

BSWB 15 - Evidence from: Older People's Commissioner for Wales

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Bil Gwasanaethau Bysiau (Cymru) | Bus Services (Wales) Bill

1. What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

The Older People's Commissioner for Wales broadly welcomes the vision for change contained in the Bill for a bus system that provides the best possible service to the public, delivering a comprehensive network of bus routes with coordinated timetables and connections, and easy to find information.

Good quality public transport is a key part of enabling everyone to live and age well in Wales. The general principles of the Bill are positive and there is a need for legislation to deliver the stated policy intention. However, legislation is only part of the picture and legislation alone will not be sufficient to ensure that Wales has a bus service which meets the needs and expectations of citizens, including older citizens.

Research on transport from the National Survey for Wales (see: [Transport \(National Survey for Wales\): April 2022 to March 2023 \[HTML\] | GOV.WALES](#)) shows that 14% of people aged 65+ used the bus at least once a week. This was the highest of all age groups and it is therefore essential that there is sufficient emphasis on older people's needs and requirements in the Bill and its subsequent implementation.

The Commissioner has recently consulted with older people on priorities for her term. Problems with public transport, including buses, were raised frequently. The current model of bus operation does not meet the needs of older people for a variety of reasons. These included limited services (or in some cases, especially in rural areas, no services), especially at evenings and weekends, inability to access health or other appointments due to routes and /or scheduling, a lack of reliability, and inaccessible vehicles. Transport problems are also regularly reported to the Commissioner during engagement events and in enquiries received by her Advice and Assistance Service.

Much of the operational detail of the Bill will be via regulations and guidance and it will be important that sufficient time is allowed for these to be consulted upon and given adequate scrutiny. The Bill also allows for regular scrutiny from the Senedd which is to be welcomed.

Key to delivering the stated policy intent is meaningful consultation and understanding the wider community's vision for bus services. This vision needs to include those who do not currently use bus services and greater consideration of the latter is needed.

The UK Government's Bus Services (No. 2) Bill, introduced in December 2024, includes important provisions on safety and driver training, including training on areas such as antisocial behaviour and disability equality (see: [Bus Services \(No. 2\) Bill \[HL\]](#)). Older people have raised the issue of antisocial behaviour on public transport (including buses) with the Commissioner, as well as accessibility. The issue of bus driver knowledge and awareness of equality and accessibility has also been raised with the Commissioner. The relevant sections of the UK Government Bill should be examined and addressed as part of the Welsh Government Bill.

2. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

▪ Part 1 - Key concepts and general objectives (sections 1 to 4)

The key concepts and general objectives are reasonable.

The objective to promote the use of local bus services is welcome but in order to be workable, greater consideration and understanding of the barriers to using local bus services is needed. In order to overcome barriers, they must first be properly understood. Older people throughout Wales, particularly in rural and isolated communities often face transport challenges and bus services have been radically cut in certain areas. This led one older person to comment in response to the Commissioner's recent consultation on her priorities that "I have a bus pass but no bus".

Increasing the availability of local bus services is essential so it is helpful to see this reflected as an objective in the Bill. The wording of 'working towards' this suggests an understanding of the scale of the challenges involved. Sufficient funding to support improvements to bus services is essential to deliver on the

objectives of the Bill. Without sufficient funding, it will not be possible to make or sustain improvements to local bus services.

The objective which focuses on continuous improvement of the reliability, safety, affordability and accessibility of local bus services has the potential to go some way to addressing many issues raised by older people. However, unlike the current draft legislation for England in the Bus Services (No. 2) Bill, there is little detail specifically on safety. The relevant sections of the legislation for England should be considered and added to the Wales Bill in order to address this, along with any further measures to address safety. This could include consideration of the points raised in last year's debate on a Member's legislative proposal for a Bill for increased safety on public transport. (See [Plenary 12/03/2024 - Welsh Parliament](#).)

None of the Bill's six objectives mention quality, quality improvement, or focus on the quality of bus services and passenger experiences. This should be added or incorporated as an objective. Quality could include references to training and set expectations of the minimum training needed to support bus drivers. Issues around driver behaviour can affect older people's likelihood of using buses, while antisocial behaviour by other passengers is another factor highlighted by older people in creating a climate where people feel unsafe. The Bill offers an important opportunity to address these issues and this is notably included in the draft UK legislation - Bus Services (No. 2) Bill. Again, the Welsh Government should consider the references to training in the UK Bill and adopt a comparable approach.

The objective of working towards achieving an integrated transport system is sensible. However, care should be given that integrated routes, particularly to link bus and rail, do not have the unintended consequence of causing inconvenience for passengers: for example, by adding unnecessary length to journeys because a bus route has to include a railway station.

