover the necessary responsibilities.

Go North West Ltd highlighted the scale of task under the Proposed Franchising Scheme, stating that management of the franchised operations would include planning; designing and specifying the bus network; managing the customer interface; overseeing the commercial performance of the network; managing contractual relationships; 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"

Go North West Ltd

They concluded that GMCA has underestimated the number of employees required to undertake the stated management functions, particularly given the apparent lack of consideration given to TfL's management of the franchised network in London (11,152 non-operational staff of which 868 worked on London Buses in 2018).

Similarly, a number of operators including Go North West Ltd, Rotala PLC and First Manchester Ltd commented upon the potential difficulties in recruiting these employees. Operators identified that these posts would be technical and require staff to have specialist levels of expertise and sector specific, local knowledge and would lead to a potentially costly and time-consuming recruitment process.

"...given the specialist nature of the skills, there should be sufficient cost factored in to GMCA's estimates for attracting high quality candidates"

Go North West Ltd

There was also scepticism around whether recruitment would be possible from within the bus sector as it may require staff to transfer from current operators. Transport organisations were unconvinced that operators would be willing to release their most experienced and best qualified employees to the management and operations teams required under the Proposed Franchising Scheme. Given the proposed salary costs, Rotala PLC were particularly sceptical that TfGM would be able to attract these specialist workers.

Similarly, there was concern that any employees from outside of the sector may not have the necessary experience, making it difficult for TfGM to meet the stated requirement of around 57 full time staff.

“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”

Rotala PLC

Go North West Ltd noted that GMCA has underestimated the potential risk associated with these staffing issues. They expressed concern that the inability to secure sufficient recruitment numbers with the necessary expertise to manage operations may expose the GMCA to greater risk than they have assumed within the assessment.

- First Manchester Ltd believed that these management costs (which they deemed unnecessary) could be avoided for both the public and private sectors under alternative reform models.

“These costs could be avoided for both parties under a partnership approach and instead their value could be invested in providing better services”

First Manchester Ltd

- Stagecoach Manchester posed two main questions challenging the basis upon which the Case had been made. Firstly, they questioned GMCA’s optimism regarding their capability to deliver such fundamental organisational change and the challenges associated with recruitment made by other operators. Secondly, they challenged the feasibility of risk mitigation plans which may have been softened to increase the attractiveness of the overall business case.

Local authorities

Bolton Council provided favourable comments in relation to the Management Case for reform. They stated their belief that TfGM have the skills, knowledge and process in place to successfully undertake the necessary management operations of the Greater Manchester bus market under the Proposed Franchising Scheme.

“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”

Bolton Council

Lancashire County Council suggested that it would be appropriate to include ongoing engagement with neighbouring authorities as a work stream to ensure that either of the implementation options takes into consideration the views of neighbouring authorities when it comes to the operation of cross boundary services.

11.1.2 Non-statutory consultees

Academic institutions

The University of Manchester provided a favourable comment regarding centralised responsibilities, stating that there was a clear need and advantage for such arrangements as outlined in the Management Case.

Transport stakeholders

OneBus were in agreement with a number of bus operators, citing the significant and unnecessary cost of an additional 57 full time staff. Aside from cost, TfGM's track record and ability to award and manage contracts under the current system was questioned by OneBus, particularly in relation to the management requirements that would be necessary under the Proposed Franchising Scheme. They referenced 2018 school contracts being awarded during the Summer Holidays, when bids had been submitted in February, leaving little time for service registration, staff recruitment and vehicle acquisition before the start of term

"TfGM 's track record in the awarding and managing of the current small number of contracts is poor."

OneBus

They also stated that the Management Case had failed to take into account the additional staff that operators would have to employ to ensure that TfGM have the necessary data, information and skills to fulfil their role under the Proposed Franchising Scheme, as well as additional staff to manage 'on the road' operations to maximise punctuality and reliability. OneBus concluded that it would be unlikely for currently employed full time staff to TUPE transfer from operators to TfGM under the new model.

"It is also very unlikely that there are 25 staff employed in roles by the operators that would TUPE to TfGM".

OneBus

11.1.3 Members of the public

Overall, 160 members of the public provided a comment in response to Q32. There were 62 members of the public who made favourable comments about managing franchised operations and 47 who made unfavourable comments.

The most commonly cited favourable responses provided by participants were about general agreement/support for the approach to managing franchised operations (53).

Additional favourable comments included:

- The Proposed Franchising Scheme would create jobs, boost employment and/or lead to the recruitment of more staff and drivers (7); and

"I think it's great that this Scheme will provide 57 new employment opportunities!"

Member of the public

- The Proposed Franchising Scheme would give TfGM/GMCA more authority and control of bus services (3).

"Allowing Manchester to control its buses for the benefit of its residents and visitors is a huge improvement to the current inadequate system."

Member of the public

Of the 47 unfavourable comments towards the management of franchised operations, the most frequently cited comments concerned costs, affordability and value for money of the proposed approach (13). Linked to this there were also concerns around increases to council tax and precept payments (4) and the use of public funds for further subsidisation through taxation (2).

"Increased costs will be incurred in managing the franchising scheme. It is also not clear that local authority officers will be more effective than public transport professionals at specifying an efficient network, which will further add to the costs and put at risk the long-term future of buses in Greater Manchester."

Member of the public

Aside from cost, other participants raised concerns about the management proposal, citing TfGM/GMCA's lack of competence and expertise to deliver the approach (9) with a further four members of the public citing a lack of evidence to support the case (4).

"It should go without saying that management of the franchising operation should be done by skilled transport professionals and NOT civil servants - unless proven to be suitably skilled."

Member of the public

Further unfavourable comments were made in general opposition to the proposed approach to managing franchised operations (6) whilst others were more specific in their disagreement, claiming the

proposed approach to be unnecessary bureaucracy and a waste of time and money (9). Other members of the public were also concerned about the over-complication of the objectives (4).

There were 13 members of the public who provided a response to this question in the form of conditional comments, offering support for the conclusion based upon specified conditions which were as follows:

- Provided there was openness, honesty and transparency (5);
- Provided TfGM/GMCA possess the required competency and expertise (4); and
- Provided there is consideration for staff support and training (3).

There were 69 suggestions provided by members of the public in response to the management approach of franchised operations. A total of 7 participants made suggestions within their response to the conclusion of the Management Case which concerned potential changes to the Assessment. Of these, three members of the public suggested that improvements could be made if there were more buses and they were more widely available. Other suggestions included:

- Consideration should be given to reorganising the routes and timings of services (1); and
- Bus services should run 24/7, 365 days a year (1).

A further 60 participants made suggestions within their response to the conclusion of the Management Case, which are already covered in the Assessment. The most common suggestion was that bus services should be run by a single operator and controlled by TfGM/GMCA (11). Similarly, a further eight participants had a similar view, which was that bus services should be coordinated, integrated and joined up with the wider public transport network in Greater Manchester

"I think it makes sense for TfGM to run the whole operation and thus be able to build a co-ordinated service that responds to demand. It will mean a larger organisation but will provide some structure to the transport network that doesn't really exist at the moment."

Member of the public

There were further suggestions relating to accountability and standards reviews, with 10 participants suggesting consideration should be given to performance reviews of services, with standards being monitored, whilst a further eight would like to see operators better held to account with some form of regulation.

"Perhaps a monthly report on performance and efficiency, including highlighting the most improved and best performers to keep the public informed as to the progress of the service as well as encourage the areas that are lagging to achieve more and gain such recognition."

Member of the public

Additional suggestions already covered within the Proposed Franchising Scheme included:

- Bus services should be improved to encourage bus use, thereby leading to fewer cars on the road (6);
- Consideration should be given to recruitment of more staff/drivers (4);
- Poor performance should be penalised with fines, penalties or contract termination (4);
- Transport systems should be based on the TfL London model (4); and
- Bus services are currently too fragmented as there are too many operators, so buses should be run by a single operator (4).

A total of 14 participants made other suggestions in their response. The suggestions concerned their preference for the bus network to be run for public benefit (4), bus services to not be run for profit (4) and bus services to be publicly controlled (3).

11.2 Management Case: Transition and implementation of Proposed Franchising Scheme

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.

Those who responded to the consultation were asked if they had any comments on the approach to the transition and implementation of the Proposed Franchising Scheme, which concluded that TfGM would be able to manage franchised operations of behalf of GMCA. Overall there were 258 participants who provided comments to this question. Most comments were favourable (130), whilst 81 participants provided unfavourable comments. A total of 56 suggestions were made in response to proposed approach to transition and implementation under the Proposed Franchising Scheme.

This table summarises responses to question 33 of the consultation:

Table 11.2 Number of participants who provided favourable and unfavourable comments

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (258)	130	81
Statutory consultee (13)	5	6
Non-statutory consultee (9)	4	1
Members of the public (236)	121	74

11.2.1 Statutory consultees

A number of statutory consultees provided responses to this question, predominantly engaging with the challenges involving the proposed timescales for transition and implementation and further scrutiny of transition related risks such as recruitment and temporary contracts.

Around a third of those statutory consultees which provided comments made favourable comments, whilst around half made unfavourable comments within their response regarding transition and implementation.

Bus operators/transport organisations

A number of the bus operators focused their criticism relating to this Case on timescales. For example, Arriva Bus UK commented that the projected timescales are highly ambitious, and more time would be necessary to establish the Proposed Franchising Scheme.

Both Arriva Bus UK and Go North West Ltd specifically noted the lack of time built in for evaluating and reviewing progress during the transition period. Particularly referencing the proposed staggered sub-area transition, both operators stated their concern that this approach would not allow for an adequate evaluation period. Furthermore, Go North West Ltd raised concerns that other acquisitions relating to the Commercial Case would hinder TfGM/GMCA's ability to effectively manage the required processes throughout transition and implementation.

"...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...It will not be possible for GMCA to implement a transition to the Scheme in full by July to September 2023".

Go North West Ltd

First Manchester Ltd raised concerns regarding contract expiry, and operators potentially ceasing to run short-term contracts knowing that they would soon be franchised, or temporarily seeking to maximise their profits on these routes during transition. As well as concern around the contracts during transition, operators reiterated their concern around recruitment. Both Stagecoach Manchester and Rotala PLC saw this as a significant risk, as the recruitment of core activities teams and strategic roles would require technical and specialist expertise. In order to fill these strategic level roles, staff may be recruited from the operators themselves or be externally recruited, neither of which were seen as favourable options and both of which were viewed as risky, time-consuming and costly exercises.

"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"

Stagecoach Manchester

Particularly as these roles are currently funded by operators, Stagecoach Manchester questioned whether any provision had been made within the business case for the incremental costs of these individuals when they transfer across from operators (TUPE).

Go North West Ltd also commented upon the potential impact on passengers given the short-term transition and implementation risks outlined within the Management Case. Both believed that the approach to transition and implementation (as set out in the Proposed Franchising Scheme) would introduce complexity and confusion to passengers, inconveniencing them through journey disruption.

Go North West Ltd referenced the management of cross-boundary services through the transition and implementation periods which have the potential to cause the greatest disruption to passengers as different ticketing arrangements would be in operation between franchised and non-franchised areas.

