

Pennine Reach Draft SQP – Comments from Transdev Blazefield Limited.

Draft SQP Document - Main

Noted that this agreement has an end date of 31st March 2021 (Section 2.2)

4.1 Relates the scheme to that shown on map (Schedule 1). Map includes A666 to Darwen Cemetery but roads listed cover only the A666 between junctions of Sandy Lane and Russell Street.

Scheme does not include Russell Place, Wordsworth Drive and Shakespeare Avenue in Great Harwood (current 6/7 route).

4.2 Refers to Appendix 2 (Affected Services) which has not been provided.

4.3 Refers to “phasing” for services extending beyond the scheme area but doesn’t seem to then define that anywhere within the document.

5.3 Says “...have secured arrangements for the effective enforcement of the Traffic Regulation Orders”. What are those arrangements?

6.1 Refers to operators only being able to use any Facilities if it is a “Participating Operator”. The definition of a Participating Operator states the operator has “given a written undertaking in the form attached at Schedule 5...” Schedule 5 obligates the operator to sign up to the standards set out in the “scheme”. All of which leads me to question if this contradicts the statement in Section 4/4.1 stating that Accrington town centre bus stops are not covered by the SQP and that Blackburn town centre is not specifically mentioned at all (other than in map shown in Schedule 1).

In other words does it unwittingly place a SQP standard on to any service using the bus stations?

Therefore it may require clarification as to the use of Facilities for non Pennine Reach routes in the areas not specified properly in the narrative.

6.1.2 & 6.2 set out possible failure to meet the Standard and allows for this to be for a period not exceeding fourteen days. As this allows for emergency roadworks (amongst other things) there has to be a question about the impact caused by planned roadworks. If there was a need to rework schedules in order to maintain the Standard there may be insufficient time to allow issues to be resolved properly (for instance additional vehicles of the correct standard drafted in, revised schedules uploaded to real time etc).

7.2 Targets for improvements are to be set out in the Voluntary Partnership Agreement. Would need to see this prior to agreeing the SQP. For instance are these targets to be operator specific or network specific? In situations where multiple operators are present can these be effectively monitored and progressed and what action can be taken? Who will determine whether they have been met? There could be resource implications in respect of data collection and collation.

7.4 a review of frequencies and timings may be initiated by the lead authority annually. Whilst minimum frequency levels can be reviewed surely the authority is not in a position to revise any operator’s timings or force up the minimum frequency levels without renegotiation of the whole partnership?

Schedule 2

1.1 “Operator (or combination of Participating Operators) must provide a minimum level of service”
If this is not viable through either over provision or simple scarcity of demand how would this be forced and how would the authority force all Participating Operators to take an fair share of these non commercial operations?

Table 1 lays down minimum frequency within the scheme area (as defined in Draft SQP 4.1);

Monday to Saturdays	Pre 0730	2 buses an hour
Excluding Bank Hols	0730-1800	6 buses an hour
	1800-2300	2 buses an hour
Sundays	Until 2200	2 buses an hour

No start time is specified on any day of operation.

Bank holiday operation is not specified.

Christmas holidays operation is not specified, wording seems to be unclear about service provision between Boxing Day and New Years Day, with Boxing Day separately being listed as requiring no service but New Years Day not stated again.

It is assumed that the frequencies refer to all Pennine Reach roads stated in the Draft SQP therefore this creates the following issues;

Does the need for a 10 minute minimum frequency along Windsor Road, Thwaites Road and the length of Accrington Road therefore mean a minimum of 15 buses per hour departing Blackburn for Accrington or is there possibility for lower frequencies along the alternate routings to maintain the headway on core sections of route but give say a 15 or 20 minute headway on alternatively Thwaites Road and Windsor Road?

The omission of Russell Place, Wordsworth Drive and Shakespeare Avenue in Great Harwood creates an issue surrounding loss of service to this well used location at the expense of sending services direct via Blackburn Road. If an operator opted to continue serving this location but otherwise met the minimum frequency standards for the rest of the Blackburn to Great Harwood route would the authority force (?) an alternative service be provided on top of that service? If so what damage does that do to the sustainability of both services?

On the basis that the frequency levels relate only to the Scheme Area as defined in Draft SQP Section 4.1 then the A666 south of Sandy Lane is not covered despite being the Pennine Reach route as far out as Darwen Cemetery. If this is correct what frequency levels are proposed for this section of the network? There is little sense promoting core frequencies if these effectively stop at Ewood.

