



Our ref - MA-KSNWT-2000-25

Llyr Gruffydd MS Chair  
Climate Change, Environment, and Infrastructure Committee  
Senedd Cymru  
Cardiff  
CF99 1NA

8 September 2025

Dear Llyr

Thank you for your Report on the Bus Services (Wales) Bill. Please see below my responses to the recommendations set out in your report.

**Recommendation 1: The Senedd should support the general principles of the Bill.**

**Response: Accept**

I am pleased the Committee supports the general principles of the Bill and I look forward to continuing to work with Committee and Members as we proceed through the Senedd scrutiny process.

**Recommendation 2: The Cabinet Secretary should direct TfW to implement a clear and ongoing communications strategy, which should include management of public expectations around the scope, timeline, and outcomes of the bus reform programme.**

**Response: Accept**

I agree that it is important that public expectations are managed in such a way as to be both realistic and transparent.

TfW, along with Welsh Government, has developed a communication strategy and plans for on-going engagement with key stakeholders, including local government, passenger groups and industry throughout the transition into the franchise model. These are in place and are revised on a regular basis. They are essential to managing of expectations of what is

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

possible at the beginning of our journey into franchising and will be adapted appropriately collaboratively as the new model matures.

The section “Communicating Changes” in the [Our roadmap to bus reform](#) (p.25), published earlier this year, provides a summary of this.

Public engagement is key to informing the development of the base network and how the public, private and third sectors will work together to deliver local bus services.

Currently public engagement in South West Wales, where the roll out of bus reform is commencing first, is ongoing and will conclude towards the end of September.

Through the engagement events Transport for Wales and Welsh Government are also working to manage public and stakeholder expectations. We have consistently sought to be honest and as transparent as possible about how the network is to be developed and about working within the current level of resource.

Looking ahead to implementation, it is important that network changes are clearly communicated, and Transport for Wales will be addressing this in a variety of ways on-line and in person.

**Recommendation 3: The Cabinet Secretary should require TfW to demonstrate that it is actively developing the necessary organisational capacity, both in terms of staffing numbers and expertise, to deliver franchising.**

**Response: Accept**

My officials are working closely with TfW to develop and apply the policy for implementation. TfW has an experienced team of professionals from the bus sector, including colleagues with experience in delivery in local authorities, operational and other parts of the industry, which they have been actively recruiting to strengthen the capacity and expertise within the teams.

TfW are developing a plan to further strengthen their multi-modal capacity and skillsets, which the organisation is supporting. As part of the annual budgeting process (and looking 5 years ahead) TfW will continue to develop the organisation to support franchising, in both the early implementation phase and also into the ongoing operational phase.

**Recommendation 4: The Cabinet Secretary should publish a policy statement explaining how learner travel relates to, and will be considered in, delivery of the Bill.**

**Response: Accept**

As I set out in my appearances before the Committee, the Bill does provide an opportunity to help improve the provision of bus travel for children and young people to schools and other places of training and education. Equally, I have been clear that, whilst it provides some support, it does not seek to, and cannot, address all of the challenges there are with learner travel.

Learner travel is largely provided by SME bus operators, who are often also providing local bus services in their communities, so I appreciate how important it is to ensure we support providers in our implementation of the franchise model.

I am happy to provide a policy statement explaining how learner travel will be supported through the delivery of the Bill, including through the development of the Wales Network Plan and the contracting of services.

**Recommendation 5: The Cabinet Secretary and TfW should work with local authorities to address structural barriers such as congestion and inadequate infrastructure. The Welsh Government, TfW, and local authorities should establish a formal agreement to ensure consistency in bus stop infrastructure and the provision of passenger information.**

**Response: Accept**

I agree that collaboration on these matters is important for the effective delivery of local bus services. TfW are already working with the regions to undertake empirical analysis to support the identification of areas that would benefit from bus priority interventions. Key performance measures to support this will include average speed/journey time, reliability and passenger demand.

The Welsh Government, TfW and local authorities are working together to co-develop a set of National Bus Stop Standards that will cover all aspects of bus stop infrastructure and customer information provision to deliver a consistent approach across the network.

To support this, the Grants Modernisation process, which is looking at how grants will be awarded based on recommendations on regional transport plans, will help us to collectively understand what may be considered while co-creating a strategy with key stakeholders. This may help to ensure things like bus priority measures and bus stop infrastructure are given a level of precedence in decision making in order to deliver the aims of bus reform.

