



*Response to:*

**One network, one timetable,  
one ticket: planning buses as  
a public service for Wales  
consultation**

## Introduction

Transport Action Network Cymru (TAN Cymru) welcomes the opportunity to comment on the Welsh Government's consultation on the future of bus services in Wales. This is an important step towards creating a more comprehensive, inclusive, accessible and better integrated bus network covering the whole of the country.

In particular, TAN Cymru welcomes:

- The recognition of the need for change.
- A White Paper with the ambition to make that change
- The focus on improving things for the public, making buses easier and more attractive to use.
- The promise to work with partners at a local and regional level
- Giving local authorities the right to form and run municipal bus services again.

## Consultation Question Responses

TAN Cymru's responses to the consultation questions are set out as follows:

**Question 1:** Do you agree that change is required in how we deliver bus services to meet the needs of Wales' citizens and respond to the climate emergency? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 1:** Score 5: The current system is failing to meet the needs of the public. It is expensive, inefficient and unreliable.

**Question 2:** Do you agree that franchising is required to deliver the depth and pace of change to the bus network that is required in the context of the climate Emergency? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 2:** Score 5: Yes, no other system has been able to produce the scale and speed of change required. While franchising offers the best solution, the impact of the proposals will be strongly linked to funding and an urgent switch to public transport from the car will require significant investment. In terms of financial risk and incentivising increasing passenger numbers, there is a possible downside with the franchising model where the public sector takes all the risk. This removes any incentive by the operators to maximise rider numbers through promotion and offers and can also impact on the customer service

passengers receive. This is an area the private sector can be better at and is something that needs to be addressed in the proposals.

**Question 3:** Do you agree with the Welsh Government's preferred franchising model as described above? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 3:** Score 5: Yes, it seems a sensible way of simplifying franchising for local delivery and enabling a joined-up approach across Wales and beyond, and with rail and other services too. This will need to be adequately resourced and the governance structure clearly established.

**Question 4:** Do you agree that this model provides sufficient local input for designing local bus networks? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 4:** Score 5: Yes, it seems a pragmatic way of obtaining local input while drawing up a strategic plan.

**Question 5:** Do you agree that there is a need for regional consideration and coordination of bus network plans by Corporate Joint Committees, before combining them at a national level? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 5:** Yes: score 5. Collaboration and coordination between local authorities will be important for the successful delivery of the network plans. The involvement of Wales' four Corporate Joint Committees should alleviate this task before it is considered at a national level. Combining them successfully at a national level should however remain the final aim.

**Question 6:** Do you agree that letting and managing contracts at the national level by the Welsh Government through Transport for Wales offers the best opportunity to pool franchising expertise, deliver economies of scale? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 6:** Score 5: Yes, operating franchising at the national level offers the best hope for integration with rail, including on ticketing and ensuring cross boundary coordination. This will again need to be resourced adequately and the governance structure be clearly defined.

**Question 7:** Do you agree with the need for a duty to ensure plans are designed to be affordable? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 7:** Score 5: Yes, there is no point having plans that are simply unaffordable as they will raise expectations and which could then lead to disillusionment when funding isn't forthcoming. However, in order to push the boundaries in terms of the quality and extent of the services being sought, to maximise mode shift, the Welsh Government needs to be clear about long term funding and aim to increase that above inflation year on year. Otherwise, a duty of affordability could unintentionally stifle innovation and improvement, undermining longer term objectives.

**Question 8:** Do you agree that the proposed powers to make regulations and guidance are suitable to ensure franchises are let successfully and sustainably? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 8:** Score 5: Yes, the powers seem proportionate and appropriate.

**Question 9:** Do you agree with the proposed requirement to consider the impact on SME bus operators when franchising? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 9:** Score 5: Yes, this will be important if local diversity is to be retained as otherwise it is likely a few big corporations will dominate the scene.

**Question 10:** Do you agree with the benefits of establishing a mechanism to allow a public service Operator of Last Resort to ensure services keep running if a franchise fails? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 10:** Score 5: Yes, this is necessary in case things do go wrong, which at times they will.

**Question 11:** Do you think further specific legislative provisions are needed for the transitional period until franchising is introduced? Please provide comments.