“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”

Go North West Ltd

Many operators and transport organisations expressed similar opinions that the associated risks and costs of this transition had been under-estimated and could be avoided under partnership-led approaches. Similarly, Stagecoach Manchester believed that the stated £1.7 million earmarked for business change could be better spent enhancing existing services or invested in current infrastructure that would make more of a difference to the taxpayers of Greater Manchester.

Other, more general comments and suggestions were made by bus operators within their responses to the Management Case:

- Go North West Ltd suggested that GMCA should reconsider the area by area transition plan and revise the proposal to consider a route by route plan;
- Stagecoach Manchester believed that whilst TfGM have experience of procuring private sector contracts through Metrolink, the management of bus services for the whole of Greater Manchester would be a significantly greater task (which they acknowledge is understood within the Management Case); and
- TravelWatch Northwest were concerned that bus operational experience may be lacking within TfGM currently but practices at TfL could be looked at as a possible role model when setting up and managing new structures under the Proposed Franchising Scheme.

11.2.2 Non-statutory consultees

Academic institutions

The University of Manchester provided a favourable comment within their response, in agreement that TfGM would be capable of managing franchised operations throughout transition and implementation. They also made a number of suggestions for the duration of both the initial transitional period and roll-out of the Proposed Franchising Scheme:

- Little or no additional costs to individuals using the bus network through the transition;
- Timely communication material to be circulated with contact details for specific queries to support the transition; and
- Existing annuals passes to be honoured.

Transport stakeholders

OneBus commented (with caution) that the inconvenience caused by transitional disruption would have the potential to lead to passenger decline at an early stage, as those with high expectations from reform would be put off by the failure to deliver punctual and reliable services. They note that although the assessment contains clarity on TfGM related employment plans, it lacks clarity and detail on the potential benefits to passengers of the Proposed Franchising Scheme. They also warned that the scale and risks involved in any transition should not be underestimated.

“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”.

OneBus

Other non-statutory consultees

Oxford Road Corridor stated their fundamental belief that the long-term benefits here would outweigh any short-term disruption although they acknowledge the complexities of implementation, recognising the potential challenges posed by transition. They have urged TfGM to continue to consider how disruption can be mitigated to minimise disruption.

11.2.3 Members of the public

A total of 236 participants made comments about the approach to management during the transition and implementation of the Proposed Franchising Scheme. There were 121 members of the public who made favourable comments about managing franchised operations and 74 who made unfavourable comments.

The most commonly cited favourable responses provided by participants were about general agreement/support for the approach to the transition and implementation period as set out by the Management Case (92).

A further 13 participants were confident in TfGM/GMCA's competence and expertise to deliver the proposal, with nine members of the public stating that this transition is long overdue and should be implemented as soon as possible.

"TfGM have made a brilliant job of managing the trams. If they do as well managing the buses, they will do fine."

Member of the public

Additional favourable comments were as follows:

- Risk is inevitable with change and there will be some teething issues to begin with (5);
- The Proposed Franchising Scheme will create jobs and lead to the recruitment of more staff and drivers (2); and
- It can't get any worse so anything will be an improvement (2).

Of the 74 unfavourable comments made in response to the transition and implementation approach, 34 members of the public cited a lack of competency, expertise and poor track record of TfGM/GMCA who they said should 'leave it to the experts'. Ten participants also expressed their general disagreement with the proposals and approach as set out in the Management Case.

"I do not believe that TfGM currently has the expertise necessary to specify an efficient network that meets the needs to users across Greater Manchester."

Member of the public

A number of participants raised concerns regarding the proposed objectives and the feasibility of timescales, referring specifically to the length of transition and potential for delays to implementation (10). Other unfavourable comments viewed the approach to transition management as over-complicated (12), with others also concerned that the proposals would be a waste of time and money, creating unnecessary bureaucracy (6) and ultimately not being affordable or providing value for money (5).

"I'm not sure you have understood the magnitude of the task - planning services, analysing passenger and timing data, continual need to review timetables, marketing and promotion, contract management, legal services etc."

Member of the public

There were 16 members of the public who provided a response to this question in the form of a conditional comment, offering support for the conclusion based upon specified conditions which were as follows:

- Provided TfGM/GMCA possess the required competency and expertise (6);
- Provided it is done well and executed properly (4);
- Provided there is consideration for staff awareness and support (3); and
- Provided they are regulated, and operators are held to account (3).

Three members of the public provided general comment that consideration should be given to TfGM improving their website and technology overall.

Members of the public submitted 47 suggestions in total in response to the proposed approach to transition and implementation under the Proposed Franchising Scheme.

- A total of nine participants made suggestions within their response to the conclusion of the Management Case which concerned potential changes to the Proposed Franchising Scheme.

A further 36 participants made suggestions within their response to the conclusion of the Management Case, which are already covered in the Proposed Franchising Scheme. The main suggested comments related to the desire for a single point of coordination and management. Five participants suggested that the bus services should be integrated and joined up with the wider public transport network whilst a further 5 also suggested that services should be run by a single operator and controlled by TfGM/GMCA.

"TfGM managing services seems reasonable, as they already manage Metrolink and are therefore best placed to offer integrated ticketing."

Member of the public

Other members of the public called for a simpler, single fare or oyster style system of ticketing (4), with services run by a single operator as services are currently seen as too fragmented across too many operators (3). There were a number of suggestions relating to standards and reliability which are covered within the proposal:

- Bus services should be more reliable as they are currently slow, infrequent and often late (3);
- Consideration should be given to a performance review of services, with standards being monitored so they are maintained (3); and
- Bus services should be better/or improved with services more widely available (operators have cut many unprofitable evening and weekend services) (3).

A total of eight participants made other suggestions in their response. The principal suggestions concerned their preference for bus services to not be run for profit (3) and bus services to be publicly controlled (2).

11.3 Management Case: Implementation and management of partnership options

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.

Those who responded to the consultation were asked if they had any comments on the proposed approach to the implementation and management of the partnership options, with the conclusion that TfGM would be able to manage and implement partnerships on behalf of GMCA. A total of 168 responses were received, the majority of which were favourable (83). Those submitting unfavourable responses totalled 69, whilst a further 21 responses were received in the form of suggestions.

The table below summarises the participants who provided a response to this question:

Table 11.3 Number of participants who provided favourable and unfavourable comments

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (168)	83	69
Statutory consultee (10)	4	2
Non-statutory consultee (7)	4	4
Member of the public (151)	75	63

11.3.1 Statutory consultees

A total of 10 statutory consultees provided responses to this question, predominantly engaging with comparative resourcing requirements with those outlined in the Proposed Franchising Scheme.

Bus operators/transport organisations

A number of bus operators and transport organisations provided comments regarding the management and implementation of partnership options.

There was recognition that required levels of resource would be lower than that necessary under the Proposed Franchising Scheme in terms of additional recruitment. Rotala PLC agreed that whilst there would be no major procurement phase under a partnership model, there would be additional costs to co-design the model fully and introduce the necessary systems for implementation. Although this is accepted, they consider that TfGM-employed staff could be trained by operators, or operators could potentially fill skills gaps, which would not be possible with shortages under the Proposed Franchising Scheme.

“...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”.

Rotala PLC

Similarly, Go North West Ltd noted that GMCA have identified the requirement for an additional six to eight full-time employees (dependent upon the chosen partnership model). They suggested that as little resource would be necessary within head office roles, TfGM may wish to train current employees to build awareness of partnership and coordination.

However, First Manchester Ltd were surprised at the forecast level of additional resource identified as a requirement under the partnership-based proposals. They considered that under the management of TfGM, aside from some additional administrative tasks, it should be more like a ‘business as usual’ scenario.

11.3.2 Non-statutory consultees

Transport stakeholders

OneBus provided a favourable response to the proposed management of a partnership model, agreeing with the Management Case statements that concluded partnership implementation to be less complex as it would not require a procurement phase. They also cited the Management Case conclusions which referenced TfGM’s ability to manage either partnership option without the need for excessive recruitment as would be necessary under the Proposed Franchising Scheme. They therefore questioned why partnership alternatives have not been taken seriously in the consideration of reform options.

“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!”

OneBus

Academic institutions

The University of Manchester provided a favourable response to the proposed approach to the management and implementation of partnerships. They were in agreement that TfGM would have the capabilities to deliver the approach, with an opportunity to provide a centralised influence on the network in line with the strategic ambitions of Greater Manchester. They did however cite the difficulty in fully assessing the scope and scale of potential change as this would be dependent upon the formal agreement with operator.

"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".

University of Manchester

11.3.3 Members of the public

A total of 151 members of the public made comments about the proposed approach to implementation and management of partnerships.

Half of participants who responded to this question made favourable comments within their response (75). The most commonly cited favourable responses provided by participants were in general agreement with the premise outlined within the Management Case (59), with a further four members of the public agreeing that this process is long overdue and should be implemented as soon as possible.

"A bus partnership scheme should be introduced GMCA wide at the earliest possible opportunity managed by TfGM"

Member of the public

Other favourable comments focused upon the belief that TfGM/GMCA possessed the required competence and expertise to manage and implement partnerships (11), whilst two members of the public were also supportive of the reinvestment of surplus revenues and ability of TfGM to deliver cost neutral services.

Overall a total of 63 unfavourable comments were submitted by members of the public in relation to the proposed approach of partnership implementation and management. Around a third of these comments specifically opposed the proposed partnership options as they were supportive of the Proposed Franchising Scheme instead.

"As noted before, I do not think the partnerships, when measured against franchising, meet the requirements or give a sustainable delivery model moving forward"

Member of the public

A number of participants provided unfavourable comments which referred to the conclusion of the proposed approach to partnership management, whereby TfGM would manage and implement these partnerships on behalf of GMCA. In total, 19 members of the public commented that TfGM lack the necessary competence and expertise and should 'leave it to the experts'. Similarly, a further two participants believed that GMCA should manage the partnerships whilst two additional participants were concerned about the working relationship under such a model between operators and TfGM/GMCA.

"TfGM's history in implementing partnerships in the past have not been good. I would struggle to trust this would change going forward."

Member of the public

Other members of the public raised concerns about cost. Five participants commented that the proposals were a waste of time and money, creating unnecessary bureaucracy. Another concern related to the affordability and expense of the proposal, with some worried about the value for money provided by the franchise model (3). A further three members of the public were worried about the potential cost to the taxpayer and use of public funds to subsidise implementation.

"I would be against the partnership proposals compared to the franchising ones, since I believe that although TfGM would be able to manage and implement partnerships on behalf of GMCA, they would require additional resources in comparison to the franchising proposals."

Member of the public

Additional unfavourable comments made were as follows:

- Disagreement or general opposition to the proposed approach (8);
- Solution would be too similar to the current arrangement (3); and
- Worries concerning a lack of regulation or accountability (2).

Seven members of the public expressed their conditional support for the proposal, provided that TfGM and GMCA possess the required competency and expertise to successfully manage and implement the partnership model.

Overall, 21 suggestions were submitted on the subject of the proposed approach to management of partnership options.

A total of six participants made suggestions within their response to the proposed approach to implementing and managing the partnership options. This included the suggestion that consideration should be given to a probationary review of services to monitor and maintain standards.