As the Committee recommends, we will continue to work collaboratively with TfW, Corporate Joint Committees (CJCs) and local authorities towards developing a formal arrangement on the matters raised above to reduce congestion and deliver improvements in bus infrastructure, including consistency in the provision of passenger information (digital and physical).

**Recommendation 6: The Cabinet Secretary should bring forward amendments to require the development and publication of a Passenger Charter, setting out clear standards of service, passenger rights, and accountability mechanisms. The Charter should be subject to consultation, including with under-represented groups.**

**Response: Accept in principle**

I agree with the Committee's view that a customer charter would aid passengers to understand their rights and help ensure accountability in service delivery. However, I do not think it requires a statutory requirement in the Bill.

I have asked officials to work with Transport for Wales to develop an overarching document setting out our multimodal passenger commitment, which will sit above modal specific customer charters. TfW currently has a rail specific charter ([Passenger's Charter | TfW](#)) which will be used to inform development the bus specific charter. TfW will develop this in conjunction with key stakeholders, including those representing users with protected characteristics.

It is our intention that the commitment and the bus specific charter will be subject to public consultation as part of its development. Engagement on the documents will be ongoing and they will be reviewed and revised as appropriate to ensure they are fit for purpose.

**Recommendation 7: The Cabinet Secretary should ensure that the Passenger Charter (see Recommendation 6) includes specific provisions to embed accessibility within it. We are content for the Cabinet Secretary to define accessibility, as recommended in Recommendation 11.**

**Response: Accept**

I have made it clear to TfW that accessibility needs to be a key element underpinning the commitment and Passenger Charter for Bus.

TfW are in the process of examining passenger charters from other transport authorities in the UK and abroad. Some make commitments around access for disabled people, as well as levels of comfort and safety standards passengers should expect. As noted in the answer to recommendation 6, the charter will be developed in partnership with key stakeholders, including representatives of protected characteristics to ensure that accessibility is captured appropriately. Clarification around the parameters of accessibility will need to be addressed in the Charter, as accessibility can be interpreted in many different ways, including accessibility of service provision and infrastructure, but also safety, removal of physical and other barriers that disable some users.

TfW's Access and Inclusion Panel has been established as a representative voice in the delivery of rail. I have asked that the Panel and its remit be extended so that it can represent the voice of passengers across all modes of public transport.

**Recommendation 8: The Cabinet Secretary should ensure that TfW strengthens its customer service and complaints-handling functions in preparation for increased public engagement and feedback under the new franchising regime.**

**Response: Accept**

Transport for Wales are progressing their plans to increase capacity at their customer call centres, which currently deal with feedback relating primarily to their rail operations, but also to Traveline Cymru, Fflecsi, Traws, MyTravelpass and other concessionary enquiries.

The existing contact centres, one in North Wales and another in South Wales, deal with 17,200 customer contacts a month. In order to deliver in relation to multimodal services, TfW are ensuring that the teams and systems are ready to deal with higher volumes and multi modal enquiries, and that they are set up to handle different contact methods across telephone, digital and social media channels.

TfW are currently analysing their current level of bus contacts through the Traws services. This is giving them the data to be able to predict and set up for delivery under the new local bus service arrangements. This analysis is also allowing them to set up the correct handling procedures for feedback, complaints, and lost property and how to ensure that the passenger receives a seamless and timely response to their query.

Effective management of enquiries or complaints is crucial for ensuring accountability, fostering public trust, and maintaining high service standards within the franchised bus network. As TfW will be overseeing the central customer contact, it is vital that operators

provide timely responses with clear and accurate information. To facilitate this, a well-defined framework for enquiry / complaint handling will be established, supported by service contracts and penalties that hold operators accountable for delivering precise information.

In addition to this, we intend for Bus Users Cymru, which is well established as a quasi-ombudsman for bus, to continue to deliver that role.

Work will continue in consultation with key stakeholders to develop plans in relation to customer service delivery and to enhance understanding of customer contact volumes and profiles as we roll out the new system for delivering local bus services.

**Recommendation 9: The Cabinet Secretary should ensure that the practical implications of the 15-mile threshold in the definition of a “local bus service” are kept under regular review, with particular attention to potential impacts on rural communities.**

**Response: Accept**

I am happy to accept the Committee’s recommendation. We intend to keep this and all aspects of the legislation and its implementation under review.

We note the evidence provided by CaBAC that this can be an issue for rural operators but, as they stated, changing this now would not be desirable as it would cause confusion.

