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Llywodraeth Cymru  
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Consultation – Summary of responses

Improving Public Transport

11 July 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

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# 1. Introduction

In December 2018, the Welsh Government set out legislative proposals in the Improving Public Transport White Paper for reforming the planning and delivery of local bus services and licensing of taxis and private hire vehicles (PHVs). The aim is to create a modern public transport system which should be accessible, affordable and integrated across the whole of Wales, providing choice and opportunity as a viable alternative to the private motor car.

The White Paper was published on 10 December 2018 and the consultation period remained open until 27 March 2019. An Easy Read and a Community and Youth version of the White Paper were also published. Large print, braille, audio CD and alternative language versions were available on request.

There were two parts to the White Paper which covered the following:

## **Part 1 – Bus services**

- Introduction
- What are the issues?
- Proposals
  - Joint Transport Authorities (questions 1-7)
  - Enhanced Quality Partnerships (questions 8-9)
  - Franchising (questions 10-15)
  - Local Authority Bus Services (questions 16-17)
  - Eligibility age for Mandatory Concessionary fares (questions 18-19)
  - Public transport information and monitoring (questions 20-21)

## **Part 2 – Taxis and PHVs**

- Introduction
- What are the issues?
- Proposals
  - National Standards (questions 22 – 27)
  - Enforcement (questions 28 – 30)
  - Information sharing (questions 31 -32)
  - Joint Transport Authority (questions 33 – 35)

The legislative proposals in the White Paper for bus services were

- Initial proposals for establishing Joint Transport Authorities (JTAs) with the intention that the responses inform the development of detailed proposals and further consultation;
- Enhanced Quality Partnerships;
- Franchising;
- Revising current legislation so that local authorities can run their own bus services;
- Increase the eligibility age of the mandatory concessionary fares scheme to bring it in line with the state pension age; and
- Put in place new information monitoring and sharing arrangements.

The legislative proposals in the White Paper for taxis and PHVs were:

- National Standards for taxi and PHV licensing;
- Allowing a licensing authority to take enforcement action against any vehicle operating in its area;
- The creation of a mechanism by which relevant information can be shared, for the purpose of safeguarding; and
- Redirecting all of the existing taxi and PHV licensing functions away from local authorities and into a national licensing authority, a JTA.

The purpose of this report is to provide a summary of the consultation responses and feedback from engagement activity, identifying the common themes and key issues. A wide range of individual views and comments were received, which will all be used to inform the next steps.

## **2. Engagement methods**

The White Paper included a total of 38 questions, based on the Welsh Government's proposals for legislation. The Welsh Government sought a broad range of views on the White Paper through written responses, engagement events and specific engagement meetings to ensure as many people as possible had the opportunity to voice their opinions on the Government's proposals.

The Community and Youth version of the White Paper uses less technical language and graphics in order to make the content of the White Paper more accessible. This version included seven question on the bus proposals and five questions on the taxi and PHV proposals.

The Easy Read document sought to communicate the core points of the White Paper with words that are easy to read and understand. Difficult words were highlighted and an explanation provided. This version included six questions on bus proposals and four questions on taxi and PHV proposals.

### **Written Responses**

A total of 564 responses were received. 558 responses were in relation to the main consultation document. Respondents were not obliged to provide a response to each and every question. Some respondents decided to omit questions on specific parts of the White Paper. This figure therefore includes responses from those who chose to respond to the closed 'tick box' questions, those who provided comments in the form of written text and those who provided both. 20 of the responses received were in the form of a letter and were not linked to specific questions.

Five responses were received to the Community and Youth version and one response to the Easy Read version.

Out of the responses received, 278 responses were received from the Cardiff Hackney Alliance in the form of a standard campaign response addressing the questions posed in relation to taxis and PHVs only.

The list in table 1 below contains the categories of respondents and the number of responses received in each category.

Where closed "tick box" questions have been asked we have provided a quantitative analysis and chart illustrating answers provided.

We have also analysed the comments to give an overview of the main themes that arose. A summary of the analysis of the responses for each question is shown in section 3 of this report.

## Consultation events and meetings

In addition to the written consultation, four engagement events were held at Conwy, Cardiff, Swansea and Llandrindod Wells, with a total of around 200 in attendance. The events took the form of presentations by officials, followed by facilitated round-table discussions with the opportunity for attendees to provide comments on flip charts, followed by a feedback session at the end.

Specific engagement meetings have also taken place with a range of organisations and individuals sharing protected characteristics. This has included:

- Disability Wales, who were able to provide views expressed by disabled people with a broad range of impairments;
- Guide Dogs Cymru;
- Youth Parliament; and
- Children in Wales.

Briefing sessions were also held with the following groups:

- Future Generations Commission;
- the Welsh Local Government Association;
- Country Surveyors Society and the Association of Transport Coordinating Officers;
- South West Transport Portfolio Members;
- Transport Cabinet Members Advisory Group in North Wales;
- NBN Bus Workstream;
- Community Transport Association;
- Unite, Branch Secretary for the Hackney Carriage Association;
- Taxi and PHV Licencing Experts Panel;
- Institute of Licensing; and
- Uber in Wales.

A summary of the feedback from the events and meetings is provided under section 6.

### 3. Introduction to written responses

A total of 564 written responses were received. Respondents were not asked to allocate themselves in specific sectors, e.g. member of the public or local authority. We have analysed the responses and categorised each respondent in the categories listed in the grid below. This categorisation has been used to recognise any sectorial trends or differences in our analysis of responses provided.

**Table 1**

<b>Category</b>	<b>Number of Responses</b>
<b>Members of the public / individuals, of which 55 were responses from a single member of the public</b>	<b>158</b>
<b>Local government (local authorities, town and community councils, health boards and the police)</b>	<b>50</b>
<b>Politicians and Elected Members (AMs, MPs and Councillors)</b>	<b>9</b>
<b>Passenger representative groups and protected characteristics representative groups</b>	<b>27</b>
<b>Bus operators, transport representative bodies and Unions</b>	<b>20</b>
<b>Taxi industry including PHV – drivers and operators, of which 278 were a campaign response from Cardiff Hackney Alliance</b>	<b>289</b>
<b>Community and Youth</b>	<b>5</b>
<b>Easy Read</b>	<b>1</b>
<b>Organisations</b>	<b>5</b>

The 278 campaign responses from Cardiff Hackney Alliance have been noted in the analysis of each question where they have provided a response.

Since the White Paper covered proposals on buses and taxis and PHVs, not all respondents have addressed all sections of the White Paper. 558 responses were received for the main consultation document. This is broken down as follows.

- 315 responded to questions across bus and taxi proposals.
- 101 responded to questions on bus proposals only.
- 315 responded to questions on taxi proposals only.

Five responses were received to the Community and Youth Version and one response to the Easy Read Version.

50 responses were received from local authorities, town and community councils, health boards and the police. This includes responses from three English local authorities, which broadly align with the view of Welsh local authorities.

Some local authorities have provided more than one response. This reflects the different functional areas of local authorities engaging with the consultation.

## 4. Responses to the Community and Youth and Easy Read versions

In addition to the main White Paper consultation document, more accessible versions were issued. The questions in the Community and Youth and Easy Read versions followed the same key areas and were simplified. Therefore the responses to these questions have been analysed separately.

### Part 1 Local bus services

#### **Proposal 1 – We want to create Joint Transport Authorities.**

**Do you think this is a good idea? Tick box option – Yes/No**

**Why?**

All respondents to the Community and Youth version supported this proposal. The comments noted that greater efficiency was needed but bureaucracy should be avoided and that local communities should have a voice. There was not a similar question in the Easy Read version.

**We believe there are two different ways JTAs could be set up. Which structure do you prefer?**

**Tick box options:**

**A - 1 National JTA covering all of Wales**

**B - 1 National JTA and 3 regional JTAs (4 JTAs in total)**

**C - Is there another structure for the JTAs that could be used**

**Why?**

Four respondents to the Community and Youth version supported a national JTA and one supported national and regional JTAs. The respondent to the Easy Read version supported a national JTA.

The comments from respondents included that a national approach would support joined up planning and co-ordination. There was a strong theme that there needs to be fairness across Wales so urban areas are not given priority over rural areas and that local communities should be involved.

**Proposal 2 – We want local authorities to work better with bus companies to deliver improved bus services. To allow for this we want local authorities to be able to make Enhanced Quality Partnerships.**

**Do you think we need Enhanced Quality Partnerships? Tick box option – Yes/No**

**Why?**

All respondents to the Community and Youth and Easy Read versions supported this proposal.

The comments from respondents included that better services are needed and that defining standards would be helpful. There was also support for communities to be involved in the process and for enough money to be available to deliver the improvements needed.

**Proposal 3 – We want local authorities to be able to franchise bus services.**

**Do you think local authorities having the option to franchise bus services is a good idea? Tick box option – Yes/No**

**Why?**

All respondents to the Community and Youth and Easy Read versions supported this proposal.

There were few comments, however, it was noted that careful monitoring and controls would be needed.

**Proposal 4 - We want local authorities to be able to set up and their own bus services.**

**Do you agree that local authorities should be able to run their own bus services? Tick box option – Yes/No**

**Why?**

All respondents to the Community and Youth and Easy Read versions supported this proposal.

Some respondents commented that the proposal would support better involvement of local communities and with wider objectives such as climate change and tackling rural isolation. A concern was raised about how such a service would be funded.

**Proposal 5 - We want to change the age for free bus passes.**

**Do you think it is a good idea to change the age a person can get a bus pass for free travel in Wales? Tick box option – Yes/No**

**Why?**

Two respondents to the Community and Youth version and the respondent to the Easy Read version supported this proposal. Three respondents to the Community and Youth version disagreed with this proposal.

There were few comments from those agreeing with the proposal. One respondent agreed provided the change is phased and that existing pass holders are not affected.

Those disagreeing with the proposal considered that the change would cause a reduction in bus use and have a worsening effect on climate change. It was also felt that the change would be significant for rural communities.

