

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	The Bus Services (Wales) Bill
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	Bus Services Team
Department:	Transport and Digital Connectivity
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SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Summary of Issue

In Wales, around 150,000 journeys are made by bus each day¹. Three quarters of journeys made on public transport are made by bus. Buses give people access to work and education, to help meet family and friends and are a vital service to the 19.4%² of households in Wales without a car. Women; Black, Asian and Minority Ethnic people; disabled people, younger and older people; and those with low paid or insecure work are disproportionately likely to use buses³. Buses offer vital transport to people living in Welsh rural areas (about 1/3 of the Welsh population), who are some of the worst affected by transport poverty.

Currently, however, the Welsh bus network is not fulfilling its full potential. The shortcomings of the current bus network are driven by wider systemic issues including deregulation, a history of pro-car planning policy, and the coronavirus pandemic changing the way and the amount people travel. There is also evidence of persistent gender bias in the way public transport is planned and delivered⁴.

The Transport Act 1985 introduced the deregulation of bus services throughout Great Britain (apart from Greater London, which was not subject to the same deregulation. Bus services there are now governed by the Greater London Authority Act 1999). Deregulation of buses has led to a free market. Anyone, subject to minimum safety and operating standards, can operate bus services, which has led to a system where profitability of routes and services are often placed ahead of the needs of the public. This leaves local authorities with the responsibility to fund and provide socially necessary services. As well as being operated by community transport providers, these are often delivered through contracts with commercial operators without full knowledge of route profitability and without the ability to maximise synergies across commercial and subsidised services.

The transport sector accounts for a significant proportion of the carbon emissions in Wales. Little progress has been made to reduce carbon emissions compared to other sectors. To reduce carbon emissions, we need to help people choose to travel by public transport, walking, wheeling, and cycling over choosing their car. Buses are a greener

¹ <https://statswales.gov.wales/Catalogue/Transport/Roads/Public-Service-Vehicles/vehiclekilometresandpassengerjourneysonbusesandcoaches-by-year>

² Census 2021 [Census - Office for National Statistics](#)

³ Department for Transport, 2021. National Travel Survey 2017

⁴ <https://www.weforum.org/agenda/2022/04/transport-women-gender-gap-world-bank/>

mode of transport and are key to reducing people's reliance on cars. Reducing carbon emissions now will have immediate and long-term benefits including, but not limited to, improved air quality and health.

Bus reform is central to creating an integrated public transport network. This, in turn, is essential to drive modal shift (from private cars and onto more sustainable transport options), without which we cannot meet our statutory Net Zero targets in transport. To meet our sustainable transport and carbon reduction targets, we need to make travelling by bus a more attractive option.

Summary of Proposal

As detailed in the White Paper "One network, one timetable, one ticket: planning buses as a public service in Wales", published in March 2022⁵, we are proposing to reform the way bus services are planned and delivered in Wales and to better integrate buses into the wider transport offering.

The proposed method will be to regulate the industry through a centrally co-ordinated system of mainly franchised services.

Local authorities, Corporate Joint Committees (CJCs), Transport for Wales (TfW) and the Welsh Government will work together to design bus networks and services, within the funding available. Services will be prioritised to best meet people's and communities' needs. Franchising brings together the strengths of private, municipal and community operators in efficient service delivery within a coordinated and planned public transport network. Franchising offers significant long-term benefits. That is why, after looking at the options and taking on board feedback, especially from the responses received from the White Paper⁶, we are progressing with proposals to regulate the bus network. This change will benefit the people of Wales while accommodating local and regional needs and differences.

Proposals outlined will be implemented by the Bill. A [Roadmap](#) to bus reform has been published to support key stakeholders to understand how the proposals of the Bill will be implemented.

In summary the Bill will:

- Require the Welsh Ministers to determine the network of local bus services required for the purpose of providing safe, integrated, sustainable, efficient and economic transport in Wales.