A further nine participants made suggestions within their response which are already covered in the assessment including that bus services should be run by a single operator (3) and that services should be improved and more widely available as unprofitable services have been abandoned or cut in the evenings or at weekends (2).

12. Impact of different options

This chapter summarises the responses on the impacts of different options impact of the Proposed Franchising Scheme and partnership options on passengers, operators, GMCA and the impact on wider society (as captured by Q35-Q41 of the consultation response form).

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

12.1 Comments received on the impacts of the Proposed Franchising Scheme on passengers

This section summarises a question about the impacts of the Proposed Franchising Scheme on passengers.

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

For more information see paragraphs 4.176 to 4.185 of the Consultation Document.

Those who responded to the consultation were asked if they had any comments on the impacts of the Proposed Franchising Scheme on passengers. In total, there were 400 participants who provided comments - there were 192 participants who provided favourable comments, 34 participants who provided conditional comments, 91 participants who made unfavourable comments, and 160 who provided suggestions. This section of the report provides a breakdown of the comments received from statutory consultees, non-statutory consultees, and members of the public.

Table 12.1 Number of participants who provided favourable and unfavourable comments about the impacts on passengers of the Proposed Franchising Scheme

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (400)	192	91
Statutory consultee (16)	6	8
Non-statutory consultee (20)	14	4
Member of the public (364)	172	79

12.1.1 Statutory consultees

Bus operators/transport organisations

Bus operators who made comments on the impacts of the Proposed Franchising Scheme on passengers were all unfavourable. Stagecoach Manchester, for example, felt that non-competition with other parts of the bus network and other modes of public transport (citing paragraph 2.1.29 of the Assessment) would result in fewer passengers across all modes of public transport.

Go North West Ltd were of the view that franchised systems were rigid and slow to introduce new technology, resulting in passengers not experiencing the latest technology. The consultee was also of the view that, on average, fares will see higher inflation, services will be reduced on busy corridors, and customers could be forced to break journeys on cross-boundary services.

Similar to other bus operators, Rotala PLC was of the view that bus service passengers were likely to be negatively affected by the Proposed Franchising Scheme in comparison to a partnership option. The consultee also went on to say that a shift in competition models from “in” the market to “for” the market, as outlined in the Assessment, would also negatively affect the passenger even further.

“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...competition “for” the market is an inferior form of competition model which has been recognised recently by the Competition Appeal Tribunal and will inevitably have a negative impact on the ultimate consumers of bus services.”

Rotala PLC

Local authorities

There were few but mixed comments on the impacts of the Proposed Franchising Scheme on passengers. Lancashire County Council were of the view that the Proposed Franchising Scheme could have more of a positive impact than the *do nothing* approach. The council do however question the practicality of the permit scheme and changes in fares as this, in their view, could negatively affect the local residents.

“The Proposed Franchising Scheme may have a more positive impact on passengers than the do nothing approach. This would be welcomed....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.”

Lancashire County Council

Derbyshire County Council stated that the changes in the Proposed Franchising Scheme would negatively affect services in neighbouring authorities that have no direct connection to the GMCA area.

The council were of the view that any potential loss of services would result in the council having to fund additional routes to compensate for any service gaps. The council went on to request shared responsibility with TfGM and the relevant highway authority to agree permit conditions.

Other statutory consultees

TravelWatch NorthWest stated that the long-term benefits of the Proposed Franchising Scheme would counteract any inconvenience arising from the transition period. They were also of the view that necessary measures would be put in place to minimise any inconvenience during the transition period.

“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.”

TravelWatch NorthWest

12.1.2 Non-statutory consultees

A number of non-statutory consultees provided comments on the impacts of the Proposed Franchising Scheme on passengers.

Transport stakeholders

OneBus felt that a transition to the partnership option would not present any risk to the level of service passengers received which, in their view, would be at risk under the transition to the Proposed Franchising Scheme.

The Chartered Institute of Logistics and Transport- North West Policy Group raised questions around the affordability objective. They cite the high proportion of passengers in the Phase 1 area who are unlikely to be subject to fare increases, but would still be subject to inflation-related increases.

“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 Chartered Institute of Logistics and Transport- North West Policy Group

Academic institutions

The University of Manchester requested that any risks associated with changes or removal of services are managed effectively and in a timely manner to avoid impacting the passenger experience with disruptions, inconvenience and preventing a modal shift from bus to car in the interim.

Representative Groups

The Confederation of Passenger Transport UK (CPT) raised questions around the ticket prices for passengers and how inflation will affect this over the coming years. They express concerns of prices rising higher than those in London. The consultee also stated that under a partnership approach, improvements for bus passengers could be delivered quicker than the Proposed Franchising Scheme.

Action groups

On the other hand, Steady State Manchester Collective accepted the possibility of short-term disruption. The consultee felt that the Proposed Franchising Scheme would be highly likely to produce benefits for passengers.

12.1.3 Members of the public

Of the 364 members of the public who provided comments on the impacts of the Proposed Franchising Scheme on passengers, the majority (172) made favourable comments, 32 made conditional comments, and 79 made unfavourable comments. There were also 145 members of the public who provided suggestions on the impacts of the Proposed Franchising Scheme.

The most frequently mentioned favourable comment was in general support of the impacts on passengers from franchising (74 responses). Other favourable comments included: how franchising will benefit passengers (51), a single ticketing fare or oyster system style will be available (16) and that things can't get any worse (15).

"Franchising looks like the best option in Greater Manchester for passengers."

Member of the public

"Can't be any worse for passengers compared to how it is now."

Member of the public

The main conditional comment received was favourable of the impacts on passengers provided the Proposed Franchising Scheme benefits passengers (24). Other, less mentioned conditional comments include support providing it is done well or executed properly (5) and providing there is transparency and honesty (2).

"Ultimately passengers come before everything and the success of these proposals will come from how well we are served."

Member of the public

Unfavourable comments included worries over increased bus fares (16), the Proposed Franchising Scheme not benefiting passengers (13), and general opposition or disagreement with the impacts on passengers (13).

"Who are the small fraction who would experience an increase in fare be? Are they likely to be low income groups? Could this cost be absorbed in the wider scheme to ensure that no one has an increased bus fare?"

Member of the public

Suggestions to the Proposed Franchising Scheme included consideration being given to cross boundary services (8) and that bus services should be addressing capacity issues (5). Suggestions already covered by the Proposed Franchising Scheme included bus fares being cheaper or are poor value for money (44), that bus use should be encouraged (28), and bus use should be more reliable (27).

There were also a very small number of general comments (4) made by the public which contained out of scope comments in relation to the question.

12.2 Comments received on the impacts of the partnership options on passengers

This section summarises a question about the impacts of the partnership options on 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?

For more information see paragraphs 4.186 to 4.190 of the Consultation Document.

Participants were asked if they had any comments on the impacts of the partnership options on passengers, as set out in the sub-section on Impacts of the different options. Overall, there were 202 participants who provided comments. There were 48 participants who provided favourable comments, 9 participants who provided conditional comments, 111 participants who made unfavourable comments and 70 who made suggestions. The following chapter provides a breakdown of the comments received from statutory consultees, non-statutory consultees, and members of the public.

Table 12.2 Number of participants who provided favourable and unfavourable comments about the impacts on passengers of the partnership options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (202)	48	111
Statutory consultee (15)	7	6
Non-statutory consultee (11)	2	9

Member of the public (176)	39	96
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12.2.1 Statutory consultees

Bus operators/transport organisations

Go North West Ltd were of the view that a partnership model provides greater benefits to passengers than the Proposed Partnership Scheme but at a lower cost to GMCA, and at a lower risk overall to passengers in terms of disruption and increased fares.

Rotala PLC felt that the Assessment had understated the partnership and partnership plus options. They stated that the partnership plus options could provide all of the same benefits as the Proposed Franchising Scheme with less risk to passengers and no transition period. They also argued that under a partnership option there were no legal restraints to implement equivalent interventions.

Transdev Blazefield Ltd stated that although in their opinion there is a risk that a partnership option may not be sustainable in the long term, there is equal opportunity for growth and expansion.

Local authorities

Lancashire County Council were the only other statutory consultee who provided comments on the impacts of the partnership options on passengers. The Council felt that from the information available, the partnership approach would not provide the same level of benefits for passengers as the Proposed Franchising Scheme. However, they did go on to state that the partnership approach could carry a lower risk of negatively impacting cross-boundary services.

12.2.2 Non-statutory consultees

There were a small number of non-statutory consultees who provided comments on the impacts of the partnership options on passengers.

Transport stakeholders

OneBus felt that operators did not have sufficient input on the assessment of the assumptions underpinning the partnership proposal.

Academic institutions

The University of Manchester stated that the partnership options do not address GMCA's strategic objectives for Greater Manchester. The University also argued that there is no guarantee that operators will stay in a partnership over a long-term period unless legally bound to do so.

"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 University of Manchester

Representative groups

The Confederation of Passenger Transport UK (CPT) were supportive of a partnership plan. In their opinion, it offered more simplified and flexible ticketing. The consultee went on to state that a partnership approach would allow for timescales to be expedited and it would make a meaningful difference for passengers by investing directly into 'Phase 2'.

Action groups

Steady State Manchester Collective felt that the impacts of the partnership options would be low, however the durability of this type of approach would not be failsafe.

12.2.3 Members of the public

Of the 176 members of the public who provided comments on the impacts of the partnership options on passengers, 39 made favourable comments, 7 made conditional comments, 96 made unfavourable comments and 62 provided suggestions.

The most frequently mentioned favourable comment was in general support of the impacts on passengers from the partnership options (28). Other favourable comments included: partnership options will benefit passengers (7), there will be fare freezes or costs will be absorbed by operators (4) and partnership options present less risk (2).

"Partnership would seem to have the best chance of succeeding. There are fewer risks and much, much less upheaval."

Member of the public

There were few conditional comments made by members of the public, but the most mentioned comment was supportive providing that the partnership option is executed properly (3). Unfavourable comments included disagreement or general opposition to the partnership options (27), partnership options not being the best value for money or carry fewer benefits (16) and preference for the Proposed Franchising Scheme (10).

“There appear to be very limited benefits to bus passengers from moving from the current system to a partnership system. For all the effort and cost involved to GMCA & TfGM in making the move to a new system, it would be preferable to move to the franchise system.”

Member of the public

In addition to the comments made on the impacts on passengers from the partnership options, there were 62 members of the public who provided suggestions. There were relatively few who made suggestions about the Proposed Franchising Scheme (7) or other suggestions (5). Of those who made suggestions, many were already covered by the Proposed Franchising Scheme (50), that bus fares should be simpler or there should be one single fare system (10), bus fares should be cheaper or are poor value for money (9) and bus use should be encouraged (9).

“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).”

Member of the public

12.3 Comments received on the impacts of the Proposed Franchising Scheme on operators

This section summarises a question about the impacts of the Proposed Franchising Scheme on 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?

For more information see paragraphs 4.193 to 4.200 of the Consultation Document.