To clarify, the threshold ensures that passengers are able to disembark less than 15-miles from their embarkation point (measured in a straight line), which could mean that stops must be sited in rural spaces where use may be unlikely. However, I am confident that centralised co-ordination of the network, alongside our intention to utilise flexible services and the use of hail and ride, will lead to service delivery that will maximise benefits for rural communities.

**Recommendation 10: The Cabinet Secretary should clarify how the Welsh Ministers will interpret their duty to have regard to the objectives in section 4, including how in practice they will “have regard” to the objectives.**

**Response: Accept**

I am happy to clarify how the Welsh Ministers will interpret their duty to have regard to the objectives in section 4, including how they will do this in practice.

The provision imposes a duty on the Welsh Ministers to consider the objectives in section 4 when exercising their functions. It does not require them to achieve those objectives outright. This distinction is crucial: it allows Welsh Ministers to act with flexibility, balancing competing priorities and practical constraints, rather than being bound to deliver specific outcomes regardless of feasibility. The “have regard” duty will be applied in the same way that is set out in other Acts of Senedd Cymru.

In practice, the Welsh Ministers will consider all these objectives in their decision-making, however they will need to weigh each one as necessary in order to deliver appropriately against their policies and budgets. For example, during the early stages of implementation, TfW in consultation with local authorities, may want to prioritise frequency of services, therefore more buses will be required. In this case they may need to decide whether to purchase a number of diesel buses over lower emission electric buses in order to deliver on that policy. In that case objectives 3 and 4 would be prioritised over objective 6 in the short

term. In the long-term objective 6 would be fulfilled as more people using buses means that fewer people using cars.

I have instructed officials to work with TfW to consider the development of a national Bus Board and regional bus boards structure for holding TfW to account, including against the objectives, on a day-to-day basis. This work is in its infancy and will be done in collaboration with CJs and local authority representatives. In addition, the Senedd will have an opportunity to hold the Welsh Ministers to account for how their actions have contributed to achieving these objectives through the reporting mechanism under Section 20 of the bill.

**Recommendation 11: The Cabinet Secretary should bring forward amendments to include a clear and measurable definition of “accessibility” in section 4. If the Cabinet Secretary is not minded to bring forward such amendments, he should clarify in response to this Report how “accessibility” will be interpreted by Welsh Ministers for the purposes of fulfilling their duty under section 4.**

**Response: Accept in principle**

I am happy to provide some clarity over how we are broadly interpreting accessibility as part of the objective. However, I do not intend to bring forward amendments to define the term in the Bill for the reasons outlined below and because to do so may limit what should be considered when having regard to the second objective and risk making the provision of services less inclusive.

There is no standard legal definition of accessibility largely because it means different things in different contexts and to different people. For instance:

Information - accessibility in this context could refer to information being made available that ensures people are able to catch a bus; this could relate to where the information is provided and / or the format in which it is made available.

Vehicles – whether a vehicle has any or enough space for wheelchairs, pushchairs, priority seating. Does the vehicle have effective audio and visual information on-board and is the bus equipped to ensure wheelchair and vulnerable users can easily get onto and off.

Scheduling – does the bus schedule provide enough clarity and opportunity to ensure vulnerable users can confidently rely on having access to a return journey.

Safety – do people feel safe catching and traveling on their local bus services. Much of this is down to experience but also perception. If a service or the related bus stops appear to be unsafe, women and transgender people are much less likely to feel the service is accessible to them.

In terms of Section 4(3), for the purposes of the Bill, the reference to accessibility here means that Welsh Ministers will have a duty to consider how they can improve local bus services for all users by removing physical and other barriers that prevent or limit their use.

**Recommendation 12: The Cabinet Secretary should bring forward an amendment to include learner travel within the scope of the objectives in section 4.**

**Response: Reject**

I agree with the Committee that learner travel is a vital component of the bus network and the wider bus industry. As I have stated previously, I am confident that through enabling a

better and more collaborative approach to the co-ordination of local bus services, the Bill will help support the provision of school transport and help to build young people's confidence in using local bus services beyond their time in education.

As learner travel is outside the scope of the Bill, I will not seek to include it within the scope of the objectives. I am confident that the initiatives we have announced in this area will ensure that provision for school children and young people will be strengthened within the broader package of bus reform.