⁵ <https://www.gov.wales/one-network-one-timetable-one-ticket-planning-buses-public-service-wales-html>

⁶ https://www.gov.wales/sites/default/files/consultations/2022-12/one-network-one-timetable-one-ticket-planning-buses-as-a-public-service-for-wales-consultation-summary-of-responses_0.pdf

- Require the Welsh Ministers to prepare publish and lay before the Senedd a Welsh Bus Network Plan (“the Plan”) under which they will be required to set out the key particulars of those local bus services determined as required.
- Require those services to be secured by the Welsh Ministers. The Welsh Ministers will be able to secure services via entering into local bus service contracts with operators (franchising), providing services directly (direct provision), granting local bus service permits to operators or by relying on the provision of certain other services such as community bus services.
- Lift the restriction on local authorities providing bus services to enable them to provide local bus services directly or via their own bus companies (municipal bus companies).
- Make provision for enforcement via a “restriction” and associated sanctions.
- Make provision for the collection of data and information-sharing.
- Make provision for the application of the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

Long term

Current trends and modelling suggest that if we do nothing then the bus industry is at serious risk of further failure in routes and services which would have a huge impact on the people of Wales. The Bill will provide the people of Wales, and its visitors, with a cohesive, strategic bus network. The network will be on a cyclical reporting process to ensure Welsh Ministers are meeting their duties. Our commitment to sustainable transport and greener buses will have a positive long-term effect on the climate.

Prevention

Given the year-on-year decline in bus patronage⁷, it is fair to conclude that without action passenger numbers will continue to decline, which would have cost implications. The proposals aim to prevent and reverse the decline in bus patronage and the associated potential increase in private car usage or marginalisation of those unable to afford a car.

Integration

The improvement in the Welsh bus network could play a role in preventing negative cycles such as the decline in services in rural areas, which if nothing were done, would further prevent young people accessing jobs and act as a barrier to business accessing markets and growing, and levels of social isolation among individuals within rural communities would remain or be exacerbated.

Collaboration

Discussions with the industry and other stakeholders including the public on the subject of bus reform have been on-going since 2017 and have taken place in the form of bus

⁷ [Bws Cymru connecting people with places](#)

summits, working groups and public consultations. Two bus summits have taken place in 2017 and 2018 followed by eight detailed workshops across Wales and the 12-week public consultation on the White Paper.

The implementation of the Bill proposals will be the responsibility of the Welsh Ministers (via Transport for Wales) working with all other stakeholders: local government, corporate joint committee representatives from customer groups, and industry operators.

Involvement

It is key to the success of Wales's bus reform that we involve as many voices as we can, and to establish regular and continual discussions, reviews and improvement, to truly deliver a network for the Welsh people.

Involvement will be through, and not limited to:

- Transport for Wales Independent Advisory Panel
- Regional Stakeholder Forums
- Transport for Wales Accessibility and Inclusion Panel
- network planning on a local, regional and national level
- involving partners such as trade unions

Impact

The main benefits of the proposals can be summarised as:

- Improved co-ordination of local bus service provision, enabling decisions to be made that are driven by public need
- Ensuring consistency and clarity in the provision of information to the public on local bus services, which will help to build confidence in the network and encourage patronage
- Opportunities to better integrate local bus services with rail, and modes of active travel.

The main challenges of the proposals can be summarised as:

- Transition to this new way of working is complex and will take time
- The proposals will not provide an immediate panacea for existing challenges facing operators and passengers. Much will depend on continued investment by future Governments

Any potential positive or challenging impacts which could arise in relation to costs and affordability are explored in more detail in the Regulatory Impact Assessment.

Costs and savings

The Explanatory Memorandum, which includes a Regulatory Impact Assessment has been developed to support the Bill. Within the document, costs and savings have been modelled and addressed. Modelling has been undertaken using current data gathered by Welsh Government, ARUP and Transport for Wales.

However, to achieve continued success and adapting the network to suit the needs of its passengers, funding must be periodically reviewed to ensure the network is delivering its full potential.

By operating a gross contract model and the Welsh Government taking the responsibility for the farebox revenue, we will be able to put profits back into the bus system, sharing the changes across Wales and ensuring a fair and invested network. Allowing us to be in better control of public money and where it is spent.

Mechanism

Proposals outlined will be implemented by the Bill. A [Roadmap](#) to bus reform has been published to support key stakeholders to understand how the proposals of the Bill will be implemented.

SECTION 2. WHAT WILL BE THE EFFECT ON SOCIAL WELL-BEING?