**Proposal 6 – We want information about bus services to be shared better.**

**Do you think this is a good idea? Tick box option – Yes/No**

**Why?**

All respondents to the Community and Youth and Easy Read versions supported this proposal.

Some respondents commented that those who do not have access to the internet would find it particularly difficult accessing the information and that bus shelters should provide up-to-date relevant information which is not the case in some areas.

**Part 2 Taxis and private hire vehicles**

**Proposal 1 – We want to create new national standards for all taxis and PHVs.**

**Do you think all local authorities should have to adopt the same standards when issuing taxi/PHV licenses? Tick box option – Yes/No**

**Why?**

Three respondents to the Community and Youth version and the respondent to the Easy Read version supported this proposal.

There were few comments, however, some respondents noted that the same standards should be reflected equally throughout Wales.

**Do you think a national standard about vehicle pollution is a good idea? Tick box option – Yes/No**

**Why?**

Three respondents to the Community and Youth version and the respondent to the Easy Read version supported this proposal.

Respondents felt that climate change should be taken more seriously by local councils and the Welsh Government and the same standards should be reflected equally throughout Wales.

**Proposal 2 –We want to give local authorities the power to take action against any taxi or PHV if they need to.**

**Do you think all local authorities should be able to take away any taxi or PHV licence? Tick box option – Yes/No**

**Why?**

Three respondents to the Community and Youth version and the respondent to the Easy Read version supported this proposal.

There were few comments, however, respondents noted that the consequences should be the same as other areas across Wales.

**Proposal 3 – We want to create a national database that holds the information about all licenses in Wales.**

**Do you think all local authorities should be able to share information about taxi and PHV licenses? Tick box option – Yes/No**

**Why?**

Three respondents to the Community and Youth version and the respondent to the Easy Read version supported this proposal.

There were few comments, however, respondents noted that they are surprised this has not already been implemented.

**Proposal 4 – We’re thinking about the best way to achieve Proposals 1-3. We are considering allowing a new national licensing authorities (a Joint Transport Authority or JTA) to licence all taxis and PHVs in Wales.**

**Do you think taxi and PHV licensing should be done by:**

**A new national licensing authority (JTA for all of Wales (Option A)?**

**The 22 Welsh local authorities (Option B)?**

**Why?**

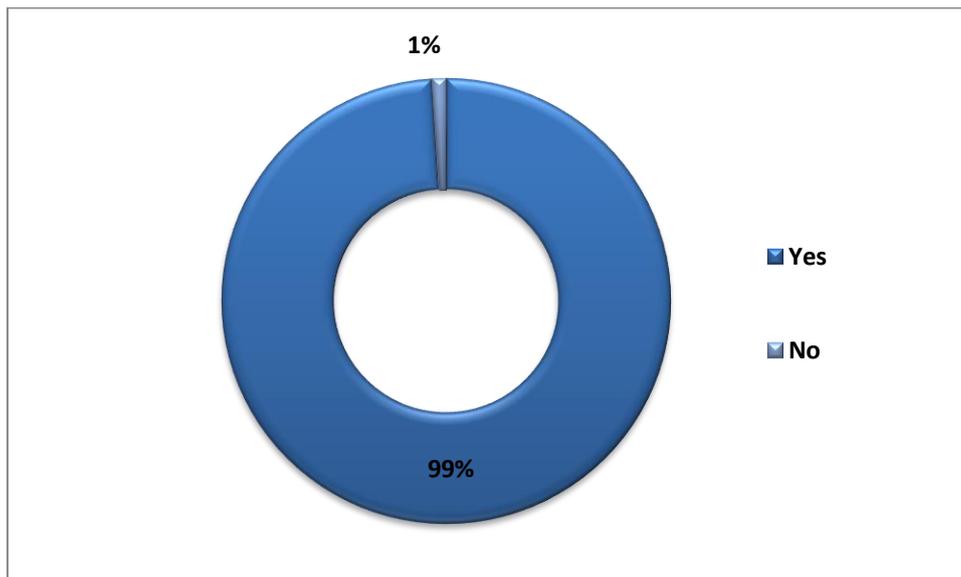
Three respondents to the Community and Youth responded to proposal 4. Two respondents chose option A and one chose Option B. No comments were given for this question.

## 5. Detailed analysis of written responses

### Part 1: Bus Services

**Question 1 - Do you agree that it is important for local authorities to work together with regard to local bus services? Yes/No? Please explain your answer.**

**Figure 1: Responses to Question 1**



A total of 142 responses were received for this question. 142 responses were provided to the closed tick box questions, of which 140 responded yes and 2 responded no. 100 respondents provided comments.

A clear majority considered that it is important for local authorities to work together. Notably, 30 of the 34 responses from local authorities agreed with the proposal.

Many of the responses from local authorities reflected that there are arrangements in place for regional working and that the legislative proposals would formalise this.

Many respondents felt the proposals would assist in facilitating more consistent and integrated transport that better reflects the travel patterns of the public which is often different to local authority boundaries. Some respondents noted that there should be a more collaborative approach between local authorities, bus operators and local people.

## **Question 2 - Please provide comments on the proposed organisational structures. Which is your preferred option and why?**

The consultation document did not provide a tick box option choice but outlined the following two options:

Option 1 – National JTA with regional delivery boards; and

Option 2 – National JTA with three separate regional delivery boards.

107 responses were received for this question. Of the 107 responses there were mixed views across all categories of respondents.

In analysing the responses we have determined that 31 were in favour of Option 1 and 34 were in favour of Option 2. 22 responses favoured regional working without a national JTA and 20 expressed no clear preference.

Respondents favouring Option 1 considered that a national JTA would best support a clearer, standardised approach and would provide the best opportunity for economies of scale.

Respondents favouring Option 2 considered that regional JTAs would support a more localised approach with local accountability and considered that the different regions of Wales have different challenges that need to be specifically addressed. However, they also considered that there was a role for national approach and that this would support continuity. Some respondents felt that there should be 4 regional JTAs.

Respondents that were considered to favour a regional approach without a national JTA either made no comment or clearly expressed concerns about a national JTA.

Some respondents considered that wider issues such as planning and patient transport should be within the scope of JTAs.

**Question 3 - Is there another organisational structure for JTAs that we should consider? Please describe.**

72 responses were received for this question.

Respondents expressed broad support for regional approaches. Some felt that existing regional structures should be used as the organisational footprint.

A common theme in a number of responses was the need to ensure that regional JTAs fit with other administrative areas such as Health Boards and joint working arrangements which are emerging as an alternative to merging local authorities. Some proposed that, to work effectively, there should be sufficient funding and resources for the authorities to deliver the key improvements at a regional level.

Some respondents presented alternative approaches, such as JTAs focussed on regional and urban areas or JTAs addressing specific delivery functions. Some considered that Transport for Wales could have a role at the national level, working with the Welsh Government.

Further comments echoed by local authorities were that ongoing five-year funding arrangements are required for the delivery of the Regional Transport Plans.

#### **Question 4 - Do you have any comments on the proposal that the Welsh Ministers should be represented on a JTA or any committees of a JTA?**

96 responses were received for this question.

We analysed the responses to determine whether respondents support the Welsh Ministers being represented on JTAs. 89 respondents expressed support for the proposal whilst 24 disagreed and 19 did not express a clear view either way.

Respondents supporting the proposal felt that the Welsh Ministers' representation would reinforce the Government's commitment to delivery and ensure an effective strategic perspective for planning, implementation and funding programmes. However, there was also a view that such representation should be limited to a national JTA.

Some local authorities expressed concerns that local accountability could be diluted and that the Welsh Ministers' representation would cause a blurring of roles and conflict of interest.

Several respondents felt it would be helpful for the Welsh Ministers to have an observer role and sought clarity about voting rights and representation of other stakeholders such as passengers, planners and health board representatives.

**Question 5 - Do you have any comments on the proposals that the Welsh Ministers should have powers to issue guidance and directions, and to intervene where a JTA is failing to exercise its functions effectively?**

99 responses were received for this question.

We have analysed the responses to determine whether respondents support this proposal. 79 respondents expressed support for the proposal whilst 5 disagreed and 15 did not express a clear view either way.

Comments included that it would be a mechanism to ensure strategic direction, delivery of best practice and hold JTAs to account.

There was broad support for the Welsh Ministers to have powers to intervene in the event of a JTA failing to exercise its functions, provided the basis for this intervention is clearly set out in legislation so that such situations would be well evidenced and proportionate.

The respondents that did not agree to this proposal considered that transport is a local issue or that powers to issue guidance and give support were acceptable but not intervention.

Respondents sought further clarification in the following areas:

- What format will the intervention take?
- How long will the intervention be applied?
- What length of time will the intervention last?
- What are the circumstances under which the intervention can be removed?
- What is the appeal process?
- Who would audit the JTA?
- Who would assess the JTA's success or failure?

## **Question 6 - Is the proposed division of national and regional functions appropriate?**

99 responses were received for this question.

We have analysed the responses to determine whether respondents support the proposed division of functions. A significant proportion of the respondents agreed with the proposal, 49 agreed that the proposed is appropriate, 12 disagreed, 38 did not express a clear view either way.

Responses in agreement expressed that it is important for regions to maintain local contractual and infrastructure management, whilst national functions could oversee the standardisation of approaches across the region.

A number of respondents felt further clarification is required on some roles and responsibilities before a more definite assessment could be made and that there needs to be strategic direction from the Welsh Government. Several responses reflected their preference for alternative models of JTAs and answers to earlier questions in relation to JTAs.

Several local authorities called for co-design of detailed proposals and further clarification was requested in the following areas:

- How will a national JTA be funded
- Is the National JTA TfW (Transport for Wales)?

## **Question 7 - Should any other transport functions be transferred to a JTA?**

79 responses were received for this question.

