

# Welsh Government consultation document – One network, one timetable, one ticket

## Friends of the Earth Cymru response

### About us

Friends of the Earth Cymru was set up in 1984, is part of Friends of the Earth England, Wales and Northern Ireland, and supports a unique network of local campaigning groups working in communities throughout Wales. We are part of an international network of 75 national groups, counting over 2 million members and supporters globally. Friends of the Earth is dedicated to the protection of the natural world and the wellbeing of everyone in it. We combine people power all over the world to transform local actions into global impact.

We welcome these proposals for bus reform in Wales and urge the Welsh Government to proceed with this legislation as soon as possible as 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 two years ago, and the examples of Zurich canton in Switzerland.

### Climate emergency context

We're in a climate emergency and the science shows us that we only have a few years left to act. We're already seeing and feeling the impacts of climate change – in Wales with flooding and extreme heat, as well as globally. This poses a significant threat to the health and well-being of current and future generations, as well as the natural world.

Transport is the third largest source of greenhouse gases in Wales, behind business and energy supply, with a 16% share of GHG emissions. In order to transition to net zero, as we urgently must, there must be a transformation in public transport in Wales, combined with active travel options.

## Consultation questions

**Q1:** 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 strongly agree to strongly disagree.

Strongly agree

Comments:

Yes, we need a transformational reform of the way bus services are delivered in Wales – to make transport fairer and greener. Transport is responsible for a fifth of carbon emissions and 16% of GHG emissions in Wales and we’re facing a climate emergency. Bus services have long been the Cinderella service in Wales despite carrying three times as many passengers as trains<sup>1</sup>, and being the only public transport option across much of Wales, especially in rural areas and for those without access to a car.

**Q2:** 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 strongly agree to strongly disagree.

Strongly agree

Comments:

Yes we believe that franchising is required to deliver the scale and speed of change required and the strategic approach needed (which includes the ability to set a timetable that connects to train departures and arrivals, and minimum service levels for different settlements). It will of course also need an increase in funding and further investment, so is not a panacea in itself.

Given both the scale and urgency of the climate emergency we have to make significant changes to how we travel and connect communities in the next couple of years, and a new structure that can deliver that is necessary.

**Q3:** Do you agree with the Welsh Government’s preferred franchising model as described above? Please score from strongly agree to strongly disagree.

Strongly agree

Comments:

---

<sup>1</sup> 90 million bus passenger journeys each year by bus, approx 30 million rail journeys, Welsh Government White Paper p.10

Yes as long as it is resourced and that the governance structures are set up in good time. It provides a balance between local delivery and the joined up approach which is needed.

**Q4:** Do you agree that this model provides sufficient local input for designing local bus networks? Please score from strongly agree to strongly disagree.

Strongly agree

Comments:

A strategic approach needs to combine local needs with national standards e.g. frequency of service based on settlement types.

**Q5:** 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 strongly agree to strongly disagree.

Strongly agree

Comments:

Yes, collaboration and coordination between local authorities and on a regional level will be essential for successful delivery, however it ultimately needs to be combined into a national network plan.

**Q6:** 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 strongly agree to strongly disagree.

Strongly agree

Comments:

Yes, franchising at a national level can also help with integration, including with rail services, to ensure the desired outcome of one network, one timetable, one ticket.

**Q7:** Do you agree with the need for a duty to ensure plans are designed to be affordable? Please score from strongly agree to strongly disagree.

Strongly agree

Comments:

Yes, unaffordable plans will only undermine public confidence. However there needs to be a clear funding commitment, and public investment to make this transformative change, ensure a modal shift and meet carbon reduction targets. Otherwise plans will be unambitious and not meet the objectives.

**Q8:** 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 strongly agree to strongly disagree.

Strongly agree

**Q9:** Do you agree with the proposed requirement to consider the impact on SME bus operators when franchising? Please score from strongly agree to strongly disagree.

Strongly agree

Comments:

Local need and knowledge is an essential part of this proposal, and local and SME providers should be given a fair opportunity. Local employment opportunities and fair employment terms should also be a consideration.

**Q10:** 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 strongly agree to strongly disagree.

Strongly agree

Comments:

Yes, as the pandemic has shown, a last resort option is necessary to ensure services, although this should not be necessary under normal circumstances.

**Q11:** Do you think further specific legislative provisions are needed for the transitional period until franchising is introduced?

No comments

**Q12:** Do you agree that local authorities should be able to run bus services directly? Please score from strongly agree to strongly disagree.

Strongly agree

Comments:

Yes, this may well be necessary in some areas, as long as service standards and timetabling meet an agreed national standard. However there will need to be assurances and procedures in place to ensure that there is a level of independence from political interference e.g. reallocation of budgets.

**Q13:** Do you agree that local authorities should be able to set up arms-length companies to operate local bus services? Please score from strongly agree to strongly disagree.

Strongly agree

Comments:

Yes this would avoid the concern mentioned in the previous answer.

**Q14:** Do you agree that local authorities should be able to invest in or acquire bus companies? Please score from strongly agree to strongly disagree.

Strongly agree

**Q15:** Do you agree that municipal bus companies should be able to raise fund by borrowing or selling shares? Please score from strongly agree to strongly disagree.

Agree

Comments:

Yes, especially if this allowed more community ownership.

**Q16:** Are there any additional safeguards you would like to see applying to the use of these powers?

No comments

**Q17:** Are there any further comments you would like to provide on the content of this white paper?

No comments

**Q18:** Do you have any comments on the draft Regulatory Impact Assessment published alongside this paper?

No comments

**Q19:** 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?

**Q20:** 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.

Ensuring a bilingual service should be a part of the condition of franchising.

In the long term these proposals, and the achievement of an integrated, affordable public transport system throughout Wales should have a positive impact on predominantly Welsh speaking communities in rural areas who currently have little or no access to public transport, enabling better access to services, employment and cultural activities.

**Q21:** 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:

In order to meet both air quality standards (as are intended to be set under new clean air legislation) and moving to a net zero Wales as quickly as possible the franchising process must be linked to ensuring a fleet of clean electric buses throughout Wales. This will of course require investment.

We would also encourage consideration of integration not only with rail but active travel options and an e-charging network – for vehicles including cars and e-bikes.

Accessibility and cost are two other key factors to ensure a fair transport system, and we would urge the involvement of groups who will be most impacted and face the greatest barriers in developing these proposals.