2.1 People and Communities

Welsh Government is committed to working with stakeholders to better understand the issues surrounding accessibility to bus services to improve social wellbeing. It is recognised that people experience varied accessibility issues depending on their protected characteristics. It is important to take account of these variable requirements when seeking to make bus travel more accessible.

Currently, accessibility issues are not recognised and are not thought about and/or addressed in discrete ways. Tackling these issues can be achieved by measures such as space for users of wheelchairs or other mobility aids, push chairs, priority seating, accommodation for assistance animals, as well as audible and visual information, improving the social wellbeing of disabled users. Driver knowledge and training is also crucial in this respect to ensure that all users feel safe, confident, and comfortable using the bus network.

The proposed legislative changes will allow a greater level of flexibility and influence which will help to meet integrated public transport and wellbeing commitments by increasing patronage, reducing car use, reducing carbon emissions and improving air quality.

Whilst the Bill will not make specific provision in relation to improved accessibility, other than regarding information, it will provide the basis for a bus system that enables the planning and implementation of actions that will lead to improved accessibility.

One of the key benefits of regulating the bus network is the opportunity it presents for achieving a co-ordinated bus network and a level of standardisation, for example in information, the bus fleet and infrastructure and driver training, that enables consistency and manages expectations. This would facilitate greater connectivity, with associated

improved access to communities, facilities, services and employment opportunities. This will help to reduce social isolation within Wales and contribute to improved mental wellbeing within the population.

If passengers do not feel confident that they will be able to access local bus services in a safe and dignified manner, they will be dissuaded from travelling. By facilitating an accessible bus service network through improvements to planning, co-ordination and information, passengers will benefit no matter their race, beliefs, sexuality, sex, gender, age or disability, confident that they can easily access a bus stop, and travel by bus without incident or delay, improving their social and mental wellbeing.

The Bill does not make provision for learner travel, but making provision for better planning and co-ordination of the network will support school age children and young people to get to and from their place of education, including Welsh Medium and faith schools. Outside of education settings, bus network planning should ensure that young people are able to socialise with friends and get out and about. This should help to establish public transport as their preferred mode of transport throughout their lives.

It is important that we facilitate the establishment of a network that promotes access for all to culture, heritage, and the Welsh language, and encourages participation in the arts, and sports and recreation.

Affordability is a key aspect of attracting more people to use the buses. If the cost of bus travel is too expensive then this can prevent some people using the services to access work; education; health services; social and leisure activities, etc. This will have consequential impacts on a person's mental and physical health. Bus reform will allow for consideration of ways to manage fares in a fair and inclusive way.

The new bus system is anticipated to result in an overall positive effect on social well-being and on people and communities. An overview of the impact on specific groups is outlined in the remainder of this section.

2.2 Children's Rights

It is recognised that different transport options can offer welcome independence and freedom for children and young people, however as highlighted within the [Bws Cymru Plan report](#), currently many of the concerns young people have come from a lack of available services, lack of confidence or not understanding the bus system, and a lack of safety, or perceived safety, on buses.

A Children's Rights Impact Assessment can be found at Annex A.

2.3 Equality

An overview of the potential impacts is outlined below. An Equality Impact Assessment can be found at Annex B.

- An integrated national bus network will provide an easy to understand, consistent, service that improves legibility and understanding for many people who can be reliant on public transport.
- Improved and integrated bus services would positively benefit Black, Asian and Ethnic Minority users, as they are particularly reliant on public transport and are disproportionately economically disadvantaged.
- By securing the long-term sustainability of the bus network, Wales would ensure that there is equality of opportunity for all groups to access employment, leisure, health and education services to the benefit of the economy, culture, and health and well-being.
- The proposals support wider reform goals, including those focusing on decarbonisation of fleet and depots and rationalising the network. These will have a positive impact on improving air quality providing long term and long-lasting health benefits. This will be especially evident in built-up areas which typically have lower air quality. It is important for groups that are more vulnerable to the health-effects of poor air quality, such as children or older people, those who are pregnant or with existing health conditions.

2.4 Rural Proofing

An overview of the potential impacts is outlined below. A Rural Impact Assessment can be found at Annex C.

