

SERVICE PERMITS CONSULTATION REPORT

Report on the two consultations conducted in relation to the introduction of Service Permits within Greater Manchester:

- i. Consultation on the proposed service permit application process and service permit scheme
- ii. Consultation on the proposed condition/descriptions of conditions that the franchising authority may attach to service permits

TfGM, May 2023

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1. Executive Summary

Where a bus franchising scheme is introduced, the Transport Act 2000 requires a franchising authority to operate a 'service permit scheme' to ensure that other services, which do not form part of the franchised network of services are still able to operate.

The Transport Act 2000 and the Franchising Scheme (Service Permits) (England) Regulations 2018 require a franchising authority to carry out two different consultations regarding a proposed service permit scheme before the authority can begin to accept applications for service permits by operators and attach conditions to those permits, namely: a consultation on the proposed service permit scheme itself; and, a separate consultation on the proposed conditions/descriptions of conditions that the authority may attach to service permits when granted.

The two consultations were conducted concurrently via an online survey between 1st and 29th March 2023. This open consultation was promoted by TfGM in several ways including an advert on the TfGM website home page, notices at all bus stations and interchanges in Greater Manchester and, by direct invitation to 90 stakeholders such as bus operators, neighbouring Local Transport Authorities (LTAs) and Trade Body organisations.

The consultation relating to the proposed service permit scheme sought views on the process itself including questions on timescales to apply and receive a response, the information required from applicants, the proposed application fee; permit validity; when a service permit comes into effect, and the process around decision making.

The consultation relating to the proposed service permit conditions/descriptions of conditions that an authority may attach to a service permit sought views on potential conditions relating to operational conditions, passenger information and customer service conditions, fares and ticketing conditions, and service monitoring conditions.

In total, 50 responses to the online survey were received, together with one written response.

Feedback gathered through the survey was provided by five categories of respondent: bus operators (16%); neighbouring LTAs (8%); Trade Body organisations (4%); Greater Manchester Districts (6%); and residents (66%).

Questions fell broadly into two types. There were questions that asked respondents whether they agreed or disagreed with the proposed process or

types of service permit conditions, and questions where respondents were asked to provide comments on specific aspects of the proposed process or type of service permit conditions. The responses demonstrated how the views differed between respondent types, as well as identifying differing views with a single category of respondent. Where the questions were 'yes/no', respondents also had an opportunity to provide comments.

Overall, having considered the range of views submitted in the consultation it is recommended that the Service Permit Policy Statement and Notice of Conditions/Description of Conditions remain largely as set out in the consultation documents, except for rail and tram replacement bus services where, based on the consultation response, it is recommended that TfGM apply a simplified application process for these services with reduced information requirements for a permit covering all eventualities including unplanned events.

It is also recommended that TfGM proactively engage with bus operators and neighbouring LTAs in advance of the start of Bus Franchising. This will ensure a smooth introduction of this new process and support applicants by providing advice prior to submitting service permit applications.

In addition to the proactive engagement, it is also recommended that TfGM produce a Frequently Asked Questions (FAQ) document to provide clear guidance on the new process.

2. Background and Context

In March 2021, a decision was taken by the Mayor of Greater Manchester to introduce a bus franchising scheme covering the entirety of Greater Manchester. Under franchising, most services and their frequencies will be determined by Greater Manchester Combined Authority (GMCA). Transport for Greater Manchester (TfGM), will coordinate bus services and the bus network in Greater Manchester, working alongside the bus companies who will run these services under 'local service contracts' TfGM will become responsible for the arrangement and operation of local bus services through the phased introduction of the franchising scheme across Greater Manchester between September 2023 and January 2025.

Local bus services that are not provided as part of the franchised network, not excepted from the franchised network or are not an interim service (as defined in section 123O of the Bus Services Act 2017) will require a Service Permit to operate within Greater Manchester once the franchising scheme begins.

Regulation 3 of the Franchising Schemes (Service Permits) (England) Regulations 2018 (the Regulations) states that before a franchising authority can start to operate a Service Permit process it must consult with 'operators, relevant Local Authorities and any other persons as it may see fit'. Regulation 3 (2) (a) of the Regulations also requires the consultation to set out and seek views on the following matters:

- a. the description of the proposed application procedure;
- b. the description of the proposed required information that a person applying for a service permit must submit with the application;
- c. the proposed amount of any fee that must accompany the application;
- d. the proposed periods of validity of service permits;
- e. the proposed period or periods of time within which the franchising authority must take a decision on an application for a service permit;
- f. the proposed period or periods of time that must expire before the service permit is effective; and
- g. the proposed period or periods of time which must expire before the variation or withdrawal of a service by an operator is to take effect, which must not exceed 56 days.

In addition to the above, a franchising authority cannot attach conditions to a service permit until they have published a Notice specifying the conditions/descriptions of conditions that they may attach. Before they publish the Notice, franchising authorities are required by section 123R (5) of the Transport Act 2000 to consult on the sorts of conditions/descriptions of conditions they may decide to attach to service permits.

In September 2022, under delegated authority TfGM conducted the 'Bus Service Permit Consultation' (the 'Consultation').

The aim of the Consultation was to seek views on:

- TfGM's proposed service permits ***process***; and
- The ***types of conditions/description of conditions that may be attached to service permits***.

3. Methodology

Online Response Form

An online response form was provided on the TfGM website for participants to provide their feedback, along with the supporting information on the proposed Service Permit application process and the Conditions TfGM may apply to a Service Permit. The online consultation ran for 4 weeks from 1st March 2023 until 29th March 2023.

4. Communication and Promotion

The Consultation was promoted by TfGM in a variety of ways including:

- Advertisement on TfGM's website homepage.
- Invitations sent directly to 90 stakeholders (the statutory consultees):
 - 59 bus operators
 - 8 neighbouring LTAs
 - 10 Greater Manchester (GM) districts
 - 13 other known transport stakeholders
- Notices at all bus stations and interchanges in Greater Manchester.

Whilst particularly relevant for transport operators providing, or intending to provide, bus services in Greater Manchester and neighbouring LTAs, the consultation was an open consultation and welcomed the views of any interested individuals or organisations.

Consultation Results & Analysis

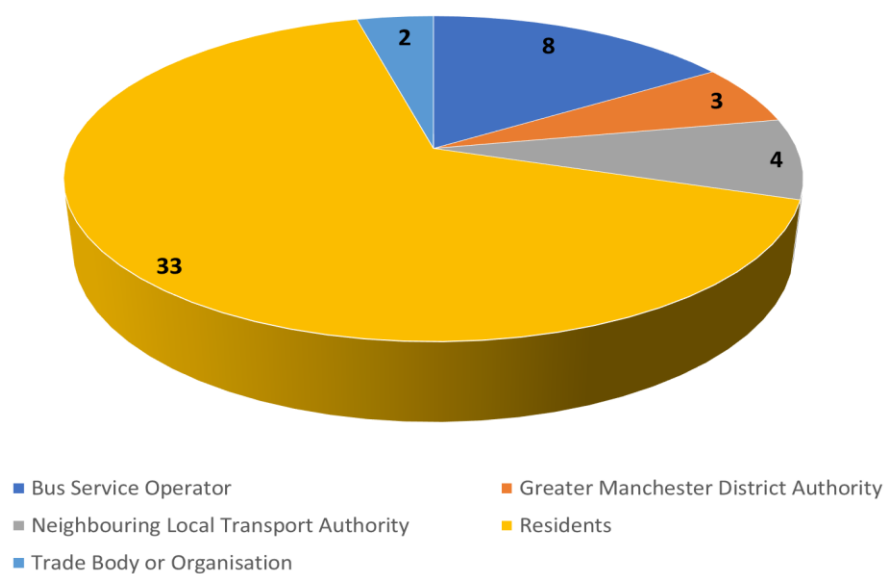
5. Respondent Profile

A total of 50 responses were received online. A response was also received in writing from Transport Focus that expressed their support for the aims of the proposed Service Permit Policy Statement and Conditions.

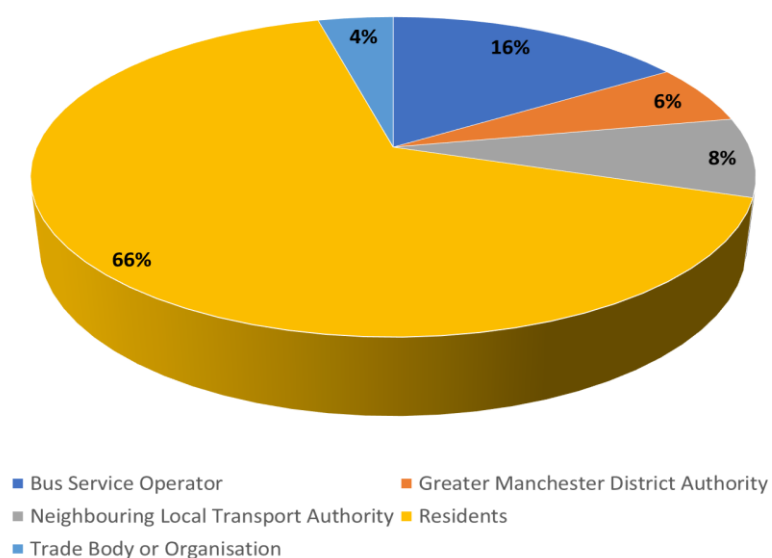
Overall, the 50 online respondents who responded to the full survey fall into 5 categories which break down as follows:

Type of Organisation/Company	No. of Respondents
Bus Service Operator	8
Greater Manchester District Authority	3
Neighbouring Local Transport Authority	4
Residents	33
Trade Body or Organisation	2
	50

Respondents by Type (Number)



Respondents by Type (Percentage)



- Of the eight bus operators (16% of the total response) that responded to the online consultation, seven bus operators operate services into Greater Manchester from neighbouring areas with two of these also specifically stating they represented the interests of more than one group company.
- These respondents represent 80% of the bus operators currently providing cross boundary services into Greater Manchester on a commercial basis, and 40% of the operators that provide services that are fully subsidised by neighbouring authorities.
- Two stakeholder organisations representing transport operators also responded, plus Transport Focus, who represent passenger interests, and responded to the consultation in writing rather than via the online survey.
- 50% (4) of the neighbouring LTAs, and 30% (3) Greater Manchester district councils responded to the consultation.
- The largest group of respondents (33 responses, representing 65% of the total number) was 'Residents':
 - 29 (88%) of the 33 respondents indicated that they lived in Greater Manchester, with responses from postcodes across all parts of the conurbation, other than Rochdale.
 - Wigan (5) and Bolton (4) were the most prevalent areas. Responses mostly indicated they were bus passengers, as well as people who may work in or have an interest in the bus industry and wished to anonymise their responses.
 - 4 (12%) of the 33 Resident respondents indicated they lived outside Greater Manchester (including Suffolk, Calderdale, and Lancashire postcodes).
 - See appendix 1 for a breakdown of Residents' demographic profile.
- In addition, there were a small number of informal queries received directly by TfGM from organisers of rail replacement services, and operators of airport park and ride services, seeking clarity on how the proposals impacted them.

6. Service Permit Process

The first part of the consultation sought responses on TfGM's proposed Service Permit process.

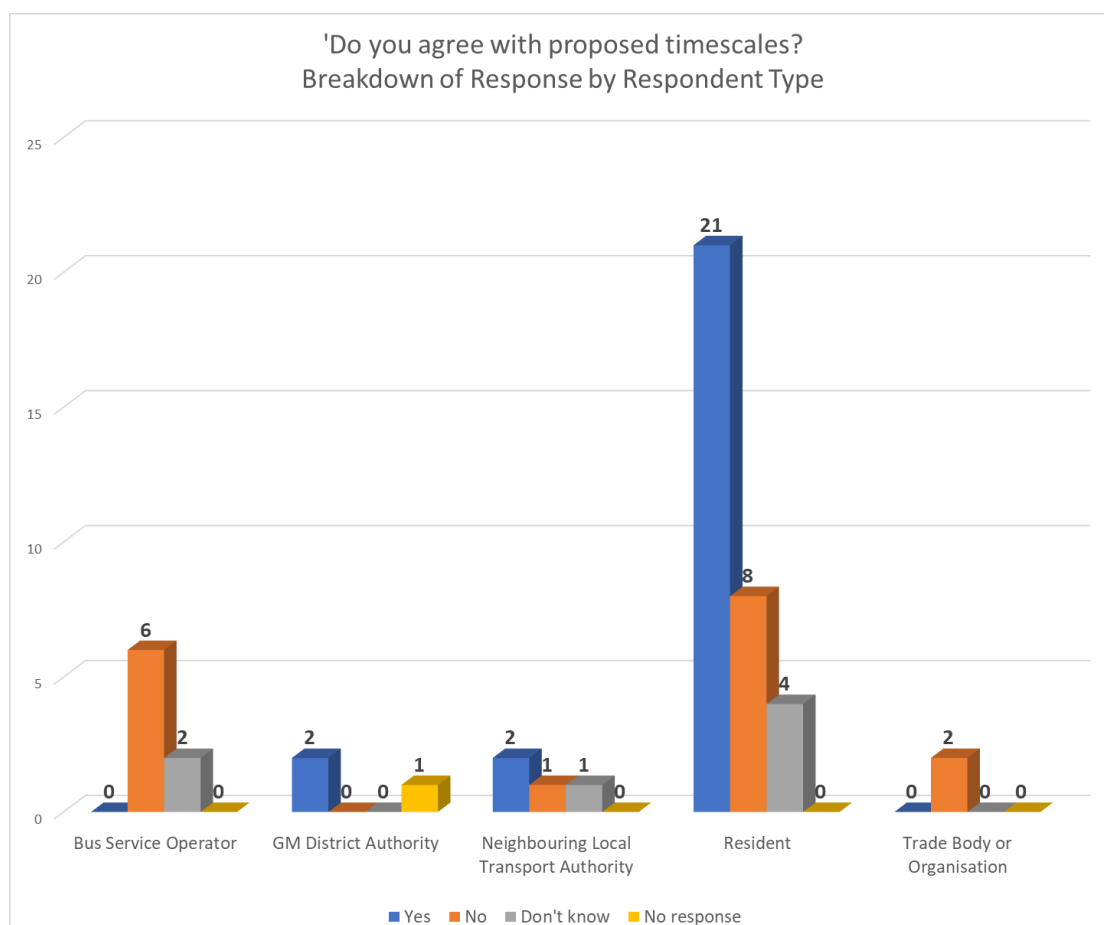
6.1 Timescales (When to apply)

The consultation asked if the respondents agreed with the proposed timescale of 98 days - 28 days for TfGM to assess the application and a further 70 days until the effective time. Respondents were also asked what changes they would propose if they disagreed with this proposed timescale.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	0	6	2	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	2	1	1	0	4
Resident	21	8	4	0	33
Trade Body or Organisation	0	2	0	0	2
	25	17	7	1	50



- 50% (25) of respondents supported the proposed timeline.
- 34% (17) of respondents did not agree with the proposed timeline, including all 8 of the bus operators who responded.
- 16% (8) of respondents neither agreed nor disagreed.
- Five bus operators suggested a timescale of 10 weeks (70 days), as this would be in line with the existing local bus service registration notice period for operators to register bus services with the Traffic Commissioner. Three bus operators said they were unclear whether the 98 days included the period to register the service with the Traffic Commissioner and sought clarification on this. One LTA suggested a timescale of 12 weeks (84 days) but provided no further details regarding its proposal. One trade organisation and one operator thought that existing services should be subject to a shorter timescale than for new services.