Of the 79 respondents who expressed an opinion, they noted that once the JTA is established consideration could be given to incorporating the following transport functions:

- Non-emergency medical patient transport adult care transport;
- Co-ordination and funding of community transport schemes;
- Traffic regulatory powers;
- Social Services;
- Active Travel;
- Car Parking and Park and Ride;
- School and additional learning needs transport;
- Traffic Management;
- Procurement;
- Civil Parking Enforcement;
- Accessibility standards and information;
- Monitoring local bus services;
- Development of technological solutions – IT;
- Development of regional transport plans;
- Integration with rail, sea and air travel;
- Consideration of taxis and private hire vehicles;
- Highways and trunk road agencies;
- Timetable information;
- Ticketing;
- Stronger linkage with land use planning;
- Consideration and implementation of clean air zones and air quality issues;
- Operation of regional bus companies; and
- Traffic commissioner role.

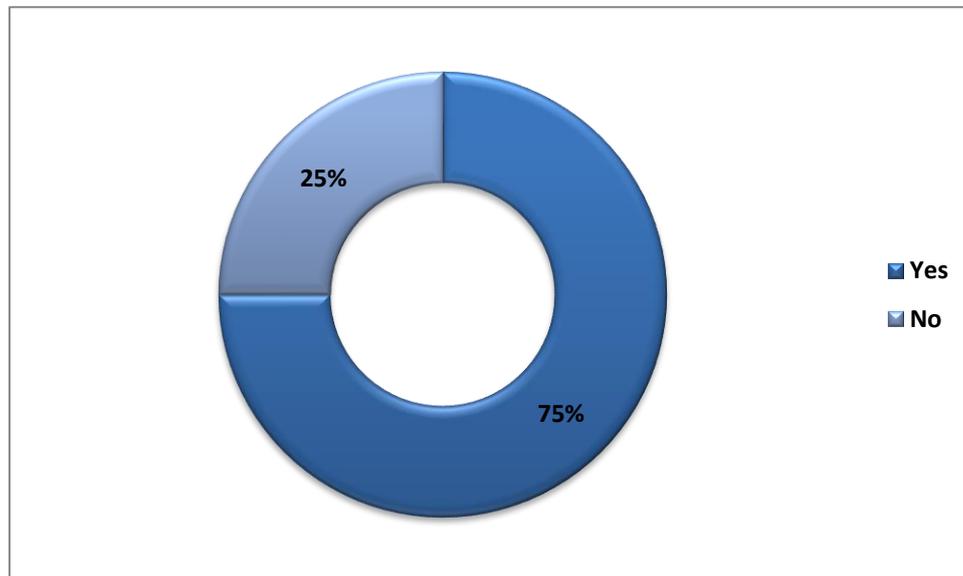
Several respondents felt that the JTA would need to focus on public transport and bus issues. Adding functions could then be a future development. There was a general interest in the development and consultation of detailed JTA proposals.

The following functions were noted as functions that should not become JTA functions unless there is a clear business case:

- Highways maintenance; and
- Winter maintenance.

## Question 8 - Do you think that legislation is required to secure the benefits of enhanced partnership working? Yes/No?

Figure 8: Responses to Question 8



A total of 106 responses were received for this question. 100 responses were provided to the closed tick box questions, of which 75 responded yes and 25 responded no. 77 respondents provided comments.

Whilst a range of views were expressed in the comments, there was a general theme that partnership approaches and collaboration between local authorities and bus operators is essential and putting this on a legislative framework was important.

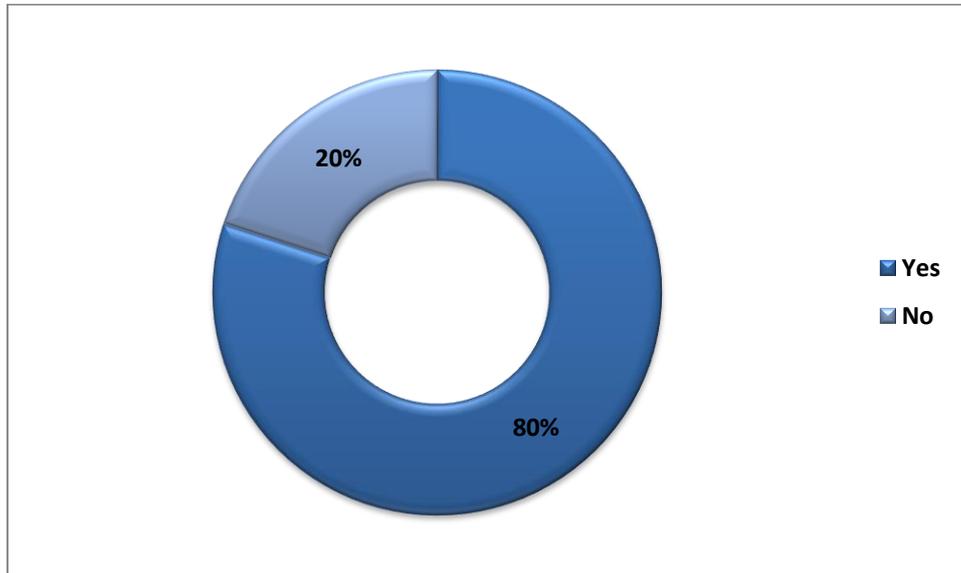
It was considered that legislation is the key to delivering consistency, quality and effectiveness to ensure standards are maintained. Also, there were views that it would provide consistency across regions to improve and develop services.

Some respondents considered that voluntary arrangements and existing statutory quality partnerships should be retained.

In contrast bus operator alliances were given as an alternative and one bus operator considered that the proposals were unnecessary and cumbersome.

**Question 9 - Do you agree with our proposals for EQPs, in particular the proposed process for developing and making EQPs? Yes/No?**

**Figure 9: Responses to Question 9**



A total of 100 responses were received for this question. 88 responses were provided to the closed tick box questions, of which 70 responded yes and 18 responded no. 59 respondents provided comments.

There was general support for EQPs provided they contributed to improved services for passengers. Involvement of all parties in the development of EQPs was welcomed and some respondents highlighted the need to involve passengers earlier, including those from groups with protected characteristics.

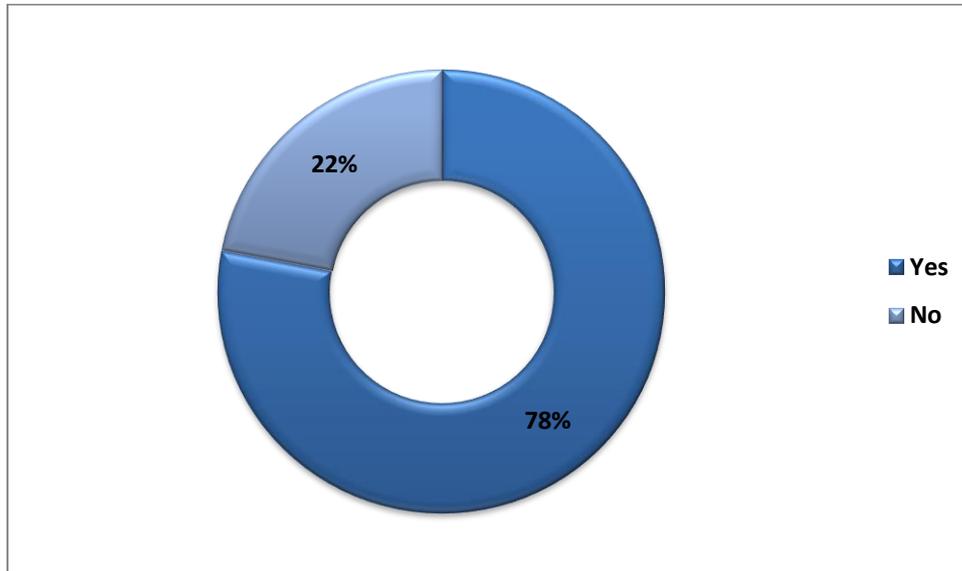
Many welcomed the partnership approach and highlighted the importance of trust, collaboration and agreement. The voting mechanism was recognised as a way to involve SMEs.

Some respondents who disagreed with the proposal considered that a voluntary approach or better implementation of existing partnership models should be used. Others highlighted that more financial resource was needed and raised concerns around the complexity and bureaucracy of the proposals. Further comments included concerns that the consultation does not address how the Welsh Government would deal with a dispute between a single operator and the local authority.

Respondents have also sought clarification from the Welsh Government in relation to how EQPs would be developed should the Welsh Government establish the proposed JTAs.

**Question 10 - Do you think that the proposed scheme provides a more workable option for the franchising of local bus services? Yes/No?**

**Figure 10: Responses to Question 10**



A total of 107 responses were received for this question. 90 responses were provided to the closed tick box questions, of which 70 responded yes and 20 responded no. 72 respondents provided comments.

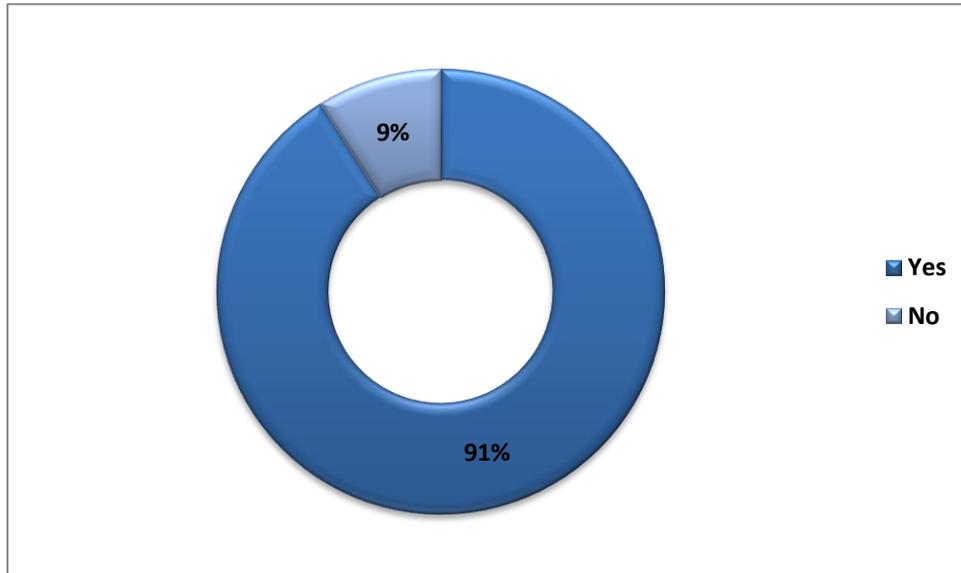
Some respondents from local authorities expressed that funding restraints are their main concern but believe this provides an opportunity to improve local bus services as a whole.

