

Greater Manchester Combined Authority

Date: Friday 12th December 2025

Subject: Results of the Trial of Free All Day Bus Travel for Older and Disabled People

Report of: Andy Burnham, Mayor of Greater Manchester, Portfolio Lead for Transport
and Caroline Simpson, Group Chief Executive, GMCA

Purpose of Report

In Greater Manchester, English National Concessionary Travel Scheme (ENCTS) pass holders are currently entitled to free bus travel between 9.30am and midnight during the week and all day on weekends and public holidays.

In August 2025 and then November 2025, Greater Manchester trialled the removal of the pre-9.30am travel restriction on bus travel for ENCTS pass holders to assess the benefits of removing time restrictions. This report sets out the findings of those trials and notes that any decision to remove the 9.30am travel restriction would be subject to finalisation and approval of the GMCA Transport Revenue and Mayoral Budgets; the legal process required to amend the Greater Manchester Local Concessionary Scheme; and approval by the Mayor.

Recommendations:

GMCA is requested to:

1. Note and comment on the findings of the trials; and
2. Note that any decision to remove the 9.30am travel restriction would be subject to finalisation and approval of the GMCA Transport Revenue and Mayoral Budgets; the legal process required to amend the Greater Manchester Local Concessionary Scheme; and approval by the Mayor.

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Equalities Impact, Carbon, and Sustainability Assessment:

No direct implications. Extending pre-9:30am use to all older and disabled people on a permanent basis in future. would improve access to public transport and support more sustainable travel.

Risk Management

Legal and financial risks and considerations are detail below and in the body to the report.

Legal Considerations

S93 of the Transport Act 1985 contains the function of Combined Authorities to establish a Travel Concession Scheme and offer certain additional local concessions. In GM this is a Mayoral function.

Any changes would require an amendment to the existing Local Concessionary Fares Scheme which is a mayoral decision. The Travel Concession Scheme Regulations 1986 set out the publication requirements for scheme variations and requires publication and notification of the scheme variation at least 28 days in advance with a 28 day response period which cannot run concurrently, resulting in a 56 day period in total.

Service Permit operators are required to adhere to the fares and ticketing condition attached to their permit, which includes adherence to ENCTS schemes. No change is anticipated to the condition as a result of any changes to the Local Concessionary Fares Scheme.

Financial Consequences – Revenue

The revenue implications of any future amendment of the local concessionary scheme to introduce free all day bus travel for older and disabled people are set out in Section 4.

Financial Consequences – Capital

No direct implications.

Number of attachments to the report: Nil

Background Papers

N/A

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution?

No

Exemption from call in

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

No

Overview and Scrutiny Committee

N/A

1. Introduction

- 1.1. In August and November 2025, Greater Manchester undertook a trial to remove the pre-9:30am restriction for holders of English National Concessionary Travel Scheme (ENCTS) passes. This trial was designed to assess the impact of allowing older and disabled residents to travel free on buses before 9:30am, a change from the usual restriction, which limits free travel to after 9:30am on weekdays. The trials aimed to understand the effects on accessibility, equity, demand, operational performance, and financial sustainability, with a view to informing future policy and budget decisions.
- 1.2. The November trial has only recently concluded and detailed work on the evaluation is ongoing. However, alongside the findings from the August trial, this report presents some headline findings from the November trial.