TfGM assessment and response

The proposed timescale of 98 days allows 28 days for the permit application to be considered and a further 70 days until the effective time¹. Service Permits replace the registration requirement in Greater Manchester for non-franchised local bus services, and operators will not also need to register services within Greater Manchester with the Traffic Commissioner.

The current registration process will however continue to apply outside of Greater Manchester and the Service Permit timescale accounts for this. The 70 days until the effective time after a permit application has been assessed is to enable bus operators to have sufficient time to register any aspect of the service running outside of Greater Manchester with the Traffic Commissioner. Applicants are advised to only do this once the Service Permit for the section within Greater Manchester has been granted, and TfGM has notified the operator and relevant neighbouring LTA.

Service permit applications are required to be assessed against the criteria set out in section 123Q of the Transport Act 2000. A permit must be granted if the service will benefit passengers in Greater Manchester and will not have an adverse effect on franchised services in the scheme area. Each application will need to be carefully assessed against these criteria, including any applications relating to the continuation of existing

¹ **‘Effective time’** refers to the beginning of the day on which a local service may first be provided under a service permit (regulation 2 of the Regulations).

services. As each application will follow the same assessment process, all applications will require the full 28-day assessment period.

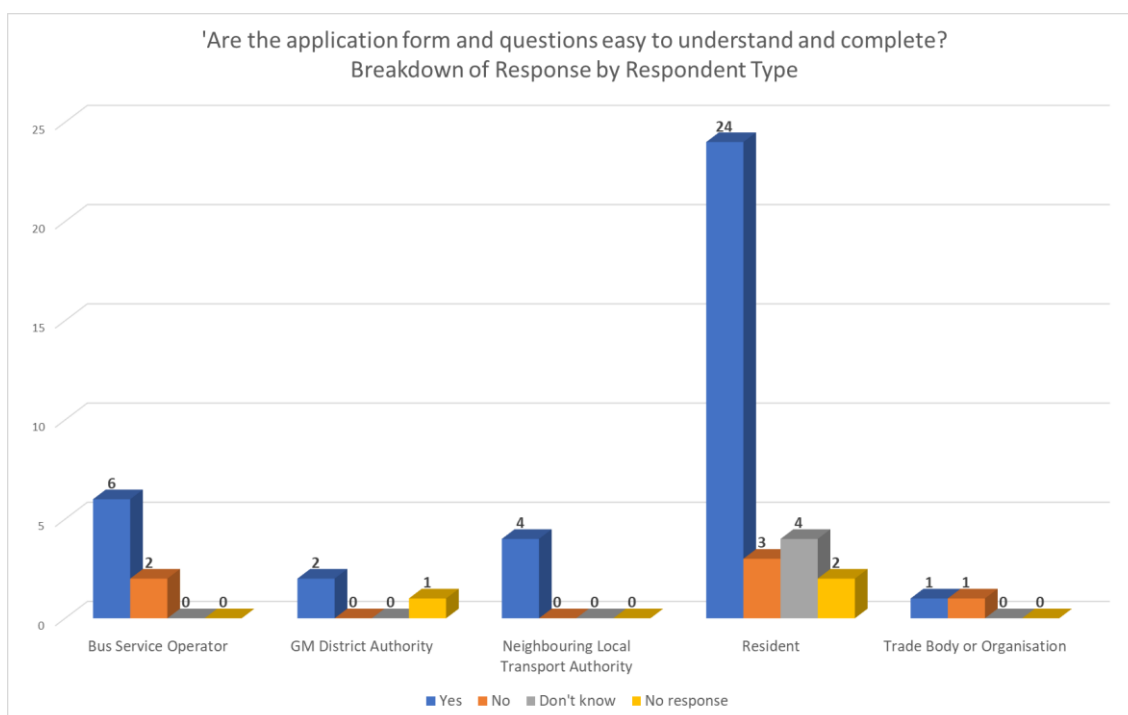
6.2 Application Form

Respondents were provided with a copy of the proposed Service Permit application form and asked if it was easy to understand and complete. They were also asked whether they would suggest any changes.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	6	2	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	4	0	0	0	4
Resident	24	3	4	2	33
Trade Body or Organisation	1	1	0	0	2
	37	6	4	3	50



- 74% (37) of respondents agreed with the layout of the application form, which was based on the current documentation used to register a local bus service with the Traffic Commissioner, along with additional information needed to help assess the impact of the proposed permit service on the franchised bus network.

- 12% (6) of respondents disagreed with the proposed application form.
- 14% (7) of respondents neither agreed nor disagreed.
- Six of the eight operators (75%) agreed that the application form was easy to understand and complete, with the remaining two operators questioning the need to specify the vehicle types and capacities they would typically use.
- Organisers and suppliers of rail replacement services, along with their trade body, also highlighted that some aspects of the form, including the vehicle type and standards, would be difficult for them to know in advance of an emergency replacement commencing, suggesting either an exemption or simplified form for rail or tram replacement services.

TfGM assessment and response

Tram and rail replacement services do fall within the scope of the Regulations, which differ from the exemptions from registering local bus services. Tram and rail replacement services will need a service permit if they are a 'local service,' as defined by Section 2(1) of the Transport Act 1985. Mindful of the unique characteristics of tram and rail replacement services however, including the short notice involved with unplanned events, it is proposed that TfGM will apply a simplified application process for these services, with reduced information requirements for a permit covering all eventualities, including unplanned events and the proposed Service Permit Policy Statement is updated to reflect this. This will enable operating companies to provide any tram or rail replacement services within Greater Manchester compliant with the service permit regulations. As set out in the consultation the permit will be issued to the appointed tram or rail replacement coordinating company and the permit will allow for sub-contracting by the coordinating company to other operators undertaking the rail or tram replacement services.

For all other service permit applications, it is proposed that bus operators will be required to specify the basic types and typical capacities of the vehicles they intend to use on the permit service. This is to enable TfGM to assess the suitability of the application and impact on the franchised network. Although it would not preclude the use of alternative vehicles in an emergency, significant or regular changes to the vehicle types by the operator could affect their compliance with the Conditions of the permit, and/or the need to apply to change the permit in the future.

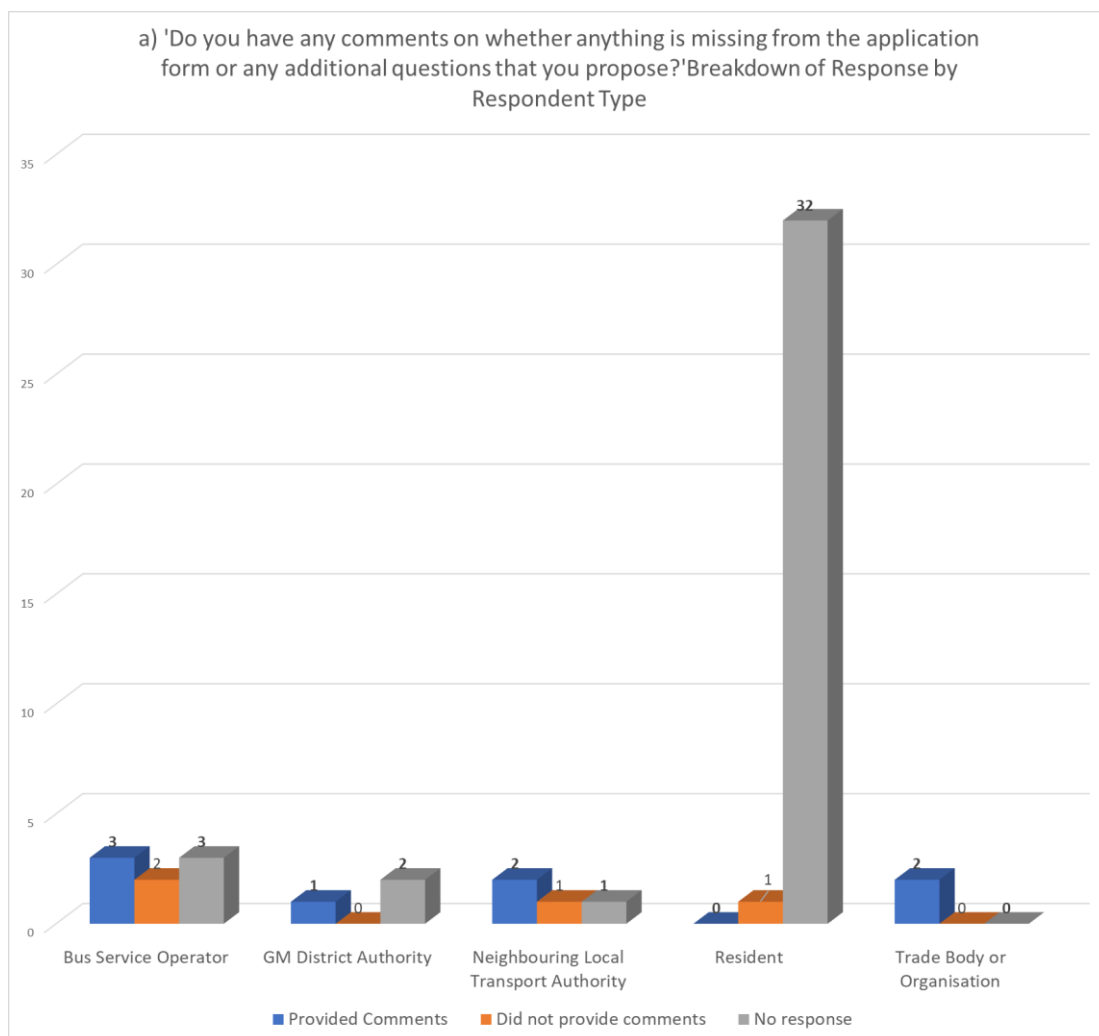
6.3 Information Required

Respondents were provided with a list of the information that would be needed for the application to be processed and were asked to comment on:

- a) anything missing from the form or any additional questions that they would propose be added; and
- b) any comments on the proposed information requirements.

a) Comments on whether anything missing from the form or any additional questions that they would propose be added

Breakdown of responses	Provided Comments	Did not provide comments	No response	Total
Bus Service Operator	3	2	3	8
GM District Authority	1	0	2	3
Neighbouring Local Transport Authority	2	1	1	4
Resident	0	1	32	33
Trade Body or Organisation	2	0	0	2
	8	4	38	50



8 respondents provided responses, with the following 2 suggestions for additional information on the application form:

- a question to ask whether the applicant had any conversations with an LTA about their proposals; and
- a question to confirm applicants have uploaded relevant data to the DfT BODS service.

Other responses provided were more general rather than a direct response to the consultation question, including the following:

- One comment about the importance of the service to the local authority area outside Greater Manchester.
- 3 comments relating to vehicle emission standards.

- One comment around the notice period specified to provide reasons for a permit refusal.
- One comment that there is no given timescale for TfGM to acknowledge receipt of an application.
- One comment about how stop list for bus stopping points should be provided (e.g., stop names or NAPTAN numbers).
- One comment relating to whether a new application and fee will be applicable in the event that a bus stop is relocated or given a different NAPTAN number.

TfGM assessment and response

a) Response to ‘anything missing from the form or any additional questions proposed’:

The questions included in the application form are centred around whether the application meets the statutory test to enable a permit to be granted. As such it is not proposed to include additional questions.

As part of the assessment period TfGM is proposing that affected LTAs are notified of the application to enable them to provide feedback on it, including any passenger benefits the proposal offers. As such it is not proposed to include an additional question on the application form regarding LTA engagement.

The condition relating to vehicle emission standards requires vehicles to meet the standards of Euro VI or better.

As defined by the Regulations, if TfGM does not grant a service permit it must give notice of its reasons to the applicant within a period of 10 days beginning with the date on which it decides not to grant the service permit. Where possible TfGM will provide this information as soon as it is available.

Applications will be acknowledged as soon as possible on receipt.

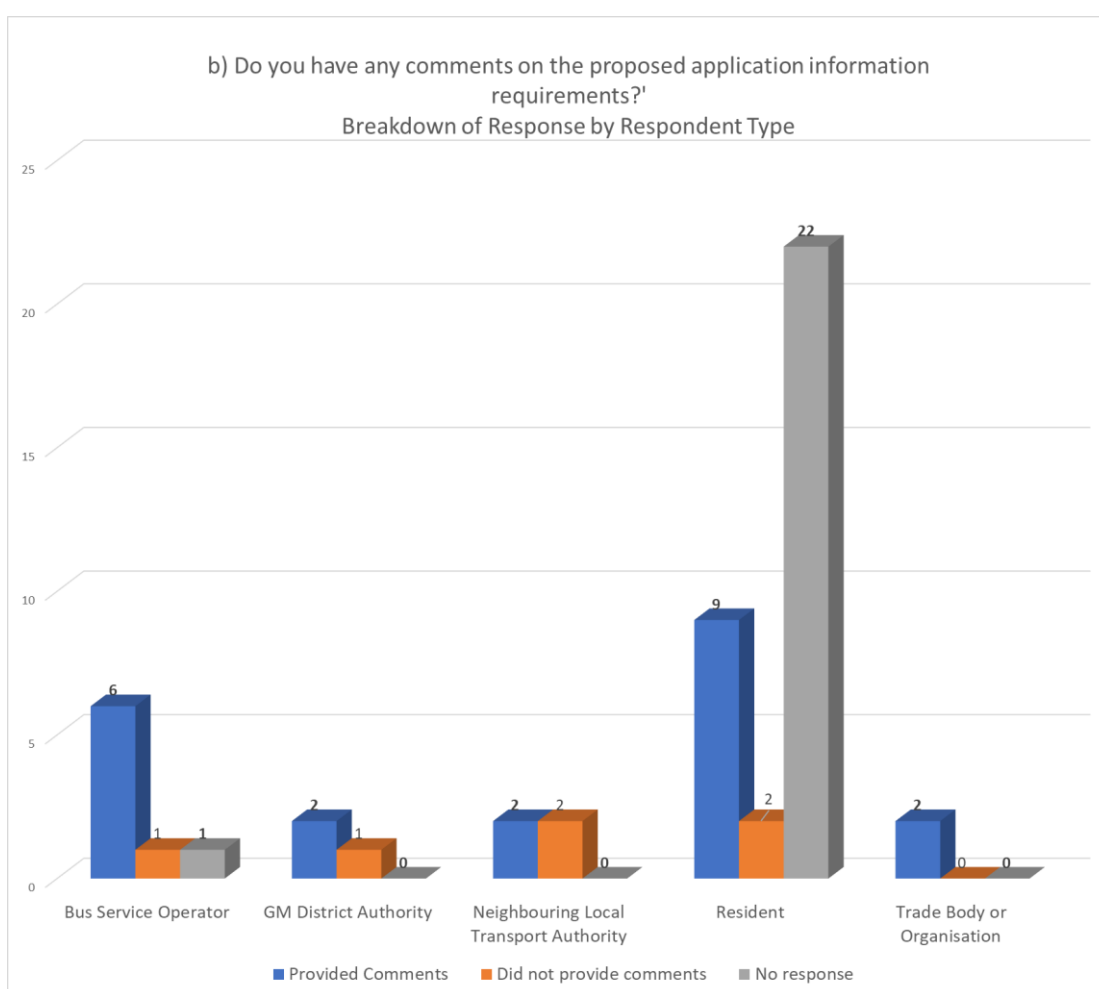
The application details all the stopping point locations. Whilst it would be helpful to provide this as NAPTAN details this is not obligatory.