The objective to reduce greenhouse gas emissions and waste from road transport is to be welcomed. Older people continue to be worried about climate change. Research undertaken on behalf of the Commissioner in February and March 2025 found that 81% of older people were concerned about climate change.

3. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

- Part 2 - Functions of the Welsh Ministers relating to local bus services (sections 5 to 20)**

It is welcome that Welsh Ministers will be required to seek the views of local authorities and other stakeholders when preparing and revising the Welsh Bus Network Plan (WBNP), and that they will be required to keep the Plan under review.

However, the list of consultees does not take account of stakeholders who do not currently use buses and have no plans to do so at present. This cohort of potential users are key to increasing the number of passengers using the bus network but will not necessarily be captured by s.6 (4) (f) of those who "represent the interests of persons using or likely to use local bus services" [emphasis added]. Ways to include the interests of those who could be encouraged or persuaded to use local bus services should also be built into the development of, and consultation on, the WBNP. This could be part of broader community engagement on what communities want to see from bus services and what would make them more attractive to a wider range of citizens or encourage existing users to make more journeys by bus.

While it is sensible to have regard to regional transport plans when Welsh Ministers prepare the WBNP, Welsh Ministers should seek their own assurance that regional transport plans have in turn have been subject to meaningful and wide-ranging consultation, including with older people, otherwise the WBNP risks compounding any problems with existing regional transport plans. Consultation via predominantly online means or with heavy emphasis on online forms and surveys is likely to exclude a significant amount of older people, many of whom are existing bus users, or who would like to rely on bus services.

It is essential that sufficient consideration is given to the successful operation of cross border services, both in the development of the Bill and its implementation. Too often, older people who live on the border with England and who use cross-border services, experience additional problems and complications. One older person informed the Commissioner that "Living in a border village neither Wales or England want to accept responsibility for us". It is vital that citizens, including older citizens, who live near the Wales-England border do not experience poorer quality bus services and planning as a result of where they live.

It would be helpful for the Bill itself to specify that cash payments will be retained across all bus services. This would provide reassurance to groups who predominantly rely on cash and acknowledge the growth in the use of cash since 2022, which is at least partly a response to the ongoing cost of living crisis.

Reporting on progress at regular intervals as set out in the Bill will be helpful in terms of scrutinising developments. Such reports should be user friendly and accessible, allowing interested parties to understand progress.

While this section of the Bill focuses on Welsh Ministers, the Bill also needs to set out further clarification on the specific role of local authorities.

4. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

- **Part 3 - Restriction on providing local bus services (sections 21 to 24)**

No comments.

5. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

- **Part 4 - Information and data (sections 25 to 31)**

Coordination of relevant information and data could have a positive effect on bus travel if it makes it easier to find details relating to journeys.

However, it is essential that the Bill specifies that the provision of information and data to the public cannot be online only and is explicit about this. Offline channels for providing information must be maintained and operate to the same standard as online ones. Offline and online channels for information must be developed simultaneously so that offline access does not become a 'bolt on' or a problem to be solved at a later date.

While good quality apps will be welcomed by many older people, access to information about local bus services that relies exclusively or heavily on smart phones or QR codes will not be acceptable. Older people who do not make use of the internet should not be disadvantaged and should be able to access

information and plan journeys by other non-digital channels: for example, printed timetables and over the phone, to ensure accessibility for all.

The current drafting of the Bill is insufficient in terms of clarity on what 'available to the public' means in practice. In order to provide certainty, an additional sentence should be included in 27 (1) or 27 (5) noting that for the purposes of the legislation, 'available to the public' means the information cannot be provided solely via digital or online means.

The ability for Welsh Ministers to request information from local authorities or community councils on areas such as bus routes, bus stops and infrastructure under Section 26 is helpful. However, the Bill should also incorporate ways to improve bus stops and infrastructure, taking account of concerns around safety (as highlighted earlier). Requiring a regular audit of bus stops would help identify where there are problems. Concerns like bus stop safety, lighting in poorly lit areas, or the physical challenges of boarding and alighting buses, particularly in adverse weather conditions or at night need to be addressed. This would go some way towards the Bill's objectives of promoting the use of local bus services and continuously improving the reliability, safety, affordability and accessibility of local bus services.

6. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

- Part 5 - Local authority powers and duties (sections 32 to 34)**

No comments.

7. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

- Part 6 - Miscellaneous and general (sections 35 to 44)**

No comments.

8. What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

One of the biggest barriers to the implementation of the Bill's provisions is funding. Bus services have been altered, reduced and withdrawn, particularly since the pandemic, in an attempt to manage costs. Franchising and improved planning alone will not enable the Welsh Government to meet the objectives set out in the Bill. For example, franchising may not improve punctuality and reliability.

