

Please use this template to draft your responses to submit via the online consultation form.

Evidence from: Friends of the Earth Cymru / Cyfeillion y Ddaear Cymru

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

You do not need to answer every question, only those on which you wish to share information or have a view.

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?

(We would be grateful if you could keep your answer to around 500 words).

We welcome these proposals for bus reform in Wales and believe that this bill is a crucial step towards an integrated, inclusive and accessible public transport system, enabling a modal shift and reducing both carbon emissions and air pollution in Wales.

We believe these proposals are in line with recommendations made in our report '[A Wales Transport Policy fit for the Climate Crisis](#)' which we published five years ago, and the examples of Zurich canton in Switzerland which based its structure on the principle of 'one network, one timetable and one ticket'.

We must change how we travel - transport is responsible for 17% of carbon emissions in Wales and it's vital we reduce these emissions. 2024 has been confirmed as the hottest year on record globally, surpassing even 2023. The climate crisis is wreaking havoc in Wales and around the world. This bill has been a long time coming but it should ensure Wales's buses are the right path to do that in a fair and just way.

Over 20% of households in Wales don't have access to a car, especially socio-economically deprived groups, and areas of Wales have no rail passenger

services, with bus services the only transport option. It is the only public transport option in many rural areas, and buses carry three times as many passengers in Wales than train passengers.

Having said that, bus services have significantly declined in Wales over the past 15 years, with cuts of over 50% in the number of bus journeys.

Research by Friends of the Earth and the University of Leeds showed that **services declined in every local authority in Wales in recent years**. Fewer and fewer people are travelling by bus, and people in rural areas are feeling increasingly isolated.

How Britain's bus services have drastically declined - Friends of the Earth

We believe that this is valuable evidence in favour of these proposals – in order to reverse that decline Friends of the Earth recommends two significant changes – regulation, and more funding. This proposal meets the first of those changes. We recognise that additional funding is also required.

As well as the proposals for franchising, we hope that the inclusion of vehicle emissions in the criteria will ensure a shift from a diesel fleet to electric buses as soon as possible, and with the support needed.

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)

(We would be grateful if you could keep your answer to around 500 words).

We support the key concepts and general objectives of this Bill.

We are pleased that the Objectives include reducing greenhouse gas emissions and waste from road transport in Section 4(7) as emissions from transport account for 17% of all emissions in Wales. Having an integrated public transport system is crucial, because it makes it possible for people to leave the car at home and make a modal shift to more sustainable travel.

It will be necessary to ensure that Section 4, (5) integrated transport system, and (6) facilitating journeys that involve more than one local bus service, work together. An integrated transport system requires facilitating journeys *between* different modes, and with active travel, as well as between buses.

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)**

(We would be grateful if you could keep your answer to around 500 words).

These powers seem to be reasonable and in line with the stated intention.

We would seek clarity on whether in addition to the reviewing procedures and duties regarding the Welsh Bus Network plan contained here whether there should be a periodical review of the plan or new plan developed, e.g. every 4/5 years, in addition to the duty on Welsh Ministers to keep the plan under review on an ongoing basis.

We're also not clear why in Section 7(6) there is a 13-month period given between a plan revision and laying it before Senedd Cymru.

There may be simple answers to these questions which aren't on the face of the bill.

Preparing plans will require local and community consultation, and we would seek clarification on whether the consultation list contained in section 6 (4) is sufficient to achieve this. Subsection (f) includes a reference to persons using or likely to use local bus services, but it is not clear to us if this includes those who do not or cannot currently use bus services. It is vital that their needs are considered in preparing the new network plan (e.g. shift workers and those in rural communities).

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)**

(We would be grateful if you could keep your answer to around 500 words).

No comment

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)**

(We would be grateful if you could keep your answer to around 500 words).

In Section 25(4) it would be useful to clarify if information by operators relating to vehicles and their use (i) includes information on vehicle emissions, and fuel or power. This would seem to be necessary in order for Welsh Ministers to report on their objective in Section 4(7). It is also consistent with regulations under Section 10 which may relate to vehicle emissions, and types of fuel or power.

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)**

(We would be grateful if you could keep your answer to around 500 words).

No comment

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)**

(We would be grateful if you could keep your answer to around 500 words).

No comment

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

(We would be grateful if you could keep your answer to around 500 words).

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)

(We would be grateful if you could keep your answer to around 500 words).

The powers are necessary and seem reasonable.

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

(We would be grateful if you could keep your answer to around 500 words).

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?

(We would be grateful if you could keep your answer to around 500 words).

No comment

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

(We would be grateful if you could keep your answer to around 500 words).