In the event that an existing stop is relocated there is no requirement to submit a service permit variation. Existing stops cannot be given a new NAPTAN number, however, should one of the stops identified in the permit be replaced by another stop with a new NAPTAN number then

this would be a minor variation that can be covered under the 56-day variation period (or short notice if required).

b) Comments on whether respondents had 'any comments on the proposed information requirements':

Breakdown of responses	Provided Comments	Did not provide comments	No response	Total
Bus Service Operator	6	1	1	8
GM District Authority	2	1	0	3
Neighbouring Local Transport Authority	2	2	0	4
Resident	9	2	22	33
Trade Body or Organisation	2	0	0	2
	21	6	23	50



21 responses were received on the wider question of whether respondents had any comments on the proposed application information, including:

- Two respondents stated operators should be able to determine what and where they operated on cross boundary routes.
- One respondent suggested the application form should identify the key benefits the service offered, and one felt the importance permit services provided to the neighbouring transport authority should be included.
- One respondent sought details of accessibility for people of limited mobility.
- Two respondents questioned the requirement for details of the stopping places or a working timetable, or if existing services would automatically be accepted (one respondent).
- One respondent suggested additional features could be provided to enhance the application process e.g., detailed map information.
- Two resident respondents queried whether operators should be able to set/increase their own fares.
- Seven comments related to expectations around vehicle types and two comments relating to tram/rail replacements.
- One respondent commented that nobody wants franchising.
- One responded commented that the application is about right as cross border services are vital and one said the application seemed reasonable.

TfGM assessment and response

b) Response to 'any comments on the proposed information requirements':

The Bus Services Act 2017 provides that no local bus service may be provided in a franchised area (if there is a stopping place for the service in that area) unless it either a franchise contract service, an exempted service under the regulations, or it is provided under a service permit. This includes applications for the continuation of existing services, as it is necessary to assess all services.

The assessment of applications for service permits needs to be made against the statutory tests and therefore the information requested largely relates to that needed to enabling TfGM to appropriately evaluate the application.

The questions included in the application form are centred around whether the application meets the statutory test to enable a permit to be granted.

In addition to service permit conditions all operators will need to continue to comply with public service vehicle accessibility regulations, as such no additional questions are included in the application regarding accessibility.

The proposed requirement for a detailed working timetable, showing all journeys to be operated, and the stopping places, is considered necessary to assess the impact of the proposal on the franchised bus network.

The Regulations allow Service Permit holders to set their own commercial fares. TfGM is however able to specify the retailing and acceptance of specific tickets and passes – see section 7.3 for details.

Information relating to vehicles and tram and rail replacement services is provided under section 6.2

Following consultation, the Mayor took the decision to introduce the Greater Manchester Franchising Scheme for Buses 2021 (the “Franchising Scheme”) in March 2021.

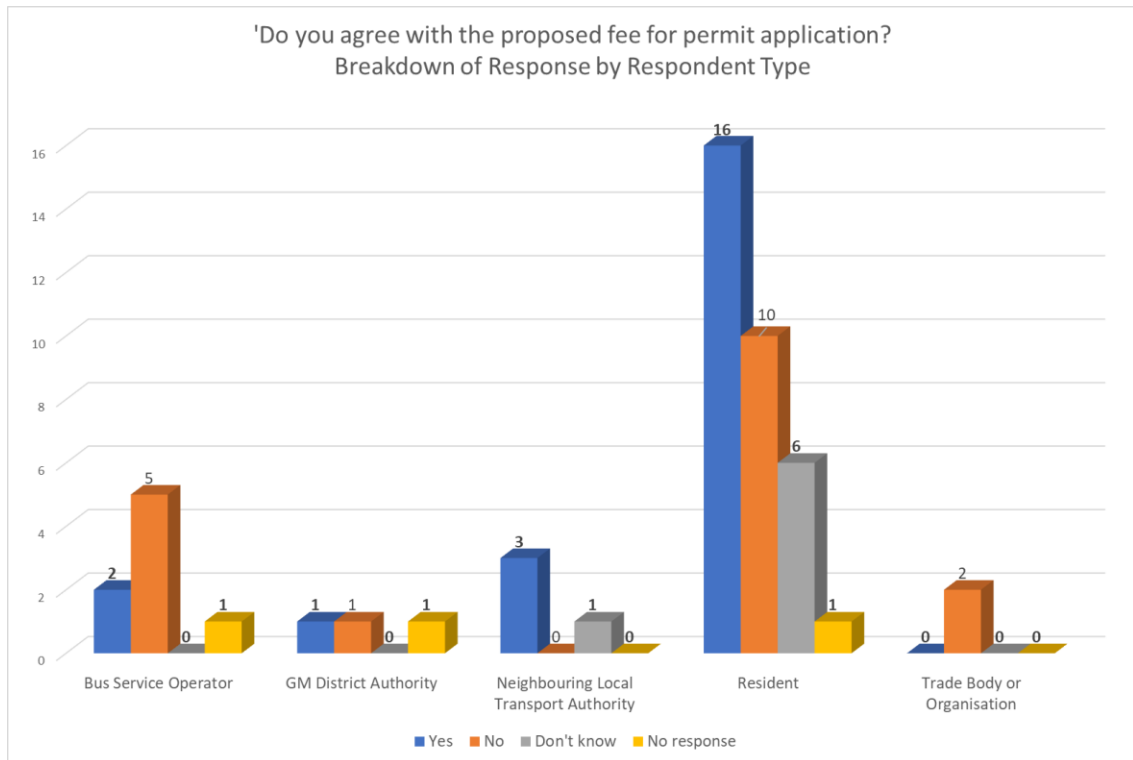
6.4 Proposed Fee

Respondents were asked about the proposed fee of £160 for TfGM to assess new permit applications, or renewals of permits and £65 for the variation of an existing permitted service.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	2	5	0	1	8
GM District Authority	1	1	0	1	3
Neighbouring Local Transport Authority	3	0	1	0	4
Resident	16	10	6	1	33
Trade Body or Organisation	0	2	0	0	2
	22	18	7	3	50



- 44% (22) of all respondents agreed with the proposed fee.
- 36% (18) did not agree with the proposed fee, with nine suggesting it was too high and three suggesting it should be the same or no more than the fee levied to register a local bus service with the Traffic Commissioner (currently £60).
- 20% (10) neither agreed nor disagreed with the proposal.
- 75% of the bus operators (6) and 50% of the transport authority respondents (2) highlighted that the fee for new service permit applications was more than the cost of registering a bus service with the Traffic Commissioner. One operator asked for clarity on the cost calculation, two asked if it would be in addition to the Traffic Commissioner charges. Two transport authorities also sought further clarification, and one asked whether a cross-boundary service jointly funded with TfGM would incur a fee.
- A trade body respondent sought assurances there would be no fee charged for cancelling a permit and suggested changes to services for reasons outside an operator's control should also not incur a fee.
- One thought that the fee could be prohibitive given the fragility of the bus industry post-Covid, another suggested there should be a concession to accommodate changes to the route or times to

avoid operators not making them on the grounds of cost, and that fees relating to subsidised services would be passed on to the neighbouring authority to pay.

TfGM assessment and response

The Regulations allow for the recovery of no more than the reasonable cost of processing the application. The proposed fee reflects costs that will be incurred processing, assessing the application, and determining if it meets the statutory test criteria set out in the regulations, as well as notifying affected stakeholders and administering the permit.

The requirements for assessing service permit applications are distinctly different to those involved with registering a bus service and consequently the fees involved are not comparable.

It is proposed that minor changes under a reduced notice period, that are envisaged to require less administration, would be charged a reduced fee of £65. Amendments for specific public holiday periods and cancellations (service withdrawals) would be made at no cost to the operator. TfGM will review the service permit fees on at least an annual basis to ensure that only reasonable costs are being recovered and that the scope of any reduced fees remains appropriate.

Applications for a service permit will need to be made by the licensed operator and the appropriate fee paid when their application is submitted to TfGM.

Should the permit service also operate outside of Greater Manchester, it will also require registering with the Traffic Commissioner for which additional charges may apply.

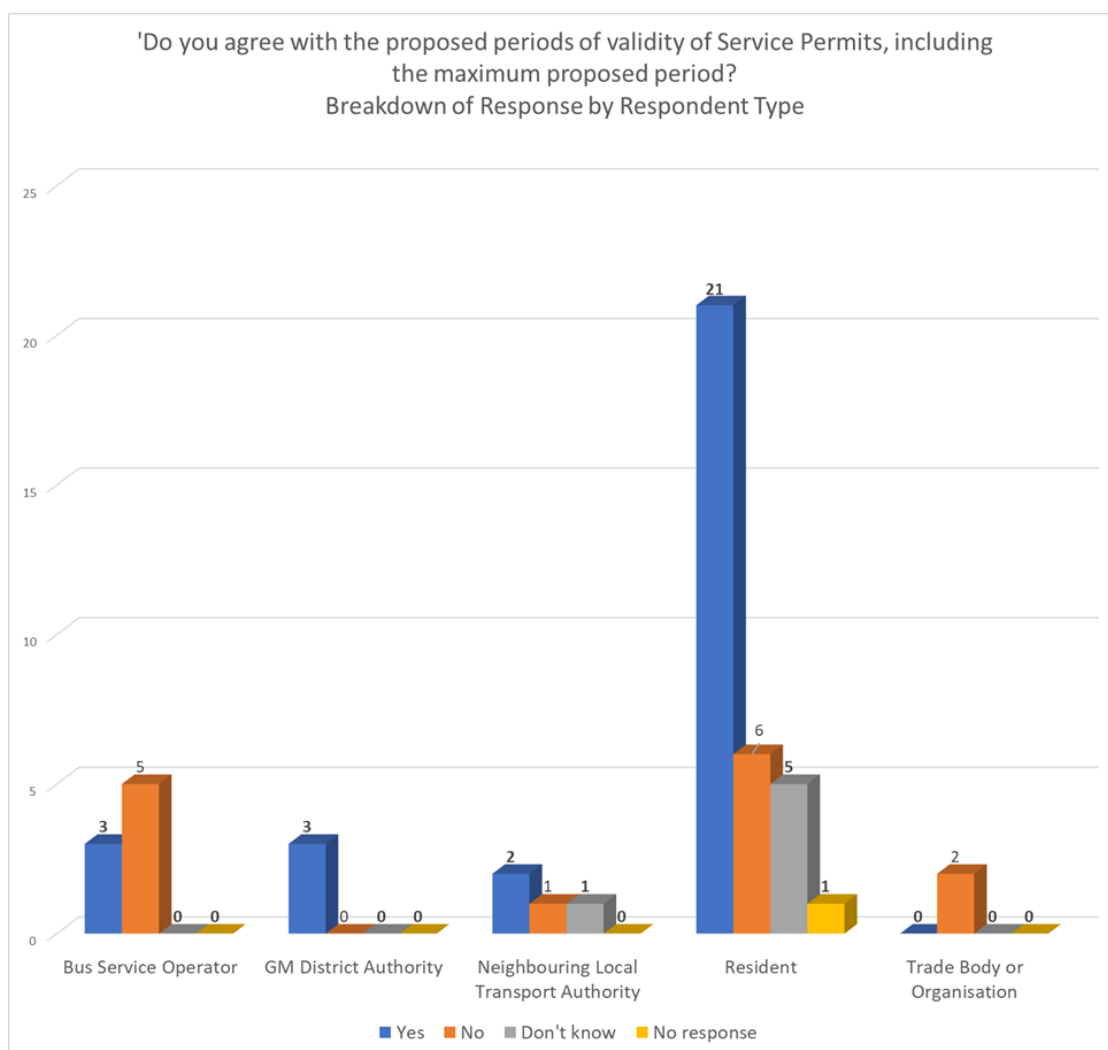
6.5 Permit Validity

The consultation asked if the respondents agreed with the proposal that service permits would be granted for a period of up to five years, at which point a new permit application would be needed for the service to continue. Respondents were also asked to suggest suitable alternative periods if they disagreed.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	3	5	0	0	8
GM District Authority	3	0	0	0	3
Neighbouring Local Transport Authority	2	1	1	0	4
Resident	21	6	5	1	33
Trade Body or Organisation	0	2	0	0	2
	29	14	6	1	50



- 58% (29) of respondents agreed with the proposed period of validity.
- 28% (14) did not agree, including 5 of the 8 bus operators who responded, and half of the transport authorities (2).
- 14% (7) neither agreed nor disagreed with the proposal.

- Two operators thought a permit should be continuous, while another thought it should not be for less than 5 years; one respondent said it should correspond to the franchise period; one thought it should be for 12 months, and another for a maximum of three years.
- Two operators sought clarity regarding services that were for a specific or limited period only (e.g., event or rail replacement services), or where another operator was to acquire the cross-boundary service or operator.
- Two trade body respondents thought a service permit should be valid for at least 5 years, with one suggesting it should then be renewed on a rolling basis at no additional cost to the operator.
- One transport authority asked for the validity to be for 7 years to match the duration of their contracts, and another thought it should not be less than 5 years.

TfGM assessment and response

The Regulations require permits to have a maximum time limit. The proposed maximum time limit of five years reflects the length of the initial franchise period. Aligning the maximum time of Service Permits with the length of franchised services will allow for a potential future review of whether services continue to be provided through Service Permits or become part of the franchised network.

It is proposed that TfGM may issue a Service Permit for a shorter specified period of validity than five years where it considers that the statutory test may only be met for that shorter period.

Service Permits will be non-transferable but applications to replace a permit service being withdrawn by another operator could be replaced by a new operator under the Reduced Notice period.

In response to the transport authority comments regarding matching the duration of its contracts, it is proposed that where a service is provided under contract to an LTA, the permit length may be aligned with the expiry date of the contract to provide the service (a specified period of up to eight years).