Participants were asked if they had any comments on the impacts of the Proposed Franchising Scheme on operators, as set out in the sub-section on Impacts of the different options. Overall, there were 161 participants who provided comments on the impacts of the Proposed Franchising Scheme. There were 63 participants who provided favourable comments, 60 who provided unfavourable comments and 54 who left suggestions. The following section provides a breakdown of the comments received from statutory consultees, non-statutory consultees, and members of the public.

Table 12.3 Number of participants who provided favourable and unfavourable comments about the impacts on operators of the Proposed Franchising Scheme

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (161)	63	60
Statutory consultee (14)	6	9

Non-statutory consultee (10)	5	4
Member of the public (137)	52	47

12.3.1 Statutory consultees

Bus operators/transport organisations

Go North West Ltd stated that the risks for operators under the Proposed Franchising Scheme were “very grave” for a number of reasons, such as significant losses through cliff-edge loss of business that may occur if a franchising contract is not awarded, as well as redundant assets and employees if a franchise contract requires less services than the status quo. The consultee felt that there is ultimately a risk of an operator becoming insolvent due to the risks associated with the Proposed Franchising Scheme and this may carry financial repercussions for GMCA to make alternative arrangements.

Rotala PLC echoed the views of Go North West Ltd by stating that there is a risk that the Proposed Franchising Scheme could result in operators exiting the market and losing their business, which would result in legal action between operators and GMCA.

“Rotala PLC 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...”

Rotala PLC

Transdev Blazefield Ltd stated that since many of their vehicles are on fixed term leases, they could potentially be left in a situation where they are bound by lease agreements but cannot service them by revenue.

Local authorities

Bolton Council were of the view that the introduction of the Proposed Franchising Scheme would have a significant impact on some operators, however it could be a catalyst for new operators to move into Greater Manchester and also allow smaller operators to grow.

Lancashire County Council raised questions around the financial feasibility on some cross boundary services. They went on to say that forced changes to routes or implementing stopping points could potentially make services less practical and effectively lead to some operators withdrawing from the market. Derbyshire County Council echoed these concerns made by Lancashire County Council.

12.3.2 Non-statutory consultees

There were a few non-statutory consultees who provided comments on the impacts of the Proposed Franchising Scheme on operators.

Transport stakeholders

OneBus provided examples of partnership schemes which are currently present in locations across the country (e.g. Bristol, Birmingham and Merseyside). They went on to state that incumbent operators could potentially create risk for TfGM if assets were moved elsewhere due to unsuccessful franchising bids or if operators were unwilling to enter negotiations regarding depot assets. OneBus also expressed concern around new operators bidding for franchising contracts who have little-no experience of the road network in Greater Manchester.

The Chartered Institute of Logistics and Transport- North West Policy Group asked if contingency plans were in place in situations where operators chose to dispose of assets elsewhere which and could effectively lead to service disruption.

Academic institutions

The University of Manchester felt there was a need to appraise the benefit of no on-road competition (e.g. less congestion and delays, better air quality).

12.3.2 Members of the public

There were 137 members of the public who provided comments on the impacts of the Proposed Franchising Scheme on operators. Of these, 52 made favourable comments, 47 made unfavourable comments and 43 provided suggestions.

The most frequently mentioned favourable comment was in general support of the impacts on operators from the Proposed Franchising Scheme (31). Other favourable comments included: The Proposed Franchising Scheme will level the playing field for smaller operators (8), operators will have to provide a public service (7) and the Proposed Franchising Scheme will prevent a monopoly or will drive competition (5).

"Whilst I appreciate impacts on operators, they are providing a SERVICE which is currently very poor/non-existent for some GM residents. This proposed scheme addresses this effectively."

Member of the public

The unfavourable comments included: operators receiving fair treatment or compensation for losses (9), general disagreement or opposition (7) and worries over operators not having enough control of services (6).

"Some operators could lose all of their work overnight, especially smaller ones. Some of these will have worked hard to build up networks (e.g. Jim Stones) with excellent reputations, only to see that hard work wiped out."

Member of the public

There were 5 members of public who made suggestions to the Proposed Franchising Scheme - the main one being that consideration should be given to cross boundary services (3). The 29 members of the public who made suggestions already covered by the Proposed Franchising Scheme included the suggestion that bus services should be regulated or operators should be held to account (5), reformed or changed (4) and improved due to operators cutting services or abandoning unprofitable routes (4).

"It is understood at least some of the impact this change could have on operators. Where they have some local and some cross-boundary services, such as Arriva or Transdev, they may reconsider how they prioritise services from or totally just outside Greater Manchester."

Member of the public

There was one general comment made by a members of the public which contained out of scope comments in relation to the question.

12.4 Comments received on the impacts of the partnership options on operators

This section summarises a question about the impacts of the partnership options on 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?

For more information see paragraphs 4.201 to 4.202 of the Consultation Document.

Participants were asked if they had any comments on the impacts of the partnership options on operators. There were 77 participants who provided comments. Of these there were 34 who provided favourable comments and 36 who provided unfavourable comments. There were also 14 participants who provided suggestions. The following section provides a breakdown of the comments by statutory consultees, non-statutory consultees, and members of the public.

Table 12.4 Number of participants who provided favourable and unfavourable comments about the impacts on operators of the partnership options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (77)	34	36

Statutory consultee (7)	5	1
Non-statutory consultee (6)	3	3
Member of the public (64)	26	32

12.4.1 Statutory consultees

Bus operators/transport organisations

Rotala PLC stated that providing there is an appropriate partnership arrangement, a partnership option would be positive for the bus market in terms of services, patronage, and allowing operators to price services to reflect costs in a competitive environment.

Go North West Ltd were of the view that under a partnership option, GMCA would be protected against any major cost or risk as these would be accountable to the operators. They went on to state that operators would face public scrutiny for performance, and operators would also commit to more resource and investment.

“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.”

Go North West Ltd

Stagecoach Manchester felt they could not comment fully on the commercial implications of the partnership options as they felt the Ambitious Partnership considered in the assessment had not been tested with operators.

“The ambitious partnership considered in the assessment appears not to have been tested with operators. 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.”

Stagecoach Manchester

Local authorities

Bolton Council were the only local authority to comment on the impacts of the partnership options on operators. The council felt that the partnership options would have limited impact on the operators as services, timetables and ticketing would continue to be decided the operators and there would be little change.

12.4.2 Non-statutory consultees

The Chartered Institute of Logistics and Transport- North West Policy Group was the only non-statutory consultee to comment on the impacts of the partnership options on operators. The Institute stated that the partnership options on the whole appear to deliver similar results with lower risk and cost, plus equivalent involvement from stakeholders.

12.4.3 Members of the public

Overall, 64 members of the public provided comments on the impacts of the partnership options on operators. There were 26 who provided favourable comments while 32 provided unfavourable comments. There were also 10 members of the public who made suggestions.

The most cited favourable comment was general agreement or support towards partnership options (21) whereas the most mentioned unfavourable comment was general opposition and a preference for the Proposed Franchising Scheme (17).

"The partnership in my opinion could help the operators most in future."

Member of the public

The majority of suggestions made were already covered by the Proposed Franchising Scheme (7). The most mentioned suggestions already covered by the Proposed Franchising Scheme included consideration should be given to the proposals put forward by OneBus (2) and bus services should not be determined by operators or market force (2).

"The OneBus offer as described on their website looks like a significant improvement over the 'do minimum' option to me."

Member of the public

12.5 Summary overview on the positive or negative impacts that the different options may have on local bus operators

This section summarises two questions about the impacts that the different options may have on local bus 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?

For more information see paragraphs 4.201 to 4.202 of the Consultation Document.

PLEASE SELECT ☒ ONE BOX ONLY.

- Yes
- No
- Don't know

Q39b. If so, please explain what you think those positive or negative impacts would be.

Consultees who responded to the consultation using the response form were asked if they anticipate any positive or negative impacts of the different options on their business, if they currently operate local bus services in Greater Manchester. Nine consultees responded via the response form, of which, five said they *don't know* and four said they do anticipate impacts (positive or negative).

This section of the report provides a breakdown of the comments received from statutory consultees, non-statutory consultees, and members of the public.

12.5.1 Statutory consultees

Bus operators/transport organisations

Go North West Ltd stated that the Proposed Franchising Scheme would have a detrimental impact on their business for a variety of reasons, including loss of services leading to stranded passengers, employee redundancies/de-prioritisation due to uncertainty and lower levels of scrutiny for GMCA. The consultee stated that a partnership option would have a positive impact on their business. Reasons included operational stability which would allow future planning and investment in innovation, stability for employees and flexibility to agree network changes due to customer demand.

Transdev Blazefield Ltd were of the view that franchising is both a risk and opportunity for the consultee. If successful in bidding, the consultee felt there was opportunity for growth, particularly for their cross-boundary services. If unsuccessful in bidding, the risk identified revolved around the consultees limit of exposure via their Rochdale depot and fleet.

Stagecoach Manchester stated that any change to the bus market would impact them significantly. The operator referenced their responses to the Economic and Financial case in particular, querying the Earnings Before Interest and Taxation ("EBIT") margin assumptions that potential franchisees could expect, as well as the assumptions on pensions in the Assessment.

“...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...that the assumptions in the Assessment regarding pensions are also not reflective of the current market and cause us considerable cause for concern...”

Stagecoach Manchester

12.5.2 Non-statutory consultees

OneBus stated that a partnership option would be the preferred option. The consultee felt that the partnership option would provide less risk compared to the Proposed Franchising Scheme and be delivered quicker.

“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.”

OneBus

12.6 Comments received on the impacts of the different options on GMCA

This section summarises a question about the impacts of the different options on GMCA.

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.

Participants were asked if they had any comments on the impacts of the different options on GMCA as set out in the sub-section Impacts of the different options. There were 113 participants who provided comments on the impacts of the different options on GMCA. There were 60 participants who provided favourable comments, five who provided conditional comments, 35 who provided unfavourable comments and 37 who provided suggestions.

Table 12.5 Number of participants who provided favourable and unfavourable comments about the impacts on GMCA of the different options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (113)	60	35
Statutory consultee (11)	6	8
Non-statutory consultee (9)	4	2
Member of the public (93)	50	25

12.6.1 Statutory consultees

There were a small number of statutory consultees who left comments on the impacts of the different options on GMCA. The following sections break down the responses received by category of consultee.

Bus operators/transport organisations

Go North West Ltd stated that the Proposed Franchising Scheme does not represent value for money and presents the riskiest economic model, which in their view exposes GMCA to financial and legal risk. The consultee went on to state that additional risks will arise if the required expertise cannot be found by GMCA to manage the Proposed Franchising Scheme.

"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."

Go North West Ltd

Rotala PLC stated that the Proposed Franchising Scheme would negatively impact GMCA and it is an underfunded model. The consultee predicted that the Proposed Franchising Scheme would result in staff shortages which would require funding, ultimately from the taxpayer.

Local authorities

Bolton Council felt that TfGM were best placed to advise GMCA on any impacts of the different options. They went on state that none of the risk should be transferred to any of the 10 Greater Manchester local authorities.

Derbyshire County Council expressed concern over the long-term sustainability of funding for the Proposed Franchising Scheme due to the continued decline in bus patronage forecasted.

"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."

