

CTA's response to the GMCA's Doing Buses Differently consultation

About the Community Transport Association

This response is submitted by the Community Transport Association (CTA), a national charity working with thousands of other charities and community groups across the UK that all provide and support local transport services that fulfil a social purpose and community benefit.

One of our activities is to contribute to the formation of public policy where community-led solutions within transport can improve access and inclusion. Central to this is showing how better outcomes are achieved for people and communities when they have access to community transport.

Around 30 per cent of CTA's 1,300 plus members are charities whose main work is the provision of community transport and they would typically use this label to describe their work. This form of community transport helps to address the quality, affordability and accessibility of transport options for people who cannot drive and don't have access to conventional public transport, especially in rural areas. It also recognises that some needs are best met through communities doing things for themselves.

This is about providing flexible and accessible community-led solutions in response to unmet local transport needs, and often represents the only means of transport for many vulnerable and isolated people. Significant user groups are older people and disabled people.

High levels of volunteer involvement, the ability to attract charitable funds, accessible vehicles and a not-for-profit business model, all mean community transport is often a more reliable and resilient way of meeting a greater range of transport needs, especially for our more isolated and vulnerable citizens.

The other 70 per cent of CTA's members are charities, community groups and other not-for-profits who use the same permit regime to run transport to support their main charitable activities, such as scout groups, Age UK or RVS branches.

Introduction

The CTA welcomes the opportunity to respond to GMCA's consultation on buses. Since the deregulation of buses, the community transport sector have been an active and vital, albeit under-recognised, arm of the bus network. The CTA and its members have long observed how the bus market is largely operated in response to failure – where the market has failed to provide socially necessary services, the local authority steps in to subsidise; where the local authority fails to subsidise a route, community transport steps in to meet demand.

Moreover, the proliferation of bus companies in Greater Manchester and the lack of unified ticketing and information makes navigating the network confusing, and leaves users out of pocket and disillusioned with a network where private companies prioritise profits over need. As the consultation document points out, there are more than 150 different types of bus ticket – this is simply unsustainable and demonstrative of a system that does not work in the interests of its passengers. Steadily falling custom for buses substantiate this view.

Where transport needs are unmet, community transport steps in. This occurs when 'unprofitable' services are reduced, withdrawn or altered, leaving communities either without service altogether or with limited services that do not meet needs (for example, services that do not start early enough for people to get to work or college, or services that do not end late enough for people to get home after an evening shift); or when the commercial services that are available are inaccessible particularly to those with mobility issues or due to cost.

The CTA believe that there must be a better way of integrating both profitable services, delivered by the market, and socially necessary services, delivered by local authorities and community transport operators, that can improve efficiency and increase resilience across the bus system.

Questions about the Proposed Franchising Scheme

CTA welcome the Proposed Franchising Scheme for several key reasons. Firstly, we support the Strategic Case's conclusion that reforming the bus market is the best way to address challenges facing the local bus market. Much of GMCA's Vision for the future of the bus market aligns with CTA's Vision, including integrated services across buses and other modes of transport, integrated ticketing, increased network efficiency and improved user experience. We believe that greater authority for GMCA to make and be accountable for key decisions about network, fares and standards is the best way to achieve long term stability for the network, and we would therefore support the Proposed Franchising Scheme over the Do Minimum and partnership options, especially in light of operators' willingness only to engage in a comparatively limited Voluntary Partnership Agreement.

Secondly, **CTA welcome the GMCA's plans for allowing small and medium sized operators to be involved** in the PFS by introducing a range of measures that remove barriers to entry. As supporters of transport localism, we believe that local communities are best placed to understand their local priorities, resources and needs, and are hence best able to address the

challenges they face in their own local area, and support all measures that enable smaller operators to participate.

Further to this, we note that the Assessment states that the **GMCA may consider extending the consultation on the proposals to wider stakeholders, including bus passengers and representatives of disabled people, and we would strongly welcome that extension.**

Community transport operators provide accessible and inclusive transport solutions to those who are excluded from accessing conventional transport, owing to mobility restrictions or geography. As such, they offer a unique insight into the lives of vulnerable people, so it is vital that they are consulted with to ensure that their needs will be met, and to **make sure that the future franchising environment is one that enables community transport provision to flourish.**

The CTA recently launched our **People Powered Transport project**, which sets out four key ideas to enabling communities to work together to shape and create their own transport solutions, with access and inclusion built in from the start.

This project was founded on CTA's observation that many of the conversations about transport innovations overlook the role and contributions of the voluntary sector, especially those working with people who currently face barriers to being fully able to access today's passenger transport. We believe that there needs to be a more human voice in these conversations and our project aims to help guide policy makers to implement policies which prioritise greater accessibility and inclusivity. We have introduced these policy pairings to show how we want the future of transport to look and to show how communities and the CT sector can provide solutions to some of the problems that we face in transport today.

We hope that the principles encapsulated in this project can be incorporated into any changes implemented following the conclusion of GMCA's consultation. To find out more, please see attached document entitled 'People Powered Transport'.

Alongside this, we further note that the consultation document states that GMCA 'would set appropriate requirements and simplify the procurement process to reflect the size and scale of these franchises to avoid creating barriers to entry.' As part of this process, we would **encourage GMCA to incorporate social value metrics into contracts** and ensure that these metrics have a high rating to ensure that wider social benefits are adequately taken into account when services are procured. CTA recently launched a project and preliminary report exploring the current commissioning landscape and barriers to entry for smaller operators, and discussing how commissioning can be more inclusive of smaller operators. You may find our report, entitled '**Commissioning for the Community**' attached to this submission.