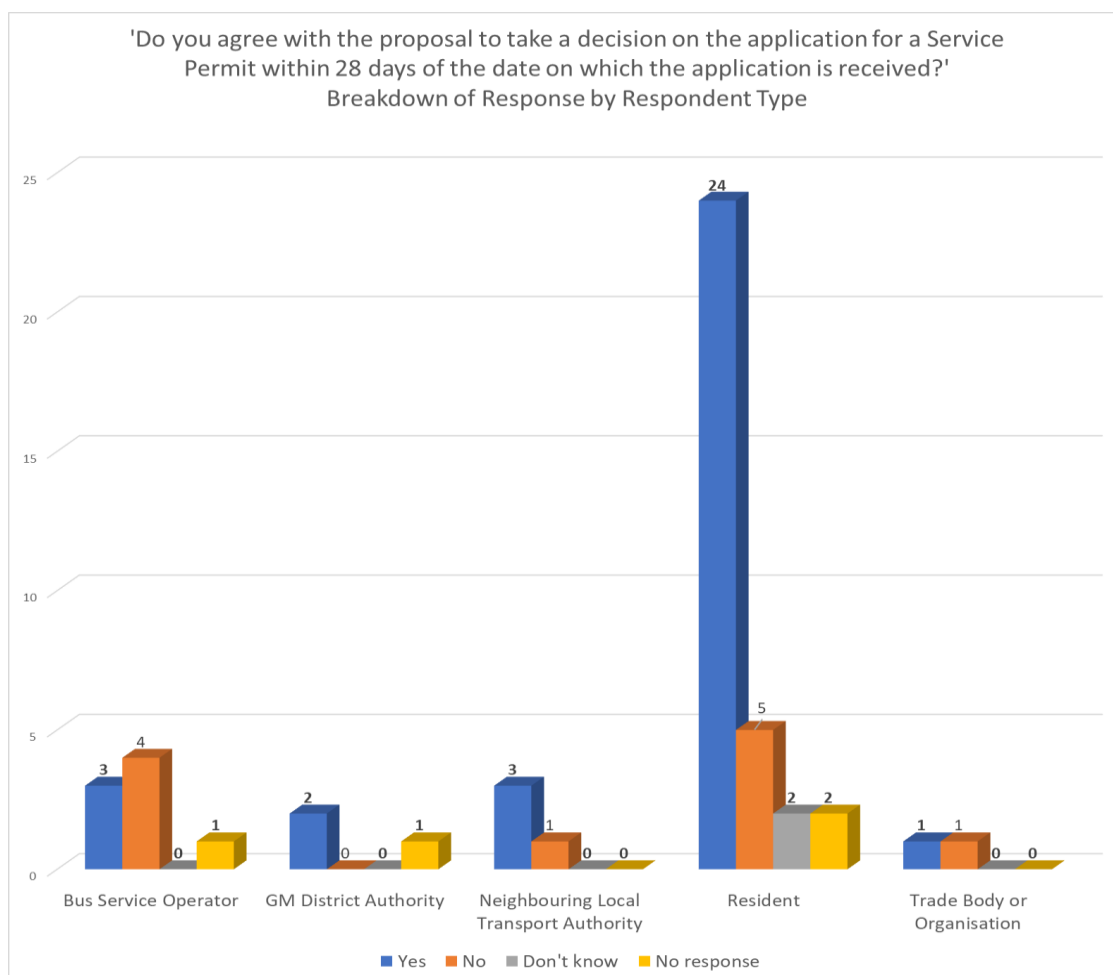
6.6 Timeline to Assess Permit Applications

Respondents were asked to comment on the proposal for TfGM to notify a decision on whether the permit will be granted within 28 days of receiving a permit application.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	3	4	0	1	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	3	1	0	0	4
Resident	24	5	2	2	33
Trade Body or Organisation	1	1	0	0	2
	33	11	2	4	50



- 66% of respondents (33) agreed with the proposal to take a decision on the application for a Service Permit within 28 days of the date on which the application is received.
- 22% (11) did not agree with the timescale, including 5 of the 8 bus operators who responded, three of which sought clarity on the process, along with two trade body responses, and whether the 28 days would commence from the time the application was submitted or the time it was acknowledged by TfGM. Two respondents also sought clarity on the appeals process.
- 12% (6) of respondents neither agreed nor disagreed with the proposal.
- Three operators thought the period should be reduced to within 14 days, while three resident responses raised that 28 days might not be sufficient to fully scrutinise a permit application.

TfGM assessment and response

A permit application will require a proper assessment against the statutory test criteria and, where appropriate, consultation with stakeholders and the applicant if there has been no pre-application engagement regarding any potential conditions that may be required. Dependent on the complexity of the application, we consider that this will require significantly longer than the 14 days (potentially 10 working days or less) that some operators have suggested. For clarity, the 28-day period being proposed by TfGM will commence from the point the service permit fee and application are received. Should a decision on an application require less time, then the operator will be notified of the outcome in less than 28 days where possible.

Applicants are strongly encouraged to speak to TfGM's Bus Services team, in confidence, at least 21 days before submitting an application to discuss their proposals, particularly where the application includes operation along roads not currently served by buses. This is to ensure that infrastructure issues can be considered and taken into account by TfGM and will also assist the applicant in complying with the requirement that a full list of the proposed stops, stands, and terminal points is supplied with its application, as omissions or inaccuracies in the information supplied may delay TfGM's ability to consider a permit application, or result in the application being refused.

It is recommended that TfGM undertake further engagement with affected operators and LTAs to clarify the process, including the appeals process. This will be done through pre-application engagement and the

introduction of a guide to service permit applications, including any frequently asked questions.

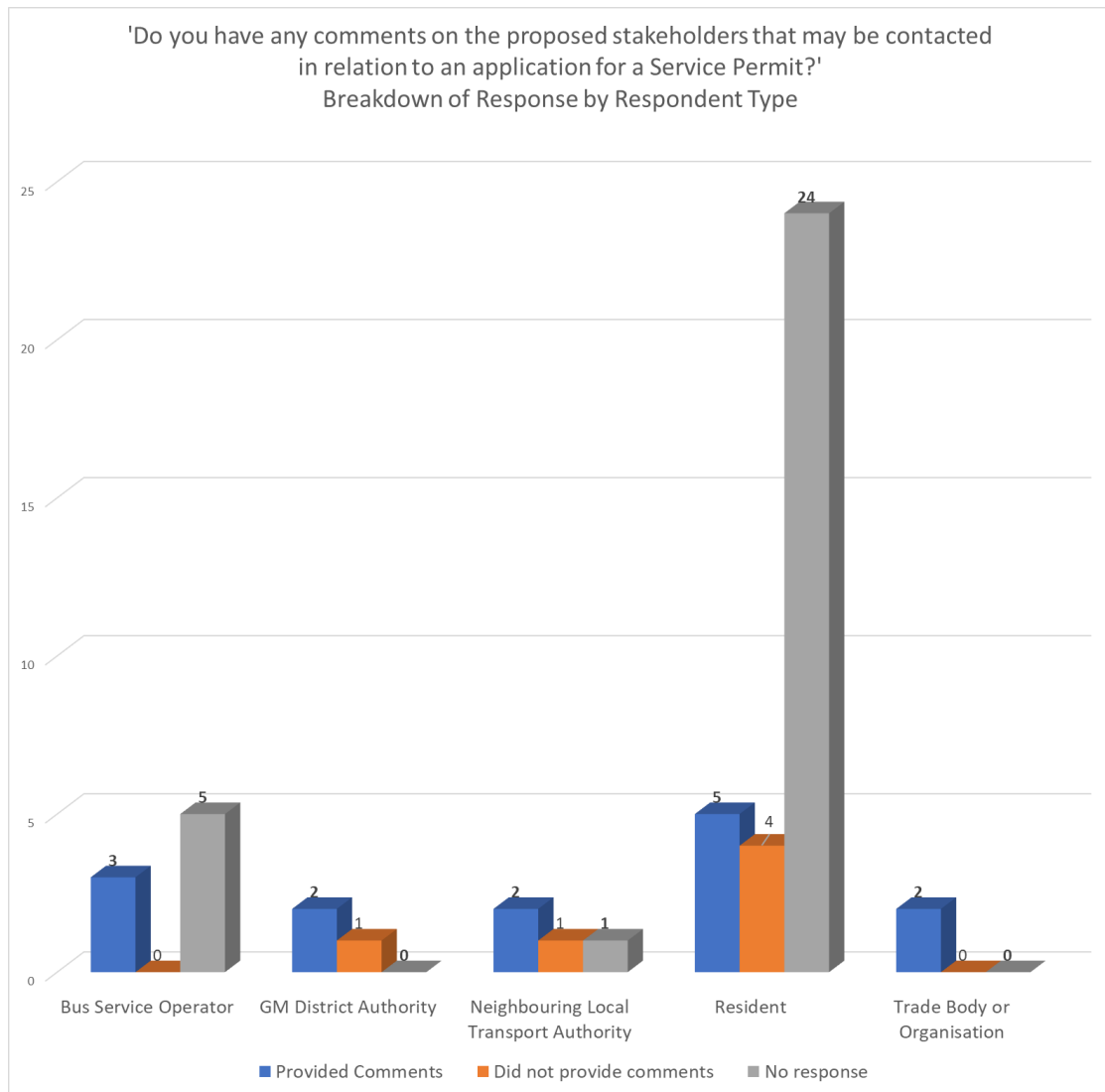
6.7 Decision Making Process

Respondents were asked to comment on the proposed stakeholders that may be consulted by TfGM to inform the decision-making process on the service permit application.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Provided Comments	Did not provide comments	No response	Total
Bus Service Operator	3	0	5	8
GM District Authority	2	1	0	3
Neighbouring Local Transport Authority	2	1	1	4
Resident	5	4	24	33
Trade Body or Organisation	2	0	0	2
	14	6	30	50



- 28% (14) of respondents commented on the proposed stakeholders that may be contacted in relation to an application for a Service Permit.
- Within the 14 comments provided, 50% (7) indicated that they understood there might be situations where TfGM may need to consult with a stakeholder.
- Concern was expressed by four respondents that stakeholder engagement may further delay the process, with one adding a concern that an objection may prevent an application proceeding.
- Three respondents thought that passengers or those living along the line of a proposed route should also be consulted.
- Two operator respondents expressed concern about the risk of potentially commercially sensitive information being shared in

advance of a decision on the application, or when an application is refused, as the applicant may intend to appeal or re-apply.

- Two other respondents queried why there might be a need to consult with the Police.
- One neighbouring transport authority suggested that TfGM “must” consult with them rather than “may”, whilst one operator respondent queried the need to do so, given that bus operators are required to consult with an LTA prior to registering the service with the Traffic Commissioner.
- A trade body respondent asked that any objections be dealt with quickly, so as not to delay the process, and one operator respondent asked for the potential consultees to be more clearly defined. One District Council suggested that local authorities and parish councils be given a say in the process and for planning proposals for new developments be taken into consideration when assessing service permit applications, particularly where the permit service is the only bus service in the locality.

TfGM assessment and response

TfGM proposes notifying relevant LTAs and District Highways, where appropriate, when service permit applications that affect them are received, and they will be given an opportunity to comment on them as part of the service permit assessment. Due to potential commercial sensitivities and the need to determine the outcome of a service permit application within 28 days, there will not be an opportunity for wider consultation, such as with service users or Parish Councils.

Other stakeholders, such as the Police, may be consulted by TfGM however where new stops or other infrastructure are needed. TfGM may also be required to consult with the Police regarding a permit application for sporting or public events, or to consult with a school or other organisation involved in arranging the permit service, or whose needs it is primarily intended to serve.

Although such consultation may run concurrently, it is recognised that feedback from these additional consultees may not always be possible within the 28-day decision period. The need for new stops, for example, may require a site visit to be arranged, or more information may be requested in relation to a specific part of the proposals.

TfGM will not consult with other bus operators, including bus franchise operators, as the assessment will be in relation to the impact on the franchised network that TfGM is responsible for.

TfGM will decide on the permit application within the 28-day period, based on meeting the statutory test. It is proposed that the applicant will be informed when the decision is made or as soon as practical afterwards, along with any Conditions that will be required if the permit has been granted. Any delay in notifying the applicant will comply with the regulations and should not affect the effective time of the service, unless this has already been raised with the operator as a concern.

In response to concerns around commercial sensitivities, it is recommended that applicants identify any information in their application which it considers to be commercially sensitive so that TfGM can, if necessary, seek appropriate undertakings from stakeholders should it be necessary to share that aspect of the application in more detail.

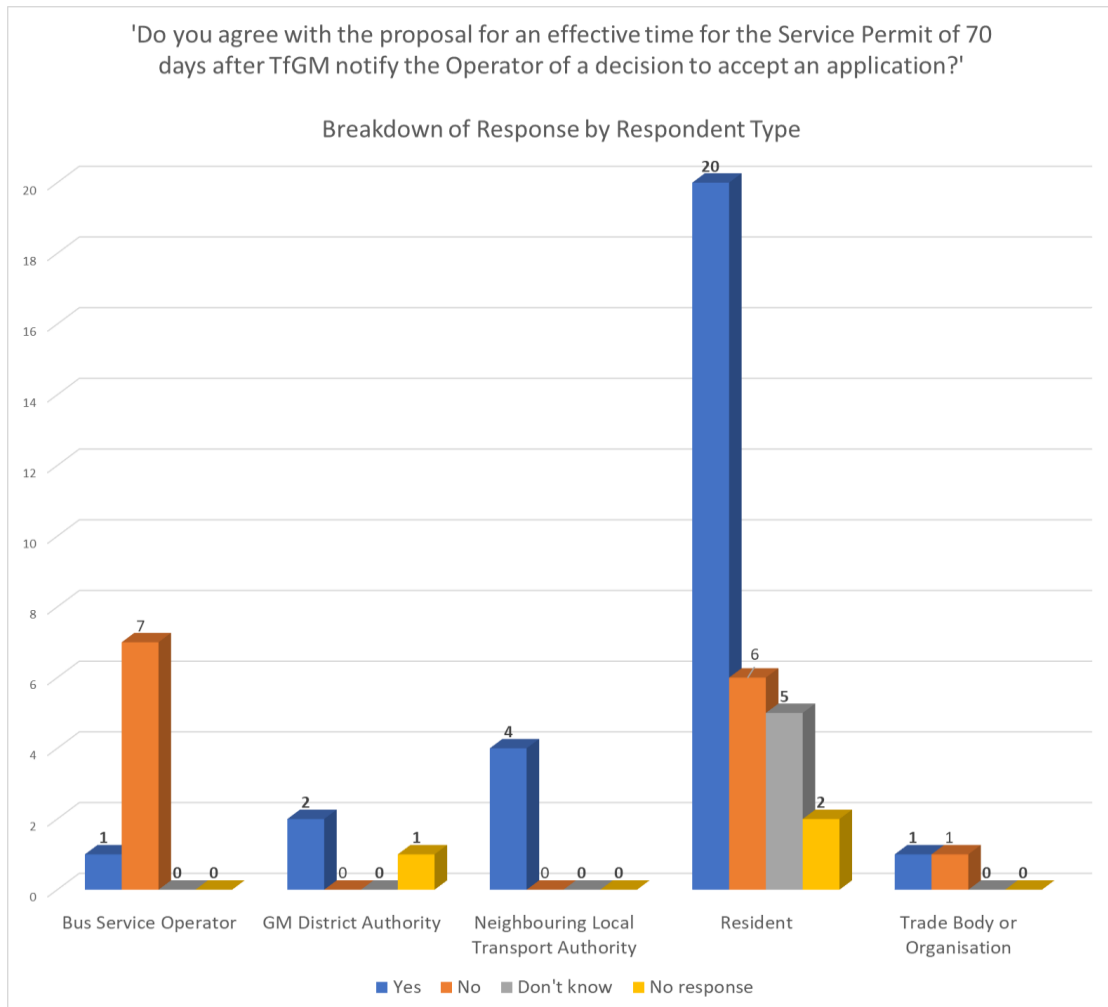
6.8 Effective Time

The consultation proposed an effective time for the service permit of 70 days after TfGM notified the operator of a decision to accept a permit application.