- The legislative proposals would allow strategic planning of bus services to meet rural needs. They would also benefit the mental well-being of people living in rural areas with better co-ordination of services supporting improved connectivity to combat social isolation.
- Through franchising and enabling demand responsive travel, the opportunity is there to provide bus services which best meet the needs of individuals in their area, including those on lower incomes, providing opportunities to access employment, education and socio-economic mobility⁸.
- The reforms aim to improve connectivity and information provision. This would benefit young individuals living rurally, both economically and socially, helping them access new technology and increase their confidence in using public transport services.
- The legislative provisions are intended to support people to more easily access services, visit friends and relatives, as well as allowing them to travel further afield

⁸ Valuing the social impacts of public transport final report March 2013. [Valuing the social impacts of public transport: final report](#)

to access health, cultural and community services and facilities, this will be particularly beneficial to older people.

- Improvements in transport infrastructure will help rural businesses and sectors to expand. An improved bus network and transport infrastructure help businesses meet and respond to changes in market demand and availability with the introduction of improved service information and data availability. It will also facilitate wider access to the workforce.

2.5 Health

An overview of the potential impacts is outlined below. A Health Impact Assessment can be found at Annex H.

Lifestyles

Legislative changes will positively impact on the Welsh population's diet and physical activity, as:

- the proposed provisions are likely to increase access to parks, leisure centres, gyms and other areas which promote and provide opportunities for physical activity and exercise.
- integrating the bus network with other transport options and providing more reliable integrated bus services would also improve access to a wider range of food choices, including healthier more affordable options.

Social and Community Influences on Health

It is considered that the legislative changes will positively impact on social networks and social isolation within Wales, as:

- the provision of improved transport services which offer more affordable transport options would increase opportunities for groups who cannot afford and/or are unable to access private transport options (for example they are too young, are disabled or have no driving licence). This would reduce feelings of isolation and exclusion for these individuals, allowing them to access a wider range of opportunities and improve their social network.
- ensuring an effective bus network in rural and urban areas which is co-ordinated and integrated with other forms of public transport would also improve access for more vulnerable and isolated groups.
- improvements to bus services information and travel data, including the use of audio or visual announcements, would help to make travelling on the public bus network easier for many groups, including disabled people, older people and people

not local to the area. Ease of bus use would allow these groups to access wider social networks and therefore benefit from the associated positive health outcomes.

Living environment influences on Health

It is considered that the legislative changes will positively impact on Wales' living environment and contribute to improvements in air quality as:

- encouraging the use of buses could help to reduce private vehicle use. Alongside investment in sustainable options, such as low carbon/zero emission vehicle fleets, the proposals would help to reduce pollution and improve air quality. This intervention would provide health benefits, especially in built-up areas which are typically more polluted.
- reducing private vehicle use and encouraging a modal-shift to the public transport network could reduce the impact of traffic-related noise which is shown to negatively impact health by increasing disturbance and causing annoyance and sleep deprivation.
- With reduced numbers of private vehicles on the roads, there is potential for road safety generally (especially in existing busy trafficked areas) to improve therefore bringing overarching benefits to living environments.

Access to employment and education

It is considered that the legislative changes will positively impact on people's access to employment and education as:

- The provision of an improved bus service across Wales which offers transport options that are available and affordable to all members of society could increase access to wider employment and educational opportunities for those who rely on public transport. This would include low-income groups, young people and older people, particularly for those in more isolated and rural areas.
- Ensuring an effective bus network across rural and urban areas, which is co-ordinated and fully integrated with other forms of public transport, would increase physical access to a much wider range of employment and, in many cases, reduce the time taken to reach them. This could provide access to a wide range of employment and educational opportunities, including a greater variety of jobs, schools, training courses, learning centres and apprentice schemes. Access to education and employment has positive impacts on both physical and mental health and wellbeing, it can reduce feelings of stress and anxiety, and provide direct access to health benefits associated with secure employment.

