

Response from Bus Users UK to the Consultation on Proposed Bus Franchising in West Yorkshire

7 January 2024

Section 1: Description of the Proposed Franchising Scheme

Q1. Do you have any comments on the proposal that the Proposed Franchising Scheme should apply to the entire West Yorkshire region?

Pros:

1. **Consistent Services:** Applying the Franchising Scheme to the entire West Yorkshire region would ensure a uniform and consistent approach to managing bus services across the entire area. This could lead to standardised levels of service quality and efficiency.
2. **Integrated Planning:** Managing the entire region under a single scheme allows for integrated planning and co-ordination of bus services. This could potentially result in better connectivity, optimised routes and improved overall transportation efficiency.
3. **Economies of Scale:** By applying the scheme to the entire region, there may be opportunities for economies of scale in terms of procurement, administration and management. This could lead to cost savings and more efficient use of resources.

Cons:

1. **Diverse Needs:** Different areas within West Yorkshire may have unique transportation needs. A one-size-fits-all approach might not address the specific requirements of each zone adequately. Tailoring solutions to local demands could be challenging.
2. **Complex Implementation:** Implementing the scheme across the entire region involves significant logistical and administrative challenges. Co-ordinating such a large-scale transition requires careful planning, resources and time.
3. **Local Operator Impact:** Small and medium-sized operators in certain zones might find it challenging to compete in a system that applies uniformly to the entire region. This could potentially affect local businesses and limit diversity in the market.

Q2. Do you have any comments on the proposal to split the geographical area of the Proposed Franchising Scheme into ten zones to be procured across three rounds?

Pros:

1. **Phased Implementation:** Splitting the implementation into three rounds allows for a phased and more manageable transition. This can help in addressing challenges one step at a time, ensuring smoother integration and minimising disruptions to existing services.

2. **Focused Procurement:** Procuring zones in rounds will allow the local authority to focus on specific regions at different times. This approach may facilitate a more detailed and careful consideration of the unique characteristics and needs of each zone during the procurement process.
3. **Resource Management:** The phased approach may help in more effective resource management, both in terms of administrative resources and the capacity of operators to adapt to the changes.
4. **Learning from Early Rounds:** Implementing the scheme in phases allows authorities to learn from the earlier rounds and make adjustments or improvements in subsequent rounds based on actual experiences and feedback.

Cons:

1. **Fragmented Services:** Splitting the geographical area into zones might lead to fragmentation of services, especially if there are significant differences in how each zone is managed or operated. Ensuring seamless connectivity across zones could be a challenge which could cause confusion and upset among passengers.
2. **Inequality in Timing:** The phased approach may result in disparities in service quality and standardisation across different zones, especially if some areas undergo franchising earlier than others and passengers will not know what to expect nor when.
3. **Logistical Complexity:** Co-ordinating the procurement process for ten zones across three rounds is a complex logistical task. It requires precise planning and execution to ensure a smooth transition without major disruptions to services and passengers' needs.
4. **Operator Adaptation:** Operators might face challenges in adapting to a phased implementation, especially if they operate in multiple zones. Coordinating changes across different zones could be demanding for both large and small operators.

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

Considerations:

1. **Accessibility and Inclusivity:** It's crucial to ensure that the franchising of local services does not compromise accessibility for all members of the community, including those with mobility challenges or other accessibility needs. The franchising model should be designed to maintain or enhance inclusivity.
2. **Service Quality and Efficiency:** The primary goal of franchising local services is stated as necessary to improve service quality and efficiency. The proposal should outline how the franchising model will achieve these objectives, including plans for route optimisation, improved frequency and overall better passenger experience in a manner which is markedly better than an Enhanced Partnership, especially given the significant additional cost to the public purse.
3. **Stakeholder Engagement:** Involving local communities, passengers, and other stakeholders in the decision-making process is essential. Understanding the unique needs and

preferences of each locality can help tailor the franchising approach to better suit the community.

4. **Operator Diversity:** While the franchising scheme may involve larger operators for certain categories (Category A Lots), it's important to consider how the proposal encourages diversity in the market, allowing opportunities for small and medium-sized operators (Category B and C Lots) and ensuring Community Transport is involved.
5. **Feedback Mechanisms:** Establishing mechanisms for ongoing feedback from passengers and communities can help monitor the effectiveness of the franchising scheme. Regular reviews and adjustments based on actual experiences can contribute to the success of the system. An **independent** complaints system needs to be in place and clearly advertised.
6. **Integration with Other Modes of Transportation:** The franchising proposal should consider how local bus services integrate with other modes of transportation, such as trains or trams. Seamless connectivity enhances the overall effectiveness of the transportation network and builds confidence in passengers and potential service users.
7. **Environmental Impact:** Assessing and addressing the environmental impact of franchised services, including considerations for fuel efficiency and emissions reduction, aligns with broader sustainability goals. Increasing passenger numbers because services are planned to be more reliable and integrated will contribute to meeting climate change targets and improving health through pollution reduction.
8. **Economic Impact:** Analysing the economic impact of franchising on local businesses, especially smaller operators, is important. Balancing the benefits of standardised services with the potential challenges faced by local businesses is crucial.