Whilst there is broad support for improving bus services through the franchising proposals, many respondents highlighted practical challenges and some complex issues in implementation. Some respondents felt that franchising would not be suited to all areas of Wales and would welcome a localised approach. It was also expressed that congestion would need to be addressed if franchising was going to work and some recognised that existing arrangements for tendering bus services in non-commercial areas were similar to franchising arrangements. Some respondents felt that franchising would bring certainty of routes and could deliver service improvements.

Several respondents expressed concern regarding the financial and staffing cost on local authorities and felt that it would destabilise the bus market causing reduced competition which could affect future franchising tenders. There was a clear view from bus operators who provided detailed views that franchising would not deliver benefits or value for money and some expressed concern that it would bring uncertainty and risk for operators and that SMEs would be significantly impacted.

**Question 11 - Do you think there should be a requirement for the assessment to be subject to an independent audit? Yes/No?**

**Figure 11: Responses to Question 11**



A total of 96 responses were received for this question. 90 responses were provided to the closed tick box questions, of which 82 responded yes and 8 responded no. 78 respondents provided comments.

The respondents clearly voiced that independent audits would ensure that appropriate procedures are followed and that assessments are undertaken by a local authority or JTA are robust, thus ensuring the procedures are compliant with the relevant legislation.

A number of respondents from local authorities felt that an independent audit would ensure fairness, equality and accountability.

Some respondents considered that the Traffic Commissioner should have a role in determining franchising proposals.

Some respondents expressed concerns about the proposals and considered that an independent audit was unnecessary, costly and could cause delay.

## **Question 12 - Do you have any other comments on the proposed process for franchising?**

37 responses were received for this question.

Many responses echoed concerns raised in relation to the other questions on franchising.

A range of issues were raised by respondents, including that franchising is a costly tool that would be difficult to administer and would lead to a loss of competition. Furthermore, some bus operators commented that the threat of franchising would cause uncertainty and reduce investment by bus operators.

Other points raised included the impact of congestion and reducing service standards on buses should be addressed to support franchising and the shift to public transport.

**Question 13 - Do you have any comments in relation to the proposals for the issuing of permits in circumstances where franchising arrangements are in place?**

43 responses were received for this question.

A range of respondents commented that the consultation document does not set out the terms and conditions of permit arrangements and therefore more information is required. There are concerns that if more clarity is not provided, this could potentially result in differences and inconsistencies between neighbouring franchising authorities.

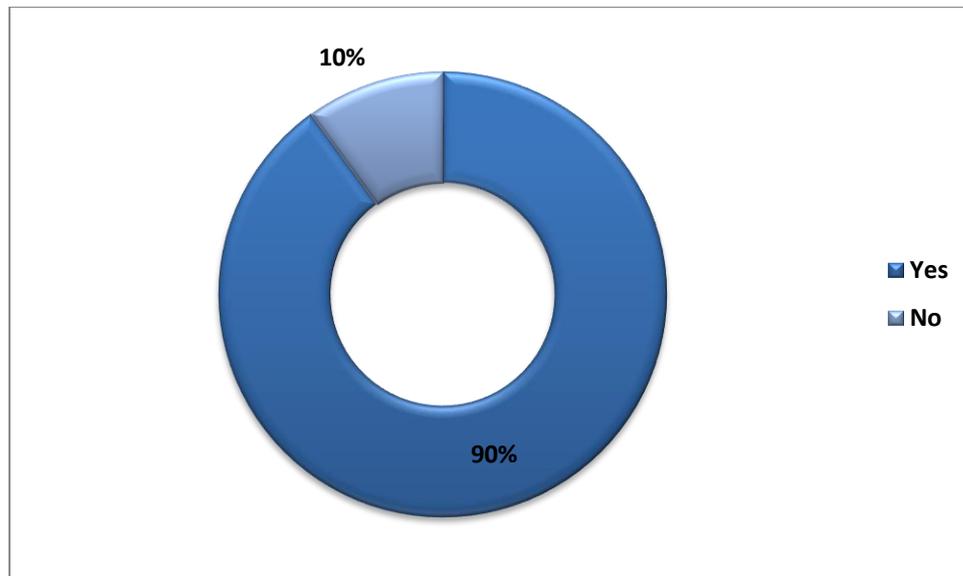
The need for neighbouring authorities to work together on issues such as permits was noted by some respondents.

Some respondents requested more clarity in respect of the following:

- How will we be affected? We currently run under S22 permits and do not have any contracts as that goes against the whole remit of these permits; and
- Would community transport be able to carry concessionary fare passengers with proper recompense, rather than a proportion of the standard adult fare?

**Question 14 - Do you agree that as part of any arrangements to let franchise contracts, specific consideration should be given to how SMEs can be enabled to be involved in the procurement process? Yes/No?**

**Figure 14: Responses to Question 14**



A total of 109 responses were received for this question. 103 responses were provided to the closed tick box questions, of which 93 responded yes and 10 responded no. 79 respondents provided comments.

Most respondents felt that SME bus operators provide important, locally responsive bus services and that healthy competition should be maintained through any franchise procurement process.

Many felt that it was important that franchise procurement processes should be open, fair and take account of the prevailing bus market in the local area. Some local authority respondents felt that this could be achieved through letting contracts in a similar way to the London bus franchise model. However, other respondents felt that the London model was overly complex and difficult for SMEs.

Many respondents felt that complex procurement processes could be a deterrent for SMEs and that SMEs should be supported through the procurement process.

Several respondents highlighted the importance of community transport and the potential impact of franchising.

**Question 15 - What transitional arrangements should be considered in order to ensure that bus services are not compromised during the process of preparing to franchise?**

71 responses were received for this question

The risks associated with the transition from commercial services to franchised services were broadly recognised. Potential actions noted in the comments to address this risk include:

- Thorough consideration of this issue at concept stage;
- Issuing short term interim contracts on a subsidised basis;
- Extend the notice period for withdrawing a service; and
- A clear notice / lead in period to franchising.

**Question 16 – Do you think that local authorities should be able to run bus services directly (i.e. in-house services)? 16a. In what circumstances do you think this would be appropriate?**

**16b. What, if any, safeguards do you feel ought to be put in place with in-house services to ensure that no local authority has an unfair advantage in a deregulated market, and why**

115 responses were received for this question.

Through analysing the responses, we have determined that 80 respondents were in favour of local authorities running bus services in house, 19 disagreed and 16 did not express a clear view either way.

This is a multiple part question. Not all responses clearly indicated which part of the question was being addressed. The comments below reflect the broad responses to all parts of question 16.

The majority of respondents were supportive of the proposal. Responses echoed a theme that local authorities should run in-house services where little or no alternative transport options exist and should be considered mutually beneficial to residents. Many stated that it should be supported where it was evidenced that social need that was not being satisfied in the commercial market and some gave examples such as in rural areas, learner transport and social care transport.

There was also clear support where such services are set up and run transparently resulting in a cost effective solution for more and better quality bus services.

There was a pattern of concern that local authorities would have limited resources, staffing capability and funding to introduce bus services in house.

Respondents who did not support the proposal considered that bus services should be run by those with experience and that more fundamental issues needed to be addressed to reverse the decline in bus use and community transport used instead.

**Question 17 – Do you think that local authorities should be able to set up arms-length companies to operate local bus services? 17a. In what circumstances do you think this would be appropriate? 17b. What, if any, safeguards do you think should be put in place with arms-length bus companies to ensure that no local authority has an unfair advantage in a deregulated market, and why?**

96 responses were received for this question.

Through analysing the comments we have determined that 63 respondents were in favour of local authorities running bus services through an arms-length company, 22 disagreed and 11 did not express a clear view either way.

This is a multiple part question. Not all responses clearly indicated which part of the question was being addressed. The comments below reflect the broad responses to all parts of question 17.

In general there was broad support for local authorities to have the option to create arms-length companies where local bus services will be improved for passengers and there is a clear value for money rationale. Some respondents felt that this should be a tool of last resort and favoured local authorities providing services in-house. Several respondents highlighted the importance of community transport.

Many respondents commented that safeguarding openness and clear accountability were important and that the governance structure would need to reflect these aims. The potential impact on local competition was also raised particularly if local authorities are considering franchising or EQPs.

**Question 18 - Do you agree with the Welsh Ministers' proposal to align entitlement to a mandatory concessionary fares pass with a woman's pensionable age? Please give reasons for your answer.**

107 responses were received for this question.

Through analysing the responses we have determined that 65 respondents agreed with the Welsh Ministers' proposal, 29 disagreed and 13 did not express a clear view either way.

Many respondents supporting this proposal considered that alignment to a woman's pensionable age is justified to ensure equality, that it would support ongoing sustainability of the scheme and be consistent with England. Other comments reflected that: disabled users should continue to receive concessionary passes; the changes should be phased; and impact assessments should be carried out and savings reinvested into bus services.

Of the respondents that were not in agreement with the proposal and provided reasons, views expressed were that: it would cause a reduction in bus journeys; was discriminatory to older people who have been impacted by pension changes; it would increase loneliness and isolation; and would mean a long wait for those who miss out.

Other respondents expressed that alternative approaches should be considered further including: means testing; paying for the pass and all journeys free; restricting the time to journeys after 9.30am; making savings through centralising the administration; and increasing eligibility for young people.

## **Question 19 - Do you agree that an incremental change is the most appropriate method?**

67 responses were received for this question.

On analysing the responses we have determined that 50 agreed that an incremental change is the most appropriate method, 14 disagreed and 3 did not express a clear view either way.