Derbyshire County Council

12.6.2 Non-statutory consultees

Comments made by non-statutory consultees on the impacts of the different options on GMCA are summarised below.

Transport stakeholders

In response to this question, OneBus referred to paragraph 3.9 of the OneBus Economic Review (Jacobs Economic Report), which details impacts on GMCA and TfGM.

The Chartered Institute of Logistics and Transport- North West Policy Group were of the view that the number of qualified staff required for TfGM to manage the bus network in Greater Manchester was underestimated, considering the intention to recruit. The Institute referred to the Tyne and Wear Quality Contract Scheme report and how this was a constraint for Nexus.

Academic institutions

The University of Manchester did not wish to see a period of disruption or staff shortages to address changes and queries.

Action groups

Steady State Manchester Collective felt that the impacts would be acceptable and drew comparison to the London franchising scheme, which in Steady State Manchester Collective's view, was successful.

12.6.3 Members of the public

There were 93 members of the public who left comments on the impacts of the different options on GMCA, as set out in the sub-section Impacts of the different options. There were 50 members of public who provided favourable comments, 4 who provided conditional comments, 25 who provided unfavourable comments and 33 who provided suggestions.

Of the 50 who provided favourable comments, the most cited comment was agreement or general support (19). Other comments included agreement or general support with the Proposed Franchising Scheme (17) and reinvestment of surplus revenue (9).

"It's fantastic that surpluses would be reinvested into the bus service to benefit passengers: this is exactly how our public services should be run."

Member of the public

Of the four who left conditional comments, the most mentioned comment was providing the Proposed Franchising Scheme is done well or executed properly (2). The most mentioned unfavourable comments included worries that GMCA is retaining too much risk or responsibility (5), worries over value for money or cost control (4) and general opposition towards the Proposed Franchising Scheme (4).

"Franchising seems to be an unnecessary cost risk for GMCA, and extra expertise is required which GMCA/TfGM do not currently possess."

Member of the public

The most mentioned suggestion was that bus services should align with TfGM/GMCA environmental objectives or should be more environmentally friendly (7). Other suggestions included bus services should serve public benefit (7), bus services should be publicly controlled (5) and bus services should not be run for profit (4).

"It is appropriate for GMCA and TfGM to take on the risks and benefits and any required organisational change consequent on taking responsibility for creating and managing a decent bus service as part of a climate and health aware 21st century city plan."

Member of the public

12.7 Comments received on the impacts of the different options on wider society

This section summarises a question about the impacts of the different options on wider society.

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.

Participants were asked if they had any comments on the impacts of the different options on wider society as set out in the sub-section Impacts of the different options. There were 344 participants who provided comments. Of those, there were 187 participants who provided favourable comments and 74 who provided unfavourable comments.

Table 12.6 Number of participants who provided favourable and unfavourable comments about the impacts on wider society of the different options

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (344)	187	74
Statutory consultee (14)	11	9
Non-statutory consultee (19)	13	9
Member of the public (311)	163	56

The following section provides a breakdown of the comments received from statutory consultees, non-statutory consultees, and members of the public.

12.7.1 Statutory consultees

Bus operators/transport organisations

In their response, Rotala PLC referred to the Jacobs Review of Consultation Economic Case, stating that the methodology used calculate the wider economic benefits from introducing the Proposed Franchising Scheme raises concerns. This raised further questions over the benefits realisation.

Go North West Ltd stated that the impacts of the Proposed Franchising Scheme on wider society could not be more beneficial than a partnership model, splitting these impacts into economic and environmental impacts. The consultee referred to their answers at Q17 and Q23 respectively.

Local authorities

Bolton Council stated that TfGM were best placed to understand the impact of the different options on wider society. They noted that with a partnership option there will be little change whilst the Proposed Franchising Scheme could potentially increase public transport patronage and reduce car journeys.

Other statutory consultees

TravelWatch NorthWest highlighted the Proposed Franchising Scheme's forecast that it would reduce car use and promote more sustainable travel.

12.7.2 Non-statutory consultees

Transport stakeholders

In response to this question, OneBus referred to paragraph 3.10 of the OneBus Economic Review (which says there has been an over estimation of benefits of the Proposed Franchising Scheme and requesting details of the assumptions underpinning them). The Chartered Institute of Logistics and Transport- North West Policy Group highlighted congestion as an impact for wider society and this was an issue which was potentially not addressed by franchising in its entirety. They acknowledged that wider environmental benefits such as fleet sustainability and air quality are best serviced by franchising, however the cost may be lower via a partnership option.

Academic institutions

The University of Manchester highlighted a number of perceived positive impacts from the franchise model such as retaining staff and students, more environmentally friendly buses, increased accessibility and safety and more late night/early morning routes to support shift work.

12.7.3 Members of the public

There were 311 members of the public who left comments on the impacts of the different options on wider society, as set out in the sub-section Impacts of the different options. Of those, 163 members of public provided favourable comments, 56 provided unfavourable comments and 184 provided suggestions.

The most cited favourable comment was generally positive towards the Proposed Franchising Scheme (72). Other comments include agreement or general support towards wider societal impacts (42), positive environmental impacts such as less pollution and cleaner air (32) and that franchising will drive economic growth (18).

"The franchising option is the one that offers the most benefit to wider society - it gives a value-for-money enhanced service for passengers - it gives cleaner vehicles - it increases passenger numbers and therefore decreases car congestion - it guarantees services for certain neighbourhoods."

Member of the public

Unfavourable comments included the do minimum option must be ruled out (11), disagreement or general opposition regarding impacts on wider society (10) and unfavourable comments towards partnership options (8).

"There will be disruption with little benefit."

Member of the public

The majority of those who made suggestions (177) were suggestions which were already covered by the Proposed Franchising Scheme. The most cited suggestion already covered by the Proposed Franchising Scheme was that bus services should be promoted or encouraged so fewer cars are on the road (62). Other suggestions already covered by the Proposed Franchising Scheme included that the bus services should be environmentally friendly or greener (35), more reliable (30), joined up with wider public transport network (25) and more widely available (25).

"I hope the environmental benefits work, as we all must think of new ways to reduce our CO2 emissions. Better bus travel, with less redundant routes and less car usage, would help strongly with that."

Member of the public

13. Equality Impact Assessment

13.1 Summary overview

This chapter covers comments received on how the Proposed Franchising Scheme could impact on persons with protected characteristics as identified by GMCA's draft 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?

For more information see the draft Equality Impact Assessment (Section 5)

Under equality legislation, GMCA is required in the exercise of its functions to have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not share it.
- Foster good relations between those who have a relevant protected characteristic and those who don't.

Relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

The draft Equality Impact Assessment concludes that the Proposed Franchising Scheme would have a high positive impact on children and young people, 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. It does not identify any groups that would suffer an adverse impact.

In total, there were 285 participants who provided comments, including from 14 statutory consultees, 27 non-statutory consultees, and 244 members of the public. Of those who provided comments, this included 130 participants who provided favourable comments, and 61 participants who provided unfavourable comments. There were also 93 participants who made general comments, and 54 participants who made suggestions.

Table 13.1 Number of participants who provided favourable and unfavourable comments about the impacts of the Proposed Franchising Scheme on persons with protected characteristics

	Number of participants who made favourable comments	Number of participants who made unfavourable comments
All who provided a response (285)	130	61
Statutory consultee (14)	4	4
Non-statutory consultee (27)	13	5
Member of the public (244)	113	52

The next section of this chapter first looks at the responses from statutory consultees, followed by non-statutory consultees, and then members of the public.

Please refer to section 3.3 of this report for more information on how to interpret the consultation findings.

13.2 Statutory consultees

Of those who made comments, this included Go North West Ltd which stated that it noted that the focus of the draft Equality Impact Assessment was on bus users rather than employees. Salford City Council stated that it was satisfied that the draft Equality Impact Assessment showed that protected groups would not be adversely affected. TravelWatch NorthWest stated that while it broadly agreed, it believed that there was an issue at present with competition between wheelchair users and prams and pushchairs, and that an important element was driver awareness and better facilities for those with disabilities.

"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...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."

TravelWatch NorthWest

Other statutory consultees who provided comments included Rochdale Borough Council which stated that draft Equality Impact Assessment in its opinion did not address impacts relating to the affordability of fares or the impact on people with mental illnesses. Trafford Council believed that the draft Equality Impact Assessment should consider the impacts on people during the phasing in of the Proposed Franchising Scheme factoring in the potential loss or reduction of bus services during this time. The Council believed that this could have a significantly negative effect on people, particularly on specific groups. HCT Group believed that the Equality Impact Assessment had a narrow focus, and missed out important aspects.

"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. 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."

HCT Group

First Manchester Ltd did not believe there would be any material differences between the franchising proposals and a partnership led approach in respect of their impact on persons with protected characteristics.

13.3 Non-statutory consultees

Some of those who provided comments made it clear they were in support of the draft Equality Impact Assessment. This included The University of Manchester which stated that it supported all measures that have a positive impact on persons with protected characteristics, and that this aligned strongly with their own core goal of social responsibility. The Church of England, Diocese of Manchester observed that services thinned out on many routes in the early evenings, which it believed had forced older people into their homes in the evening and thus limited the potential for intergenerational activities. Manchester Friends of the Earth stated that it agreed with the draft Equality Impact Assessment, and that in particular that it would benefit older people. Steady State Manchester Collective also cited benefits for older citizens.

"...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."

Manchester Friends of the Earth

"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."

Steady State Manchester Collective

Others in agreement included, Mobilities Justice CIC, Intu Trafford Centre, WalkRide Greater Manchester, Saddleworth Parish Council, Transition Buxton, Manchester Metropolitan University, and Abellio.

“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.”

Manchester Metropolitan University

“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.”

Abellio

The Manchester Local Care Organisation stated that it supported robust equality impact assessments on route planning/times of services that include consideration for and emphasis on the needs of the unpaid workforce in local communities.

Some of those who provided comments raised concerns and/or made suggestions. This included Kate Green, MP for Stretford and Urmston who said she was surprised at the absence of systems to ensure regular checks on the equality impact on different equality groups, and urged ongoing monitoring, to include passenger feedback and engagement with stakeholders and representative groups. The University of Manchester Students' Union thought that accessibility needed to be a key feature, and suggested a number of things to improve this, including driver training, audio cues at bus stops, a second door on buses, and that TfGM should sign up to be a third party hate crime reporting centre. It also suggested a help system for people who might feel threatened, and that GMCA should consult and collaborate with different community groups across Greater Manchester, so as to make buses safer and more accessible.

The Northern Care Alliance NHS Group observed that the draft Equality Impact Assessment had been completed for the Proposed Franchising Scheme, but none of the other options included as part of the Assessment, such as a partnership option. OneBus did not think that the Proposed Franchising Scheme would meet the needs of disabled passengers.

“As noted elsewhere in this response, TfGM has failed to do their part in the delivery of the Public Service Vehicle Accessibility Regulations 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.”

