

DRAFT RESPONSE TO GREATER MANCHESTER CONSULTATION *DOING BUSES DIFFERENTLY*

Dear XXXX

Thank you for the opportunity to respond to your *Doing Buses Differently* consultation.

Bus travel across both our regions is a vital in underpinning our economic, inclusive and green growth objectives. We both have targets to increase bus patronage including through a much improved passenger experience. As you know we have established a West Yorkshire Bus Alliance and through this we are working with operators on shorter term benefits for passengers. We are very interested in your proposals for franchising and are keen to learn from your experiences in reviewing the options. Thank you for your ongoing offer of working together.

West Yorkshire Combined Authority understands that the preferred approach is to franchise the bus operations across the Greater Manchester geography taking a phased approach across three sub-areas. Ownership of depots would come under Greater Manchester Combined Authority whilst the provision of buses would remain a franchisee's responsibility. Franchising would see services and frequencies determined by Greater Manchester Combined Authority and operated under local service contracts awarded to bus operators by Transport for Greater Manchester, on behalf of Greater Manchester Combined Authority. Circumstances allowing, the first franchise contracts would be awarded in April 2021, with the operation of franchised services commencing in January 2022.

On reviewing the consultation documents, our response focuses on four key areas, which have strategic importance to West Yorkshire, these are:

1. Implications for cross boundary services and ticketing arrangements
2. Depot Arrangements
3. Operating Standards for Vehicles
4. Transitional arrangements and their implications for West Yorkshire

Implications for Cross Boundary Services and Ticketing Arrangements

We acknowledge that the impact on cross boundary services has been considered, the West Yorkshire Combined Authority has the following cross boundary services, which take customers into Greater Manchester:

- 589 Todmorden – Littleborough Rochdale
- X58 Halifax – Sowerby Bridger – Ripponden- Littleborough- Rochdale
- 84 Huddersfield – Marsden- Oldham- Manchester (Sundays)
- 185 Huddersfield – Marsden- Oldham

West Yorkshire Combined Authority would welcome further conversations with Transport for Greater Manchester on the likely impact that a franchised operation

would have on cross-boundary services. As issuing a permit requires a two-stage test, then a level of risk is presented to any service. It would be useful to understand what involvement neighbouring authorities can have in the introduction of a permit scheme, especially in terms of services that are not directly funded by transport authorities. The principles we would look to establish include:

- Ensuring that these cross boundary services are maintained and others are not prevented from being established (Q15 and 26).
- A collaborative approach to marketing and cross boundary ticketing and for the 'GM ticketing add-on' to be considered alongside other existing multi-operator products.
- Greater interoperability to support the overarching transport strategy objectives to enhance connectivity and creating a more integrated public transport system for example on (Q26).

A common Integrated Ticketing System would be a practical step to achieving cross boundary integration of ticketing, for example utilising the Transport for the North approach to fare capping, open data and disruption messaging across the region. However, if Greater Manchester choose a system that is not compatible regionally or even cross boundary, then this may take collaborative opportunities away (Q26).

Integration of systems and collaborative working for areas, such as real time, where West Yorkshire Combined Authority is already operating on a Yorkshire-wide basis would provide an opportunity for better integration (Q46B).

Equally, adopting national standards, such as TransXchange and SIRI will enable easier communication with neighbouring authorities and non-franchise operators running into the Greater Manchester area. Limiting integration could pose some risks for cross boundary services and integration into the wider regional network. The importance of integrating systems across boundaries will enable a more integrated network and may impact on the social and economic objectives of the network (Q15 and Q46B).

West Yorkshire Combined Authority would also welcome a further conversation regarding information and marketing. Bus operators in West Yorkshire are increasing leading on customer marketing and information, therefore, the impact on customers travelling into West Yorkshire needs to be understood (Q26).

Depot Arrangements

Greater Manchester Combined Authority is proposing to purchase the depots and lease them to the operators. This will allow for greater competition and encourage more operators to bid for the large franchises (Q11 and Q22).

West Yorkshire Combined Authority would be interested to understand if the procurement of the depots is likely to impact on the phasing of the franchise sub-areas -whether the phasing is subject to change depending on whether depots are easier to secure in some sub-areas than others. It is unclear if the splitting into sub-areas is purely geographical or based on other factors, such as patronage, number

of routes, urban-rural split, population, availability of other transport modes. It is unclear how the strategic depots fit into the sub-areas (Q4).

Operating Standards for Vehicles

Recent discussions with operators indicate that the manufacturing lead time for new buses is currently nine months. It is likely that increased demand for zero-emission buses could extend the nine-month timescale (Q7 and Q8).

The consultation pledges to introduce a zero-emission bus fleet by 2024. It is important to engage operators with the Clean Air Plan in advance of franchising to ensure the fleet commitments are attainable within the given nine-month period between contract award and implementation.

The structure of the proposed franchised scheme allows for the implementation of a zero-emission bus fleet to be phased up to 2024. The final phase of franchising will see the introduction of services on Saturday 23rd December 2023. If there is any delay to introducing franchising this may impact on the ability to reach a zero-emission bus fleet by 2024 (Q15 and Q23).

Whilst Greater Manchester Combined Authority can specify fleet standards, funding opportunities need to be available to support the delivery of the Clean Air Plan (Q15 and Q23).

Transitional arrangements and their implications for West Yorkshire

The transition period set out in the consultation is 2020 to 2023. This will enable both the operators and Transport for Greater Manchester to phase the resources required implementation.

The approach to implementation chosen by Transport for Greater Manchester provides opportunities to mitigate risk, for example, acquiring a single supplier of on-bus technology to enable data sharing and identification of temporary legal and procurement resource (Q33).

Summary

The introduction of franchising may cause short term complexity and confusion for customers, especially when travelling across boundaries. This is clearly something that you want to mitigate and so the West Yorkshire Combined Authority would welcome a discussion and agreement to:

- ensure a clear plan to mitigate and manage this is put in place to minimise disruption; and
- share data and monitor performance, especially during the early days of implementation. This will ensure that impact of franchising on passenger movements, especially cross-boundary movements, can be monitored and responded to where required.

Finally, in the event that the West Yorkshire Combined Authority were to adopt franchising powers, co-operation with Transport for Greater Manchester would be sought to ensure that the abutting franchising and statutory ticketing schemes were

complimentary and did not place barriers to the development of further cross boundary travel in the future.

Yours Sincerely