Access and quality of services

It is considered that the legislative changes will positively impact on people's access to services as:

- A co-ordinated more reliable network could increase direct access to healthcare and social services and facilities, particularly for those who rely on public transport. Indirectly, it could also help to provide more reliable services for carers and healthcare professionals who rely on public transport for visiting those in need of at-home care and support.
- the use of open data and up-to-date information sharing could help to reduce the risk of missed medical appointments by improving the reliability of local bus routes when accessing services.
- improved access and reliability of services could indirectly help to improve wellbeing by increasing positive feelings about a local community and reducing service isolation.

2.6 Privacy

The proposals put forward under this legislation do not require the processing of personal data and no Privacy Impact Assessment has been undertaken.

SECTION 3. WHAT WILL BE THE EFFECT ON CULTURAL WELL-BEING AND THE WELSH LANGUAGE?

3.1 Cultural Well-being

The Welsh Government's commitment to supporting cultural well-being is demonstrated in Llwybr Newydd: the Wales Transport Strategy (Llwybr Newydd)⁹, which identifies the need to join up planning for transport and major events in Wales and work with Visit Wales to promote transport heritage attractions in Wales.

The development of a planned integrated network of bus services will provide an easy to understand, co-ordinated network of routes and timings, integrated with community-based transport. This will facilitate participation in the arts, sport, culture, heritage and recreation across the whole of Wales by making these facilities more accessible. An improved integrated transport system for people that live in rural areas could also improve access to such opportunities in more traditionally hard to reach areas, which typically rely more on the private car for travel.

Under the proposals the Welsh Ministers will have a duty to work with local authorities in the development of the Welsh Bus Network Plan, setting out the key particulars of local bus services across Wales. This will provide local authorities with a better say in how public transport in their areas can support communities. This would support greater connectivity, with associated improved access to the arts, music, literature and heritage in Wales.

Utilising the responses to the consultation on the (withdrawn) Bus Services (Wales) Bill and the [One Network, one timetable, one ticket](#) White Paper has helped consider the potential impacts of the proposals on cultural well-being. For example, Diverse Cymru suggested interactive maps and better information in towns and other key locations, such as shopping centres and libraries would assist access. They highlighted that this might provide an opportunity for agreements to be made with shops or community services for them to share public transport information and help people access bus services. Through bus reform and the actions set out in Bws Cymru¹⁰, there could be scope to co-locate public transport with tourist information. This would help improve people's access to cultural and heritage assets which are also often tourist attractions. The Future Generations Commissioner contributed to the consideration of new ways in which people are creating and consuming culture via digital technology.

The continued decline in bus use, in particular following the COVID pandemic, has led to a reduction in the ability of people to access arts, sport, culture, heritage and recreation

⁹ [Llwybr Newydd: the Wales Transport Strategy 2021 | GOV.WALES](#)

¹⁰ [Bws Cymru: connecting people with places | GOV.WALES](#)

opportunities. The legislation seeks to help ensure the long-term provision of accessible and sustainable bus services, thus seeking to avoid reductions in services. This would maintain, and likely improve access to culture, particularly those who are currently limited by transport options available to them.

Overall, the proposals are anticipated to result in a positive effect on cultural well-being, with the magnitude of that effect ranging from minor to moderate subject to the scale of change during implementation of the legislative changes.

3.2 Welsh Language

The Welsh Language Impact Assessment is available below at Annex E.

The potential benefits of the proposals regarding the Welsh Language are the use of the Welsh language and cultural identity could be included in the branding of bus services or information sharing initiatives at the implementation stage.

Giving local authorities a greater level of influence on public transport services will support the creation of connected integrated public transport networks which best meet the needs of Welsh-language communities, thereby promoting the use of the Welsh language.

Bws Cymru includes a number of actions which seek to promote the use of the Welsh language. This includes Action 21 (Welsh language standards), and Action 29 (Bus Driver training) which seek to support bus drivers to learn and use Welsh whilst also providing the required investment for bilingual services (in terms of advertising, promotions, information and customer services). The aim is to provide a service that meets the linguistic needs of Welsh speakers such that they feel comfortable and confident to use Welsh across all services. This will also contribute to achieving Bws Cymru Action 18 (Buses accessible for all), i.e. creating an inclusive service, removing any linguistic barriers that Welsh speakers may face.

The assessment presented in this document is based on the potential impact of the proposed provisions in the Bill and the opportunities presented for their delivery. The latter is considered at a high level because detail around implementation is being developed. Further assessment of the impact of delivery will be carried out to make sure that any adverse impacts identified are mitigated during project development.