2. Background and Rationale

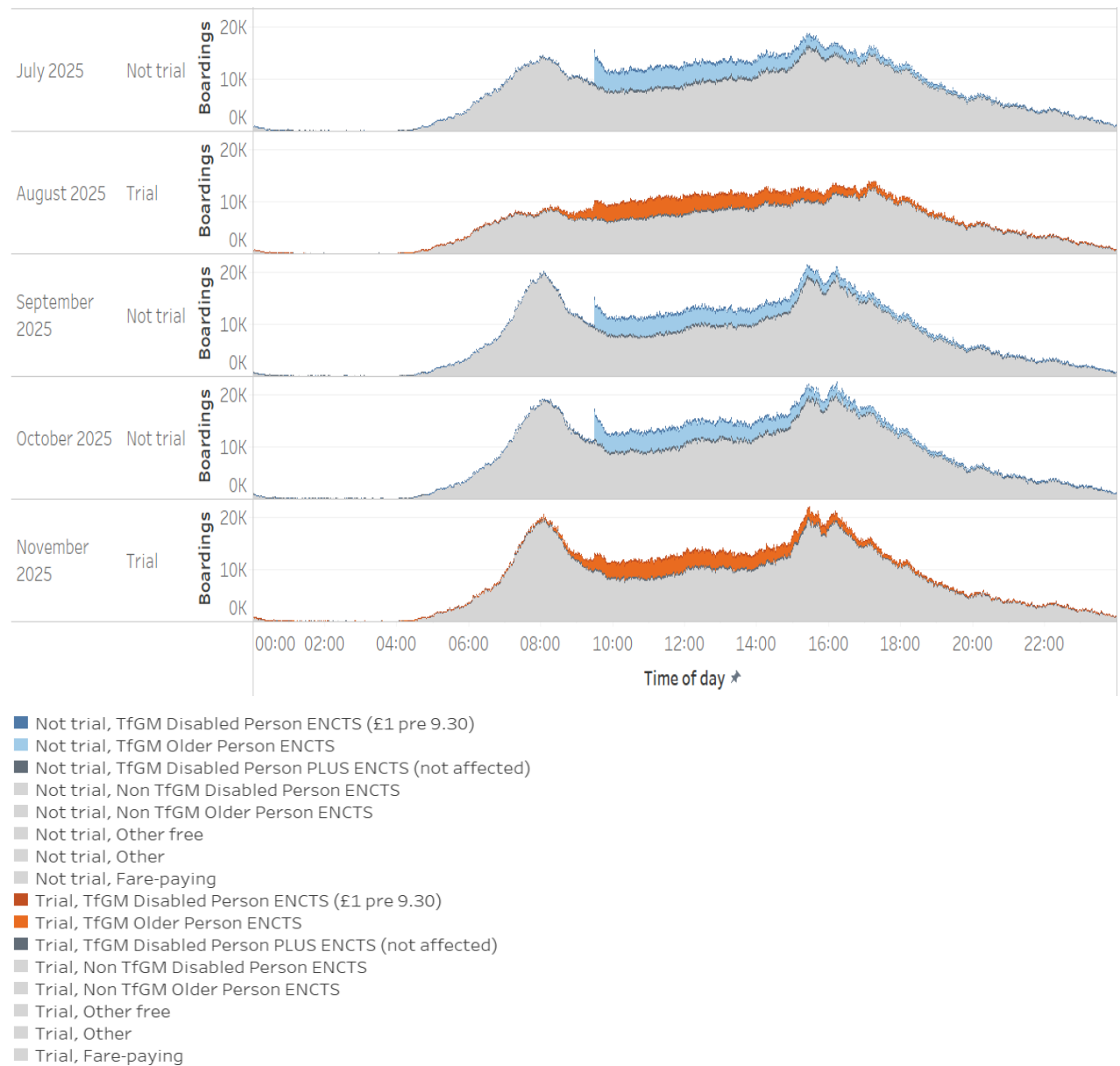
- 2.1. The ENCTS scheme provides free bus travel for people over state pension age and those with eligible disabilities, typically from 9:30am until 11:00pm on weekdays and all day at weekends and public holidays. Greater Manchester's local scheme extends weekday hours to midnight. However, the restriction to post-9:30am travel has long been cited by older and disabled people, and their representative groups, as a barrier to accessing medical appointments, caring responsibilities, employment, and social opportunities. The rationale for the restriction has been to manage congestion during peak times and to limit the financial impact on transport budgets.
- 2.2. The August and November trials provided an opportunity to evaluate whether removing this restriction would deliver tangible benefits to passholders, and to assess the operational and financial implications for the bus network.
- 2.3. Detailed evaluation of the trials is ongoing, bringing together quantitative analysis of smart ticketing and boarding data, qualitative feedback from passholders, drivers, and representative groups, and operational assessments. Data has been collected from Bee Network buses and participating service-permit operators, including cross-boundary services. Surveys and interviews have been conducted at interchanges, and feedback sought from both passholders and fare-paying passengers. Capacity modelling and analysis of route-level impacts is also being undertaken.