Summary of responses

Of the 50 responses received online:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	1	7	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	4	0	0	0	4
Resident	20	6	5	2	33
Trade Body or Organisation	1	1	0	0	2
	28	14	5	3	50



- 56% (28) of respondents agreed with the proposal for an effective time for the Service Permit of 70 days after TfGM notify the Operator of a decision to accept an application.
- 28% (14) did not agree with the proposal, including 7 out of 8 (88%) of the bus operators who responded.
- 16% (8) of respondents neither agreed nor disagreed with the proposal.
- Most bus operators thought the service permit application should run concurrently with the process to register local bus services outside of Greater Manchester.
- All four transport authority respondents supported the proposal.
- Bus operators also highlighted that the effective time for tram or rail replacement services could often be at short notice and therefore needed to be less for these types of services.

TfGM assessment and response

The 70-day period between the decision regarding a service permit application and the effective time of that service permit allows sufficient time, where required, for bus operators to fulfil their obligations to register any part of the route that is not within Greater Manchester with the Traffic Commissioner. By undertaking the two processes in a sequential manner, this allows the registration with the Traffic Commissioner to be undertaken with the knowledge of the outcome of the permit application for the portion of the route within Greater Manchester.

In response to the feedback regarding tram or rail replacement services, TfGM proposes that tram or rail replacement service permits will allow the operation of any replacement service between specified stations or areas within and, to and from, Greater Manchester. This will enable tram and train operating companies to organise replacement services without the need to apply for a new permit each time.

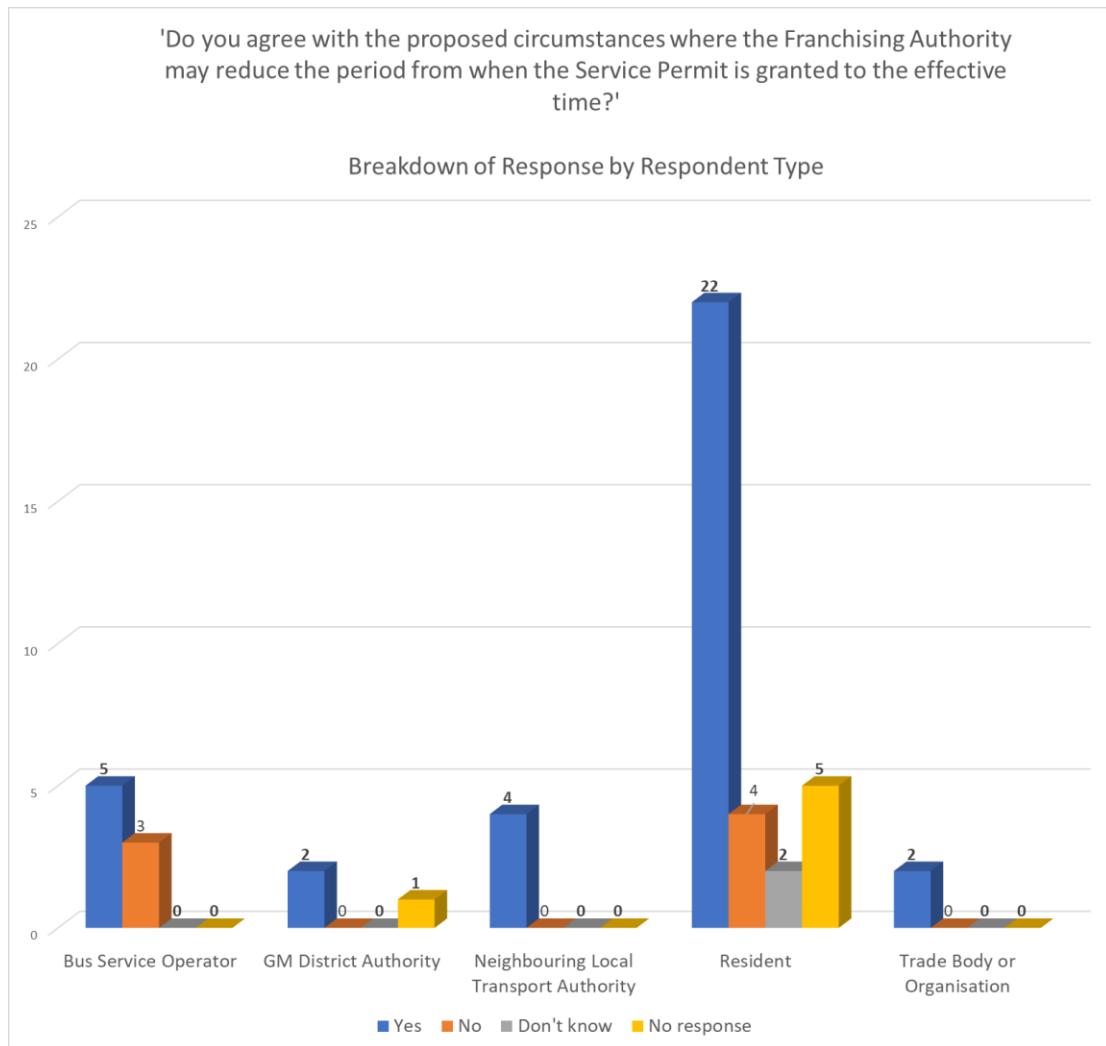
6.9 Reduced Notice Period

Respondents were provided with a list of circumstances that may lead TfGM to reduce the notice period for a service permit and asked to comment whether they agreed with the proposed circumstances. This included applications to replace an existing permit service that was being withdrawn, or where the permit needed to be amended to cater for specific holiday periods or events, safety reasons, or other changes that did not alter the service within Greater Manchester or that could not have been reasonably foreseen by the operator.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	5	3	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	4	0	0	0	4
Resident	22	4	2	5	33
Trade Body or Organisation	2	0	0	0	2
	35	7	2	6	50



- 70% (35) of respondents, including 5 of the 8 bus operators, agreed with the proposed circumstances.
- 14% (7) of respondents did not agree. Some of the bus operators were concerned about the length of time of the service permit application process and that this would increase the likelihood of operators having to seek short notice applications with the Traffic Commissioner for changes outside of Greater Manchester.
- 16% (8) of respondents neither agreed nor disagreed with the proposal.
- One response suggested that appeal/arbitration should be part of the process and that service permits should not be restricted for commercial reasons by TfGM. Two responses sought clear guidelines on timescales and said that these needed to be adhered to.

TfGM assessment and response

The proposed 98-day timescale seeks to minimise the need for operators to seek short notice changes with the Traffic Commissioner for any sections of services outside of Greater Manchester because the service permit application decision will be made within 28 days. This leaves a further 70 days to follow the full registration notice period for sections of route outside of Greater Manchester.

The proposed Reduced Notice element of the permit process is to allow urgent or unforeseen changes to be accommodated. This could, for example, include an amendment to the timetable due to changes to school hours, or the need to re-route a service due to a Traffic Regulation Order.

As defined by the Regulations, an appeals process is administered by the Traffic Commissioner. A service permit applicant may appeal to the Traffic Commissioner over a permit application refusal, the conditions attached to a service permit, or a decision to revoke or suspend a service permit.

Service Permit applications will be only assessed against the statutory test and other considerations will not influence whether a permit can be granted.

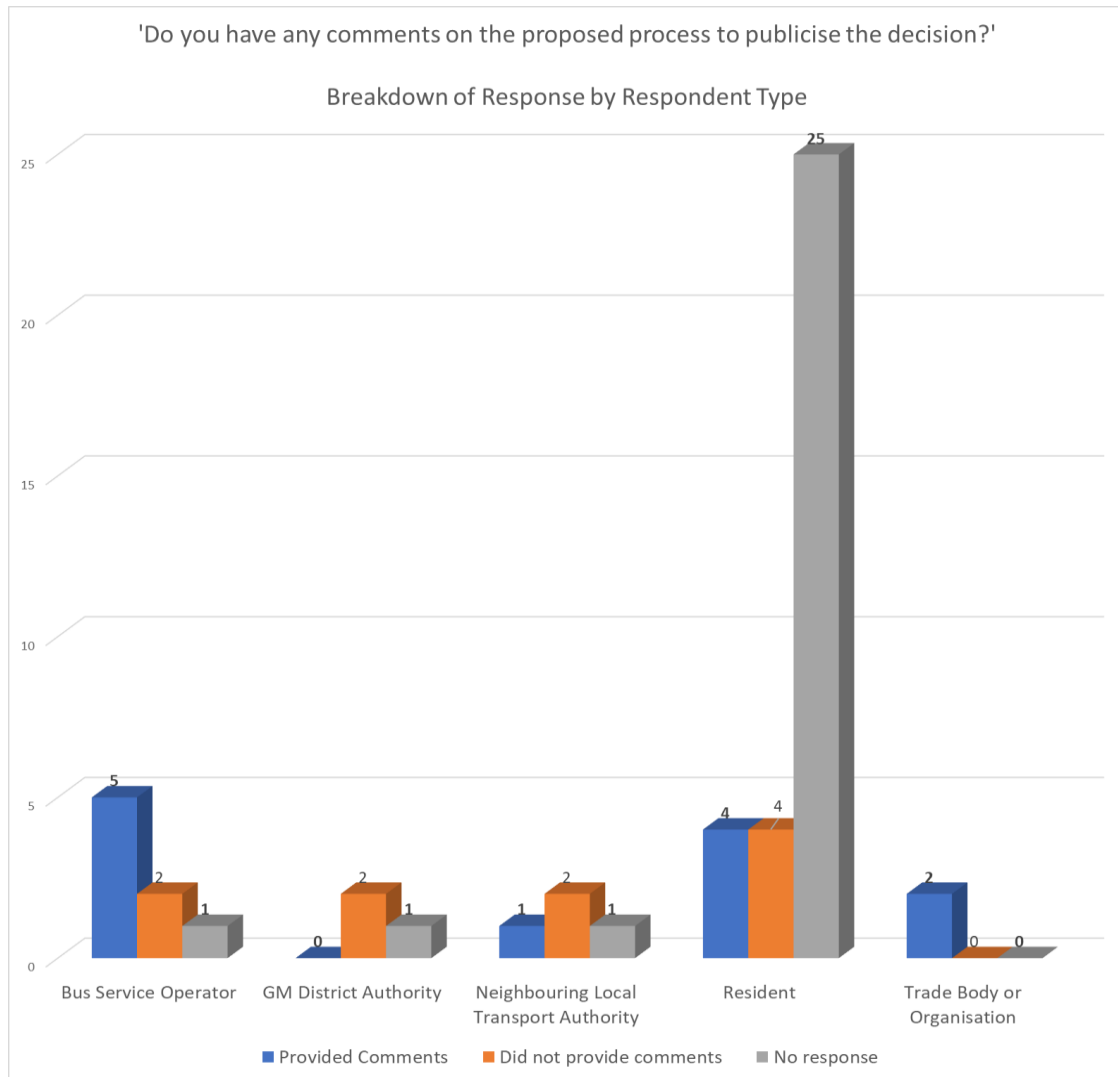
6.10 Publication of the Decision

The consultation asked if the respondents had any comments on the proposed process to publicise the decision in writing within 14 days, with a summary of the applications and outcomes also made available online. Participants were also asked if they had any alternative proposals for TfGM to consider.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Provided Comments	Did not provide comments	No response	Total
Bus Service Operator	5	2	1	8
GM District Authority	0	2	1	3
Neighbouring Local Transport Authority	1	2	1	4
Resident	4	4	25	33
Trade Body or Organisation	2	0	0	2
	12	10	28	50



- 24% (12) of respondents commented on this, with three bus operators asking for details of the applications not to be published if the operator wished to appeal, or until the service was registered with the Traffic Commissioner if it also operated outside of Greater Manchester.
- Four respondents thought the decision should not take up to 14 days to be communicated and that it should be done at the point the decision is made. Three of these also sought clarity as to whether the decision must be notified within 10 days and not 14 days.
- One respondent asked for confirmation that the decision would be made in writing, with another adding that the decision should fully detailed.

- One respondent thought that all permits should be granted and another that the information should be publicly available.

TfGM assessment and response

The Regulations relating to service permits require the franchising authority to notify operators within 10 days of their decision if the permit application is to be declined, and within 14 days if it requires Conditions to be attached.

TfGM will decide on the permit application within the 28-day period, based on the statutory criteria. It is proposed that the applicant will be informed in writing when the decision is made, or as soon as practical afterwards, along with any Conditions that will be required if the permit has been granted. Any delay in notifying the applicant will comply with the regulations and should not affect the effective time of the service unless this has already been raised with the operator as a concern.

It is proposed that TfGM may also publish details of those service permit applications granted but, in response to the consultation, it will do this no earlier than 42 days before the effective time of the service permit. This will allow sufficient time for operators to register any element of the service outside of Greater Manchester.

The published details will be as follows:

- Service Permit number
- Variation number
- Operator name
- Licence Number
- Service number (except tram and rail replacement services)
- Service type
- Service start point, via points and end point
- Date received
- Effective time
- End Date
- Whether it is a cross boundary service or not

Details of any unsuccessful applications will not be published.