Thirdly, we support the proposal to allow the continuation of services running from a not-yet franchised area into a franchised area to ensure minimal disruption for passengers.

Questions about the assessment

14. Do you have any comments on GMCA's objectives for the future provision of bus services as set out in the Strategic Case?

CTA supports the objectives set out by GMCA in the Strategic Case, however would add that 'increasing accessibility' is added to the objective of improving customer experience. Many vulnerable users are excluded from the transport network owing to poor accessibility on vehicles, or poorly integrated routes which make multi-modal journeys impossible for those with mobility restrictions. Community transport vehicles are often wheelchair accessible, with rear passenger lifts and convertible spaces, while drivers and passenger assistants are professionally trained to assist passengers with mobility issues to ensure that transport is truly inclusive of all.

Where commercial services cannot provide this level of mobility assistance, we would recommend GMCA consider integrating community transport services into franchise arrangements.

18. Do you have any comments on the packaging strategy for franchising contracts under the PFS, as set out in the Commercial Case?

The Commercial Case sets out how the GM bus network would be split, and CTA would ask for greater clarity on how section 22 services would fit within this arrangement.

23. Do you have any comments on the approach to fleet under the PFS, as set out in the Commercial Case?

CTA support the approach to fleet under the PFS, but would like to draw GMCA's attention to some of the challenges faced by the community transport sector in relation to emissions standards and electric vehicles.

Firstly, where vehicles are required to be electric, **GMCA must ensure that there is appropriate infrastructure, such as charging facilities, available in areas which are currently poorly connected to the transport network and which therefore have not attracted private investment for the installation of necessary facilities.** Demand for community transport is highest in the areas where traditional private and public transport has the least reach and those community transport operators must not be unduly penalised and less able to compete for contracts owing to their operating in a rural area.

Secondly, **support should be made available to ensure that the costs of purchasing an electric fleet are not prohibitive for operators.** The small-scale nature of many community transport operations means that vehicles tend to be older and it is difficult for operators to accumulate the necessary capital to buy new vehicles, retrofit appropriate engines, or absorb running costs in the same way that a larger commercial operator working at scale would be able to. The amount and types of income that can be generated by community transport is further limited by the regulatory requirement that community transport operators cannot make a profit. A new standard minibus can cost upwards of £40,000 – a figure that would be especially difficult for smaller organisations reliant on voluntary

funds to raise. Compounding these issues, any new specifications are likely to devalue vehicles that do not currently use Euro 6 engines, preventing organisations from trading in older vehicles to raise funds or in part-exchange for new vehicles.

If the financial costs for upgrading vehicles are unsustainable, community transport operators may be unable to participate in the procurement process, leaving those with the greatest need, who are reliant on CT services due to mobility issues, without access to transport and subsequently vital services. In the long term, this is likely to add to loneliness and isolation, with a knock-on effect on health and social care services, to the detriment of the Proposed Franchising Scheme's vision of improving customer experience and its allocation of a high positive rating for users with protected characteristics in its Equality Impact Assessment.

CTA believes that clean air is an important issue facing our communities in Greater Manchester. We support steps to improve air quality across the county and acknowledge that vehicle emissions contribute to poor air quality. However, we believe that **GMCA should be mindful of the social impact that proposed changes will have on vulnerable passengers.**

24. Do you have any comments on the approach to Intelligent Transport Systems under the PFS, as set out in the Commercial Case?

CTA support the approach to Intelligent Transport Systems as set out in the Commercial Case. Consistency across services is vital to creating an accessible and more easily understandable bus network.

28. Do you have any comments on the assessment of the commercial implications of the partnership options as set out in the Commercial Case?

It is disappointing that the operators within OneBus ruled out the use of an EPS, as we are concerned about the lower incentive for operators to comply with required standards under VPAs. While operators have indicated agreement to financial penalties, it is stated that these will be 'limited' and the scale, extent and timing has not been made clear, which raises questions about how far operators are willing to adhere to 'agreed' standards and whether the costs for implementing new standards would outweigh the financial penalties for failure to do so, leaving operators preferring to pay the cost of a fine.

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?

CTA believe that, though there may be short-term disruption to the network over the five-year transition period to the franchising scheme, the long-term impacts on passengers by way of improvements to the network are overwhelmingly positive. We support a future with reduced fares, simplified and interoperable tickets, and also improved customer service.

However, CTA do have some concerns about the transition period between which Greater Manchester will move from a deregulated bus market to a fully franchised system, and the risk that operators stop investing in services and relocate good vehicles to other areas in anticipation of not being able to win a franchise. This would most negatively impact passengers; it would be useful to know what actions will be taken to mitigate this risk.

Final Questions

45. *To what extent do you support or oppose the introduction of the Proposed Franchising Scheme? Why do you say this?

See answer to questions on Proposed Franchising Scheme

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.

The Proposed Franchising Scheme could be improved by increasing the accessibility of the consultation documents. Although there is the option of a short questionnaire and the inclusion of an introduction, executive summary and assessment, this still constitutes 31 pages, which is unrealistic to expect the average bus user to engage with. As such, responses will likely be weighted towards stakeholders and experts whose views may not be fully representative of users' experiences and wishes. It would be useful to have a shorter and more engaging summary to improve user responses.

48. *Finally, do you have any other comments you want to make?

It is CTA's understanding that when the GMCA agreed its devolution deal with Government that it also undertook control of some health budgets. If this is indeed the case, we would encourage GMCA to exert pressure over health to develop co-ordinated approaches to non-emergency patient transport.

If you would like to discuss this submission in greater detail or have any further questions, please do not hesitate to contact our Policy Executive, Suzanne Lau, at suzanne@ctauk.org.