Q4. Do you have any comments on the services which are exempt from regulation under the Proposed Franchising Scheme?

General Considerations:

1. **Clear Definitions:** It is important for the proposal to provide clear and specific definitions of the exempted services to avoid ambiguity and ensure consistent application.
2. **Communication:** Clear communication to the public, stakeholders, and operators about the rationale behind exemptions is crucial. This helps build understanding and support for the proposed franchising scheme.
3. **Review Mechanism:** Including a mechanism for periodic review of exemptions ensures that the list remains relevant over time. Changes in circumstances or operational requirements may necessitate adjustments to the exemptions.
4. **Collaboration with Stakeholders:** Engaging with stakeholders, including school authorities and railway operators, during the development and implementation of the franchising scheme is essential. Collaborative decision-making can lead to more effective outcomes.

In summary, the proposed exemptions seem reasonable, recognising the unique characteristics and operational requirements of closed school services and rail replacement services. Ensuring clarity,

communication, and periodic review will contribute to the successful implementation of a Proposed Franchising Scheme.

Q5. Do you have any comments on the date on which the Proposed Franchising Scheme is currently proposed to be made, 14 March 2024?

Two and a half months between the consultation closing and the analysis of the feedback suggests that there is no expectation of a change of decision as to the way forward, which in turn suggests that this is a consultation into how a franchising scheme would be accepted rather than whether it is the right mechanism for providing buses in the region.

In terms of communicating the decision, you should note that accessibility is key and you should take into account how you inform interested parties who are digitally excluded.

Q6. Do you have any comments on the date on which it is proposed that the first franchise contracts would be entered into, 28 June 2026?

The timeline allows for a structured planning process. If the decision is made to proceed with the Franchising Scheme, the period between the decision date and the start of the first franchised services allows for planning, procurement and coordination.

This time gap between the decision date and the initiation of franchised services offers a transition period. This will be crucial for operators, the local authority and the community to adjust to the upcoming changes gradually.

It should be noted that an Enhanced Partnership scheme would be significantly faster to set up and the public should see benefits more quickly. The costs of a franchising scheme are also far higher to the public purse and services would be at risk of being cut if local authority budgets come under pressure, so this seems like a higher-risk option which offers more jeopardy to passengers, an issue not addressed in the document.

In our view, nothing in this consultation demonstrates that the benefits to be accrued could not be achieved by a well-managed Enhanced Partnership scheme which would give control to the local authority while spreading the risk.

Q7. 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 (mobilisation period)?

Pros:

1. **Operational Readiness:** Allowing a nine-month mobilisation period provides operators with a reasonable timeframe to prepare for the commencement of services under the franchise contract. This period is crucial for logistical planning, staffing, equipment acquisition and other operational considerations.
2. **Smooth Transition:** A longer mobilisation period would contribute to a smoother transition from the existing model to the franchised services. It would allow for a phased approach to changes, reducing the likelihood of disruptions and ensuring a more seamless transfer of responsibilities.

3. **Operator Engagement:** A longer mobilisation period would provide operators with sufficient time to engage with the franchising requirements and make any necessary adjustments to their operations. This could lead to a more co-operative and effective implementation.

Cons:

1. **Extended Transition Period:** While a longer mobilisation period offers advantages, it also means a more extended transition period before the franchised services become operational. This may impact the realisation of benefits believed to be and promoted as associated with the franchising scheme within the community.

Q8. Do you have any comments on the proposals for how the Combined Authority would consult on how well the Proposed Franchising Scheme is working?

Inclusivity of Stakeholders: The list of statutory stakeholders is broad, covering a range of perspectives, including local bus operators, employees, passengers, affected local authorities, regulatory bodies and any other relevant bodies or individuals. However, it would be wise to contact all West Yorkshire representative bodies for people with specific needs or accessibility requirements which should be known to the Authority and involved in ongoing consultation as to the success or challenges of the scheme. This level of inclusivity should ensure a reasonable understanding of the scheme's impact.

Regular Engagement: The requirement to consult with users of local bus services within 24 months from the start of franchised services reflects a commitment to ongoing engagement. Regular feedback collection will allow for adjustments and improvements based on real experiences and needs.

This should include analysis of complaints and comments sent to an independent body which meets the Trading Standards legal requirement of a registered Alternative Dispute Resolution body.