3. Findings

Impact on Travel Patterns

- 3.1. The November pilot provided a valuable opportunity to observe travel behaviour under more typical weekday conditions, supplementing the initial findings from the previous trial in August. The evidence from November confirms and extends the earlier conclusions, offering a richer picture of how ENCTS passholders responded to the removal of the pre-9:30am restriction.
- 3.2. Prior to the trial, ENCTS journeys accounted for 14% of total boardings on Bee Network buses, with only 0.7% of these occurring before 9:30am (i.e. disabled passholders who pay £1 on presentation of their ENCTS pass). During the August trial, this figure rose to 7.6%, representing a substantial increase in early-morning concessionary travel. The November trial, conducted outside the summer holiday period, was particularly important for understanding whether this pattern would persist when overall bus patronage was higher and travel routines more settled.
- 3.3. Early analysis of November boarding data revealed that the distribution of early-morning travel remained broadly consistent with August, with ENCTS journeys again accounting for over 6.5% of all boardings. The half-hour before 9:30am (9:00am to 9:30am) continued to be the most popular window for ENCTS passholders, accounting for a significant proportion of early trips and suggesting that usage from passholders is self-regulating to avoid the 'peak of the peak' (7:30–8:15). Instead, users tended to travel opportunistically, choosing times that best suited their individual needs, such as attending medical appointments, fulfilling caring responsibilities, or reaching work commitments.
- 3.4. One of the most striking findings from both trials has been the smoothing of the characteristic 'bow wave' of boardings at 9:30am (see figure below). In non-trial months, there is a pronounced surge of passholders waiting for the curfew to lift, often resulting in crowded conditions on the first post-curfew services. During the trial, this 'surge' was replaced by a more even distribution of demand across the morning period.

Figure 1: Boardings over Pilot Period vs Non-Pilot Periods



- 3.5. Route-level analysis from November confirmed that the impact of the trial varied by corridor. On core city centre routes, around 6% of pre-9:30am boardings were ENCTS trial passholders, with these corridors carrying the highest absolute numbers and warranting continued monitoring given potential capacity constraints. Secondary town centre routes saw 9% of pre-9:30am journeys made by passholders, while local looping routes saw this figure rise to 13%.
- 3.6. The November pilot also provided further insight into the behaviour of passholders on cross-boundary (non-franchised) services. Data from operators such as First West Yorkshire and Warrington showed that, of 9,300 journeys made using TfGM-issued passes during August, only 3% occurred in the weekday pre-9:30am period. This suggests that the impact on cross-boundary services was modest, but it remains an important consideration for future scheme development and

negotiations with service-permit operators if the restriction on travel is removed on a longer-term basis.

- 3.7. Capacity modelling and driver feedback from November suggests the overall effect on buses reaching capacity was limited. Most trips gained only one additional passenger. However, the analysis has shown that there are several services operating near or at capacity (at least 15) and although the additional numbers of ENCTS passengers using these services was relatively small, it exacerbates already challenging capacity and crowding issues on some parts of the bus network. The marginal impact of removing the ENCTS restriction could necessitate additional vehicles to meet demand (i.e. additional Peak Vehicle Requirement – PVR). See section on Financial Implications.
- 3.8. The November findings also highlight the diversity of reasons for early-morning travel among passholders. Interviews and surveys revealed that many were travelling for work, volunteering, medical appointments, or social engagements. The ability to travel before 9:30am was seen as a significant improvement in flexibility and independence, allowing passholders to participate more fully in community life and access opportunities that would otherwise have been out of reach.