**Response 11:** No, but local authorities should probably be advised not to enter into long-term arrangements which might prejudice and affect moving towards the franchising system

**Question 12:** Do you agree that local authorities should be able to run bus services directly?

**Response 12:** Yes, this is clearly necessary where there are few operators willing to bid, or where the local authority might end up paying over the odds. If the local authority is likely to be operating quite a number of services, then it would make more sense for this to take place as an arms-length company. This would ensure the bus operator is more independent and less likely to suffer

political interference and a reallocation of resources when budgets become tight within the local authority.

**Question 13:** Do you agree that local authorities should be able to set up arms-length companies to operate local bus services? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 13:** Score 5: Yes, this would be our preferred model for public ownership for the reasons stated above.

**Question 14:** Do you agree that local authorities should be able to invest in or acquire bus companies? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 14:** Score 5: Yes, to give them flexibility in providing services.

**Question 15:** Do you agree that municipal bus companies should be able to raise fund by borrowing or selling shares? Please score from 5 agree strongly to 1 disagree strongly. Please provide comments.

**Response 15:** Score 5: Yes, this could allow for more grassroots community ownership, as seen with sustainable energy co-operatives, or bring in wider industry knowledge and expertise.

**Question 16:** Are there any additional safeguards you would like to see applying to the use of these powers? Please provide comments.

**Response 16:** With regard to our responses above, we wonder whether there should be a nominal limit on local authorities running bus services, before it is required to set up an arm's length company to give the bus operator a more stable footing, less susceptible to the vagaries of political interference or resource diversion. On this last point, it might be prudent to restrict the money that can be taken out from these municipal companies to what was lent to them alongside any reasonable interest charges. Beyond that, any surpluses should be reinvested to provide better services, buses and other infrastructure.

**Question 17:** Are there any further comments you would like to provide on the content of this white paper?

**Response 17:** It may be necessary to consider what bus operators will be expected to contribute to in terms of bus infrastructure. App development, real time information boards at bus stops and big destinations, bus shelters, bus priority measures, etc. are all things that operators can be currently expected to contribute to in various forms. With franchising, this will disappear, certainly

for those franchised route operators, yet with pressures on public funding, those areas with municipal companies might expect those companies to fund more than if there was a private operator running the service. This could then lead to there being less money to reinvest in the company itself and upgrading the bus fleet.

**Question 18:** Do you have any comments on the draft Regulatory Impact Assessment published alongside this paper?

**Response 18:** No comment

**Question 19:** We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

**Response 19:** The current proposals do not have an apparent impact on the Welsh language and its provision. We hope that a coordinated franchising system across the nation will include the promotion of a thorough Welsh language policy that operators will be asked to adhere to.

**Question 20:** Please also explain how you believe the proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

**Response 20:** Transport Action Network does not have a position on this.

**Question 21:** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

**Response 21:** While franchising will bring some big benefits on its own, the full beneficial impact and step change in services and infrastructure will only be achieved with substantially more funding. This will be critical in increasing buy-in to the proposals and enabling a shift from cars to bus and rail, to help to quickly reduce carbon emissions. Indeed, if more services are required and to be run by cleaner buses, this will potentially require a big investment to expand the bus fleet. Somehow that will need to be paid for.

While shorter car journeys can be easier to decarbonise by shifting them to walking, cycling and to local buses, it will be essential to reduce longer distance journeys which make up a substantial number of carbon emissions. To do this, integration with rail will be key, also linked to creating mobility hubs where a range of transport services can be procured to enable integration with the public transport network.

There will need to be a clear process in place for the integration of local and regional knowledge within the network development. This will be essential for the creation of a bus network that suits all people in all parts of Wales. This should include seeking input from groups who have the greatest access barriers, such as disabled people, and prioritise local authorities with low levels of car ownership, where people rely most on bus services.

Therefore, while a one network, one ticket approach for public transport is important, finding a way of integrating the ordering and paying for other services such as e-scooter / bike / e-bike / car hire / etc to create as seamless as possible public transport based journey will be essential. This needs to be considered from the outset to allow these elements to be incorporated in the future, if not at the beginning.

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Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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