

**Date** May 12th 2025

Transport Action Network (TAN) Cymru

To: Bus Reform Team, Transport for Wales / Welsh Government

Date: May 2025

## **Subject: Consultation Response – Bus Services (Wales) Bill Implementation and the Welsh Bus Network Plan**

### **1. Introduction**

TAN Cymru strongly welcomes the passing of the long awaited Bus Services (Wales) Bill. We believe that the deregulated market has failed communities in Wales resulting in a "vicious cycle" of declining services and rising fares.

We view franchising not merely as a technical change in contracting, but as a once-in-a-generation opportunity to create a "One Network, One Timetable, One Ticket" system that prioritises social value over private profit.

### **2. Core Policy Positions**

#### **A. The Franchising Model and Social Necessity**

We support the Bill's move to make franchising the default mechanism for bus delivery.

- **Policy:** Bus networks must be designed to serve "socially necessary" routes—connecting hospitals, schools, and employment hubs—regardless of their immediate commercial profitability.
- **Key Ask :**Minimum Service Level Guarantee: The Welsh Bus Network Plan must establish a "Social Minimum for rural areas, too many bus routes have disappeared due to lack of perceived usage, we should encourage bus use rather than withdraw services
- **Key Ask:** We call for a transparent definition of "social necessity" that prevents "transport deserts" in rural and peri-urban areas. Cross-subsidisation from high-frequency urban routes must be used to protect vital rural lifelines.

#### **B. Multi-Modal Integration**

A bus journey rarely starts or ends at the bus stop. To achieve a true modal shift, the bus network must be seamlessly integrated with active travel.

- **Policy:** Every bus stop should be viewed as a mini-interchange within the Sustainable Transport Hierarchy.
- **Key Ask:** The **Welsh Bus Network Plan** must mandate that all new franchise contracts include requirements for:

- **On-bus cycle carriage:** Standardised spaces non-folding cycles on TrawsCymru and long-distance routes.
- **Integrated Infrastructure:** Bus stop upgrades must include secure, cycle parking and be accessible via high-quality "Wheeling" routes.

### 3. Strategic Recommendations

- **Key Ask:** Funding to move from emergency "stop-gap" funding (like Bus Emergency Scheme (BES)) to a long-term, multi-year settlement that allows the Corporate Joint Committees (CJCs) to plan networks over longer periods.
- **Key Ask:** We fully support the lifting of the ban on municipal bus companies and urge the Welsh Government to provide a "Start-up Fund" for councils wishing to follow the successful models of Cardiff Bus or Newport Bus.
- **Key Ask:** Local Authorities and TfW must have full access to real-time patronage and revenue data from operators. This data should be Open Source to allow third-party app developers to improve passenger information.
- **Key Ask:** To ensure a stable transition, we support the mandatory application of TUPE regulations, protecting the terms, conditions, and pensions of the existing bus workforce.

### 4. Addressing the "Reliability Gap"

The greatest barrier to bus use is congestion. Even a franchised network will fail if buses are stuck in traffic caused by private cars.

**Key Ask:** The implementation of the Bill must be paired with civil enforcement powers for Local Authorities to create "Bus Gates" and dedicated lanes. We advocate for a "Bus First" policy on all strategic corridors, ensuring that the 20mph default limit is supported by physical priority measures that make the bus faster than the car.

### 5. Conclusion

The Bus Services (Wales) Bill is the legislative "engine," but the Welsh Bus Network Plan will be the "map." TAN Cymru urges the Welsh Government to remain bold. We must not settle for a "Base Network" that merely manages decline; we have the opportunity for an aspirational Network that actively improves demand by being affordable, frequent, and synced with Active Travel routes.

Yours sincerely,

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**Welsh roads and climate campaigner**

**TAN Cymru**