6.11 Changes or cancellation of Permit Services

The consultation sought views on the notice periods as follows:

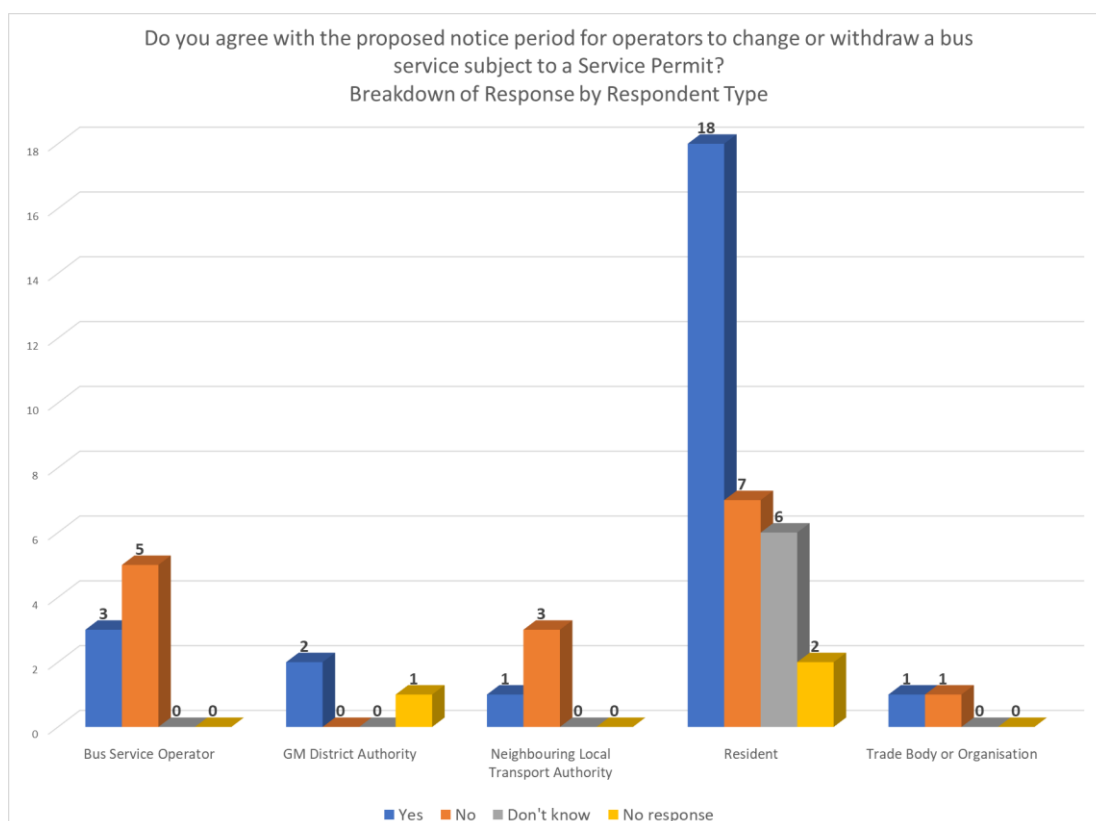
- a) Views on proposed notice period for operators to change or withdraw a bus service; and*
- b) Views on the proposed circumstances where a franchising authority may reduce the notice period to change or withdraw a bus service.*

Summary of responses

Of the 50 online responses received:

- a) Responses related to views on proposed notice period for operators to change or withdraw a bus service***

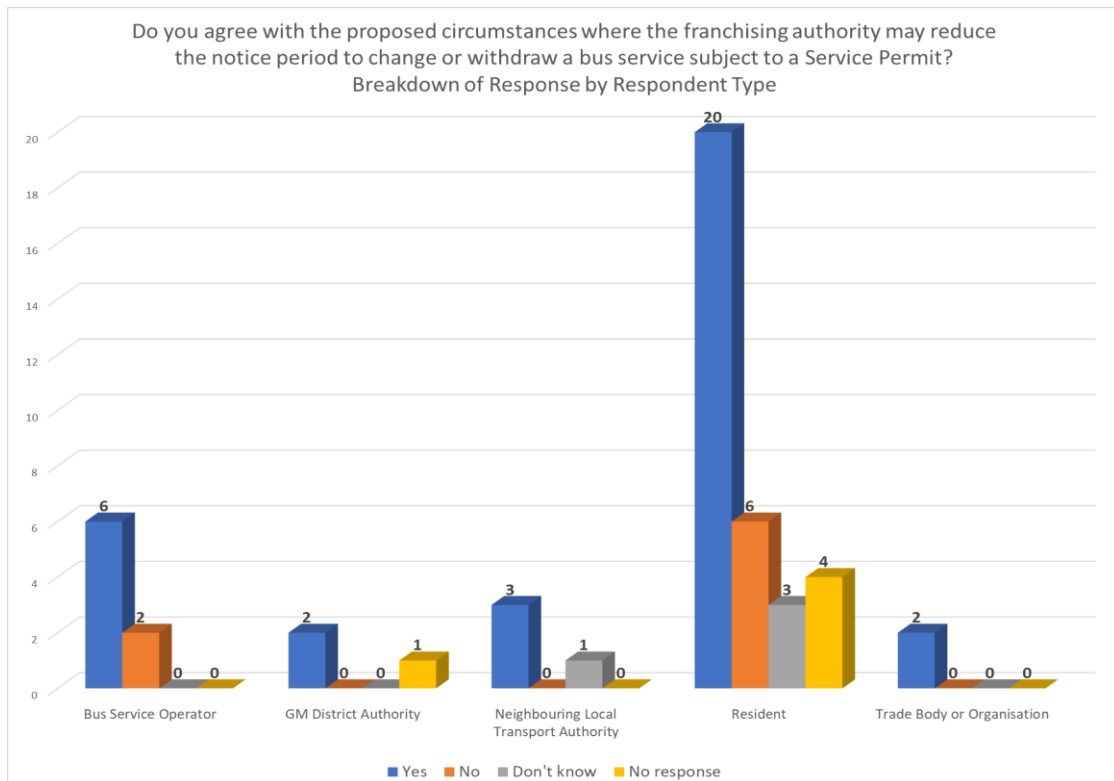
Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	3	5	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	1	3	0	0	4
Resident	18	7	6	2	33
Trade Body or Organisation	1	1	0	0	2
	25	16	6	3	50



- 50% (25) of respondents agreed with the proposed notice period.
- However, 62% (5) of the bus operators and 25% (1) of the transport authorities sought further clarity on what changes would be permitted at less than 98 days' notice. There was a concern from some transport authorities that this might delay significant changes being made to bus services in their areas.
- 32% (16) of respondents did not agree with proposals. Four of those disagreeing with the proposals were also seeking further clarity on the changes permitted at less than 98 days' notice, whilst one suggested a 28-day notice period, one a 112 day notice period, three a 56 day notice period and three a 70 day notice period.
- 18% (9) of respondents neither agreed nor disagreed with the proposal.

b) Responses related to the proposed circumstances where a franchising authority may reduce the notice period to change or withdraw a bus service

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	6	2	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	3	0	1	0	4
Resident	20	6	3	4	33
Trade Body or Organisation	2	0	0	0	2
	33	8	4	5	50



- 66% (33) of respondents agreed with the proposed circumstances where a franchising authority may reduce the notice period.
- 16% (8) of respondents did not agree with proposals. Three of those disagreeing with the proposals were concerned that a reduced notice period would be too short and said that no reduced notice period should be allowed for. Two of those responding sought further clarity on the circumstances where a reduced notice period would be permitted.
- 18% (9) of respondents neither agreed nor disagreed with the proposal.

TfGM assessment and response

Only very minor changes to, or cancellations of a Service Permit would be permissible at reduced notice, requiring no greater than 56 days as defined by the regulations.

Seasonal variations at Christmas/New Year and on Public Holidays will be permitted, as currently, at 21 days' notice and will not incur a fee.

Most variations to timetables, including those for summer school holiday periods, will require a new service permit application at 98 days' notice.

This does not preclude the use of reduced notice applications where appropriate to satisfy urgent or unforeseen circumstances.

It is proposed that TfGM develops a guide to service permit applications which sets out the circumstances that changes to services would be permitted at less than 98 days' notice.

The consultation documents stated that where a Service Permit is revoked or suspended this would take effect 14 days after the notice is given. Although no comments regarding this were raised in the consultation, the effective date for a revocation or suspension has been amended to 56 days after the date on which the notice is given, as this is the earliest date the Regulations permit.

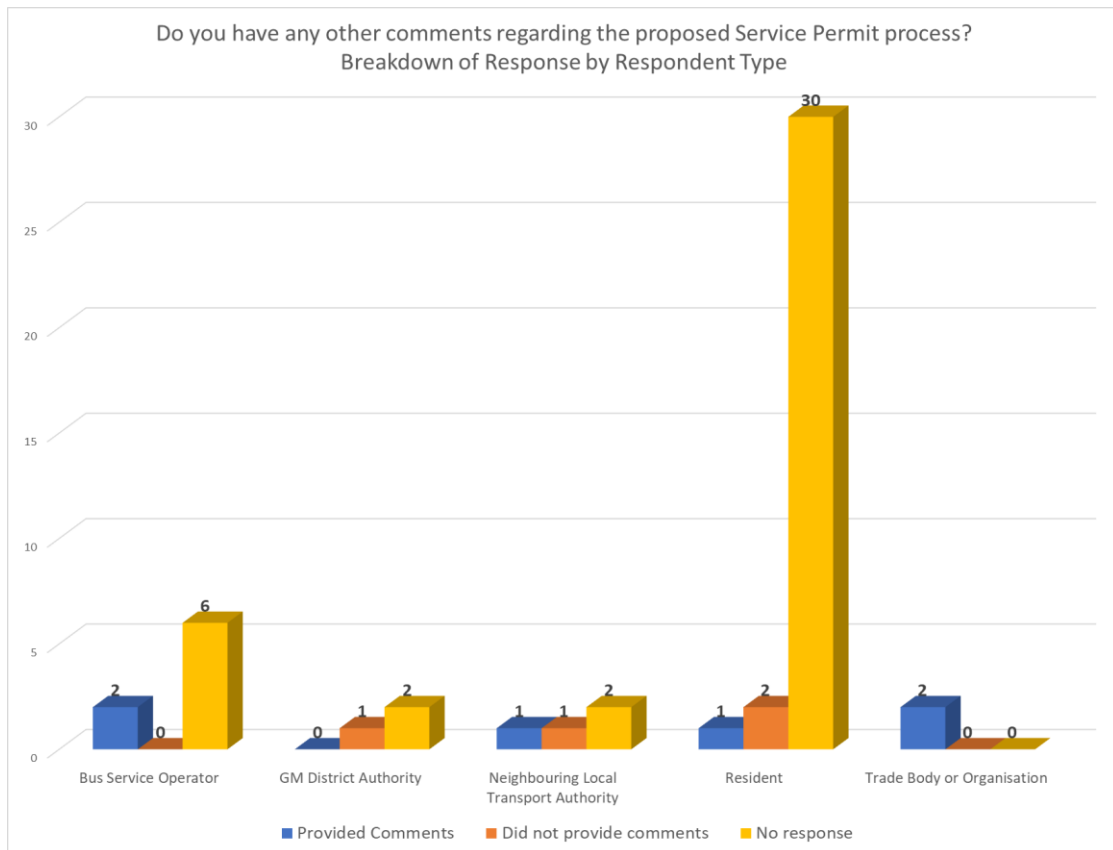
6.12 Comments on the overall process

Respondents were asked if they any other comments regarding the proposed Service Permit process.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Provided Comments	Did not provide comments	No response	Total
Bus Service Operator	2	0	6	8
GM District Authority	0	1	2	3
Neighbouring Local Transport Authority	1	1	2	4
Resident	1	2	30	33
Trade Body or Organisation	2	0	0	2
	6	4	40	50



- 12% (6) respondents provided comments regarding the proposed Service Permit process, ranging from those wanting all bus services in Greater Manchester to be franchised services, including all cross-boundary services, to those who felt that cross-boundary services should have unfettered access to operate in Greater Manchester.
- One bus operator was concerned that commercial considerations could be a reason not to grant a permit and that appeal rights/arbitration was missing from the process.
- Another operator wanted to see “grandfather rights” i.e., for existing services to be granted a service permit automatically to existing services without applying for a service permit.
- One local transport operator wanted the process to take account of the impact on bus passengers in neighbouring LTA areas.

TfGM assessment and response

Service permit applications are required to be assessed against the criteria set out in section 123Q of the Transport Act 2000. A permit must be granted if the service will benefit passengers in Greater Manchester

and will not have an adverse effect on franchised services in the scheme area. It is not possible to apply “grandfather rights” to determine whether a service meets the statutory test and service permit applications for new services will be given equal consideration to those relating to the continuation of existing services. A service permit applicant may appeal to the Traffic Commissioner over a permit application refusal, the conditions attached to a service permit, or a decision to revoke or suspend a service permit.

7. Conditions/Description of Conditions

Conditions may be attached to a Service Permit, including an existing permit service, which the operator would have to comply with. These conditions may vary depending on the type of service proposed.

TfGM may also introduce, amend, or remove a condition during the period of the permit.

Respondents were asked whether they agreed to or comment on the types of potential conditions that TfGM may attach to a permit.

6.13 Operational

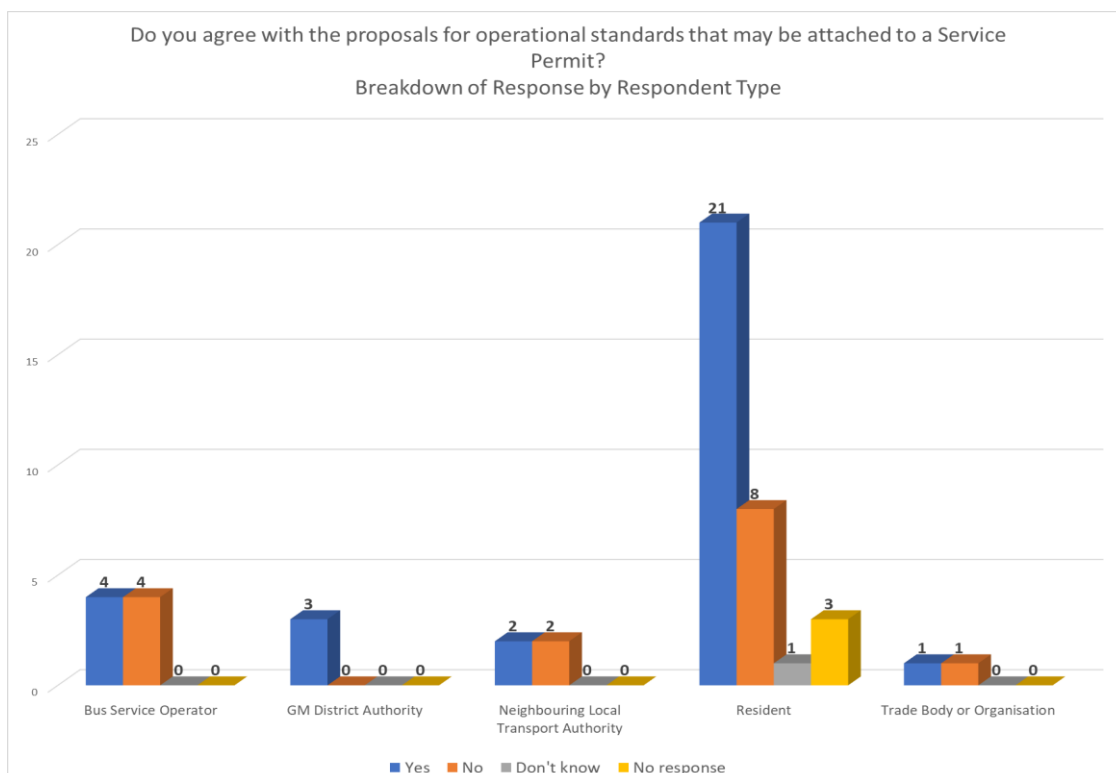
Respondents were provided a list of proposed operational conditions and descriptions of such conditions and asked whether they agreed or had any comments on the proposals. The proposed operational conditions which were described covered specific aspects:

- *Environmental Standards*
- *Accessibility*
- *Health & safety*
- *Vehicle Types, the route, stopping places and terminus points*
- *The use of Additional/Duplicate vehicles*
- *Service performance & operational standards*

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	4	4	0	0	8
GM District Authority	3	0	0	0	3
Neighbouring Local Transport Authority	2	2	0	0	4
Resident	21	8	1	3	33
Trade Body or Organisation	1	1	0	0	2
	31	15	1	3	50



- 62% (31) of respondents agreed with the proposed operational conditions.
- 30% (15) of respondents did not agree.
- 8% (4) of respondents neither agreed nor disagreed with the proposal.
- 50% (4) of bus operator respondents agreed with the proposed standards. Three others asked for operators to be given 'reasonable time' to meet any required standards after a permit is granted and to consider applying fewer conditions where most of the service is provided outside Greater Manchester.
- 2 of the 4 (50%) of the transport authority respondents also agreed with the proposed standards, with the remaining two concerned about the budgetary impact of operators having to

raise standards for their contracted services and the potential timeline.