Learner travel will remain the responsibility of local authorities, which is one of the key reasons why we are, and will continue, to work collaboratively with local authorities in the development of the Wales Bus Network.

**Recommendation 13: The Cabinet Secretary should clarify the meaning of “economic” in paragraph 5(1)(a) of the Bill.**

**Response: Accept**

I note from the Committee's report that some stakeholders were of the view that the term “economic” is ambiguous and could relate to affordability or economic development. To clarify, it can relate to both for the purposes of section 5(1)(a) of the Bill, i.e. the affordability of running bus services, including consideration of the cost and maintenance of vehicles and the cost of delivering a franchised network, as well as consideration of the impact on economic development at local, regional and national level of the delivery of local bus services.

The terminology has been used similarly in section 108(1)(a) of the Transport Act 2000 relating to local transport plans.

**Recommendation 14: The Cabinet Secretary should bring forward an amendment to paragraph 5(1)(a) of the Bill, to include securing accessible transport as a core duty for Welsh Ministers.**

**Response: Reject**

I understand the Committee's desire to ensure accessibility is treated as a fundamental principle in determining required services. It underpins how we intend to deliver inclusive transport for people and communities.

The purpose of Section 5(1)(a), however, is to determine the type of services that are required rather than the standard of service. This should be established in the delivery, including as part of the contracts and permits where accessibility requirements can be targeted through obligations and conditions, including around vehicle standards and driver training.

Due to the potentially very broad meaning of the term “accessibility”, as demonstrated in my response to recommendation 11, including it as a core and undefined requirement would effectively be placing a significant unspecified burden on the Welsh Ministers which could result in significantly fewer bus services and as a result significantly reduced inclusivity.

Therefore, while I am sympathetic towards the ambition of this recommendation, I cannot accept it.

**Recommendation 15: The Cabinet Secretary should bring forward an amendment to section 6 of the Bill to require consultation with under-represented groups, including people with disabilities, children, and older people, in the preparation of the Welsh Bus Network Plan.**

**Response: Accept in principle**

I agree with the Committee's view that under-represented groups should be included in the development of the Network Plan. An amendment to section 6 of the Bill is not necessary because section 6(4)(f) already requires consultation with those representing the interests of persons using or likely to use local bus services - under-represented groups are captured by this provision.

Seeking the views of under-represented groups is key to the development of the bus network. In South West Wales, TfW are currently undertaking a public and stakeholder engagement which will conclude at the end of September. This includes workshops across the region to seek the views from people representing those with protected characteristics.

**Recommendation 16: The Cabinet Secretary should bring forward an amendment to section 6 of the Bill to require Welsh Ministers to have regard to learner travel provision when preparing the Welsh Bus Network Plan.**

**Response: Reject**

As I stated in my response to recommendation 12, learner travel is outside of the scope of this Bill. However, I want to be clear that learner travel can and will be considered as the Welsh Bus Network Plan is developed, working closely with local authorities who retain statutory responsibility for learner travel. This is already taking place in South West Wales. I will provide a policy statement (as per my response to recommendation 4), showing how learner travel can be supported.

**Recommendation 17: The Cabinet Secretary should bring forward amendments to the Bill to formalise the role of CJsCs and local authorities in bus network planning under the Bill. If the Cabinet Secretary is not minded to do this, he should progress the development of a memorandum of understanding to explain how the Welsh Government, TfW and local government will work in partnership to deliver the ambitions of the Bill.**

**Response: Accept in principle**

I am happy to confirm that the Welsh Government will enter a Memorandum of Understanding (MoU) with TfW and local authorities on ways of working to deliver the ambitions of the Bus Services (Wales) Bill. As I mentioned in relation to recommendation 10, I have instructed officials to work with TfW in considering the establishment of a national Bus Board and an additional regional structure to ensure a leading role for CJsCs in the development of the Network Plan, whilst also allowing them to hold TfW to account in its delivery of local bus services.

Transport for Wales have been working with the CJsCs and local authorities on Bus Network Planning in preparation for the implementation of the Bill, this is most mature in the South West where implementation plans are further forward. This collaboration has been supported by a 'Zonal Methodology' which was co-created with local authorities and

supported through engagement with the WLGA and Transport Cabinet Members across the SW region and will continue to be developed as we roll-out subsequent regions. It sets out the joint working that will be undertaken in preparation for bus reform.

I am of the view that this will provide the formalisation of the roles of the CJs and local authorities without amending the Bill and introducing potential stumbling blocks to the delivery of a dynamic bus network.