OneBus

In terms of groups that represent people with protected characteristics, comments were received from The Proud Trust, The Guide Dogs for the Blind Association, and Greater Manchester Disabled Peoples Panel and included as follows:

- The Proud Trust mentioned that the costs of buses prevent people being able to get to LGBT+ youth support venues, and that those who are LGBT+ are more likely than the general population to suffer many hidden costs (physical, verbal and financial), and as such are forced to pay more to protect themselves, such as paying for private taxis as a way to safely get from A to B. The organisation also stated that young people have witnessed hate incidents on Greater Manchester buses, and that school children in particular can be problematic and LGBTphobic.
- Greater Manchester Disabled Peoples Panel identified 11 priority areas it would like to see a bus system provide for disabled people. This included a need for audio and visual real time information announcements at stops and on buses, improved signage, driver training and disability awareness to be standardised across the whole service, that a carer pass should be provided, and that it should be represented on the commissioning board.
- The Guide Dogs for the Blind Association cited the 2010 Equality Act, but believed that many bus operators were not meeting their legal obligations. The organisation believed that there would be continued scope for audio-visual technology to be mandated across Greater Manchester, and that TfGM would have the opportunity, via franchising, to introduce consistent, high-quality disability equality training for passenger facing staff.

“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...through franchising, TfGM have an opportunity to ensure that passengers can travel with confidence knowing frontline staff have the training they need.”

The Guide Dogs for the Blind Association

13.4 Members of the public

There were 244 members of the public who provided comments on potential impacts of the Proposed Franchising Scheme on people with protected characteristics as identified in GMCA's draft Equality Impact Assessment.

There were 113 members of the public who provided favourable comments. The main comments were supportive in general (52), and that the draft Equality Impact Assessment had given adequate consideration to everyone (29). Other, less frequently cited favourable comments included that specific characterises such as elderly and disabled passengers had been afforded adequate protection (12), that there was adequate consideration for staff awareness, training and support to look out for those with protected characterises (3) and that it would be an improvement or make things better for those who are disadvantaged by the existing system (2).

"Agree. This kind of centralised network coordination will undoubtedly benefit people of all walks of life who are not currently well-served by the network."

Member of the public

There were 52 members of the public who provided unfavourable comments. Of those who provided unfavourable comments, this included general disagreement (9), and a belief that the draft Equality Impact Assessment would be a "box-ticking" exercise without substance, and/or that it was too vague (9). Other, less frequently cited unfavourable comments included a belief that the draft Equality Impact Assessment would be unnecessary (5), and/or that certain sections of the community had not been given enough consideration, including elderly people (4), disabled people (4), and female passengers (4).

"...it seems overoptimistic to state that all people with protected characteristics will benefit as the current passenger mix is not always representative of the wider population of GM. This therefore has the appearance of a tick box exercise. I see no evidence that people of BAME heritage with clearly benefit from this approach unless it can be guaranteed that service provision is increased within places with higher ethnic diversity and unless there is a deliberate attempt to address socio-cultural barriers to use of public transport - this strategy does not recognise at any point that these barriers exist."

Member of the public

Of those who made general comments and/or suggestions, these included a belief that everyone should be treated equally (14), that more consideration would be needed for those with impaired mobility, including those who used wheelchairs (13), and that the needs of female passengers would need to be considered further too (13).

"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."

Member of the public

14. Organised campaign and petitions

14.1 Organised campaigns

Of all responses received, **1,240 were considered to be campaign responses**. All of these responses related to one campaign from Better Buses for Greater Manchester. The main points contained within the Better Buses for Greater Manchester campaign gave support for a better, publicly controlled bus network.

A total of 930 responses included text which Better Buses for Greater Manchester included on its website. The response made several points in response to the Strategic Case, including the challenges facing the local bus market and the conclusion that it is not performing as well as it could (Q12 of the response form). Specific comments included:

- The bus market is not working well for residents of Greater Manchester;
- 8 million miles of bus services since 2010 have been lost, which is 11% of the service, despite fares increasing two years in a row;
- The North West's bus network has shrunk more than any other region;
- Bus company shareholders in the North West have received an average £18.4 million in dividend pay-outs a year for the past ten years;
- The Proposed Franchising Scheme would result in public control of Greater Manchester's buses;
- The Local Government Association showed recently that 69% of residents think local councils should be the main decision-makers on bus services; and
- A better bus network is necessary to take part in society: to get to work, the hospital, shops, public services and visit loved ones.

The campaign also provided comments in response to the agreement that reforming the bus market is the right thing to do to address the challenges facing it (Q13 of the response form). Specific comments included:

- Support for taking control of the bus network, to give local authorities control of the bus routes, fares, and ticketing;
- The network as a whole can join up to make an integrated bus network that is more accountable to the community;
- Right now, this system works only for bus company shareholders;
- There is a need for buses that are clean and green and accessible and bus companies have not delivered on both fronts;

- Support for 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); and
- 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).

The campaign went on to provide comments in response to the conclusion of the Economic Case (Q17 of the response form). Specific comments included:

- Currently, public money makes up 40% of bus companies revenue, yet we have no control over fares, the vast majority of routes and timetables;
- 10% of that public money is leaked as dividends;
- Public control means all of the fare revenue is taken and bus companies are given 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 Greater Manchester supported the idea of subsidising bus routes which are unprofitable but necessary for the public good; and
- A better bus network can finally be delivered.

The campaign also provided comments in response to the Financial Case inclusion (Q30 of the response form). Specific comments included:

- 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; and
- These costs will result in a better bus network, run for the public over shareholders, with much better value for the public money currently given to buses.

The campaign provided a number of other general comments, including:

- 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;
- A system is needed which puts the interests of Greater Manchester's people first;
- Franchising is the only option that allows cross subsidy from popular/profitable routes to less busy/unprofitable routes;
- The additional expenditure over that for the Voluntary Partnership is not large - £25m (£122m vs £97m) over the 5-year implementation period. That equates to £5m per year, or £500k per

council area, or £4.34 per household per year (source: TfGM Franchising paper, executive summary, page 23);

- The economic assessment indicates a better return from franchising in terms of economic, social and environmental benefit than from either partnership model; and
- Buses are hugely important to individual lives and there is a huge opportunity to transform them so that they work for citizens over shareholders.

A further 502 responses provided a comment which replicated text used by Better Buses for Greater Manchester on its Facebook page (entitled Publicly Controlled Buses). Standard text included in these responses in support of the Proposed Franchising Scheme included:

- Support for better, publicly controlled buses which could see Greater Manchester set a precedent across the UK;
- What people think of buses and the reasons for supporting publicly controlled buses; and
- What people want from buses moving forward.

Finally, a further 63 responses provided a comment which replicated text used on a postcard produced by Better Buses for Greater Manchester. Specific comments showed support for TfGM's proposal for bus reform because it will mean more control over the bus service to make buses more accessible and get affordable fares, to introduce more evening and weekend services and to introduce a smart ticket which can be used on all transport (where daily spending is automatically capped).

14.2 Petitions

○ All 1,240 campaign responses referred to the Better Buses for Greater Manchester campaign. In addition, Better Buses for Greater Manchester submitted a petition. A petition differs from a campaign response in that it will comprise a single response alongside a number of signatures. Campaign responses on the other hand are submitted by individual participants. The text of the petition was as follows:

"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.

The final decision hasn't been made. Sign the petition now to make your buses better.

Dear Andy Burnham, please regulate our buses."

A total of 11,510 members of the public and other organisations signed the petition.

Another petition was submitted by Councillor Adrian Pearce of Stalybridge North Ward. This supported the Proposed Franchising Scheme as it would make bus services more responsive to the needs of the people of Ridge Hill in Stalybridge. Specifically, the petition called for:

- The restoration of the 389 bus route, including the return of the bus stops on Church Walk and St George's Street;
- The reinstatement of the 389 route from Ashton to Hyde; and
- The reinstatement of the 387 service to Tameside Hospital to include Springs Lane and Ridge Hill.
- The petition was signed by 53 residents.

15. Late responses

While the consultation closed at 23:59 on Wednesday, 8 January 2020, 72 responses were received after the consultation deadline.

As per the protocols set up at the beginning of the consultation, late responses have been analysed separately, with a short summary of what was said included in this chapter of the report. No responses were received online after the deadline as the portal was closed- however those who began their online response before 23:59 but submitted afterwards were accepted.

This addendum chapter summarises all of these late transmitted responses from the public, organisations and groups. None of the late transmitted responses raised any substantive new issues beyond those already identified in the responses submitted before the close of consultation.

Table 15.1 Late responses received

	Postal response form	Email	Campaigns
Individuals	7	20	40
Stakeholders	0	5	0

15.1 Statutory consultees

Competition and Markets Authority

The Competition and Markets Authority provided a response in support of making the bus market work better. They provided a response focused upon their view of franchising and the provided alternatives with the stated offer to have input into the final packaging strategy and design if the Proposed Franchising Scheme were to be adopted.

They recognise that franchising could be the most effective vehicle for delivering objectives as concluded within the Assessment, however, they urge consideration of significant risks before proceeding. They refer to risks created by structural changes which would not be reversible and may have negative impacts upon passengers in the long term. They recognise that statutory process has been followed with regard to consideration of both the voluntary partnership agreement and Ambitious Partnership through the Enhanced Partnership Scheme.

Reference is made to the importance of franchise design and competition as this will have a significant impact on the number of firms competing. Therefore, vital consideration must be given to the size of

franchises, the length of franchises, the timing of renewals and the ability to oversee performance and take action. They were in agreement with the transition proposal regarding sub section rollout, but consideration must be given to fair competition amongst operators including those who are not currently concentrated within each sub area. They suggest reflection upon expected levels of competitions for purchased franchise contracts and recommend GMCA to consider smaller franchises for greater flexibility and stronger competition.

On the proposed asset strategies, they welcome GMCA's approach however, given the range of franchise package sizes, they urge consideration around scope to split strategic depots by different operators to provide greater flexibility in the design of franchise areas. Further competition could also be promoted by facilitating the potential expansion of smaller operators to staircase towards larger franchise awards.

Finally, they emphasise the need for a space for innovation which should be suitably flexible to reflect the potential range of demand responsive and hybrid services.

15.2 Non-statutory consultees

Association of British Commuters

The Association for British Commuters provided a response which stated their full support for the Proposed Franchising Scheme, with the caveat that stronger legislation will be needed and the option for a fully integrated, publicly owned transport system should be urgently explored. They recognised the benefits which would be brought to Greater Manchester such as multi-modal ticketing and fare capping, better frequency, connectivity, environmentally friendly buses and more local power and accountability. They also attached a published blog and referenced a documentary in support of the Better Buses campaign for Greater Manchester.

Age UK Bolton

Members of the over 55s people's platform met to discuss the consultation and provided the following comments. They discussed current challenges such as unreliability of services, cancellation of services, poor standards and cleanliness and a lack of information through timetabling. They also discussed issues particularly pertinent to their interest group such as the inability to use concessionary passes at peak times, drivers not pulling into the curb or setting off before passengers are seated and a lack of evening services limiting the activities of some older people. There was general support for reform amongst the group and a desire for an integrated Oyster style system which may support improvement although they noted the fact that transition would provide challenges.