- Two respondents thought a requirement for Euro VI vehicles was unnecessary, particularly for rail replacement services as it might restrict their ability to secure sufficient compliant vehicles; while two others felt they should be Euro VI and switch off their engines at termini, such as Piccadilly Gardens (1).
- Another respondent thought that operators should be allowed to determine what type and size vehicles they used, while three others thought they should be allowed to run duplicates if necessary.

TfGM assessment and response

Although TfGM does not consider the proposed Conditions that were described to be unduly onerous, given that these operational standards are already being provided by most operators in the case where enhanced standards are proposed these will be applied in a proportionate manner.

It is recommended that operators engage with TfGM prior to submitting a service permit application to better understand what Conditions may be attached to the service permit. Any representations regarding whether a condition is appropriate in the context of the relevant service will be considered on a case-by-case basis.

TfGM recognises the unique characteristics of tram/rail replacement services and, in response to the consultation, vehicle types and engine specifications will not form part of the Conditions for these services.

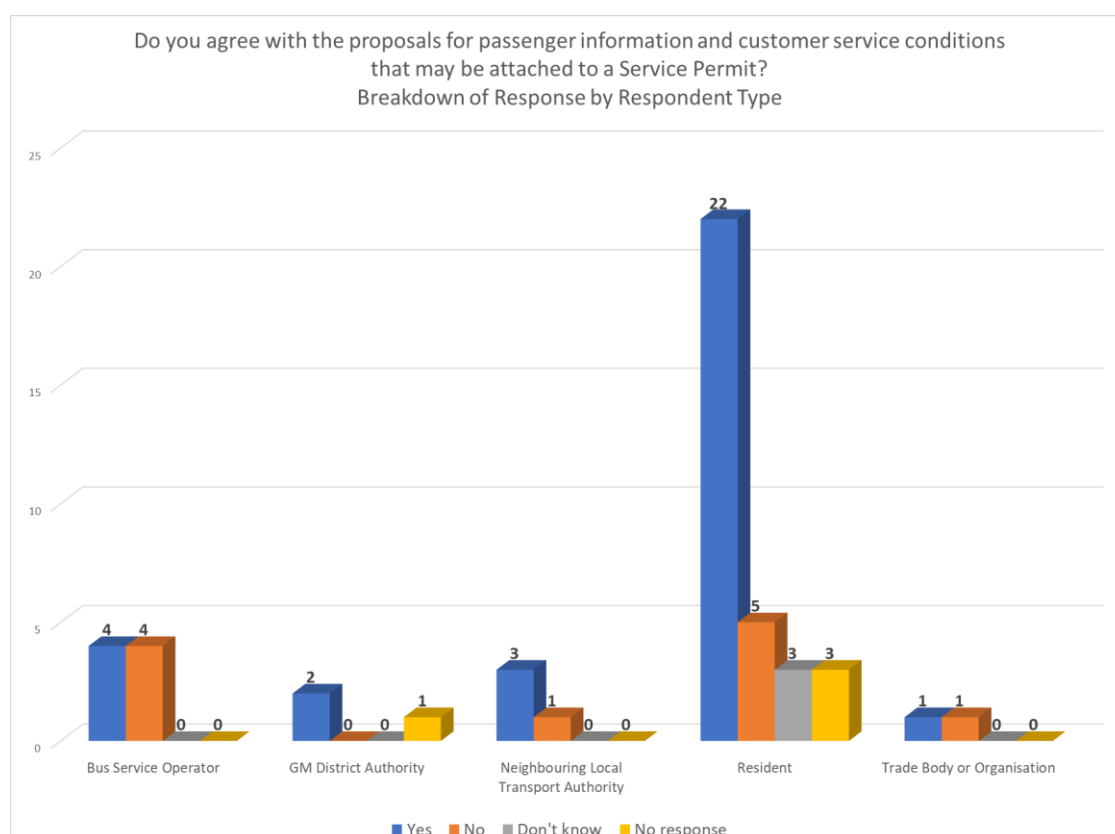
6.14 Passenger Information & Customer Service

Respondents were asked if they agreed to the proposed passenger information and customer service conditions / descriptions of conditions that may be attached to a service permit or if they wanted to make any comments about them.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	4	4	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	3	1	0	0	4
Resident	22	5	3	3	33
Trade Body or Organisation	1	1	0	0	2
	32	11	3	4	50



- 64% (32) of respondents agreed with the proposals for passenger information and customer service conditions.
- 22% (11) of respondents did not agree.
- 14% (7) of respondents neither agreed nor disagreed with the proposal.
- 4 of the 8 (50%) bus operator respondents agreed with the proposed standards. The four others were all concerned about the implications of avoiding duplicate service numbers in Greater Manchester for neighbouring LTA areas. One operator additionally said that route numbers were indirectly part of an

operators marketing and the identity of a route. This latter point was also made one trade body respondent.

- 75% (4) transport authority respondents agreed with the standards, with one requesting more time for bus operators to be able to comply.
- Three other respondents thought that services numbers should not be changed, while one asked for them to better co-ordinated by area.
- Two respondents highlighted the need for TfGM to consider how a service's number fits in with a neighbouring area numbering scheme.
- Two respondents sought clarity on what TfGM considered a 'reasonable timescale' for operators to respond to complaints.
- One sought clarity on what driver training would be required
- One cross boundary bus operator sought additional standards concerning CCTV that complied with its own vehicle specification, but not currently featured on all others.

TfGM assessment and response

TfGM proposals on service numbers are to ensure that the service numbers of permit services do not duplicate that of another service in the same locality or district(s) of Greater Manchester, as this is likely to cause confusion to passengers. Where an application proposes to utilise a service number that clashes in such a way, it is proposed that TfGM will engage with the applicant and relevant neighbouring LTAs to identify an appropriate alternative service number.

Although suggestions to require additional passenger information and customer service standards are welcome, TfGM is not proposing to require enhanced features such as internal and external CCTV for permit services given fewer operators currently meet these standards and the potential costs these could have on other LTAs and cross-boundary service providers. Vehicle standards are likely to continue to gradually evolve over time however and TfGM will continue to liaise with operators and neighbouring transport authorities regarding these.

It is considered unhelpful to prescribe a specific timescale for operators to respond to complaints, as this will vary dependent upon the nature and complexity of the complaint and each operator's complaints handling procedures and response targets.

Driver training standards will be similar to those already existing for those operating subsidised services for TfGM and cover areas which all operators should expect to comply with, including customer care, disability awareness training, and, where applicable, an awareness of the bus station/city centre safety requirements.

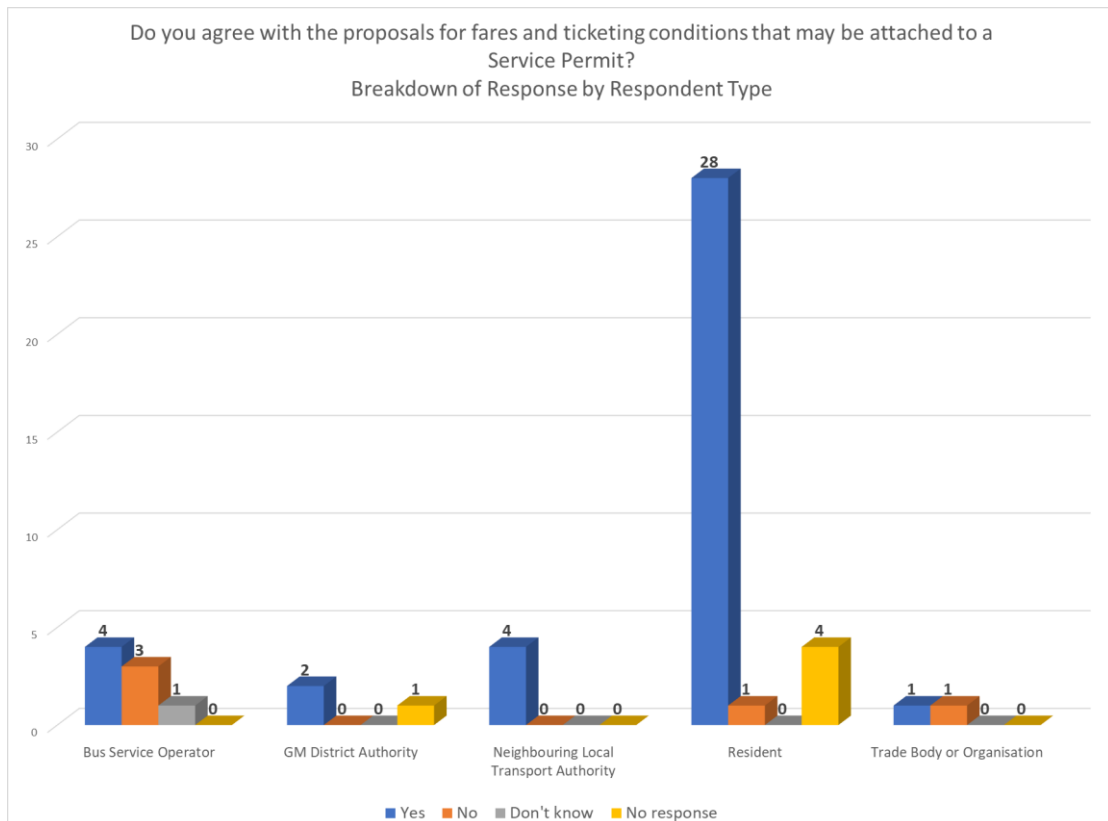
6.15 Fares & Ticketing

The consultation document highlighted that TfGM would require its fares and tickets to be issued, retailed, and accepted on the permit service, along with any ticket offers, promotions, or prices for journeys within the Greater Manchester Concessionary Boundary, unless it was specifically exempted from doing so by TfGM. TfGM will continue to reimburse Operators under the principle of 'no better and no worse off' in line with the existing concessionary and capped fares scheme arrangements in place. Respondents were asked if they agreed with these proposals or had any further comments to make about them.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	4	3	1	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	4	0	0	0	4
Resident	28	1	0	4	33
Trade Body or Organisation	1	1	0	0	2
	39	5	1	5	50



- 78% (39) of respondents agreed with the proposal for fares and ticketing conditions that may be attached to the Service Permit.
- 10% (5) of respondents did not agree.
- 12% (6) of respondents neither agreed nor disagreed with the proposal.
- 50% (4) of bus operators who responded agreed with the proposals. Two bus operators sought greater clarity on the reimbursement process/ formulae, with one operator also wanting the right to raise their fares at least annually, even if TfGM did not. Another saw the requirements as unduly onerous and thought they could affect the viability of their existing cross boundary services.
- One trade organisation did not wish to see restrictions on operators operating cross boundary services to offer their own multi-use tickets with a concern that this could affect viability of services. Another noted that there was no facility for operators to raise fares at least annually in line with inflation, whether or not TfGM raised their fares.
- 100% of the four transport authorities who responded agreed with the proposals, however one also sought clarity on any

exemptions and the grounds for doing so. One noted that a reduction in revenues for accepting lower fares on contracted services could require reimbursement to the contracting authority.

- One respondent wanted to see the cash fares accepted on all buses and require change to be given. Another asked for simpler fares, one asked for other operator tickets to be accepted on all buses, and one asked for fare increases to kept to a minimum.

TfGM assessment and response

Operators currently operating services in Greater Manchester are required to accept certain multi-operator tickets pursuant to the terms of a statutory ticketing scheme. These fares (amongst others) are currently managed by GMTL, which manages the setting of fares. TfGM currently have in place a capped fare scheme that caps the price of some of these fares, reimbursing operators for the impact of such cap. The proposal is that service permits will require acceptance of certain tickets and this condition will therefore mostly continue these existing ticketing arrangements both with operators both being required to accept certain tickets specified in the permit by TfGM, with those tickets capped by the fare scheme and with those operators continuing to be reimbursed to ensure they are 'no better and no worse off.', as a result of the cap being applied to those ticket prices.

The reimbursement arrangements for any such fares which are specified will sit outside of the Service Permit scheme, but compliance with any conditions will be dependent upon those reimbursement arrangements being in place. TfGM's existing reimbursement arrangements already allow for reimbursement to take into account of underlying fares changes made by operators, which may be made at least annually, and in other exceptional circumstances.

Fares and ticketing conditions will be applied unless there are specific reasons for not doing so, such as a service that operates only a small proportion of mileage within Greater Manchester.

The conditions will not stop operators from charging their own fares on services, only requiring that the specified fares are accepted.

Therefore, operators or LTAs, where applicable, will continue to be able to set their own fares alongside retailing and accepting TfGM specified tickets and products.

As a result of the above, TfGM's proposals are not expected to have the adverse impacts raised as a concern: as cross-boundary operators will still be able to charge their own fares in addition to those specified by TfGM; the proposals should not adversely affect the commerciality of services, as operators will be reimbursed for adverse impacts; and operators will still be able to raise fares at least annually.