**Recommendation 18: The Cabinet Secretary should bring forward amendments to require guidance to be prepared, consulted on, and published on the revision of the Plan (sections 7 and 8), particularly as the provisions will affect others, such as local authorities and operators. This guidance should explain the meaning of “minor” and “reasonably practicable” in section 8.**

**Response: Accept in principle**

I am happy to develop an advice note to help local authorities and operators understand the meaning of “minor” and “reasonably practicable” within the context of revisions to the network plan. The advice note will also contain information to help local authorities and operators better understand the circumstances around revisions to the network plan. It will be developed in collaboration with local authorities and in consultation with wider stakeholders.

This is a more appropriate approach than bringing forward an amendment to require guidance to be issued on revision of the Plan, as this would essentially require the Welsh Ministers to issue guidance for themselves.

**Recommendation 19: If the Cabinet Secretary is not minded to bring forward amendments to require guidance on the face of the Bill in relation to revising the plan (sections 7 and 8), he should give a commitment that he will use the Welsh Ministers’ general powers to issue guidance on this matter. The guidance should be subject to consultation with stakeholders. The guidance should explain the meaning of “minor” and “reasonably practicable” in section 8.**

**Response: Accept in principle**

As mentioned in my response to recommendation 18, I am happy to produce an advice note to help local authorities and operators understand the meaning of “minor” and “reasonably practicable” within the context of revisions to the network plan. This would be developed in collaboration with local authorities and in consultation with wider stakeholders.

**Recommendation 20: The Welsh Government should publish a response to the Wales Centre for Public Policy report within three months of its publication.**

**Response: Accept in principle**

As the Welsh Government has co-authored the report, it would not be appropriate for me to issue a formal response. The purpose of the report is for my officials and I, along with Transport for Wales, to learn from it, and we will be using the report to inform our thinking. I am happy to share the final report with the committee.

**Recommendation 21: The Cabinet Secretary should keep under review approaches to contract design and procurement to ensure that the SME sector can participate in the**

**new regime, including through smaller contract lots and simplified bidding processes. The Welsh Government should ensure there is adequate support for SMEs who wish to participate in the franchising process.**

**Response: Accept**

The SME sector is incredibly important to the Welsh local bus market. Franchise packages will vary in size and complexity, with opportunities that are attractive to all types of operators. Large, SME and publicly owned bus operators all have a part to play in a successful franchising programme.

As part of the development of a Template Franchise Agreement, TfW have been mindful to use clear straightforward language. In comparison to some contracts used elsewhere, their template is shorter in page count and relatively free of jargon.

TfW will:

- Offer walk-through sessions to interested prospective operators to explain the procurement process and the contract, especially those parts which (of necessity) may include complex legal provisions.
- Engage in meaningful dialogue with prospective operators as to where a particular contract could adopt a simplified approach. This is more likely to apply to smaller contracts but will reflect the risk profile on a case-by-case basis.
- Signpost organisations that offer support to SMEs in relevant areas.
- Take a pragmatic approach to incentive and/or penalty regimes, which will be tailored to the routes served.
- Make franchise payments to operators on 'day one' of a payment period to cover the next four weeks, rather than retrospectively at the end of a period. This should help with cashflows for all operators, but perhaps with particular importance to smaller organisations.

**Recommendation 22: The Cabinet Secretary should clarify how cross-subsidy will operate under franchising, including whether it will function at a national or franchise-area level. This should include clarification of how cross-subsidy will align with commitments to local reinvestment of local authority contributions. It should also make clear that those local authority contributions are additional to funding committed by the Welsh Ministers.**

**Response: Accept**

As is currently the case, under the new model Welsh Government will continue to provide the majority of the funding to support the provision of bus services in Wales. Under the existing system the contribution made by local authorities to support bus services varies considerably – we want to continue to see them contribute to the provision of local bus services, which is why the Bill includes section 34 which empowers local authorities to give financial assistance in connection with the provision of local bus services.

I have committed to ensuring that all additional funding provided by a local authority will be spent within that authority. I will work with local authorities, the WLGA and CJsCs to ensure funding continues to invest in local bus provision. Any local authority contributions will amount to additional investment on top of Welsh Government funding, in some cases allowing additional services to be provided.

Adopting the new model through the Bill does allow Welsh Government to consider cross-subsidisation of more profitable routes and services to support investment in less profitable

(but socially necessary) services. This is one of the advantages of a franchised system – ensuring that all funding generated by services can be reinvested in other parts of the bus network.