Comprehensive Approach: The proposed approach, as detailed in section 8 of Appendix 5 and section 5 in the Management Case of the Assessment, suggests a comprehensive strategy for consulting on the operation of the Proposed Franchising Scheme. This could include surveys, public meetings, focus groups, and other mechanisms to capture diverse opinions.

Elements for consideration

Clear Communication: It's important to communicate the purpose and outcomes of the consultation effectively to all stakeholders, ensuring they understand how their input contributes to the evaluation and potential improvements of the franchising scheme. Perhaps a 'You Said, We Did' strategy?

Accessibility of Feedback Mechanisms: Ensure that the mechanisms for providing feedback are accessible and user-friendly for a broad audience with diverse needs. This may include online surveys, but also strategies to reach the digitally excluded such as community meetings in various locations, local radio and newspaper segments and other strategies to reach a diverse range of participants.

Balancing Perspectives: While gathering feedback from various stakeholders is crucial, it's important to balance conflicting interests and opinions. In particular passenger forums need to be representative of the local population and include bus passengers with a range of characteristics in

order to obtain thorough and comprehensive feedback. Often utilising a volunteer method encourages feedback from a narrow sector of the bus-using society, so cannot be relied upon to give the full picture. The consultation process should aim to find common ground and address concerns constructively.

Transparent Reporting: The results of the consultation should be transparently communicated to the public, stakeholders, and decision-makers. This transparency fosters trust and accountability in the decision-making process. It is also an opportunity to celebrate any improvements to services.

Iterative Evaluation: Consider adopting an iterative evaluation approach, allowing for continuous adjustments to the franchising scheme based on feedback received over time.

Learning from Experience: The consultation process can serve as a valuable learning experience. WYCA can gather insights into challenges faced by users, operators, and other stakeholders and use this information for ongoing refinement.

Section 2: Assessment Summary - Strategic Case

Q9. The Strategic Case sets out the challenges facing the West Yorkshire bus system and says it is not performing as well as it could. Do you have any comments on this?

Based on the information provided, it is clear that the West Yorkshire bus system is facing significant challenges that impact both customers and the wider market. However, the majority of the challenges identified are not unique to West Yorkshire, but national bus system problems.

Customer Challenges:

1. **Declining Patronage:** The long-term decline in bus patronage, exacerbated by the COVID-19 pandemic, indicates challenges in attracting and retaining customers. It's crucial to address local factors contributing to this decline, including the impact of transport poverty, especially in more rural areas of West Yorkshire.
2. **Affordability:** The rising cost of bus travel over the past decade may act as a barrier for potential customers. While recent initiatives like the Mayor's Fares aim to address this, ongoing efforts are needed to ensure affordability.
3. **Customer Satisfaction:** Variability in customer satisfaction levels, particularly dissatisfaction with value for money and inconsistent service experiences, highlights the need for a more standardised and customer-centric approach. Within this challenge there is also a greater need to work with disability groups to ensure that the bus system in West Yorkshire is accessible and inclusive.
4. **Safety and Inclusivity:** Ensuring safety and inclusivity for all customers is essential. Addressing issues that impact people with protected characteristics will be a positive step towards creating a more inclusive transportation system.

Market Challenges:

1. **Financial Sustainability:** The reliance on public funding to maintain the network underscores financial challenges. The identification of routes deemed not financially viable raises concerns about the sustainability of the current model but restrictions on Authority budgets

could also be a significant challenge to the future success of a scheme wholly reliant on public funding.

1. **Tendered Services Pressure:** The increasing pressure on tendered services budget necessitates careful consideration for maintaining essential, socially necessary but uncommercial services.
2. **Operator Challenges:** Financial pressures on operators, compounded by external factors like inflation, rising costs of operation and driver shortages, contribute to the overall strain on the bus market. In particular, recently drivers have moved away from the region because of the offer of higher wages elsewhere.

Network Challenges:

1. **Unequal Network Access:** The unequal access to the bus network across West Yorkshire, especially for core services, highlights the need for a more inclusive and strategically planned network.
2. **Risk to Services:** The potential risk of declining services and bus mileage due to a lack of long-term financial stability poses a threat to the overall network's sustainability.

Operational Challenges:

1. **Bus Priority and Reliability:** Inconsistent bus priority measures contribute to poor punctuality and reliability, impacting customer satisfaction and overall effectiveness of the bus service. This in turn impacts on the trust of passengers, some of whom may find alternative modes of transport, which further reduces ridership.
2. **Green and Better Vehicles:** Challenges in achieving a zero-emission fleet and addressing inconsistent customer standards for green and better vehicles require targeted efforts and huge investment. The requirements of the Accessible Information Regulation will also increase the purchase cost of new vehicles.

Q10. The Strategic Case suggests that reforming the bus market is the right thing to do to address the challenges facing the local bus market. Do you have any comments on this?