Future funding for buses should take account of the fact noted in the Bill's Explanatory Memorandum (page 7, para 3.1) that that buses remain the most practical and popular choice for public transport, and account for about 90 million passenger journeys each year. This compares with approximately 30 million annual rail journeys.

There is lack of clarity regarding transitional arrangements as franchising is introduced on a staged basis throughout Wales. It is important that the impact of transition is understood and managed so that there is no adverse effect on passengers.

There may be barriers for smaller bus companies who could find it difficult to compete with larger companies. This risks leaving the provision of bus services to be managed by a relatively small number of large companies, some of whom are based outside of Wales.

Local knowledge is another important factor that must not be overlooked: when entering into local bus service contracts, it is essential that any tendering exercise takes into account experience or understanding of delivering bus services in the specific geographical areas covered by the tender. This is especially the case in rural locations where knowledge of local geography is crucial to planning suitable vehicles and routes. Older people have highlighted circumstances where smaller buses would be better than larger vehicles, given the types of roads that routes are likely to encompass. If local knowledge is not valued sufficiently during tendering and planning, there is a risk of unsuitable vehicles and routes that do not work for passenger.

Developing the WBNP will require meaningful engagement and this needs to extend beyond the groups currently listed in the Bill. Those who are currently unlikely to use buses must be consulted if the Bill is to be able to have a positive impact on increasing passenger numbers.

Welsh Ministers must also be assured that regional transport plans are themselves accurate and reliable sources of information, based on strong community engagement before relying on them too heavily to inform the WBNP.

The Bill needs to be explicit that provision of information to the public cannot be solely online or rely on being able to use the internet. Restricting information to online sources only would make it harder for some older people to be able to use bus services due to a lack of knowledge of timetables, how to use demand responsive services etc.

9. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)

The powers are broad but there is understandably a balance between the amount of detail it is reasonable to include in the Bill and that which needs to be contained within subordinate legislation. It is vital that sufficient time is allowed and meaningful consultation takes place on any ensuing regulations and guidance.

10. Are any unintended consequences likely to arise from the Bill?

The success of the Bill depends to a great extent on how effectively it is implemented. Delays in rolling out new systems or services, could undermine benefits. There is potential for the timetable for the implementation of the Bill to slip which may cause further challenges.

Changes to routes etc. might make the bus service harder for some older people to access and navigate if sufficient effort is not made with regards to communicating developments. Unless the Bill is explicit about the need for information to the public to be provided via non-digital methods, there is a risk that older people and other groups with a higher risk of digital exclusion, may struggle to find the information they need. This is especially the case as the Explanatory Memorandum notes the skewing of bus passengers towards lower income quintiles (page 178), who will be more at risk of digital exclusion.

11. What are your views on the Welsh Government's assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

As with any large project of this nature, there are concerns regarding affordability, deliverability and overall cost. The Explanatory Memorandum tries to address this via some of the references to contingency in its risk assessment. However, in practice, there is a risk that any additional costs to implement the Bill or manage transition etc., could be high.

Reassurance that estimations of the number of staff needed for Communications / messaging and social media / stakeholder engagement and Public Relations and Marketing fully take into account the need to engage via non-digital routes would be helpful. There will need to be sufficient capacity to deal with queries, contact etc. via telephone and in some cases, hard copy post.

The assessment of financial implications could have included a value for money assessment.

12. Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum or any related matters?

The Bill offers potential advantages for older people if implemented effectively, such as improved accessibility and enhancements to bus services. However, older people have concerns about the reliability of services, the risk of cuts or route changes, and their ability to access timely information.

The infrastructure around passenger voice and engaging with communities in the Bill as it stands is not strong enough. This also relates to the lack of voice for people who do not currently travel by bus. It is important to understand the motivations of those who do not currently use bus services in order to develop effective interventions to grow the passenger network. Without hearing and incorporating these stakeholders, it is not possible to map out and understand unmet need.

It is essential that improvements to bus services are also made in the more immediate term, rather than simply waiting for the Bill to pass and franchising etc. to be implemented across all parts of Wales. Opportunities to identify and address the concerns of older passengers should be taken now. Mechanisms for ensuring that the voices of older people are heard in relation to planning bus

services, for example, via local authority work on Age-Friendly Communities, should be well-established in advance of the Bill's passing.

The corresponding draft UK Government Bus Bill should be examined and its focus on safety and driver training should be incorporated into the draft Wales legislation.

It is vital that Transport for Wales ensure that they have sufficient expertise specifically on buses to ensure the successful implementation of the Bill.

Keeping stakeholders, including older people, well-informed during a period of change is important. Providing clear and consistent messaging will be key in providing assurance and preventing any further erosion of confidence in bus services.