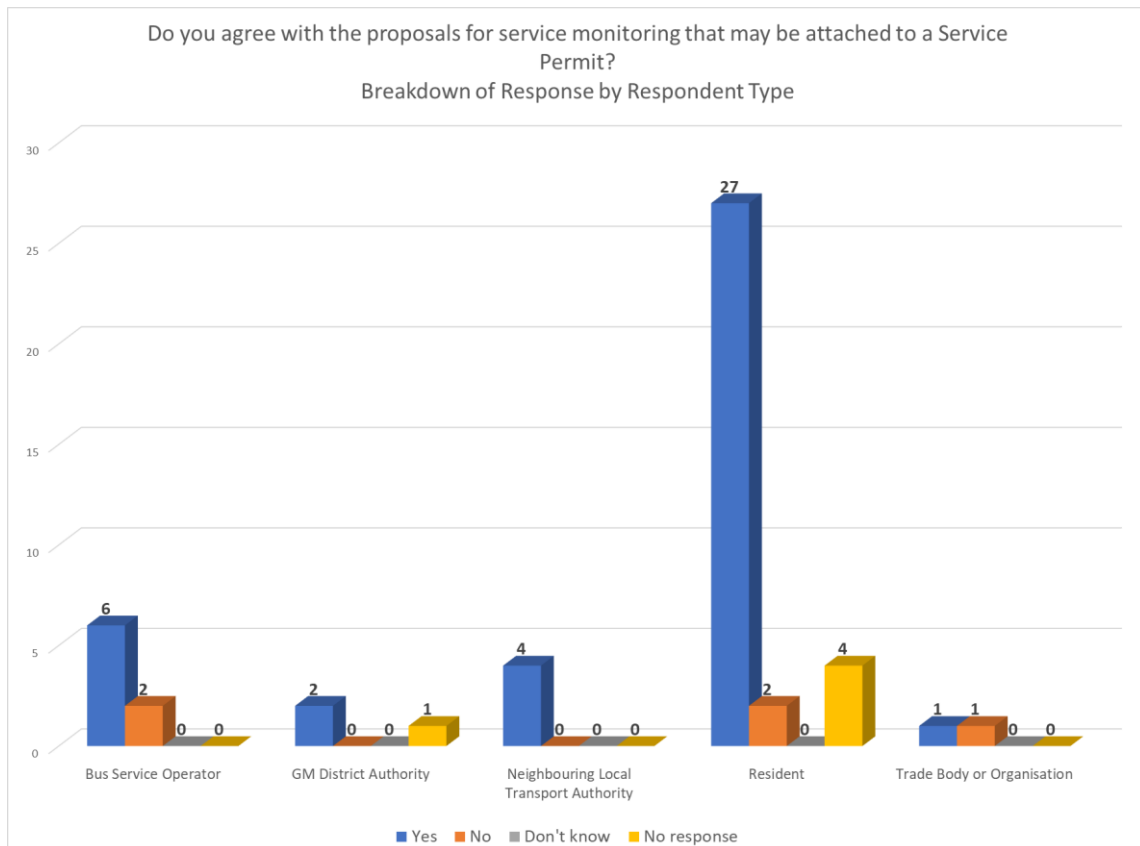
6.16 Service Monitoring

The consultation proposed that Authorised representatives of TfGM would be allowed to board vehicles operating the permit service to observe or record any information relevant to the operation of the Service Permit. TfGM would also require service quality and performance data for the purpose of confirming compliance with service permit condition. Respondents were asked if they had any comments on these proposals.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Yes	No	Don't know	No response	Total
Bus Service Operator	6	2	0	0	8
GM District Authority	2	0	0	1	3
Neighbouring Local Transport Authority	4	0	0	0	4
Resident	27	2	0	4	33
Trade Body or Organisation	1	1	0	0	2
	40	5	0	5	50



- 80% (40) of respondents agreed with the proposals for service monitoring that may be attached to Service Permits.
- 10% (5) of respondents did not agree with the proposals.
- 10% (5) of respondents neither agreed nor disagreed with the proposal.
- 75% (6) of bus operators who responded agreed, with the remaining two wanting strict guidelines to be agreed on what TfGM could monitor with regards to commercial bus services.
- 100% (4) of the transport authorities who responded agreed with the proposals, with one also wanting to be informed if a permit service serving their area breached the service permit conditions in GM.
- One bus operator wanted permit services to be treated no differently as franchised services with regards to submission of performance issues to the Traffic Commissioner or the Driver & Vehicle Standards Agency (DVSA). They also expressed a concern that TfGM might attempt to attach a Condition requiring the operator to expand their times or days of operation of the service.

TfGM assessment and response

As with registered local bus services outside of Greater Manchester, post franchising there will be a need to monitor local bus services within the conurbation to ensure they comply with the agreed specifications. It is important that TfGM can ensure that permit conditions are complied with, and a monitoring regime will be required for this purpose. The standards applied to the monitoring of franchised services will not be below those which will be required for service permit services.

In the Consultation it was highlighted that in the event of performance issues TfGM would liaise with service permit operators and may, where appropriate, inform the Traffic Commissioner and DVSA. In light of feedback from the Consultation, it is additionally recommended that TfGM may engage where appropriate with neighbouring LTAs to better understand the causes and agree practical solutions to address them.

A franchising authority can only attach to a service permit conditions of a description on which it has consulted, and it cannot force an operator to simply run more journeys should it feel there are deficiencies in the proposed route or timetable. It may however raise any concerns with the operator, outside of the permit application process, to see if they can be resolved for the benefit of passengers.

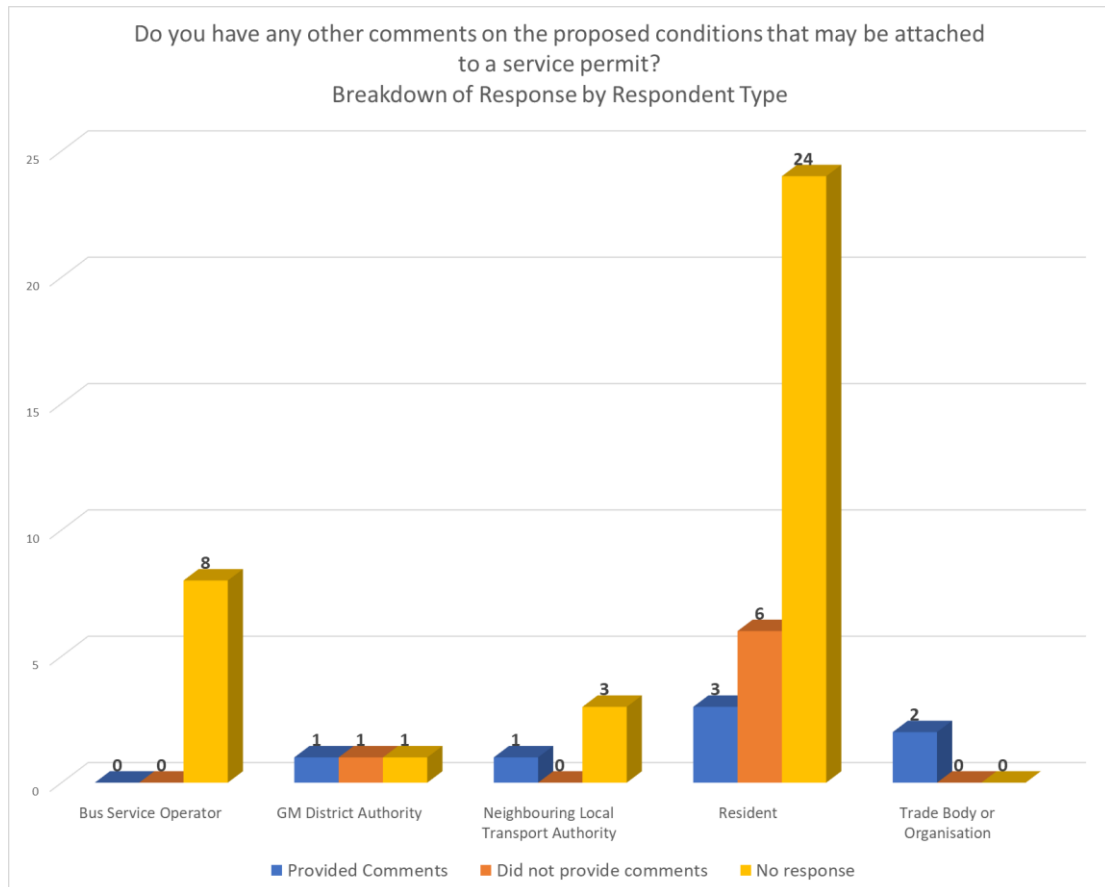
7.5 Overall Comments on the Attachment of Conditions/Descriptions of Conditions

Respondents were asked if they any other comments regarding the proposed conditions that may be attached to a Service Permit.

Summary of responses

Of the 50 online responses received:

Breakdown of responses	Provided Comments	Did not provide comments	No response	Total
Bus Service Operator	0	0	8	8
GM District Authority	1	1	1	3
Neighbouring Local Transport Authority	1	0	3	4
Resident	3	6	24	33
Trade Body or Organisation	2	0	0	2
	7	7	36	50



- 14% (7) of respondents provided comments regarding the proposed conditions that may be attached to a Service Permit.
- One trade body asked that TfGM view cross boundary services as complementary rather than competitors to the franchised bus network, and not do anything that might result in their loss. A view echoed by one transport authority respondent that asked for sufficient time to be granted to allow cross boundary operators to gradually raise their standards.
- One district council requested that the contact details for permit service operators to be shared with them.
- One resident response requested the reinstatement of particular routes or frequencies, while another wanted to see cash accepted on all buses and for the driver to issue passengers with a ticket.
- One resident response thought that the Conditions being applied should be monitored to ensure they were not adversely affecting permit services.

TfGM assessment and response

TfGM understands the important role and value that cross-boundary and other complementary services can deliver alongside the franchised bus network. Many of the proposed conditions for permit services are already being largely met by most operators, whilst other conditions are ones which can be easily complied with by operators. As such, TfGM does not consider these to be unduly onerous. The attachment of conditions will however be considered on a case by case basis and will account for different circumstances and the types of service being proposed.

Operators are strongly encouraged to engage with TfGM before submitting a permit application, which will enable potential conditions to be discussed and any allow any issues to be identified along with potential solutions for these.

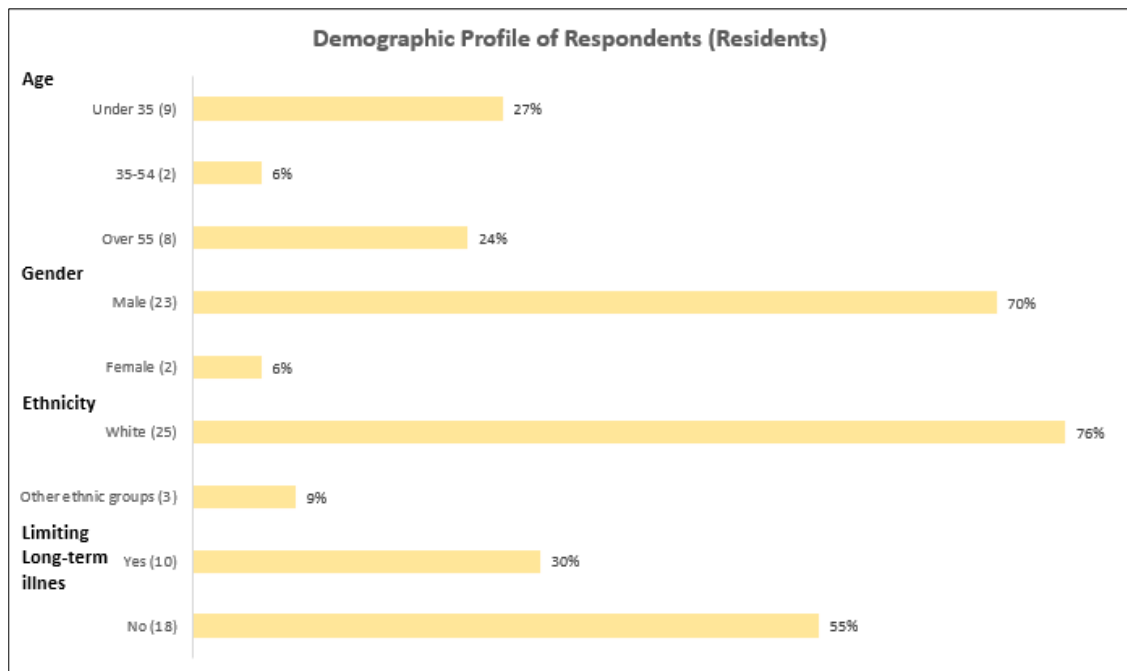
Consultation with stakeholders will be co-ordinated through TfGM, however if a stakeholder wishes to discuss an application directly with the applicant, then this request will be passed on to the relevant operator.

The service permit application process provides a means for operators to apply for, and be granted, a Service Permit, which enables bus operators to provide non-franchised services within Greater Manchester, subject to these meeting the statutory test. The decision as to which service permits are applied for rests with bus operators and TfGM cannot compel operators to reinstate specific services, or service frequencies, or to set fares and ticketing requirements beyond those relating to the issuing, retailing and acceptance of TfGM fares and tickets.

It is proposed that TfGM produce a guide to service permit applications to provide applicants with more details and answer any frequently asked questions.

Appendix 1

A total of 33 residents responded to the consultation. The chart below provides a summary of the demographic profile of those who responded.



The number of residents who responded to the survey by all protected characteristic groups is as follows:

Age:

- 9 people under 35 (of which 8 are between the ages of 18 and 24 and, and 1 under the age of 18)
- 2 people between the age of 35 and 54
- 8 over the age of 55
- 1 person did not specify the age
- 13 people preferred not to respond

Disability

- 10 people say their day-to-day activities are limited because of a health condition or disability.

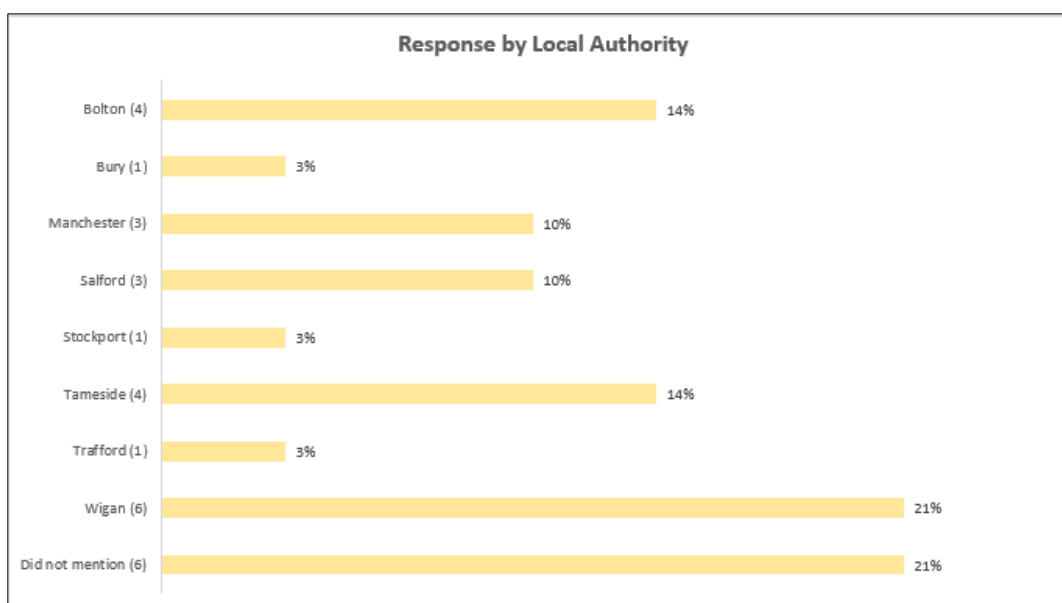
Gender

- 23 men (including trans men)
- 2 women (including trans women)
- 1 prefer to describe their gender in another way
- 5 preferred not to mention their gender
- 2 persons did not respond

Ethnicity

- 25 people from a white background
- 3 people from a non-white background
- 4 preferred not to mention
- 1 person did not respond

There were 29 (88% of the total number of resident responses) responses by local authority area of residence, shown in the figure below:



4 responses (12% of the total number of resident responses) were also provided from people living outside of GM.