The challenges outlined in the document, such as declining patronage, financial sustainability, and network inefficiencies, support the need for significant changes to the existing bus market structure.

1. **Customer-Centric Approach:** Reforming the bus market is an opportunity to address customer challenges, including affordability, inconsistent service experiences and complex ticketing. A more customer-centric approach could lead to improved satisfaction and increased ridership. Our primary goal is to ensure that bus passengers receive the best value, reliable and quality service.
2. **Greater Influence on Green Initiatives:** reforming the bus market may provide the Combined Authority with greater influence in promoting zero-emission fleets and sustainable practices.
3. **Reform model:** There is nothing in the documentation that clearly explains why the Franchising model is deemed more likely to provide the desired outcomes than an Enhanced

Partnership model. There are concerns about the ongoing viability of services if the only funding available has to come from the public purse. Our understanding suggests that any new Labour government is also unlikely to provide additional, ring-fenced funding for local transport, which we feel would be required to give confidence in this proposal. We also would like to see an exit strategy laid out in the event that the model chosen is not as successful as planned. While this is built in to an EP model, there does not seem to be anything on this topic in the Franchising model.

Q11. Do you have any comments on the Combined Authority's objectives as set out in the Strategic Case?

Transportation is a fundamental aspect of daily life and societal well-being.

1. Social Inclusion and Equality

Access to Opportunities: Adequate transportation enables access to essential services such as education, healthcare, employment, and social activities. Eradicating transport poverty ensures that everyone has equal opportunities to participate in society.

2. Employment Opportunities

Job Access: Accessible transportation is essential for people to reach their workplaces. Lack of affordable and efficient transport options can limit job opportunities, particularly for those living in economically disadvantaged areas. Entry level jobs require transport to be available very early and very late, so a traditional 9-5 approach would not be useful.

3. Health and Well-being

Access to Healthcare: Transportation is critical for accessing healthcare services. Individuals facing transport poverty may struggle to reach medical appointments, resulting in delayed or inadequate healthcare, impacting overall health outcomes. Research shows that social isolation is more damaging to health than smoking and transport is a key factor in overcoming isolation.

4. Education

School Attendance: Adequate transportation is necessary for students to attend schools regularly. Transport poverty can lead to absenteeism, limiting educational options and achievements and perpetuating cycles of disadvantage.

5. Community Cohesion

Social Interaction: Reliable transportation facilitates social interactions, reducing social isolation. Research shows that social isolation is more damaging to health than smoking. A well-connected community promotes cohesion, and transport poverty may hinder community engagement and connections.

6. Economic Impact

Local Economic Development: Accessible transportation is vital for local economies. Lack of transport options can isolate communities from economic activities, hindering local development and growth.

7. Environmental Sustainability

Reduced Car Dependency: In many cases, transport poverty forces individuals to rely on personal vehicles, contributing to traffic congestion and environmental pollution. Affordable

and efficient public transportation can reduce dependency on private vehicles, promoting environmental sustainability.

8. **Quality of Life**

Overall Well-being: Adequate transportation contributes significantly to an individual's overall quality of life. The ability to travel easily and affordably enhances well-being by providing a sense of independence and freedom.

9. **Social Justice**

Equitable Access: Eradicating transport poverty aligns with broader principles of social justice. Everyone, regardless of socio-economic status, should have equal access to transportation options that enable them to lead fulfilling lives.

10. **Government and Policy Goals**

Sustainable Development: Addressing transport poverty is often aligned with broader government goals related to sustainable development, poverty reduction and social inclusion.

Efforts to eradicate transport poverty typically involve developing and improving public transportation systems, ensuring affordability and addressing disparities in access across different communities. These initiatives contribute to building more inclusive, equitable and sustainable societies.

Q12. Do you have any comments on how the Proposed Franchising Scheme could deliver the impacts set out in the Strategic Case and therefore contribute to bus reform objectives?

1. **Network Enhancement:** The ability to set routes and frequencies, along with an enforceable performance regime for franchise contracts, is a positive aspect, (although not exclusive to a Franchising model). This could lead to a more coordinated and efficient network, addressing challenges related to network design and planning outlined in the challenges section. A wider and more efficient network, with greater accessibility, connectivity and convenience for bus passengers would be welcome.
2. **Fares and Ticketing Simplification:** The proposed Franchising Scheme's capacity to set fares and simplify the customer offer through a single retail channel is advantageous, though also achievable by other means. It aligns with the objective of improving the customer experience by streamlining the ticketing process and reducing complexity. People who are not regular bus passengers have identified that the current complexity is actually a barrier to travel and to them using buses.
3. **Unified Customer Service:** The prospect of having a single brand, app, and point of customer contact under the proposed Franchising Scheme is beneficial although this could have (and, in our view, should have) been achieved under the current Enhanced Partnership. However it is very important that accessibility is taken to account as part of the design process and we would recommend the involvement of some disabled passengers and disability advocate groups in the design of customer contact services.
4. **Bus Priority and Traffic Flow:** The scheme's potential to better align with planned bus priority through network powers, along with improving traffic flow, would have a positive impact. It complements Key Route Network (KRN) powers, presenting opportunities for better bus priority and reduced congestion. If local authorities work on creating bus priority,

using intelligence from bus operators, this will have a positive impact on journey times and punctuality. This in turn will make using the bus a more attractive option to the general public.