Current evening frequencies would need massive increases to meet the minimum specified levels. Blackburn to Accrington via Great Harwood is currently a LCC supported service operating hourly Monday to Saturday. Will the tendering authority increase the frequency, and introduce a Sunday evening service where there is currently none? If not how is it proposed that these massive increases in resource are funded and again if they are non commercial, as obviously is the case presently, how would the disadvantage of operating them be shared between all Participating Operators should the authority again force the minimum service levels to be adhered to?

Existing Sunday evening frequencies along to Accrington and Darwen corridors also fail to meet the minimum frequency specified.

Further discussion is required on minimum frequencies to ensure the network is commercially viable or supported where necessary.

1.2 & 1.3 As the principal operator in the majority of the network we have much to lose from the demand that individual departures must be timed to give regular intervals “as far as possible”. In the first instance does this mean all operators will get sight of everyone else’s timetable before service change dates in order to plan their departures? Alternatively will someone at the authority simply instruct operators that they must retime departures at certain times? This obviously could lead to massive problems in terms of additional costs (retiming a journey may cost an additional vehicle or create needless inefficiencies).

The phrase “as far as possible” needs to be questioned further.

Services which operate through the Scheme Area or beyond it (152 or X41 for instance) but come under the terms of the SQP cannot be controlled in this manner. For instance the 152 or X41 are controlled interworking with Burnley Mainline or stand departures in Manchester. They cannot be easily retimed without reworking services and networks well outside the scope of the scheme.

1.4 & 1.5 Relate to ticketing rather than frequency so don’t understand why they are shown. It does suggest however that the SQP will not force joint ticketing arrangements.

2.1 & 2.2 Does this mean the authority will fund RTI equipment for operators to use within the scheme area?

Some reference needs to be made as to the needs of pre-existing operators of RTI schemes (i.e. us) to be not put at any financial disadvantage by implementation of the new system and that the new system should link to our existing system without development costs falling on the existing scheme operator.

2.4 As removal of a broken down bus has to be achieved in the safest manner possible it frequently relies on specialist recovery companies to recover vehicles. The timescale for this operation is beyond the control of the bus operator. Safety has to take top priority.

2.6 Agreeing a data sharing agreement will only be possible once that has been drafted and discussed.

2.7 What allowance is made for cross boundary journeys from outside of the Scheme Area? For instance Transport for Greater Manchester has service change dates. As the Bolton to Blackburn service falls half in the TfGM area and half in the Scheme Area (depending on the definition of the Scheme Area in relation to the A666 through Darwen) how would precedence be set as to the governing change dates? Likewise services such as the 152, which run through the Scheme Area but are not core services, may need to change for reasons associated with areas outside of the Scheme Area.

2.8 Says, no data relating to an individual operator will be shared in a disaggregated basis with any other operator. Should this also be restricted to any other body or individual?

2.10.1 Only note that the adoption of a fixed Euro 4 standard for single deckers throughout the five year period of the scheme would allow the use of rather elderly sixteen year old vehicles by the end of the five years. Will the authority accept buses whose engines were originally manufactured to a lower standard than Euro 3 or Euro 4, but have been retro-fitted with appropriate equipment and thus re-certified to a higher Euro rating? Neither of the above is unlikely to meet the “modern” standards envisaged by the schemes promoters.

2.12 The cause of most demand is the movement of school pupils. Will the local authorities signing up to the scheme commit to be open and transparent with operators with regards to the continued moves to push pupils off dedicated transport on to local services (massive fare increases, reduced capacity on school services, removing entitlements to school transport etc) as this is the greatest cause of unexpected surges in demand that operators cannot immediately then deal with (September 2014 being a prime example).

2.14 “interfacing with Police and the Authorities’ CCTV systems” does this mean that the images can be saved to disk and given to these other bodies or is there an expectation of the ability to link bus CCTV to CCTV control rooms in real time?

2.15 The lead authority will agree the scope and content of marketing material. This should be set out so it can be discussed and agreed before signing up to the SQP. Will all operators be expected to produce their own and will there be a prescriptive approach toward the standard?

2.17 Equally the Lead Authority should commit to inform the operators in advance wherever possible of any events, roadworks or other incidents that are likely to impact on service provision to allow operators the chance to inform customers.

2.18 A more detailed discussion is required on this item as most buses do not have effective climate control systems.

2.23 Definition of “livery” needs clarification. Is this a pre advised livery that the Lead Authority is aware of or is it simply not in bare alloy panels? (Thinking of operators who run buses in many liveries but not so many in their own livery).