**Recommendation 23: The Cabinet Secretary should ensure that TfW progresses the development of the local bus service permit system, in consultation with stakeholders, ensuring this is in place from day one of the new system.**

**Response: Accept**

The Welsh Government will ensure that TfW progresses the development of the local bus service permit system, in consultation with stakeholders, and that it is in place on day one of the new system being introduced in the South West Wales region.

**Recommendation 24: The Cabinet Secretary should bring forward regulations setting out how the permitting aspect of the Bill will work, including permit types and eligibility criteria. These Regulations should be developed in consultation with operators, local authorities, community transport, and others. In addition, the Cabinet Secretary should issue guidance to explain to operators how they can apply for permits to run services outside of the Plan.**

**Response: Accept in principle**

The Welsh Government will bring forward regulations under sections 13 and 14 setting out details relating to the application process and any further conditions that must be attached to local bus services permits. These will be subject to public consultation.

In light of the discussions held with stakeholders and the evidence presented to the Committee, I intend to publish a guide setting out the process and fees associated with applying for local bus services permits and associated matters. This advice note will be created in consultation with those persons listed in the statutory consultees list in section 6.

**Recommendation 25: The Cabinet Secretary should ensure that TfW has robust arrangements in place for the direct provision of services under section 17, and that they are ready to be implemented, if necessary, before the first phase of franchising commences.**

**Response: Accept**

I agree with the Committee's recommendation and have asked TfW to ensure that robust arrangements are in place before franchising commences. They are currently preparing a business plan for this purpose, which includes proposals for establishing a subsidiary company early next year. I will consider this plan in due course.

Work is also ongoing to establish the appropriate fleet and depot requirements. This is informed in large part by the collaboration arrangements with local authorities and industry in South West Wales in the development of the base network in the region. A similar process has been done in mid-Wales and will soon begin in the North and South East regions of Wales.

**Recommendation 26: The Cabinet Secretary should clarify whether the Teckal exemption will apply in relation to the provisions in section 17.**

**Response: Accept**

The provision of local bus services by TfW will be governed by section 17 of the Bill, and not by a franchising contract under section 9. TfW will provide services directly on behalf of the Welsh Ministers and the Teckal exemption to normal procurement rules will therefore not be relevant in those instances.

**Recommendation 27: The Cabinet Secretary should bring forward amendments to section 19, or sections 6 and 8 if preferred, to include a specific requirement for Welsh Ministers to consult with English local authorities when planning or permitting cross-border services.**

**Response: Reject**

We will of course consult English local authorities affected any section of the Plan, or any relevant revision to it, and any permitted cross-border services. Sections 6 and 8 of the Bill do not explicitly mention English local authorities on the face of the Bill, as to do so would place a requirement on Welsh Ministers to consult all English local authorities on all aspects of the Network Plan across Wales.

We are confident that sections 6(4)(g) and 8(4)(g) - a duty to consult other persons that the Welsh Ministers consider appropriate - adequately covers a duty to consult relevant English local authorities.

**Recommendation 28: The Cabinet Secretary should bring forward amendments to section 20 to require consultation with passengers and stakeholders as part of the reporting process.**

**Response: Accept in principle**

I note the suggestion by Transport Focus in their evidence that we include similar consultation requirements to those included in Part 2 of the Transport Act 2000. Consultation with passengers and stakeholders is fundamentally important, and the approach we are already adopting in South West Wales in relation to the development of the Network Plan.

I agree with the Committee that consulting with the public and other key stakeholders will help to inform the development of the reporting process. However, I am of the view that this can be achieved without amending the legislation.

**Recommendation 29: The Cabinet Secretary should bring forward amendments to require statutory guidance to explain how community transport will be integrated into the wider network, and the position of community transport operators providing services outside the contract and permitting regimes, particularly in terms of how these services will be funded and supported more generally.**

**Response: Accept in principle**

My officials are working closely with community transport operators to address some of the concerns they have raised. Transport for Wales have held a workshop with community transport operators in the South West to unpack how community transport will be integrated into the wider network. This will be repeated in each region as franchising is rolled out.

Similar to recommendation 18 above, I do not think statutory guidance is appropriate in this context because the purpose of guidance is to explain how someone should exercise their functions under the legislation.

I will ensure that strong engagement with community transport operators continues in order to help provide clarity on how community transport will be integrated into the wider network and to provide some assurances in relation to the use of community services under section 18 of the Bill.