Customer Experience and Social Benefits

- 3.9. Feedback from passholders and other passengers has been overwhelmingly positive. Most passholders valued the freedom to use their pass before 9:30am and expressed a strong desire for the change to be made more permanent. Surveys and focus groups so far report that the trials have reduced travel costs, stress, and loneliness, and increased opportunities for voluntary activity, caring responsibilities, and attending medical appointments.
- 3.10. In-person interviews at Interchanges across Greater Manchester yielded 85 customer responses, including 32 passholders (30 older persons and 2 disabled). Additional surveys on Go North West's "Chatty Bus" services provided further qualitative insights. Passholders cited a range of benefits, including easier access to early medical appointments, the ability to fulfil caring responsibilities, and greater opportunities for socialising and volunteering. Many described themselves as early risers and appreciated the flexibility to travel when needed, rather than being constrained by the current 9:30am curfew.

- 3.11. The feedback from focus groups also highlighted the stigma associated with the previous restriction, which implied that passholders did not need to travel for work or other essential purposes. Removing the restriction during the trial periods was seen as a step towards greater dignity and equity, making bus travel more accessible and inclusive.
- 3.12. Regular fare-paying passengers were generally supportive of the trials, recognising the benefits it afforded to older and disabled people. The main criticism related to the promotion of the August trial, with some drivers and passengers suggesting that earlier and clearer communication would have helped to minimise confusion. Further work is under way to assess whether the enhanced communications and marketing of the November trial was more effective in increasing awareness.
- 3.13. Operationally, drivers have reported no material impact on punctuality, although some noted slightly busier services and minor delays at stops as passholders took their seats. These operational impacts were manageable and did not result in significant disruption to the network. This will be investigated further using data from the November trial.

4. Financial Implications

- 4.1. The financial implications of the trials and any subsequent decision to remove the pre-9:30 restriction on a longer-term basis arise from two sources:
- **Revenue foregone:** This is the farebox revenue that comes from elderly and disabled passholders who are currently full adult fare-paying passengers in the pre-9:30 period. This revenue has effectively been 'lost' during the trials and would be entirely 'lost' if the restriction were removed on a longer-term basis.
 - **Additional vehicles (PVR):** This is the cost of providing additional vehicles to cope with the additional demand resulting from passholder use in the peak period (before 9:30) on several services that are already crowded and operating close to (or at) capacity.

Revenue foregone

- 4.2. Work is underway on fully estimating the revenue foregone from the trials, but early findings suggest that up to c.115,000 monthly fare-paying boardings effectively became free-of-charge during the trials. Consequently, if the restriction were

removed permanently, an annual estimate of the revenue foregone would be up to c.£2m (based on an average adult fare paying yield of £1.46).

Additional PVR

- 4.3. The November pilot is currently being analysed to understand the potential change in vehicle requirement that might arise if the trial were made permanent. Although the overall increase in peak demand is low and spread out over the peak period, the impact on capacity can be very localised. Early analysis of the November trial suggests that up to 15 timetabled services could be facing additional, unsustainable loadings and may require duplicate buses. Based on an annual cost per PVR of c.£200,000, the total annual cost of providing additional vehicles could be up to £3 million per annum.

Potential annual costs of permanently removing restrictions

- 4.4. Based on these initial findings, the total annual cost of permanently removing the restrictions could be up to £5 million per annum.

5. Other Considerations

- 5.1. Removal of the pre-9:30am restriction on a permanent basis would require amendment to the local concessionary scheme, changes to ticketing systems, and negotiation with non-franchised service-permit operators (i.e. those running cross-boundary services but allowing ENCTS use within Greater Manchester's boundary).
- 5.2. The Travel Concession Scheme Regulations 1986 set out the publication requirements for scheme variations and requires publication and notification of the scheme variation at least 28 days in advance with a 28 day response period which cannot run concurrently, resulting in a 56 day period in total.
- 5.3. Any decision to amend the local concessionary scheme is a mayoral decision.