2.34 Should the document not stipulate that drivers should remain stationary until boarding passengers are seated rather than putting the onus on the passenger to request this from the driver?

2.35 Should there be some reference added to smoking within Facilities at this point given that the Councils will certainly have a view on that within bus stations. Also reference to e-cigarettes may be useful?

2.36 Should there be some specification as to what is considered to be company uniform?

2.37 Again also add reference to e-cigarettes?

2.39 Compensation claims within the Scheme Area; what happens on cross boundary services? Is the operator held to refund the whole journey cost or only that portion within the scheme? On cross boundary schemes would a delay caused by say roadworks in Bolton be open to compensation payments to those already on board when the bus enters the Scheme Area (wherever that may be Darwen Cemetery or Sandy Lane)?

As the definition of the Scheme Area set down in Draft SQP 4.1 specifically does not cover Blackburn Bus Station would anybody boarding at this point be covered by the entitlement to compensation?

More generally who will arbitrate where “delays can be reasonably attributed to action or inaction on the part of that operator” as delays may be outside an operator’s control but it then may be, fairly or unfairly, judged that the operator should have produced another bus from somewhere else to fill a gap.

2.40.1 Does this relate to the frequency operated by that operator or all operators? For instance an operator could be providing a 7½ minute frequency alongside another operator’s similar

frequency albeit on an alternative end to end route (for instance Intack lights to Blackburn Bus Station). Is the standard frequency therefore considered to be 7½ minutes or less than 4?

2.40.2 On services that operate cross boundary, such as the X41, the scheme would effectively be a massive disadvantage given the random nature of Manchester traffic. It would encourage the withdrawal of such relatively low frequency links to be replaced by connections at the Scheme Area boundaries to the disadvantage of customers.

2.41 No standards for this process are described leaving it open for abuse from some operators (just thinking of what the Senior Traffic Commissioner said of M&Ms reliability monitoring for instance).

2.42 Can we agree the logo and the specifications for its use?

2.44 Ticketing Schemes; Given that technology may have advanced considerably by 2021 should the means of providing a joint ticketing scheme be less prescriptive in the document? The long term future of smartcard is not assured.

In respect of the proposal that there be no financial penalty to users why should users who require a greater level of service/more usage from their ticket not be expected to pay more for access to the enhanced service provision? On the basis that all operators will still be required to operate the vast majority of services within the scheme area they will continue to be reliant on commercial fares revenue to fund their operation. Therefore the authority cannot stipulate fares levels without risking the sustainability of other aspects of the scheme (such as minimum frequencies).

Under Competition law fare setting remains a decision for the operator unless a proper scheme is set up with appropriate governance. Pricing is then a matter for the scheme Board. More service coverage would inevitably mean pricing to reflect the added service. Individual operators would remain free to offer a 'discount' to this price according to their own products and business plans.

Obviously apportionment of revenue from multi operator ticket sales will be of key importance to all operators but especially the large operators carrying the biggest apportionment of the costs of operating the services within the Scheme.

2.45 As above there can be no belief that such products would not come with a price differential and a lengthy debate as to the fair apportionment of revenue.

Schedule 3

- Facilities document does not seem to make reference to the provision of information at bus stops, shelters or bus stations.
- What standards are proposed for the provision of bus stop displays or are passengers to be wholly reliant on QR Codes and other electronic means?
- If printed material is to be provided will this be provided by the relevant authority or will there be a charge to operators?
- Will operators be able to improve the standard of printed material currently shown at bus stops which various commentators believe is, within both authorities, currently confusing and fails to capitalise on the already high levels of frequency available on key corridors?
- Will bus stops be individually named and if so what consideration be given to how they are named so as to ensure consistency with printed and electronic information sources?

- Will facilities be available within bus shelters to promote services, both to users and to potential passing motorists, as we have done with our commercial services for some years?
- What opening hours will bus station facilities be expected to keep?
- What hours will they be staffed for the provision of information to customers?
- What sources/standards of information will be available at these facilities?
- Will the authorities be proactive in ensuring action is taken against inappropriate parking blocking access to bus stops at all times to allow for safe boarding and alighting?
- While the scheme area will be given the highest priority for salting in winter weather, this should not be at the expense of other bus routes.

Schedule 4

Would a regular service duplicate that extended beyond the scheme area to serve a school be included within the scholars' exemption (thinking about the 6B/7B service at LU)?