**Recommendation 30: The Cabinet Secretary should ensure that TfW develops a standardised data-sharing framework that avoids duplication of data provision, particularly where data is already shared for purposes such as school transport planning. The framework should be subject to consultation with stakeholders, including SME and community transport operators. The framework must be in place before the first phase of franchising commences.**

**Response: Accept**

I will ensure that officials work closely with TfW on the development of a data-sharing framework in good time. The Regulations on data under the Bill will clarify the information that will be required from operators to enable TfW, on behalf of the Welsh Ministers, to understand what is required of the network. The regulations will be subject to consultation with all stakeholders before the first phase of franchising commences.

As part of the franchising programme, we will collate operational data from transport operators via the powers granted through the Bill. This data will be consolidated into a centralised dataset, which will serve as the single source of truth for all relevant stakeholders. The dataset will support customer-facing services, contract management, and the compilation of key performance indicators, ensuring consistency, transparency, and efficiency across the network.

TfW will produce the network information (routes and timetables), sharing these with local authorities and operators. This will ensure any duplication is avoided.

**Recommendation 31: The Cabinet Secretary should require, by issuing guidance for TfW and local authorities, that all public transport information be made available in accessible formats, including non-digital channels.**

**Response: Accept in principle**

I agree with the Committee on the importance of ensuring that all public transport information is available in accessible formats, including non-digital channels. It is my intention to work towards providing integrated accessible public transport information.

With regard to local bus service information, section 27 requires the Welsh Ministers to make regulations setting out how and when information is published. These regulations will enable the Welsh Ministers to ensure that information is published in an accessible format.

Local authorities will no longer be responsible for providing information about local bus services. Transport for Wales, on behalf of Welsh Ministers, will be responsible for making arrangements for the publication of information. In addition to this, I will ensure that providing accessible information at bus stops will form part of the Memorandum of Understanding between TfW and local authorities currently being developed.

As mentioned in my response to recommendation 6, TfW's rail charter ([Passenger's Charter | TfW](#)) will be used to inform the bus specific charter. The rail charter currently states that customers can request timetable information in accessible formats (including large print) from Transport for Wales's Customer Relations Team. A similar approach is likely to be taken in the bus charter.

**Recommendation 32: The Cabinet Secretary should bring forward amendments to Part 4 of the Bill to require the regular publication of data on the performance of the bus network in digital and non-digital accessible formats.**

**Response: Accept in principle**

Transport for Wales are engaging with key stakeholders including the bus industry and local authorities to understand how best to monitor and evaluate the performance of the bus network. It is intended that a suite of KPI's will be developed, and work is on-going to determine how frequently reports on performance would need to be published in digital and non-digital accessible formats. Transport for Wales are considering the approaches on reporting on performance taken by Transport for London and Transport for Greater Manchester to help shape their understanding. Therefore, the regular publication of data and performance of the bus network in digital and non-digital accessible formats can be achieved without amending the Bill.

**Recommendation 33: The Cabinet Secretary should establish clear and transparent lines of accountability for bus service performance, with defined responsibilities for TfW and the Welsh Government, to ensure the public can understand issues around accountability and how poor performance will be addressed.**

**Response: Accept**

I accept the importance of clear accountability. It is important that the public can understand the role of TfW, Welsh Government, local authorities, and bus operators in the delivery of their bus services. TfW are still in the process of establishing the framework for the award of contracts, which will set out the expectations on operators, as well as incentives and penalties to address good / poor performance.

It is vital these expectations are clearly understood by the public, so I am happy to commit to sharing this information when it is finalised. In addition, I recognise the importance of sharing data with the public about the performance of the bus network and, where appropriate, the performance of operators delivering the network. The reporting duty ensures that Welsh Ministers are held accountable and are transparent in relation to meeting their objectives under the Bill. As part of this, Welsh Ministers will be required to report on the reliability of the bus network whereby bus service performance may be captured.

**Recommendation 34: The Cabinet Secretary should clarify the role of existing municipal bus operators under the franchise system, including whether they will be required to compete for contracts on the same terms as private operators or whether they will receive specific protections.**

**Response: Accept in principle**

The White Paper “One network, one timetable, one ticket” published in 2022 was clear that we intend to sustain a market that includes a range of SMEs and municipal operators, as well as large commercial operators.

