

THE COMPETITION AND MARKETS AUTHORITY REVIEW OF MARKET REMEDIES

Consultation in relation to the Local Bus Services Market Investigation Order 2012

Response to the consultation from The Go-Ahead Group Limited

27 February 2026

Introduction

We refer to the Strategic review of markets remedies consultation launched by the Competition and Markets Authority ("CMA") on 19 January 2026.

33 market remedies have been identified by CMA for review – amongst these being the "Local Bus Services Market Investigation Order 2012 ("the Order").

This response to the consultation relates to the Order and is submitted by The Go-Ahead Group Limited (Go-Ahead Group) and on behalf of its operating subsidiaries providing local bus services across England.

Executive Summary

Go-Ahead Group supports the revocation in full of the Order.

Notwithstanding being one of the most significant providers of local bus services in the United Kingdom (the "Market" for the purpose of the Order being the United Kingdom excluding London and Northern Ireland). Go-Ahead Group believes that there have been no circumstances, during the 14 years existence of the Order, requiring Go-Ahead Group or any of its subsidiaries to provide access and apply charges in accordance with the requirements of the Order. Nor is there awareness of any circumstances in which there has been a requirement to seek to enforce the availability of access arrangements and an appropriate level of charges in accordance with the Order for its own local bus services.

Go-Ahead Group considers it notable that relatively few bus stations are owned and or managed by Operators – the provision of bus stations is typically considered to be a function of the local authority or combined authority or may be provided as part of a private sector commercial development such as a shopping centre.

Go-Ahead Group provides in this response context and information supporting the opinion that Go-Ahead Group has formed in relation to the future of the Order.

Context

Go-Ahead Group is a major operator of local bus services both within the England and internationally.

It operates over 500 routes within scope of the Order a number of which are scheduled to commence or terminate at bus station.

Go-Ahead Group owns and/or manages only three Relevant Bus Stations (the term used in the Order addressing bus stations in scope of the Order) as described below.

Go-Ahead Group does not consider that ownership of bus stations forms a core part of its business activities and believes that the CMA will find that position shared by other Operators active in the Market.

The Go-Ahead Group’s experience of Bus Station access arrangements

The following table identifies only three locations at which a Relevant Bus Station is provided by Go-Ahead Group or a subsidiary company of the Go-Ahead Group. Operators that benefit from access rights appear in column 2 and information available concerning duration of the access arrangements granted is also provided.

To the best of the knowledge and belief of Go-Ahead Group none of the access rights referenced have involved recourse to the Order in the settling of the terms of access and charges or, indeed, any subsequent negotiations relating to amendments to the terms of access or the applicable charges.

Poole	Operators accessing the Bus Station other than Go-Ahead Group subsidiaries	Date upon which access was first granted
	First Bus (extremely limited summer only service representing less than 1% of departures)	Continuous – in existence prior to the Order coming into effect
Camborne	Operators accessing the Bus Station other than Go-Ahead Group subsidiaries	Date upon which access was first granted
	No other Operators require access	Not applicable
High Wycombe – ownership held by a Shopping Centre owner but managed by Go-Ahead Group	Operators accessing the Bus Station other than Go-Ahead Group subsidiaries	Date upon which access was first granted
	First Bus	No details available - responsibility passed to Go-Ahead Group in August 2024. Access rights have been respected on terms and conditions existing at that time but these are not believed to have been introduced by reason of a requirement to provide access under the Order
	Red Kite	
	Reading Buses	

As will be evident from the above, Go-Ahead Group is not aware of any requests for access at any Relevant Bus Station owned or managed by Go-Ahead Group that has not been willingly agreed to with the Operator requesting access.

Current access arrangements enjoyed by Go-Ahead Group for local bus services at Relevant Bus Stations not owned or managed by Go-Ahead Group or its subsidiaries

Go-Ahead Group is also not aware of any refusal of access to a Relevant Bus Station within the ownership or management of another Operator required for the benefit of its own services leading to recourse being had to the Order in order to secure access rights.

Developments affecting the local bus market subsequent to the Order being made

The Order came into effect approximately 14 years ago. The Order was prompted by the investigation of the local bus market undertaken by the then Competition Commission – at a time when there were a number of concerns relating to the functioning of the Market. Go-Ahead Group considers that much has changed in that time and draws attention to two particular initiatives affecting the Market – both representing the implementation of government policy and each having the objective of promoting the quality and accessibility of local bus services requiring Operators to focus on these priorities rather than engaging in head to head competition.

The implementation of Enhanced Partnerships and BSIP Funding Initiatives

Following a policy statement by the previous government in its “Bus Back Better” initiative and the implementation of Bus Service Improvement Plan (“BSIP”) funding, local transport and combined authorities have become particularly positive about relationships with local bus Operators developing Enhanced Partnership Plans and regulating certain aspects of local bus services through Enhanced Partnership Schemes¹.

Whilst the existence of an Enhanced Partnership Scheme does not directly impact upon bus station access and conditions of access, this initiative has led to greater collaboration between authorities and Operators as permitted within the confines of competition law more generally. A collaborative environment tends to eliminate any reason for Operators to consider they are operating in competition with each other.

Enhanced Partnerships also result in there being greater emphasis upon the local transport authority or combined authority taking responsibility for capital investment (including bus stations) through the ability to designate facilities as within an Enhanced Partnership Scheme. Operators are required to respond by delivering higher standards in the local bus services delivered and activities that can include timetable co-ordination.

The Implementation of Bus Franchising

Authorities that have implemented or are currently implementing franchising take back control of decision making in relation to routes operated within the franchised area. Whilst Operators may still access the franchised area with services originating out of area they are required to do so under permit. The existence of this control allows the franchising authority to regulate local service provision in a manner that, in turn, would neutralise any attempt to create head to head competition between franchised services and services operating under permit.

¹ Paragraph 8.5 of the DfT guidance document “The National Bus Strategy Delivering Bus Service Improvement Plans using an Enhanced Partnership” notes: “Through BSIPs, LTAs and their local bus operators will be redesigning local bus networks to:(b) avoid significant over and under provision of services, so that buses are appropriately spread between corridors to ensure a level of service that meets all passenger needs.”

Why Go-Ahead Group is of the opinion that the Order should be revoked

Go-Ahead Group's experience of bus station access within the Market is positive and with no evidence available to Go-Ahead Group suggesting that continuing regulatory intervention is required under current or likely future conditions in the Market.

Go-Ahead Group considers that the local transport operator sector is generally very mindful that behaviours can be challenged under competition law. Go-Ahead Group has a strictly applied policy applicable to all personnel who may become concerned with the operation of bus stations requiring awareness of and respect for the principles of competition law. Relevant training is provided to all personnel.

None the less, Go-Ahead Group is required to follow the Order for the three Relevant Bus Stations that it has ownership or management of and must comply with the obligations of the Order.

Go-Ahead Group is required to have available and publish Conditions of Use, retaining evidence that it has consulted on the Conditions of Use and must only vary the Conditions of Use in accordance with Part 4 of the Order. Go-Ahead Group must be prepared to apply charges for access (including departure and layover charges) if requested to do so by an Operator - all in compliance with the Order, presenting the need to follow detailed accounting rules to establish these charges.

Conclusion

Go-Ahead Group would like to thank the CMA for initiating this consultation. We believe that the Order should be revoked by reason, in particular, of changing circumstances and that the Order is no longer appropriate – the general principles of competition law being available should any non-competitive behaviours present difficulty in the Market.

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