What does the last clause relating to "As defined by the Local Authorities" actually mean? There has to be a good argument that "incidental" services that use part of the route without being the "core" services should have some level of exemption. For example at the current time the following services would unintentionally come under the scheme;

- 5A/5C Outer Circle (Transdev)
Old Infirmary to Ewood Interchange
Burnley Road
- 8/A Accrington Local (Pilkingtons)
Oswaldtwistle Mills to Church
Whalley Road
- 9 Accrington Local (M&M)
Whalley Road
- 12 Blackburn – Higher Croft (Darwen Coaches)
Freckleton Street to Old Infirmary
- 14 Royal Blackburn Hospital – Clitheroe (Holmeswood, tender)
Oswaldtwistle to Accrington
Rishton, Harwood Road to Harwood Bar
- 24 Blackburn – Chorley (Transdev)
Freckleton Street to Ewood Interchange
- X41 Manchester – Blackburn / Great Harwood (Transdev)
Accrington to Copy Nook
Accrington to Hyndburn Bridge
Queen Street, Great Harwood

Possible exclusion should be considered for (but either both in or both out);

- 21 Accrington – Burnley (M&M)

152 Preston – Burnley (Transdev)
Copy Nook to Rishton, Harwood Road

It shouldn't be allowed to become a "get out of jail card" if an operator was to threaten to withdraw a route (say the 231 which M&M operate but covers a large proportion of route within the Scheme Area). However there needs to be a consistent approach and it can be abused by operators trying to cream off the core services.

Annex 1

6.1 Fixed service change dates;

6.1.1 Service change dates should be set at either the beginning or end of a school holiday. Fixing it as one week prior to Easter means it could be either start, end, mid holiday or still during school time. A more sensible approach would be to tie it to general school term time as the PTE areas have historically done. The actual date can be made known for years in advance but it avoids the possible confusion of services changing during school term.

6.1.2 Change date for late summer should be in line with the beginning of the school term regardless of whenever the Bank Holiday falls. This avoids changing timetables midway through a school holiday which is unnecessarily complicated for planning drivers work patterns (in effect creating two changes in two week potentially) and difficult to explain to customers assuming a summer timetable is in force, sensibly recognising reduced levels of traffic during that period.

6.1.3 The national rail timetable change date in December is badly timed for bus operations, especially in an urban area where connecting with rail services is less necessary. On the Pennine Reach network for instance the core frequencies are so high that there would be no need to change bus times even if train times did change. However from a bus operation perspective December is the busiest time of the year for passenger numbers and operationally the most difficult due to general traffic congestion being at its worst. No bus service changes should take place during December other than the advance advertising of Christmas service levels. This avoids confusion amongst passengers. If a "winter" change date is to be included then early January is potentially a better time for this to take place on the urban network.

6.2 Assuming that services themselves do not change, only the timetable, why does the timetable need to be supplied at the preceding service change date? Potentially this means planning summer timetables in November/December to meet the timelines required to register in mid March for timetables to operate from July to September. By insisting on such a long lead time it makes the service unresponsive to both the environmental situation and customer demand some nine months later when it is launched into operation.

If anything, derogation could be allowed to have a mini service change from the first Sunday of the summer holidays to only allow for timetable revisions. As it is service levels are unlikely to be able to change given the high frequency demands already in place so all that would be happening in the majority of cases is that a realistic timetable can be implemented that avoids customers sitting in buses at numerous timing points to avoid early running.

6.3 What cost, bearing in mind that it is the operators own RTI system simply communicating with the authority's systems, and how will it be determined as to each operators share?

7.6 Should this be less prescriptive given potential change to the regime?

7.7 This needs to clarify that summer timetables would not be considered a change in respect of those counted as such.

9.1.1 How would this be undertaken? Would the authority share plans from any new operator in advance or would we simply find out about these in the normal manner in the run up to the service change date? In essence what sort of process for managing services are the authorities proposing?

9.2 Refers to an additional change date to tie in with the December rail timetable change. Does this not duplicate what is proposed in 6.1.3?

10.2 seems to suggest that as soon as a service change date has passed then discussion be undertaken for “the next but one” so in March we discuss the changes to be made in December?

10.3 Does “Punctuality Improvement Partnership processes will be co-ordinated with this Code of Conduct” mean that PIPs will be implemented?

10.5 Refers to an additional change date to tie in with the December rail timetable change. Does this not duplicate what is proposed in 6.1.3?

11.1 Would suggest that no charge will be made to operators for producing relevant information where a service change date is adhered to.

11.3 What would the penalties be?

7th April 2015.