The Bill does not change the status of the existing municipal bus operators, Cardiff and Newport Bus companies. However, due to the lifting of restrictions under section 66 of the Transport Act 1985 (section 32 of the Bill), Cardiff City Council and Newport City Council will have the option to re-establish their companies without the financial and other limitations placed on them under the 1985 Act. This means they will be on an equal footing to any other public, private or third sector operator bidding for contracts or applying for permits under the Bill.

However, the Committee is aware that the Welsh Government supports the principle of municipal bus companies remaining in the public sector. With this in mind, officials and TfW are working with Cardiff City Council and Newport City Council to examine their role under the franchised system. Any options under consideration must deliver value for money and must support the quality and delivery of the Wales Bus Network Plan.

Until we have had the opportunity to fully consider all of the options, including the legislative and value for money implications, I will not be able to set out the exact arrangements which will be put in place. However, I have asked officials that this is concluded as soon as possible, in partnership with Cardiff City Council and Newport City Council.

**Recommendation 35: The Cabinet Secretary should bring forward amendments to the Bill to introduce a statutory duty on local authorities, Welsh Ministers, and TfW to work in partnership to ensure the continuity of the bus network, following the phasing out of the section 63 duty.**

**Response: Accept in principle**

Close partnership working between Welsh Ministers, TfW and local authorities is already taking place and it is intended to continue throughout transition into the new system and beyond. To date, where transition is most advanced in the South West and mid-Wales (bridge to franchising) regions, collaboration has been very successful and of equal benefit to the relevant local authorities and TfW in the development of the network and in engagement with industry stakeholders and the public.

I am not of the view this would be enhanced by amending the Bill to introduce a statutory duty. It would not relieve concerns over local authority funding raised by the Committee. As TfW stated in their evidence to the Committee “*it will be for locally elected members to determine whether they choose to invest or not, and, in so doing, the impact that that has on their network*”. In the worst-case scenario, a statutory requirement to work in partnership to ensure the continuity of the bus network could result in potential paralysis of the network if there were any political or other disagreements between authorities and/or TfW.

I believe a more effective way to maintain close collaborative working relationships and to ensure agreed ways of working following the phasing out of the section 63 duty, is through the planned Memorandum of Understanding between Welsh Government, TfW, local authorities and CJsCs.

**Recommendation 36: The Cabinet Secretary should ensure that the phasing out of the section 63 duty is implemented with sufficient notice and guidance to enable effective planning by local authorities during the transition to franchising.**

**Response: Accept in principle**

The Welsh Government will ensure that local authorities are sufficiently supported during the transition to franchising, however the issuing of formal guidance on the phasing out of the section 63 duty is unnecessary. As outlined above in the response to recommendation 35, close partnership working between Welsh Government, TfW and local authorities is already taking place and will continue to take place throughout the implementation period. This has already been demonstrated by the collaboration taking place in South West Wales, the region where we will first be rolling out our new system, and Mid Wales, where we introduced the 'Bridge to Franchising' through joint working. A Memorandum of Understanding will be produced by Welsh Government, TfW and local authorities, to ensure local authorities are fully aware of the phasing out of the section 63 duty and that ways of working are agreed to facilitate collaborative working during transition and into the future.

**Recommendation 37: The Cabinet Secretary should publish a clear policy statement outlining how the principles of cross-subsidy and local funding will be balanced.**

**Response: Accept**

I am happy to publish a statement to this effect, building on the response I have provided to recommendation 22 of the Committee's report.

**Recommendation 38: The Cabinet Secretary should ensure that a draft policy framework on staff transfers, and employment protections is published for consultation ahead of the next Senedd election, to allow sufficient time for stakeholder input and scrutiny.**

**Response: Accept**

I will ensure that a draft policy framework on staff transfers and employment protections is published for consultation ahead of the next Senedd election. Discussions are already ongoing with industry and union representatives to inform this work.

**Recommendation 39: The Cabinet Secretary should clarify what contingency measures will be in place in the event that TUPE transfers encounter legal or operational difficulties.**

**Response: Accept in principle**

We are seeking advice from other franchise authorities including TfGM and TfL to understand the contingency measures that they have in place. We will work in partnership with unions and operators to develop these contingency measures should TUPE transfers encounter legal or operational difficulties.

I want to thank the Committee for their time and if you have any further questions, please let me know.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ken Skates', with a stylized, circular flourish at the end.

**Ken Skates AS/MS**

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru  
Cabinet Secretary for Transport and North Wales