Sustainability Goals: The ability to set standards and specifications, along with a Combined Authority-led transition to a zero-emission fleet, aligns with sustainability objectives. This addresses the challenges related to greener and better vehicles by providing a framework for a more environmentally friendly bus fleet. In turn this has lots of positive connotations for health.

Q13. Do you have any comments on how the EP+ could deliver the impacts set out in the Strategic Case and therefore contribute to bus reform objectives?

1. **Integrated and Reliable Bus Network:** The EP+ proposes an integrated, more reliable bus network with enhanced connectivity. This is a positive step towards reducing the reliance on cars and shaping the network through public consultation. The emphasis on reduced dependence on public funding is commendable and aligns with the goal of achieving a financially sustainable public transportation system.
2. **Cost-Effective Fares and Ticketing:** The commitment to cost-effective fares and ticketing with capped ticketing that is flexible for the customer is a positive impact. Achieving best value capped ticketing can contribute to making bus travel more affordable and attractive to a wider range of passengers.
3. **Improved Service Quality and Standards:** The focus on improved service quality and standards, streamlined customer contact, enhanced safety and security, and rewards for loyalty is beneficial. This addresses challenges related to customer service and information, making the overall experience better for bus customers.
4. **Faster Journey Times and Improved Reliability:** The goal of faster journey times and improved bus network reliability under the EP+ is commendable. This addresses the challenge of bus priority and contributes to making bus travel a more efficient and viable alternative to private cars.
5. **Environmental Benefits:** The EP+ emphasises the potential for environmental benefits, including improved air quality, lower carbon emissions, and job creation. This aligns with the broader objectives of sustainability and environmental responsibility.
6. **Stakeholder Collaboration:** The proposed new working groups with operators to aid joint decision-making is a positive step. Collaborative efforts between WYCA and bus operators can lead to more effective and inclusive decision-making processes.

Elements for further consideration:

1. **Operator Agreement and Funding:** The successful implementation of EP+ is contingent on operator agreement, negotiation, and funding availability. Clear communication and alignment of interests between WYCA and bus operators will be crucial to overcoming potential challenges.
2. **Public Consultation:** While the EP+ emphasises shaping the network through public consultation, the document should provide details on how the public will be engaged, ensuring their input significantly influences decisions related to the bus network.

3. **Monitoring and Evaluation:** A robust monitoring and evaluation framework should be in place to assess the effectiveness of the EP+ interventions over time. Regular feedback mechanisms and adjustments based on performance data will be crucial for continuous improvement.
4. **Flexibility and Adaptability:** The EP+ should allow for flexibility and adaptability to changing circumstances. As the transportation landscape evolves, the EP+ should be capable of adjusting its strategies to meet emerging challenges and opportunities.

Q14. The Strategic Case concludes that the Proposed Franchising Scheme is the best option for the Combined Authority to meet its strategic objectives for bus in the region. Do you have any comments on this?

Overall, it is unclear if it is the right thing to do as the proposal is based on projections. Additionally, the Franchising scheme would be run by local government which itself has seen huge economic disparity in recent years and could be greatly impacted by which political party is in power.

Decline in bus patronage and the withdrawal of operators is something happening across the country and is not specific to West Yorkshire and so in itself does not give a case for franchising. In fact in areas such as the West Midlands, where there is no franchise agreement but a strong Enhanced Partnership, there has been a rise in bus patronage.

What is more important is whether the strategic case is executable. No bus operator plans to have a decline in bus patronage, so the real question is; can the strategic objectives actually be achieved and if so, by what means and at what cost?

Equally beneficial outcomes for passengers: It is difficult to see any obvious additional benefit to passengers from a franchised model rather than an Enhanced Partnership version but it does appear that the financial and political risks are more widely spread in an Enhanced Partnership model.

Q15. Do you have any comments on the impacts of the Proposed Franchising Scheme on passengers, as set out in the Economic Case?