They had criticisms regarding the consultation document and response forms as follows:

- The consultation document itself was not user friendly (too lengthy, complex and challenging for older people)
- Information not presented in an easily accessible format
- Information informing consultation document not come from community base
- Several colleagues attempted completion but gave up as the questions were not user friendly or appropriate for target audience

Councillor Charlotte Martin, Audenshaw Ward

Charlotte Martin raised issues caused by privatisation of the bus services such as price increases, lack of investment, poor timetabling and no effort to integrate ticketing. She raised further concerns regarding bus as a genuine option for commuters compared with car journeys taking a fraction of the time. Councillor Martin was supportive of the GM Better Buses campaign, in order to utilise powers to coordinate the network and introduce standards. Furthermore, Councillor Martin suggested that GMCA consider cost comparisons between Manchester and London under TfL, and focus upon a bus network which doesn't place profit over people.

Venture Arts

Venture Arts shared notes taken from a steering group session run regarding the Proposed Franchising Scheme. They provided a number of comments regarding the experiences of members with learning disabilities:

- Current disabled persons bus pass already eliminates the issue of multiple tickets for multiple operators
- Changing buses can be stressful and confusing so more routes around the city as opposed to into the city would be helpful.
- Suggested code of conduct to address safety and anti-social issues currently experienced
- A suggestion for Manchester based charities to advertise for free on the GM fleet
- Buses as a viable mode would help those who currently struggle with the business of trams

15.3 Members of the public

Excluding campaigns, there were 27 late responses submitted by members of the public. All of these responses provided comments which were in-keeping with the themes raised by members of the public analysed in detail in throughout this report.

Appendices

Appendix A – Participant profile

This section summarises the profile of public participants who took part in the consultation via the online or paper form. A total of 5,959 members of the public participated in the consultation via the response form. The questions were optional and so not everybody provided this information. Those who submitted a response via email or letter would not have answered the questions and so are also excluded from the figures below.

Table B1 Age of respondents taking part in the consultation via online or paper response form

Age	Number of respondents
16-18	142
19-24	272
25-34	777
35-44	938
45-54	981
55-64	1,059
65-74	1,401
75 and over	262
Prefer not to say	127
Not stated	45

Table B2 Gender of respondents taking part in the consultation via online or paper response form

Gender	Number of respondents
Male	3,284
Female	2,472
In another way	43
Prefer not to say	157
Not stated	48

Table B3 Whether respondents identify as Transgender who took part in the consultation via online or paper response form

Do you identify as Transgender?	Number of respondents
Yes	34
No	4,883
In some ways	27
Prefer not to say	245
Not stated	815

Table B4 The sexual orientation of those took part in the consultation via online or paper response form

How would you describe your sexuality?	Number of respondents
Bisexual	191
Gay or lesbian	365
Heterosexual or straight	3737
Other sexual orientation	55
Prefer not to say	829
Not stated	827

Table B5 The ethnic origin of those took part in the consultation via online or paper response form

What is your ethnic group?	Number of respondents
White	5,180
English / Welsh / Scottish / Northern Irish / British	4,843
Irish	131
Gypsy or Irish Traveller	4
Any other White background	202
Mixed / multiple ethnic groups	104
White and Black Caribbean	37
White and Black African	8
White and Asian	33
Any other mixed / multiple ethnic groups	26
Asian / Asian British	163
Indian	50
Pakistani	63
Bangladeshi	12
Chinese	20
Any other Asian background	18
Black / African / Caribbean / Black British	96
African	56
Caribbean	33
Any other Black / African / Caribbean background	7
Any other ethnic group	42
Arab	17
Any other background	25
Prefer not to say	329

Table B6 The stated religion of those took part in the consultation via online or paper response form

How would you describe your religion?	Number of respondents
Buddhist	38
Christian	2008
Hindu	27
Jewish	63
Muslim	118
Sikh	3
Other religion	108
No religion	2,233
Prefer not to say	590
Not stated	816

Table B7 Health status of those took part in the consultation via online or paper response form

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Number of respondents
Yes, limited a lot	336
Yes, limited a little	938
No	4,637
Not stated	93

Table B8 Health status and impact on bus use of those with a disability who took part in the consultation via online or paper response form

Do you have a disability or long-term health condition that prevents you from using the bus?	Number of respondents
Yes	147
No	1,041
Prefer not to say	72
Not stated	14

Table B9 Working status of those who took part in the consultation via online or paper response form

Which of the following applies to you.....?	Number of respondents
I am employed by a bus operator in Greater Manchester	116
I am employed by a bus operator outside of Greater Manchester	9
A member of my family works for a bus operator	61
None of these	5,707
Don't know	44
Not stated	70

Table B10 Transport use of those who took part in the consultation via online or paper response form

Which of these mode(s) of transport do you use on a weekly basis?	Number of respondents
Car or van (either as a driver or a passenger)	3,625
Bus	3,700
Train	1,452
Tram (Metrolink)	2,284
Bicycle	880
Taxi/taxi apps/private hire	796
Walking all the way to your destination	2,690
Other	145
Not stated	52

Table B11 Frequency of bus use for those who took part in the consultation via online or paper response form

How often do you use buses?	Number of respondents
Once a week or more	3,242
Less than once a week but used in the last year	452
Not stated	6

Table B12 Reasons for bus use for those who took part in the consultation via online or paper response form

How often do you use buses?	Number of respondents
Commuting	1,524
Education	194
Social/Leisure	1,589
Other	377
Not stated	16

Table B13 Local Authority area of respondents taking part in the consultation via online or paper response form

Local Authority	Number of respondents
Bolton	381
Bury	435
Oldham	352
Rochdale	304
Stockport	780
Tameside	413
Trafford	563
Manchester	1,501
Salford	576
Wigan	406
Outside Greater Manchester (specified)	254
Not stated	39

Appendix B – List of organisations and statutory consultees that responded to the consultation

The following is a list of organisations who responded to the consultation within the advertised consultation period. Any organisation that took part in the consultation using the online or paper form was able to select the category they belonged to. Organisations that responded by email were allocated to categories by Ipsos MORI to the best of its judgement. Please note that the categorisation of organisations has been undertaken to demonstrate the breadth of the response; the categorisation is not definitive and has no bearing on the way in which the responses were dealt with.

a) STATUTORY CONSULTTEES

BUS OPERATORS

- Arriva UK Bus
- Belle Vue (MCR) Ltd
- First Manchester Ltd
- HCT group
- PDR Travel Ltd
- Go North West Ltd
- Stagecoach Manchester
- Transdev Blazefield Ltd
- Warrington's Own Buses
- Rotala PLC

LOCAL GOVERNMENT

- Blackburn with Darwen Borough Council
- Bolton Council
- Bury Council
- Cheshire East Council
- Cheshire West and Chester Council
- Chorley Council
- Derbyshire County Council
- High Peak Borough Council
- Lancashire County Council
- Manchester City Council
- Oldham Council
- Liverpool City Region Combined Authority
- Rochdale Borough Council
- Rossendale Borough Council
- Salford City Council

- Stockport Metropolitan Borough Council
- Tameside Metropolitan Borough Council
- Trafford Council
- Warrington Borough Council
- West Yorkshire Combined Authority
- Wigan Council

OTHER

- Bus Users UK
- Peak District National Park Authority
- Stockport UNISON
- Transport Focus
- TravelWatch NorthWest
- TUC North West
- UNISON (Greater Manchester Transport Branch)
- UNISON (North West)
- Unite the Union
- Wigan Metro UNISON

b) NON-STATUTORY CONSULTEES

ACADEMIC

- Burnage Academy for Boys
- IPPR North
- Manchester Medical School
- Manchester Metropolitan University
- Redwood School
- Royal Northern College of Music
- Students of Holy Cross
- University of Manchester
- University of Salford

BUS OPERATORS

- Abellio
- Keolis UK
- RATP Dev
- Tower Transit

CHARITY/VOLUNTARY SECTOR

- Age Friendly Manchester Older People's Board
- Bolton CVS
- Breakthrough UK
- Caribbean & African Health Network
- Centre for Cities
- Dunham Massey National Trust

- Equality and Human Rights Commission
- Greater Manchester Coalition of Disabled People
- The Guide Dogs for the Blind Association
- Learning, Training & Employment Group
- The Proud Trust
- Stockport Youth Partnership
- Stroke Association
- Whalley Range Community Forum
- Whitemoss Youth/Community Centre and the North City Nomads

ELECTED REPRESENTATIVES

- Afzal Khan, MP for Manchester, Gorton
- Barbara Keeley, MP for Worsley and Eccles South
- Chorlton Park councillors (Councillors Mandie Shilton Godwin/ Joanna Midgley/ Dave Rawson)
- City Mayor of Salford
- Councillor Adrian Pearce, North Ward of Stalybridge
- Councillor Charlotte Morris, Elton Ward
- Councillor Chris Wills, Withington Ward
- Councillor Eddy Newman, Woodhouse Park Ward
- Councillor Emily Rowles and Councillor Sharif Mahamed, Moss Side Ward
- Councillor Gina Reynolds, Langworthy Ward, Salford
- Councillor Marcus Johns, Deansgate Ward
- Councillor Neil Reynolds, Claremont Ward
- Councillor Tina Hewitson, Ardwick Ward
- Debbie Abrahams, MP for Oldham East and Saddleworth
- Elected Representatives for Mossley
- Sir Graham Brady, MP for Altrincham and Sale West
- Graham Stringer, MP for Blackley and Broughton
- Jeff Smith, MP for Manchester Withington
- Jim McMahon, MP for Oldham West & Royton
- Jonathan Reynolds, MP for Stalybridge and Hyde
- Kate Green, MP for Stretford and Urmston
- Whalley Range Councillors (Cllr Angeliki Stogia/ Cllr Mary Watson / Cllr Aftab Razaq)

ENVIRONMENT, HERITAGE, AMENITY OR COMMUNITY GROUP

- Altrincham Business Improvement District
- Barlow Hall Neighbourhood Group
- Chorlton Voice
- Community Transport Association
- Esoterix
- Friends of Patricroft Station
- Friends of Walkden Station
- Greater Manchester Centre for Voluntary Organisation (GMCVO)
- Heald Green Ratepayers Association

- Living Streets
- Manchester Friends of the Earth
- Manchester Local Care Organisation
- Northern Neighbourhood Forum M22
- Oxford Road Corridor
- Sale Moor Community
- The Church of England - Diocese of Manchester
- Tottington District Civic Society
- Transition Buxton
- Walk Ride Heaton
- Walk Ride Greater Manchester
- Whalley Range Climate Action Group
- Withington Civic Society

HEALTH ORGANISATIONS

- Manchester University NHS Foundation Trust
- The Christie NHS Foundation Trust
- The Northern Care Alliance NHS Group

LOCAL GOVERNMENT

- Northern Powerhouse Partnership
- Saddleworth Parish Council
- Stockport Metropolitan Borough Council, Liberal Democrat Group
- Tameside Council, Place and External Relations Scrutiny Panel

OTHER

- 607 Rebels of St. James's Church
- Better Buses for Greater Manchester
- BUS4US
- Derbyshire and Peak District Campaign for Better Transport
- Steady State Manchester Collective
- Bruntwood
- intu Trafford Centre
- J Murphy & Son
- Morrison Property Services
- Nycomm Ltd
- Ryse Hydrogen Ltd
- Schroders
- Scott-Grant Ltd
- Chartered Institute of Logistics and Transport - North West Policy Group
- Confederation of Passenger Transport UK (CPT)
- Greater Manchester Chamber of Commerce
- OneBus

- University of Manchester Students' Union
- University of Salford Students' Union
- Manchester Airports Group (MAG)
- Passenger User Group
- SE Manchester Community Rail Partnership
- Bryn and Makerfield RUG
- Mobilities Justice CIC (Pending Registration)

Appendix C – Contents of the Long and Short Response forms

Two response forms were available, a long response form comprising 48 questions about the proposal, and a shorter form comprising nine questions. All nine questions from the shorter version of the questionnaire featured in the longer version of the questionnaire.