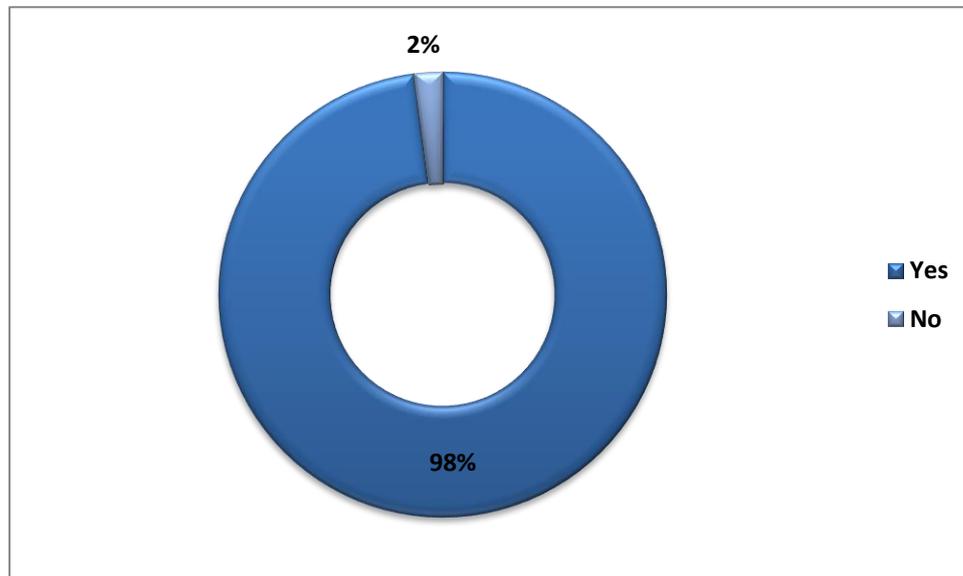
Many respondents expressed that an incremental change is fairer and helps the public adapt giving those who will be impacted time to prepare. Others supported the change in eligibility provided it was phased and existing pass holders were not affected.

Of the 14 that disagreed, the responses reflected concern that it would cause decline in bus use, increase car use, impact on the environment and impact the same group of people who have been affected by changes to state pensions.

One bus operator stated that operators would seek a “quid pro quo” for such a change as it would affect bus patronage and service viability.

## Question 20 - Do you agree with our proposal to require the release of open data on routes, timetables, fares and tickets? Yes/No?

Figure 20: Responses to Question 20



A total of 130 responses were received for this question. 129 responses were provided to the closed tick box questions, of which 127 responded yes and 2 responded no. 86 respondents provided comments.

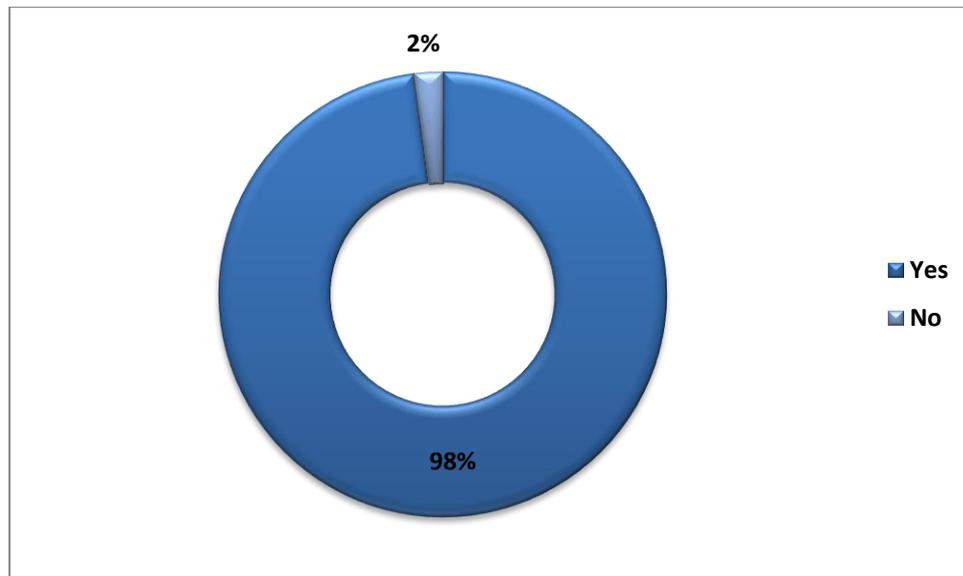
Of the responses that agreed to the proposal, there was a clear theme that high quality, accurate data about bus services should be freely available to the general public. Respondents representing older people and people with disabilities clearly stated that accurate and fully accessible information was essential.

Several respondents noted that a collaborative approach at a regional level would ensure consistency in implementation whilst others considered that the English model should be followed to avoid duplication of effort.

Some responses from local authorities and bus operators considered that the requirement should not be too onerous as it could affect the financial viability of services.

**Question 21 - Do you agree with our proposal to enable local authorities to have the power to obtain information on services which are to be cancelled or varied, and where appropriate, disclose this information as part of tendering process? Yes/No?**

**Figure 21: Responses to Question 21**



A total of 124 responses were received for this question. 122 responses were provided to the closed tick box questions, of which 120 responded yes and 2 responded no. 71 respondents provided comments.

The comments echoed a theme that provision of information where services are cancelled or varied was useful or important for local authorities. It was felt that this information would help local authorities react to changes in the network and ensure the public are well served.

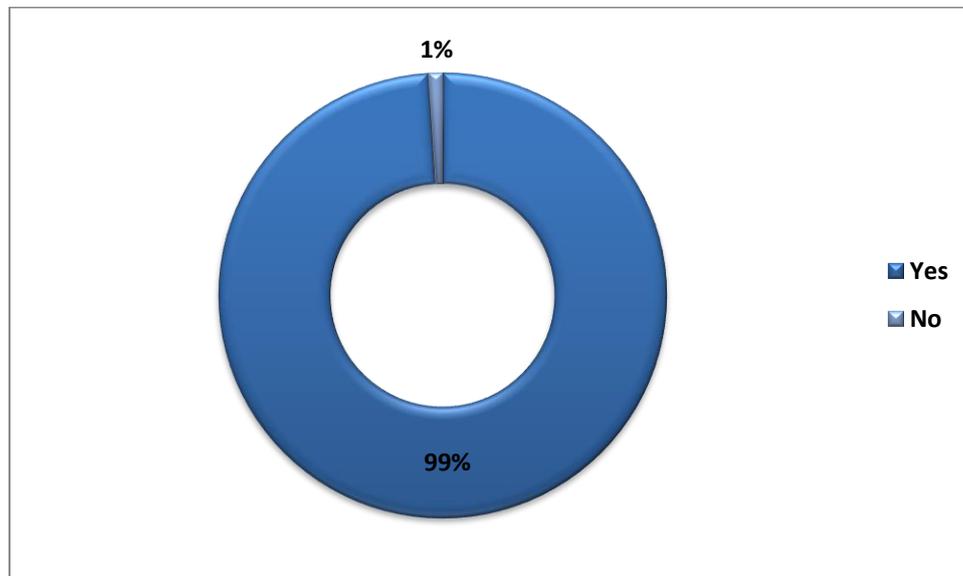
Some respondents recognised that where there are strong working relationships between local authorities and bus operators such provisions would not be necessary.

Generally bus operators were supportive of this proposal provided the information requested was reasonable and one respondent felt that it should not apply for minor variances particularly where they had been made to take account of congestion.

## **Part 2 – Taxis and PVHs**

Question 22 - Do you agree with our proposal to introduce national standards which will apply to all taxis and PHVs in Wales? Yes/No?

**Figure 22: Responses to Question 22**



A total of 427 responses were received for this question. 427 responses were provided to the closed tick box questions, of which 422 responded yes and 5 responded no. Of the 422 responses 278 were a campaigned response from Cardiff Hackney Alliance. 63 respondents provided comments.

Of the 427 responses there is strong agreement from all sectors, to introduce national standards. Some of the themes of the detailed responses that supported the proposal were that:

- It would create consistency across Wales;
- Training in sight loss awareness should be included as a national standard;
- Ensuring public safety was paramount;
- Cross border issues with England should be considered and some felt that Wales and England should have the same standard;
- There were differences of view as to whether the standard should be set for the whole of Wales or should have a degree of local determination; and
- Drivers and licensing officials should be engaged in setting standards.

Those who disagreed with the proposals and provided reasons considered that: there is insufficient information at this stage; stakeholders should be involved in developing detail; and what suits a large taxi firm may not be viable for a smaller rural operation.

## **Question 23 - Are there any matters which you would like to see contained in any national standards?**

370 responses were received for this question including 278 campaigned responses from Cardiff Hackney Alliance.

Of the 370 responses a number of suggestions were raised across all sectors.

Many respondents provided detailed lists of things that should be included in national standards and considered there should be consistency with England. The All Wales Licensing Expert Panel provided a comprehensive response to this question which was echoed by many local authorities across Wales and referenced existing and emerging guidance. The Task and Finish Group on Taxi and PHV Licensing Report and Institute of Licensing Guidance was referenced by some respondents.

Some of the key themes of the detailed responses are provided below:

- Clearly defined and consistent DBS checks;
- Disability awareness, accessibility, equality and safeguarding training;
- Customer service training;
- Driving standards test;
- Divers hours control;
- Literacy and numeracy standards;
- Medical standard for drivers. Group 2 Medical should be mandated;
- Consistent inspection regime to include supplementary vehicle standards, Enhanced MOT/Certificate of Compliance requirements and Fuel (emission standards);
- Clearly defined and consistent operator conditions;
- Age and condition of vehicle with some respondents considering this should include emissions standards;
- Vehicle external appearance – whether or not tinted windows are permitted, identification standards, livery and advertising standards;
- Passenger safety/comfort standards;
- Understanding of licensing regulations, including limits to cross border work;
- Minimum knowledge for the area licensed;
- Requirement for CCTV;
- Taxi meters and standardised pricing strategy; and
- The standards should not place unnecessary burden on the industry.

## **Question 24 - Are there any matters which you think should be excluded from any national standards?**

344 responses were received for this question, of which 278 were a campaigned response from the Cardiff Hackney Alliance. A co-ordinated response was also provided from most local authorities and the Licensing Expert Panel.