Positive Impacts:

1. **Increased Bus Services:** The assumption of a reduced operating margin allowing for an increase in the number of bus services is a positive aspect. This can lead to more choices for passengers, improved service coverage, and better accessibility to various destinations.
2. **Reduction in Journey Times:** Existing bus users would benefit from a reduction in journey times through increased service frequencies on existing routes and the introduction of new routes. This is a significant improvement, especially when compared to the Enhanced Partnership Reference Case.
3. **Network Enhancements:** Passengers would experience network enhancements through franchising, leading to improved interchange between bus and other modes. This can contribute to a more seamless and integrated transportation experience.
4. **Fare Capping and Ticketing Initiatives:** The introduction of fare capping and ticketing initiatives is a positive move. It can make bus travel more affordable and convenient for

passengers, potentially attracting more people to choose buses as their mode of transportation.

5. **Improved Connectivity:** The proposed franchising scheme aims to enhance connectivity by improving existing routes and introducing new routes. This is crucial for passengers, as it increases their options and provides better access to different areas.
6. **Attracting New Bus Users:** The interventions outlined in the franchising scheme could attract new bus users by presenting a more attractive and accessible travel mode. This is a positive step toward increasing public transportation ridership.

Challenges and Considerations:

1. **Network Reduction Over Time:** The acknowledgment that the network is assumed to reduce over time due to fewer passengers and increased costs raises concerns. Public policy requires the opposite to be the case, so planning should be for an increase in ridership over time. It's important to carefully manage this to ensure that essential services are maintained, especially in less profitable or remote areas.
2. **Mitigating Passenger Impact during Network Reduction:** The strategy should not be to reduce the network. All the societal benefits of a thriving public transport network will be lost if this is assumed to be the case and no effort is made to improve or maintain the network. A reduction in the network could result in much higher social services costs because of social isolation and lost opportunities for self-improvement via education and work. Ensuring that communities remain adequately served is crucial.
3. **Communication and Transition Planning:** Clear, accessible communication and effective transition planning are essential to inform existing passengers about changes in services, routes, and frequencies. A well-executed communication plan can help manage expectations and facilitate a smooth transition.
4. **Equitable Access:** The document should emphasise the importance of maintaining or improving equitable access for passengers. Ensuring that public transportation remains accessible and inclusive to diverse communities is vital.

Q16. Do you have any comments on the impacts of the Proposed Franchising Scheme on operators, as set out in the Economic Case?

Positive Impacts for Operators:

1. **Stable Revenue Source:** The franchising model, with full fare box control and revenue risk on all contracts, could provide a stable revenue source for operators. This can be beneficial for their financial planning and sustainability.
2. **Gradual Fleet Transfer:** The staged investment in full asset ownership, including bus depots and a 100% zero-emission bus fleet, can be seen as a positive move. It encourages a gradual transition to a more environmentally sustainable and modern bus fleet, potentially with financial support.

3. **Mixed-Sized Contract Bundles:** The consideration of mixed-sized contract bundles in the franchising model facilitates competition and allows smaller-to-medium-sized operators to participate. This could contribute to a diverse and competitive market.
4. **Social Value Consideration:** The inclusion of social value as part of the contracting strategy is a positive aspect. It encourages operators to contribute to the community and broader societal goals beyond providing transportation services.

Challenges and Considerations for Operators:

1. **Risk Transfer:** While the franchising model transfers revenue risk to the Combined Authority, it also transfers all financial risk to the Combined Authority and ensures that any blame for any changes seen as detrimental falls squarely on the shoulders of the politicians. This has the potential to politicise public transport leading to uncertainty and diminishing confidence on the part of potential passengers.
2. **Transition and Fleet Investment:** The staged transition with lots in each District area and the requirement for a zero-emission fleet by 2036 may pose challenges for some operators which could mean that some contracts cannot be fulfilled, given the current difficulties in sourcing new vehicles.
3. **Communication and Collaboration:** Clear communication and collaboration between the Combined Authority and operators are crucial during the transition period. The expertise of existing operators will need to be tapped to ensure robust decision-making processes, and their input should be considered to address operational challenges effectively without reinventing the wheel.

Q17. Do you have any comments on the impacts of the Proposed Franchising Scheme on the Combined Authority, as set out in the Economic Case?

Positive Impacts for the Combined Authority:

1. **Enhanced Control and Coordination:** The franchising model provides the Combined Authority with increased control over the bus network, including the ability to set routes, frequencies, and enforceable performance regimes. This enhanced coordination could lead to a more efficient and integrated public transportation system.
2. **Revenue and Risk Management:** The shift to a franchising model allows the Combined Authority to have full fare box control and revenue risk on all contracts. This offers a more predictable and stable revenue stream, but requires significant ongoing priority in the annual budget.
3. **Alignment with Policy Objectives:** The franchising model aligns with the Combined Authority's policy objectives related to environmental sustainability, service quality improvement, and achieving social goals. The ability to set standards and specifications for greener and better vehicles supports these objectives.
4. **Social Value Inclusion:** The consideration of social value as part of the contracting strategy reflects a commitment to broader societal benefits beyond transportation. This aligns with the Combined Authority's role in fostering community well-being and development.