Details of how the questions from the short form mapped onto the long response form are presented in the table below:

Qu No.	Long Response Form	Qu No.	Short Response Form
Questions about the Proposed Franchising Scheme			
1	Do you 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?		
3	Do you have any comments on the local services that are proposed to be franchised?		
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?		
5	Do you have any comments on the services which have been excepted from regulation under the Proposed Franchising Scheme?		
6	Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made?		
7	Do you have any comments on the dates by which it is proposed that franchise contracts may first be entered into?		
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?		

9	Do you have any comments on the proposals for how GMCA would consult on how well the Proposed Franchising Scheme is working?		
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?		
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?		
Questions about the Assessment			
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?	QA	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?
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?	QB	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?
		QC	Why do you say this?
14	Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?		
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?		
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?		
17	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 	QD	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

<p>further economic value could be delivered. Do you have any comments on this?</p>	<p>further economic value could be delivered. Do you have any comments on this?</p>
<p>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?</p>	
<p>19 Do you have any comments on the length of franchise contracts under the Proposed Franchising Scheme, as set out in the Commercial Case?</p>	
<p>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?</p>	
<p>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?</p>	
<p>22 Do you have any comments on the approach to depots under the Proposed Franchising Scheme, as set out in the Commercial Case?</p>	
<p>23 Do you have any comments on the approach to fleet under the Proposed Franchising Scheme, as set out in the Commercial Case?</p>	
<p>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?</p>	
<p>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?</p>	
<p>26 Do you have any comments on the impacts of the options on the achievement of the objectives of neighbouring transport</p>	

authorities, as set out in the Commercial Case?	
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?
28	Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?
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?
30	<p>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>QE 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>
31	Do you have any comments on the conclusion in the Financial Case about the affordability of the partnership options?
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?
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?
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?

<p>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?</p>	
<p>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?</p>	
<p>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?</p>	
<p>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?</p>	
<p>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.</p>	
<p>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?</p>	
<p>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?</p>	
<p>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?</p>	<p>QF 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>43 Do you have any other comments on the Assessment of the Proposed Franchising Scheme?</p>	
<p>Question on the Equality Impact Assessment</p>	
<p>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?</p>	
<p>Final questions</p>	

45	To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?	QG	To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?
		QH	Why do you say this?
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.	QI	Are there any changes that you think would improve the Proposed Franchising Scheme?
		QJ	Please provide further details as to the changes you think would improve the Proposed Franchising Scheme.
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?	QK	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?
48	Finally, do you have any other comments you want to make?	QL	Finally, do you have any other comments you want to make?

Appendix D – Comments on the Consultation Process

A total of 1,017 participants made comments about the consultation itself, either concerning the accompanying consultation documents, the response forms or the process in general.

Positive comments about the consultation

A total of 30 participants made positive comments about the consultation. The majority of these provided feedback on the Consultation Document, in that it was thorough and well thought through (17), that it was clear and the information well laid out (6) and that the short version is helpful (1).

When it came to the consultation process itself, seven participants thought it was overall a thorough process and well thought through.

Negative comments about the consultation

A total of 752 participants made negative comments about the consultation, of which the majority (474) related to the Consultation Document. The main points raised about the Consultation Document were that:

- It is not sufficiently informative and lacks the full facts (214);
- It is too confusing, complicated and littered with technical jargon (134);
- The length of the document is too long and will take too long to read in full (92);
- Locating it online is hard, and accessing it is difficult (54);
- It is difficult to use and not user friendly (39);
- It lacks detail (30), in particular concerning the maps and sub-areas of the zones on implementing the Proposed Franchising Scheme (21);
- It is biased and lacks impartiality (22);
- The actual print type is too small and hard to read (9);
- Detail is lacking about the proposed Phase 2 interventions (6);
- It is repetitive (2); and
- The online version suffers from technical issues, making it difficult to use (1).

A total of 326 participants made a comment about the response forms themselves. The main points raised were that:

- The response form is too complicated and the questions are too confusing to respond to (111);
- The links to the Consultation Document do not work (60);

- Overall, the response form is poorly designed (51);
- There are too many questions contained within the response form and insufficient 'tick box' questions (46);
- The response form is not user friendly (36)
- The response form is biased and lacks impartiality (30);
- It is hard to access due to online/technical issues (25);
- Questions are irrelevant and unrelated to bus services (16);
- Questions are unclear and vague (14); and
- The response form is difficult to access for disabled people and those with learning disabilities (6).

A total of 165 participants made comments about the consultation more generally (i.e. not limited to the Consultation Document). The main points were that:

- The consultation was too complicated and confusing (67);
- The Proposed Franchising Scheme is a 'done deal' and the consultation is only a box ticking exercise (56);
- Generally, the consultation is poor (36);
- There was a lack of publicity about the consultation (12);
- The consultation should have been held earlier in the process (7);
- The cost of the consultation is too expensive and a poor use of public funds (2); and
- The consultation is biased and not impartial (1).

Other comments about the consultation

Another 179 participants made general comments about the consultation, including the need to consult with local authorities (16), the disabled/elderly passengers and organisations (12), bus operators (74) and the wider public and bus passengers and listen what they have to say (301).

Comments about the Mayor/GMCA/TfGM

A total of 179 participants made comments referring to the Mayor, the GMCA or TfGM. These were categorised as positive and negative comments, with 173 negative comments made and 34 positive comments made.

Appendix E – Technical note on coding

Receipt and handling of responses

The handling of responses was subject to a rigorous process of checking, logging and confirmation in order to support a full audit trail. All original electronic and hard copy responses remained securely filed within Ipsos MORI, catalogued and serial numbered for future reference.

Development of initial code frame

Coding is the process by which free-text comments, answers and responses are matched against standard codes from a coding frame Ipsos MORI compiled to allow systematic statistical and tabular analysis. The codes within the coding frame represent an amalgam of responses raised by those registering their view and are comprehensive in representing the range of opinions and themes given.

The Ipsos MORI coding team drew up an initial code frame for each open-ended free-text question using the first thirty to forty response form responses, and ten to fifteen responses for email and letter responses. An initial set of codes was created by drawing out the common themes and points raised across all response channels by refinement. Each code thus represents a discrete view raised. The draft coding frame was then reviewed before the coding process continued. The code frame was continually updated throughout the analysis period to ensure that newly emerging themes within each refinement were captured.

Coding using the Ascribe package

Ipsos MORI used the web-based Ascribe coding system to code all open-ended free-text responses found within completed response forms and from the free-form responses (i.e. those that were letters and emails etc.). Ascribe is a proven system which has been used on numerous large-scale projects. Responses were uploaded into the Ascribe system, where the coding team worked systematically through the verbatim comments and applied a code to each relevant part(s) of the verbatim comment.

The Ascribe software has the following key features:

- Accurate monitoring of coding progress across the whole process, from scanned image to the coding of responses.
- An “organic” coding frame that can be continually updated and refreshed; not restricting coding and analysis to initial response issues or “themes” which may change as the consultation progresses.

- Resource management features, allowing comparison across coders and question/issue areas. This is of particular importance in maintaining high quality coding across the whole coding team and allows early identification of areas where additional training may be required.
- A full audit trail – from verbatim response to codes applied to that response.

Coders were provided with an electronic file of responses to code within Ascribe. Their screen was divided, with the left side showing the response along with the unique identifier, while the right side of the screen showed the full code frame. The coder attached the relevant code or codes to these as appropriate and, where necessary, alerted the supervisor if they believed an additional code might be required.

If there was other information that the coder wished to add they could do so in the “notes” box on the screen. If a response was difficult to decipher, the coder would get a second opinion from their supervisor or a member of the project management team. As a last resort, any comment that was illegible was coded as such and reviewed by the Coding Manager.

Briefing the coding team and quality checking

A small, core team of coders worked on the project, all of whom were fully briefed and were conversant with the Ascribe package. This team also worked closely with the project management team during the set-up and early stages of code frame development.

The core coding team took a supervisory role throughout and undertook the quality checking of all coding. Using a reliable core team in this way minimises coding variability and thus retains data quality.

To ensure consistent and informed coding of the verbatim comments, all coders were fully briefed prior to working on this project. The Coding Manager undertook full briefings and training with each coding team member. All coding was carefully monitored to ensure data consistency and to ensure that all coders were sufficiently competent to work on the project.

The coder briefing included background information and presentations covering the questions, the consultation process and the issues involved, and discussion of the initial coding frames. The briefing was carried out by Ipsos MORI’s executive team.

All those attending the briefings were instructed to read, in advance, the consultation document and go through the response form. Examples of a dummy coding exercise relating to this consultation were carefully selected and used to provide a cross-section of comments across a wide range of issues that may emerge.

Coders worked in close teams, with a more senior coder working alongside the more junior members, which allowed open discussion to decide how to code any particular open-ended free-text comment. In this way, the coding management team could quickly identify if further training was required or raise any issues with the project management team.

The Ascribe package also afforded an effective project management tool, with the coding manager reviewing the work of each individual coder, having discussion with them where there was variance between the codes entered and those expected by the coding manager.

To check and ensure consistency of coding, at least 10% of coded responses were validated by the coding supervisor team and the executive team, who checked that the correct codes had been applied and made changes where necessary. This was increased to at least 20% for all questions contained within the short response form.

Updating the code frame

An important feature of the Ascribe system is the ability to extend the code frame “organically” direct from actual verbatim responses throughout the coding period.

The coding teams raised any new codes during the coding process when it was felt that new issues were being registered. In order to ensure that no detail was lost, coders were briefed to raise codes that reflected the exact sentiment of a response, and these were then collapsed into a smaller number of key themes at the analysis stage. During the initial stages of the coding process, meetings were held between the coding team and Ipsos MORI executive team to ensure that a consistent approach was taken to raising new codes and that all extra codes were appropriate and correctly assigned. In particular, the coding frame sought to capture precise nuances of participants’ comments in such a way as to be comprehensive.

A second key benefit of the Ascribe system is that it provides the functionality of combining codes, revising old codes and amending existing ones as appropriate. Thus, the coding frame grew organically throughout the coding process to ensure it captured all of the important “themes”.

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About Ipsos MORI's Social Research Institute

The Social Research Institute works closely with national governments, local public services and the not-for-profit sector. Its c.200 research staff focus on public service and policy issues. Each has expertise in a particular part of the public sector, ensuring we have a detailed understanding of specific sectors and policy challenges. This, combined with our methods and communications expertise, helps ensure that our research makes a difference for decision makers and communities.