We have analysed the comments to determine that 39 responses, and the Cardiff Hackney Alliance responses, did not consider that anything should be excluded from national standards. 25 comments considered that there should be matters which are excluded. 79 gave no comments.

Notably, the co-ordinated response from local authorities and the Licensing Expert Panel stated that “no matters should be excluded, although national standards should not duplicate other legislation”.

Respondents who considered that matters should be excluded from national standards noted the following:

- Zero carbon should be an ambition not part of the standards;
- The vehicle signage and colour should be set locally;
- Vehicle age policy – some respondents felt this should be a local issue or there should be no restriction provided the vehicle passes the MOT;
- Wheelchair accessible vehicles should be locally determined;
- There should be a “local exemption” clause to allow for minor changes on local needs;
- The standards need to take account of the diversity of the industry, e.g. wedding cars;
- The tariffs should be set locally based on the local economy;
- Limiting the number of vehicles could affect availability and put the public at risk;
- A local knowledge test is not needed with satellite technology availability; and
- There is a need for further engagement and consultation.

## **Question 25 - What practical obstacles might there be to setting common national standards for both taxis and PHVs?**

355 responses were received for this question of which 278 were a campaigned response from the Cardiff Hackney Alliance.

The following practical obstacles to setting common national standards were noted by respondents:

- Cardiff Hackney Alliance – authorities not adhering to national standards when licensing;
- Co-ordinated local authority and Licensing Expert Panel responses – incorporating standards into the existing fleet of 10,000 vehicles and 12,000 drivers, and consistent standards that work for urban and rural areas. The rural and urban challenges were echoed by other respondents;
- There are too many local interests;
- The standards could be phased in to help with transition;
- Who will carry the costs of meeting new standards?;
- There are lots of different vehicle types, for example, wedding cars, 4x4s, wheelchair accessible vehicles;
- Awareness raising with operators and a need to develop a shared vision across the industry;
- Cross border issues with England;
- Cultural and religious differences;
- Emissions standards and vehicle specification for urban and rural areas; and
- The taxi industry will not want national standards.

## **Question 26 - What would be the best approach for determining the content of national standards?**

361 responses were received for this question of which 278 were a campaigned response from the Cardiff Hackney Alliance.

Those who responded to this question, responses echoed a similar theme through local authority and passenger representative groups. A summary of the key themes is provided below.

- The Cardiff Hackney Alliance commented that all stakeholders should be involved;
- The co-ordinated response from local authorities and the Licensing Expert Panel noted that there are already a number of national policies in place with Welsh local authorities and excellent examples of standards developed locally. The extensive knowledge and experience of Licensing officials and the Expert Panel should be used, and passenger safety groups and operator representatives should also be involved;
- The public, groups representing people with protected characteristics and other passenger groups should be involved;
- The industry - drivers, operators and community transport operators should be involved;
- Research best practice from Wales and across the UK;
- Several respondents suggested working group / task and finish group be convened to develop standards and that a wide range of stakeholders should be represented;
- Public consultation of proposed standards; and
- Current legislation is not fit for purpose but changes should not be rushed through.

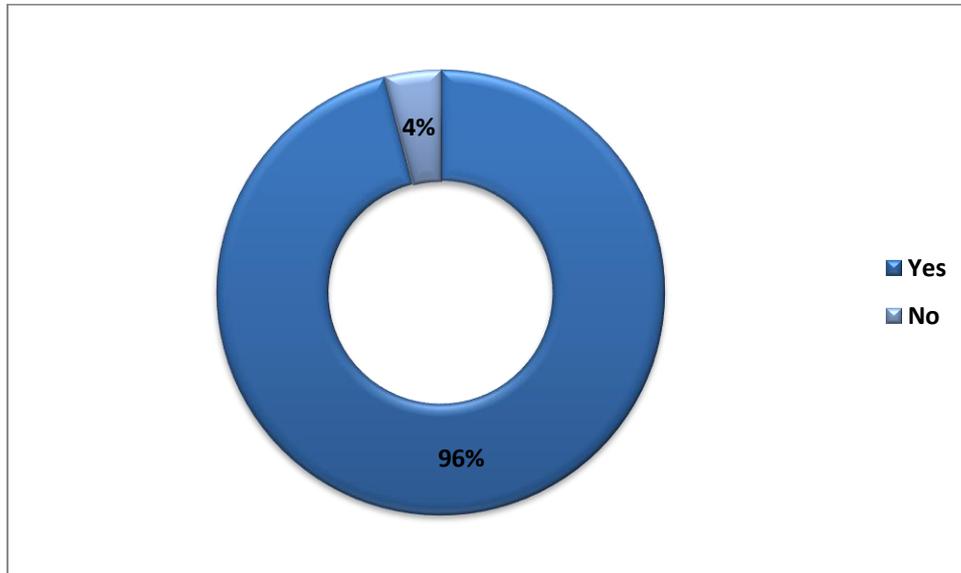
**Question 27 - Please provide any other comments or proposals around national standards that were not covered in the above questions.**

45 responses were received for this question. The key themes emerging from the comments are summarised below.

- The Cardiff Hackney Alliance did not provide a response to this question.
- The co-ordinated response from local authorities and the Licensing Expert Panel comments included that they “would not recommend that local licensing authorities be permitted to set additional local conditions above the national standard.”
- Some other responses from local authorities commented that there should be some local flexibility to set standards within clearly defined parameters.
- A range of suggested issues for consideration in setting the standards were included from some respondents, these echoed responses to question 23 and 24.
- Other notable comments included:
  - That the standards should be enforceable;
  - A call for fresh legislation for the 21<sup>st</sup> century;
  - That setting national standards would be a lengthy and involved process and there will not be complete agreement; and
  - That there is no reference in the consultation in relation to tariff setting and licensing fees.

**Question 28 - Should a local authority be able to revoke or suspend a licence relating to any vehicle operating in its area, even if it did not issue the original licence? Yes/No?**

**Figure 28: Responses to Question 28**



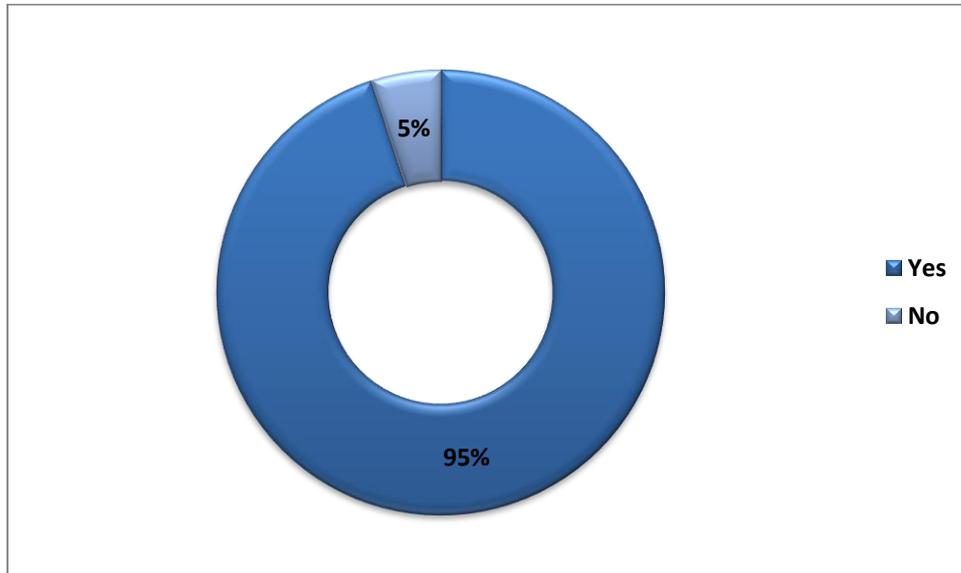
A total of 415 responses were received for this question. 403 responses were provided to the closed tick box questions, of which 386 responded yes and 17 responded no. Of the 415 responses 278 were a campaigned response from Cardiff Hackney Alliance. 71 respondents provided comments.

The key themes emerging from the comments are summarised below.

- Most responses from local authorities shared the view that revocations should be the responsibility of the home licensing authority. There was also a shared view that an authorised officer from any licensing authority area should have the power to suspend a licence immediately where there is an immediate public safety risk. Some local authority responses also commented that there should be changes to the current enforcement regime.
- The Cardiff Hackney Alliance commented that “if national standards are introduced... it is essential that the authority in which [a driver] is operating should have the power to consider action towards the driver.”
- There was also a view among other respondents that where there are national standards in place such powers would be in the interests of public safety.
- Issues relating to cross border working with England were also noted by some respondents.

**Question 29 - Should a local authority be able to issue a lesser sanction in relation to any vehicle operating in its area, even if it did not issue the original licence? Yes/No?**

**Figure 29: Responses to Question 29**



A total of 410 responses were received for this question. 397 responses were provided to the closed tick box questions, of which 377 responded yes and 20 responded no. Of the 410 responses 278 were a campaigned response from Cardiff Hackney Alliance. 75 respondents provided comments.

The key themes emerging from the comments are summarised below:

- There was broad support in the detailed comments to such an approach.
- The majority of responses from local authorities considered that being able to issue lesser sanctions to any vehicle would be beneficial to the home licensing authority and suggested fixed penalty notices as such a sanction.
- The Hackney Carriage Alliance and other respondents commented that national standards and consistency in enforcement is vital.
- Other comments included that practical implications such as a referral process and cost would need further consideration.

**Question 30 - Please provide any other comments or proposals around enforcement that were not covered in the above questions.**

320 responses were received for this question of which 278 were a campaigned response from the Cardiff Hackney Alliance.

Most local authority responses commented that:

- the power to stop and direct taxi and PHVs would be beneficial;
- development of national standards should take account of not being able to attach conditions to hackney carriage driver licenses and relevant byelaws; and
- mandatory training for all involved in licensing decision making.