Challenges and Considerations for the Combined Authority:

1. **Financial Implications:** The transition to a franchising model involves substantial initial and ongoing costs, including investment in assets such as bus depots and a zero-emission bus fleet. The Combined Authority needs to carefully assess the financial implications and ensure that the model remains economically viable.
2. **Negotiation and Collaboration:** Successful implementation of the franchising scheme requires collaboration with bus operators. Negotiations on route requirements, fleet transfer, and other aspects must be conducted effectively to ensure a smooth transition and maintain a positive working relationship, if public confidence is not to be lost in the transition.
3. **Public Consultation and Engagement:** The franchising model, impacting the entire bus network, necessitates thorough public consultation and engagement. The Combined Authority needs to ensure that the community is well-informed, and feedback is fully considered in decision-making processes.
4. **Operational Competence:** The Combined Authority needs to develop or enhance its operational competence to effectively manage and coordinate the bus network. This includes expertise in route planning, scheduling and performance monitoring.

In summary, while the Proposed Franchising Scheme offers opportunities for increased control and alignment with policy objectives, addressing financial implications, fostering collaboration, and ensuring effective **public engagement** will be critical for the success of the Combined Authority in implementing and managing the scheme.

Q18. Do you have any comments on the impacts of the EP+ on passengers, as set out in the Economic Case?

Positive Impacts for Passengers:

1. **Improved Frequency and Connectivity:** The limited network interventions under the EP+ could lead to improvements in frequency on specific corridors, enhancing the overall reliability and convenience of bus services. This could result in reduced waiting times for passengers, potentially making bus travel a more attractive option.
2. **Fare Reduction and Cap Implementation:** The possibility of reducing fares for multi-operator tickets, implementing additional fare capping, and introducing new concessionary schemes is a positive step. Lower fares and improved ticketing options can contribute to increased affordability for passengers, encouraging greater use of bus services.
3. **Route Reorganisation:** The ability to undertake route reorganisation under the EP+ provides an opportunity to optimise bus routes, ensuring they align better with passenger demand. This can result in more direct and efficient services, benefiting passengers by reducing travel times and improving overall service quality.

Challenges and Considerations for Passengers:

1. **Limited Network Interventions:** The EP+ is described as having a limited number of network interventions, subject to operator agreement. This has not been the case in other Enhanced Partnership areas, such as the West Midlands and Warwickshire. A partnership requires discussion and negotiation but the needs are led by the local authority so this document suggests that the way in which Enhanced Partnerships work has not been fully understood.
2. **Assumed Network Reduction:** The Economic Case assumes that the network under EP+ may reduce over time in line with decreased passenger numbers and increased costs. This assumed reduction in the network could impact passengers by limiting service coverage and accessibility, especially in areas with lower demand, but where operators share the financial risk, they could also trial new solutions to identified problems, at their own financial risk.

Q19. Do you have any comments on the impacts of the EP+ on operators, as set out in the Economic Case?

Not completed as this falls outside the remit of our organisation

Q20. Do you have any comments on the impacts of the EP+ on the Combined Authority, as set out in the Economic Case?

Considerations for the Combined Authority:

1. **Long-Term Funding:** The EP+ model highlights the need for long-term funding to support and sustain improvements to the network. This is a far greater risk for a franchising model.
2. In either case, this suggests a commitment to investing in the bus system to achieve broader objectives beyond immediate financial returns. The sustainability of this long-term funding commitment will be crucial for the success of the EP+ model.
3. **Supported Service Basis:** The Economic Case indicates that the EP+ may lead to an increase in services operated on a "supported service" basis. This implies that, over time, more services may require financial support from WYCA to remain operational. The implications of this shift, including budgetary considerations and the ability to allocate resources effectively, need careful examination. However, under a franchising model, ALL services would be reliant on financial support from WYCA.
4. **Central Government Funding:** The reliance on central government funding is emphasised as a crucial element for the EP+ to be effective. However, under a franchising model, ALL services would be reliant on financial support from a combination of locally raised revenue and government funding. In both cases, there will need to be advocacy efforts, effective communication, and collaboration with central government authorities to secure the necessary financial support for sustained improvements to the bus network.
5. **Integration with Overall Transport Strategy:** The EP+ model should align with the broader transport strategy and policies of the Combined Authority. This integration is essential to ensure that bus services contribute to the overarching goals related to the region's economy, environment, and the well-being of its residents.

Q21. Do you have any comments on the conclusion of the Economic Case that the Proposed Franchising Scheme will offer value for money to the public sector?

It is important to note that the calculations are all based on assumptions and guesstimates. The quality of this data is crucial to the accuracy of these projections, therefore our comments reflect this.