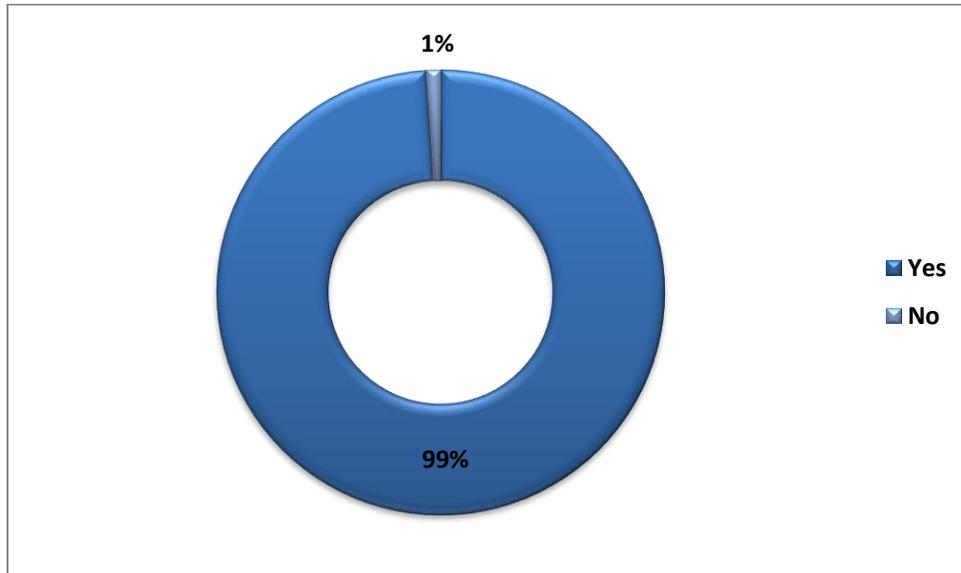
Some local authorities also commented that enforcement should cover fare refusal.

The Hackney Carriage Alliance commented that drivers should not be penalised for refusing a fare when they judge there to be inappropriate customer behaviour. They further suggested regular meetings with industry regarding enforcement issues.

Other comments included: the need for consistency; concern about funding/ resourcing to ensure proper enforcement; and how arrangements would work with drivers operating across national boundaries.

**Question 31 - Do you agree with our proposal to create a database or make other arrangements for relevant safeguarding information to be shared? Yes/No?**

**Figure 29: Responses to Question 31**



A total of 416 responses were received for this question. 416 responses were provided to the closed tick box questions, of which 414 responded yes and 2 responded no. Of the 416 responses 278 were a campaigned response from Cardiff Hackney Alliance. 75 of those respondents who agree with the proposal provided comments.

Key themes emerging from the comments are summarised below.

- There was strong support for this proposal across all sectors;
- Responses from organisations representing those with protected characteristics noted the importance of a database to help protect vulnerable people and the wider public;
- Many local authority respondents considered such a database to be critical and should include vehicles and operators, proprietors and dispatchers. The need for information sharing with English authorities was also noted; and
- One bus operator commented that such a system would also have benefits for the bus industry.

**Question 32 - Please provide any other comments or proposals around information-sharing that were not covered in the above questions.**

33 responses were received for this question.

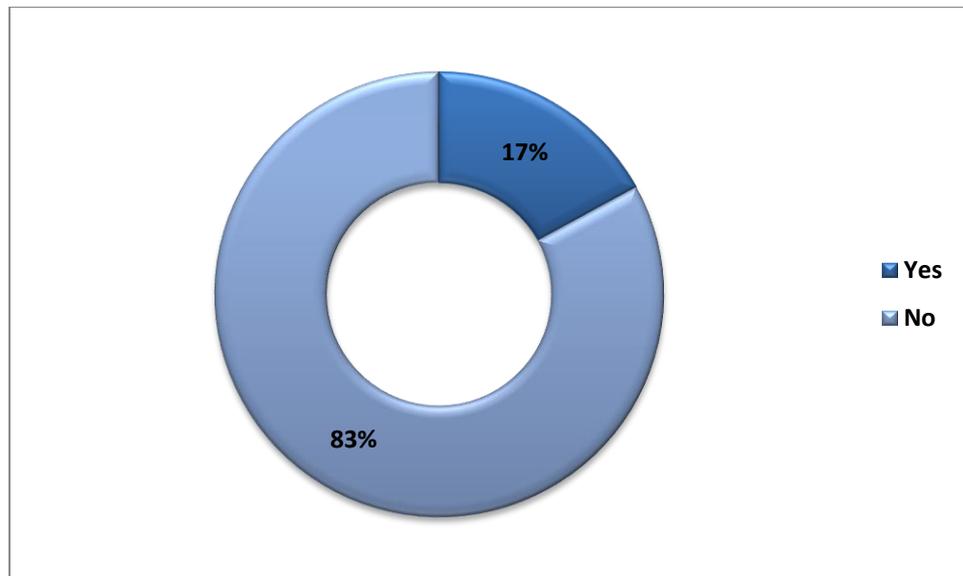
Many local authority responses noted that consideration should be given to reviewing the current Common Law Disclosure provisions.

Some respondents noted the importance of ensuring that individuals are aware of what information is stored about them.

Other responses highlighted the importance of: a common approach; that community transport should have a similar regime; and local decisions based on local knowledge.

**Question 33 - Do you agree with our proposal to redirect all of the existing taxi and PHV licensing functions away from local authorities and into a national licensing authority (Option A)?  
Yes/No?**

**Figure 29: Responses to Question 33**



A total of 402 responses were received for this question. 398 responses were provided to the closed tick box questions, of which 66 responded yes and 332 responded no. Of the 422 responses 278 were a campaigned response from Cardiff Hackney Alliance. 83 respondents provided comments.

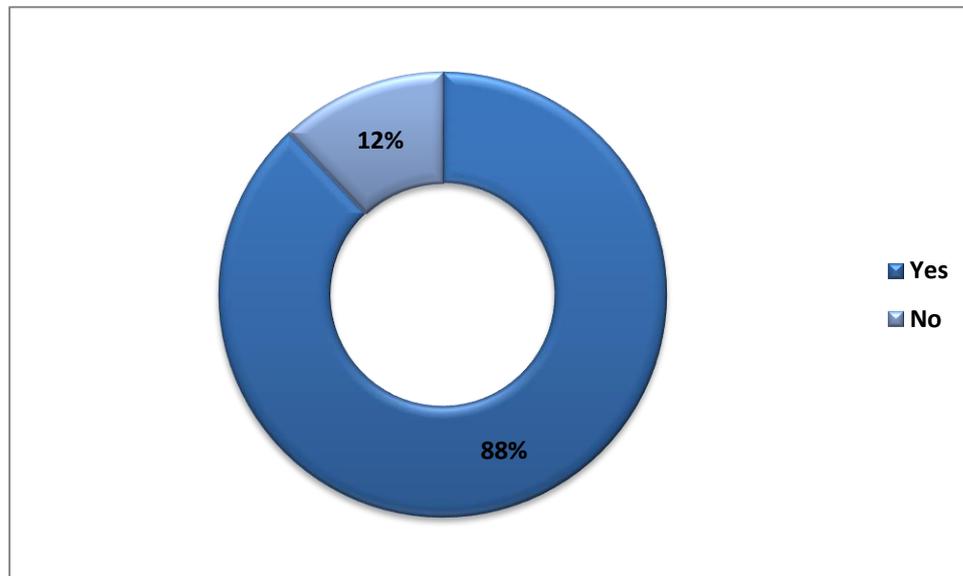
Most responses from local authorities disagreed with this proposal. They commented that further clarification is a required on how the JTA would work and felt that insufficient research had been undertaken. Many also commented that such a proposal would mean the potential loss of local knowledge.

Responses from taxi operators including the Cardiff Hackney Alliance also disagreed with this proposal and commented that local knowledge is important and centralised administration could cause unnecessary delays. However, there was some support for the proposal from the industry.

Some of those supporting the proposal commented that such a change would bring greater efficiency and consistency although concerns were raised regarding the cost of making such a change.

### Question 34 - Do you think that local authorities should continue to have responsibility for taxi and PHV licensing (Option B)? Yes/No?

Figure 1: Responses to Question 34



A total of 393 responses were received for this question. 393 responses were provided to the closed tick box questions, of which 348 responded yes and 45 responded no. Of the 393 responses 278 were a campaigned response from Cardiff Hackney Alliance. 72 respondents provided comments.

There was strong support that local authorities should continue to have responsibility for taxi and PHV licensing. Most local authorities strongly supported this option commenting on the importance of local knowledge and that the loss of such knowledge would be detrimental to the industry. They commented that further clarification is a required on how the JTA would work.

Responses from taxi operators including the Cardiff Hackney Alliance also supported this option and commented that local knowledge is important and centralised administration could cause unnecessary delays.

**Question 35 - Please provide any other comments or proposals around responsibility for taxi/PHV licensing that were not covered in the above questions.**

318 responses were received for this question of which 278 were a campaigned response from the Cardiff Hackney Alliance.

The All Wales Licensing Expert Panel provided a comprehensive response to this question and raised concerns that the proposals in relation to taxis and PHVs do not go far enough to bring about the reform and modernisation needed in the industry. This viewpoint was strongly echoed by many local authorities. The recommendations of the Ministerial Working Party into Hackney Carriage and Private Hire Licensing in England 2018 and Law Commissions work of 2012 were referenced.

Some respondents raised concerns regarding the JTA proposals and emphasised the need for keeping a local licensing system, recognising the skills and knowledge required in relation to licensing.

Other respondents highlighted the importance of other factors such as: fare-setting and minimum fares in a national context; opportunities for technology to improve the industry; cross-border working and enforcement; and safety and safeguarding issues.

Some respondents commented that there was insufficient detail on the JTA proposals in the White Paper making it difficult to respond.

**Question 36 - We would like to know your views on the effects that the legislative proposals set out in this paper 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?**

59 responses were received for this question. Many responses covered the taxi and PHV perspective only.

Some respondents commented that they would not expect there to be any impact of the proposals on the Welsh language.

Other respondents, including many local authorities, referred to existing legislation around Welsh language and the Welsh language standards. The responses from local authorities also raised the importance of those people applying for taxi and PHV licences to be able to do so in the language of their choice.

There were some comments relating to the importance of the provision of bilingual information and that there would be benefits from increased use of the Welsh language in the public transport industry. There were also comments citing concerns about cost implications and who would fund.

Some respondents highlighted the cultural diversity within the taxi and PHV trade and that many different languages are spoken throughout Wales.

**Question 37 - 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.**

35 responses were received for this question.

The Welsh Language Commissioner provided a letter in response to the White Paper rather than specific responses to questions. The Commissioner commented that consideration should be given as to how the Welsh language standards would apply to new Joint Transport Authorities. They also noted that Welsh language bus services should be considered in: setting quality standards for bus services; implementing Enhanced Quality Partnerships; assessment and delivery of franchising; and local authority bus services.

The responses to question 37 were very similar to question 36 and many responses covered the taxi and PHV perspective only.

Some respondents, including many local authorities, referred to existing legislation around Welsh language and the Welsh language standards. The responses from local authorities also raised the importance of those people applying for taxi and PHV licences to be able to do so in the language of their choice.

There were some comments relating to the importance of the provision of bilingual information and that there would be benefits from increased use of the Welsh language in the public transport industry. There were also comments citing concerns about cost implications and who would fund.

Some respondents highlighted the cultural diversity within the taxi and PHV trade and that many different languages are spoken throughout Wales.

**Question 38 - 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:**

339 responses were received for this question of which 278 were a campaigned response from the Cardiff Hackney Alliance.

As per previous responses to the consultation, comments continued to reflect that insufficient details have been provided in the White Paper. This has resulted in it being difficult for a number of sectors to respond fully. Concerns about JTA proposals for taxi and PHV were also re-stated and some respondents reiterated comments in relation to cross bordering.

Some respondents highlighted a number of areas that were not covered in the White Paper, but that they felt needed to be considered when looking at improving public transport. Some of the common themes for these included:

- The need to address issues with congestion;
- Air quality issues;
- Funding – in the contexts of ring-fenced funding for JTAs and longer term funding commitments for local authorities;
- Accessibility – both bus and taxi;
- Bus users' points of view / passenger involvement;
- The role of community transport;
- Differing transport needs and challenges – urban / rural;
- The importance of information and announcements, including audio-visual;
- Link with health transport and school transport;
- Integration with rail;
- Need to link with land use planning;
- Importance of transport for access to tourist sites;
- Taxi fee setting; and
- How national standards would apply to executive vehicles and specialist vehicles such as limousines.

## 6. Summary of engagement events and meetings

The engagement events and meetings generated some interesting discussions and feedback.

The facilitated round table discussions at the engagement events were split into different groups who focussed on the following distinct policy areas:

- JTA proposals
- Bus proposals
- Taxi and PHV proposals

People were encouraged to discuss the different proposals in relation to their table's policy area and record their comments and feedback on post it notes and flip charts provided. A range of views and comments were recorded at the sessions.

The area of focus for the discussions in the meetings and briefings varied depending on the attendees, but comments were consistent with those raised during the engagement events.

The summary below highlights some of the common themes picked up across the engagement events and meetings:

### **JTA Proposals**

There was a strong agreement on the need for local authorities to work together and that new structures should be built around those that are already in place. There was a preference for four regions with good collaborative working across regional borders.

Collaborative working was seen as an opportunity to introduce economies of scale, improve standards and introduce consistencies. However, a lack of resource and a skills shortage were quoted as areas of concern.

A stable five-year funding programme was seen as being important to plan ahead and especially with regard to succession planning.

Working regionally to deliver bus services was supported but working to such a footprint on taxis and PHVs was seen to be more challenging. Additional clarity was required on the White Paper proposals before being able to consider whether and which taxi and PHV functions could be better undertaken by a JTA. There was strong feedback that operational functions undertaken by licensing authorities should continue to be dealt with at a local level.

There was a view that highway authority functions should remain with local authorities and careful consideration should be given to the management of education transport.

There were queries raised about why three regions were being proposed rather than four.

There was a strong view that more engagement was necessary as proposals are developed.

### Structures – National or regional

There was a general view that a National Joint Transport Authority would duplicate the work of the regional bodies. There could be merit in having a national “board” or “co-ordination group” where the regional JTAs and Welsh Ministers meet to agree policies, standards and set priorities.

There was support for regional JTAs with Welsh Government setting the policy framework. There should be clear roles and responsibilities for all involved and a strong and transparent accountability mechanism.

Communities and stakeholders including the third sector should be engaged and no loss of local accountability.

A national co-ordinating group would be useful to link with Welsh Ministers and help set the national strategic direction.

### Welsh Ministers’ Role

Welsh Ministers having voting rights on the JTA was seen to be in conflict with the proposal for Welsh Ministers to have powers to direct and intervene. There was support for Welsh Ministers having such power and sitting on a JTA as an observer only.

It was felt that Welsh Ministers should be able to step in in the event of no agreement at JTA regional level. However, clarity was requested regarding when Welsh Ministers could intervene and what would be classed as failure.

### **Bus Proposals**

#### EQPs

There was general support for the proposals in relation to EQPs and there was a feeling that partnerships could lead to improvements and better use of resources, as long as it is done properly as a true partnership.

One of the issues consistently raised was the need for proper engagement with communities and passengers throughout the process to ensure their voices are heard and their needs met. Another issue consistently raised was recognising that there are very different challenges between urban and rural areas and what works for one area will not necessarily work in another.

Some concerns were raised that EQPs could be time consuming and bureaucratic. Comments were also raised that there needs to be longer contract periods and more certainty.

### Franchising

There was some support for franchising, although others felt that it would not work. There was a feeling that it could work in some areas, but would not be suitable everywhere. There were concerns raised about the costs and skills required to implement and manage franchising.

The issue of the potential impact on SMEs was an area that was consistently discussed, with mainly concerns raised about the need to ensure a level playing field in the tender process.

Better network management to avoid bus congestion on popular routes whilst other services are withdrawn.

### Local authority-run bus services

There was some support for local authorities running bus services and some felt that it would be useful where there is a lack of competition or there are high costs of subsidising services. Some felt that it would not work at all whilst others felt that it could work in some areas, but would not be suitable everywhere. There were concerns raised about the costs, capacity and skills required. Concerns were also raised about pensions.

### Information sharing

There was good support for the proposals in relation to information sharing although there was also a feeling that the information is already available. The Traveline Cymru service was raised at several meetings and the need to build on that and properly promote the service. Comments were raised about the opportunity for using funding conditions, such as Bus Services Support Grant, and registering of services through the Traffic Commissioner as ways of requiring information on services and fares.

Comments were also raised about the importance of taking into account passengers who do not access information about services online and that information needs to be made available and accessible to everyone.

### Mandatory Concessionary Fares Eligibility Age

There were mixed responses to this proposal. There was strong representation that the eligibility age should remain at 60 but there were also comments that concessionary fares should be targeted at those most in need. There was some support for the proposals if it meant that the scheme is retained and is sustainable for the future and if savings were re-invested in supporting bus services.

Some other suggestions were made, including having one off payment or annual charge for the concessionary passes, restricting travel times or applying means testing.

The need for more youth concessionary fares was a common theme raised in discussions. Another common theme was that concessionary passes are no use if there are no services to use.

### **Taxis and PHVs**

There was good support across all of the events for the proposals relating to taxis, with the exception of JTAs (points on JTAs are covered in the JTA section above). However, there was also consistent feedback that the proposals in the White Paper did not go far enough to address the issues the industry is facing, particularly with regards to cross-border working.

### National Standards

There was strong support for establishing national licensing standards at all the events.

There was some feedback that local authorities should be able to have additional standards over and above a national minimum standard to allow for local issues, such as emissions. However, there were also concerns raised that any deviations from national standards would mean that we end up with the same situation we have now – where it is easier to obtain a licence in some local authorities compared to others. This would continue to exacerbate the out of area working issues.

Queries were raised about the implication of national standards on fees for licensing. Would there be a standard fee that would apply to the whole of Wales? How would that work in practice?

Some of the areas consistently raised to be considered as part of any national standards include:

- Accessibility;
- The use of CCTV;
- Safeguarding training;

- Age and maintenance of vehicles;
- Licensing exams set to a higher level; and
- Knowledge tests.

Comments were raised that drivers would need appropriate time to comply with any new standards and concerns were raised about affordability / costs implications of any national standards.

### Enforcement

There was strong support for local authorities being able to take enforcement action on those working out of area. However, there were also concerns raised in all events that the proposals in the White Paper did not go far enough to address issues with cross-border working. This feedback came from both drivers working in urban and rural areas. There were strong feelings among some of the taxi and PHV drivers at all events that cross-border working was a serious concern for them.

Concerns were raised in the Cardiff event in particular about drivers struggling to make a living from the industry – this was linked to concerns about cross-border working and the need to limit the number of PHVs and the impact of ride-sharing services. There is a feeling that it is no longer a fair trade.

There was feedback that whilst local authorities should have the power to take enforcement action against any licensed vehicle in its area, this should be restricted to suspension and not revocation. Only the licensing authority should have the power to revoke a licence. There was also some feedback that the enforcement action should relate to vehicle issues (eg car defects, such as bald tyres) and that action against drivers should also be a matter for the licensing authority.

### Safeguarding Information

In particular, there was very strong support for proposals relating to sharing of safeguarding information. There were references made to the existing NAFN NR3 database and making use of that.

Concerns were raised that the safeguarding provisions didn't extend to safeguarding drivers. There are concerns and issues with the safety of drivers, particularly in the night time economy with assaults or aggressive behaviour, having to deal with drunk people or people on drugs and issues such as non-payment. It was felt that driver training should include how to handle difficult situations.

## **7. Next Steps**

We wish to thank everyone who took the time to provide us with their views during this consultation. We welcome the significant volume and range of comments provided which will inform our thinking when developing proposals for the improvement of public transport across Wales.