Both bus reform options, the Proposed Franchising Scheme and EP+, could offer good value for money to the public sector. The Economic Case indicates that the Proposed Franchising Scheme has a higher Net Present Value (NPV) and generates a wider range and scale of non-monetised benefits compared to the EP+. There seems to be no evidence for this conclusion other than assumptions and an inherent preference.

Both options are forecast to generate economic benefits considerably higher than the costs required for their implementation. Franchising requires much higher funding from the public purse so the risk is far higher for that option.

The advantages of the Proposed Franchising Scheme are highlighted, particularly in terms of the greater control it provides to the Combined Authority over specifying the bus network, service frequencies, and the rollout of Zero Emission Buses (ZEBs). However, the Economic Case acknowledges some uncertainty associated with the short-term impacts of the Proposed Franchising Scheme, as the actions of operators during the transition phase are uncertain.

On the other hand, the impacts of the EP+ are considered by this analysis to be more uncertain in the long term, as any agreement would require negotiation between the Combined Authority and operators. The evidence available from other Enhanced Partnership Schemes which have been up and running for some time does not suggest that negotiation has been especially hard to carry out and has resulted in clear benefits for passengers along the same lines as are desired for this scheme. The overall conclusion of your analysis is that both options are deemed to provide good value for money, aligning with the Department for Transport (DfT) guidance. The Economic Case emphasises that the economic benefits of both options are robustly higher than the costs involved, although this is not evidenced clearly.

The feedback from passengers is that they do not care deeply about the model used to run the buses. What they care about is reliability, affordability and connectivity. Therefore, as an advocate for passenger views, we have no strong preference as to which model is best, just that they deliver the best service possible for passengers as swiftly as possible and that it has a long-term, ring-fenced pledge of sufficient funding to maintain a good level of service.

Section 3: Assessment Summary- Commercial Case

Not completed as this falls outside the remit of our organisation

Section 4: Assessment Summary- Financial Case

Not completed as this falls outside the remit of our organisation

Section 5: Assessment Summary- Management Case

Not completed as this falls outside the remit of our organisation

Section 6: Assessment Summary

Q43. The Assessment concludes that the Proposed Franchising Scheme is the best way to achieve the strategic objectives of the Combined Authority. Do you have any comments on this?

As previously stated, the feedback from passengers is that they do not care deeply about the model used to run the buses. What they care about is reliability, affordability and connectivity. Therefore, as an advocate for passenger, we have no strong preference as to which model is best, just that it delivers the best service possible for passengers as swiftly as possible and that it has a long-term, ring-fenced pledge of sufficient funding to maintain a good level of service.

Our main concerns with the proposed franchising model is that it will take a long time to be implemented, add another layer of bureaucracy between passengers and operators (as happens in London where the passenger is no longer the customer, TfL reports to the London Assembly and mostly ignore passengers) and put the network at risk owing to the lack of long term budgeting ability of local authorities. Bus services should not be politicised.

Q44 Overall, to what extent do you support or oppose the introduction of the Proposed Franchising Scheme?

Neither support nor oppose.

Why do you say this?

Our aim is to see the best outcomes for passengers and local communities. Whilst we wholeheartedly support this consultation, it seems evident that users of public transport have so far not been consulted and therefore what they would like to see from any proposal has not been considered.

We are well aware that passengers want better, simpler fares and reliable services. But they also want drivers and staff who know what they are doing and can handle any issues presented efficiently and respectfully.

Increasingly they want buses which are better for the environment and can even 'give back' to air quality, through return of electricity or cleaning air as they travel.

It appears from the tenor of these documents that a franchising scheme has been decided upon and this consultation and its results may not have any impact on the decisions taken.

Q45. Are there any changes that you think would improve the Proposed Franchising Scheme?

Continuous passenger and local community involvement now and throughout any scheme proposal.

Section 6: EQIA

Q47. The Combined Authority's draft Equality Impact Assessment identifies the potential impact of the Proposed Franchising Scheme on persons with protected characteristics. Do you have any comments on it?

The Impact Assessment does not actually address how any of the needs highlighted will be met and therefore we cannot comment on its effectiveness.

About Bus Users UK

Bus Users UK is a charity that campaigns for inclusive, accessible transport. We are the only approved Alternative Dispute Resolution Body for the bus and coach industry and the designated body for handling complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of the Sustainable Transport Alliance, a group working to promote the benefits of public, shared and active travel.

Alongside our complaints work we investigate and monitor services and work with operators and transport providers to improve services for everyone. We run events, carry out research, respond to consultations, speak at government select committees and take part in industry events to make sure the voice of the passenger is heard.

Bus Users UK Charitable Trust Ltd is a registered charity (1178677 and SC049144) and a Company Limited by Guarantee (04635458).

Bus Users UK

22 Greencoat Place
London SW1P 1PR

Tel: 0300 111 0001
enquiries@bususers.org
www.bususers.org