SECTION 4. WHAT WILL BE THE EFFECT ON ECONOMIC WELL-BEING?

4.1 Business, the general public and individuals

Buses play an essential role in achieving strong and sustainable economic growth by connecting people and business to opportunities, reducing congestion, and increasing economic productivity.

The legislative proposals would provide opportunities for the public, private and third sectors to work together to deliver an integrated public transport network, and influence bus service provision. With more tools and flexibility to develop a fully integrated public transport system, there would be improved access to places of work, education, healthcare, retail, entertainment, tourism etc., contributing to economic growth by connecting people and businesses, and creating a more prosperous Wales.

Bus services play a vital role in enabling access to employment and education opportunities and facilities, especially for jobseekers. The integrated transport network will improve access to employment and training opportunities, particularly local shops and services, which will provide potential for people to gain new skills and higher salaries. Additionally, once jobseekers find employment, affordable bus travel will help to ensure they can get to their job. This improved access through better bus service provision will be an important factor in helping Wales to improve its employment rates and economic productivity, helping to address changes in the service-based economy and other anticipated future trends¹¹.

The new model for delivering bus services will provide comprehensive travel information on bus services, set consistent bus fares, and support integrated ticketing, making bus travel more accessible for all. Operators of local bus services will be required to provide clear, high-quality, and up-to-date information on bus services, which will enable the public to plan their journeys more easily. Through integrated ticketing, bus passengers may pay once for a Smartcard or ticket to cover their entire journey, irrespective of the number of changes, operators or modes of travel. This will make booking bus travel easier and help make public transport more accessible and affordable. Overall, improvements to bus service information provision and integrated ticketing with consistent fares will help create a bus system that is easy to access, use and navigate, which will lead to an increase in passenger confidence and patronage¹², thereby contributing to the economy of both rural and urban areas.

In summary, the proposals are anticipated to result in positive impacts on the economic well-being of both businesses and individuals, with the magnitude of that effect ranging from minor to moderate subject to the scale of change during implementation of the legislative changes.

4.2 Public Sector including local government and other public bodies

A Regulatory Impact Assessment (RIA) has been prepared for the Bill which outlines the likely costs, benefits and risks associated with the policy options considered, including impacts upon organisations, groups and individuals. This includes:

¹¹ Wales Future Trends Report 2021 [Future Trends: 2021 | GOV.WALES](#)

¹² <https://bettertransport.org.uk/sites/default/files/pdfs/bus-services-act-guidance.pdf>

- identification of financial costs and revenues associated with the proposals and associated transition and recurring costs, revenues and to whom costs/benefits would accrue.
- modelling of financial and economic benefits, including monetisation of environmental benefits.

Each assessment carried out is intended to help Welsh Ministers to identify a preferred option from a value for money perspective and is designed to present the information needed for Senedd Cymru and stakeholders to be able to scrutinise that decision effectively.

The RIA estimates that the preferred option will incur the following costs to the public sector:

Welsh Government / Transport for Wales

£614.8m (including Journey Time Benefits) (Table 8.4)

£689m (excluding Journey Time Benefits) (Table C-5)

Breakdown:

Transitional costs **£328.4m** (including journey time benefits and **£328.6m** excluding journey time benefits) (Tables C-4 and C-5)

Capital costs **£308.7m** of the transitional costs are classed as capital costs related to bus depots, IT and ticketing systems (Table 1.2)

Recurring costs **£286.4m** (including journey time benefits) and **£360.4m** (excluding journey time benefits) (Tables 8.4 and C-5)

Local Authorities

Transitional costs - 0

Reoccurring costs **£-26.1m** (including and excluding journey time benefits) (Table C-5)

The RIA estimates the total benefits of the preferred option will be **£2,099.7m (£911.1m** excluding journey time benefits) (Table 8-7) broken down as follows:

Operators

£20.6m financial benefits (including and excluding journey time benefits) (Table 8.5)

Users

£2,079.1m economic benefits (including journey time benefits) (Table 8.5)

£890.5m economic benefits (excluding journey time benefits) (Table C-5)

While the public sector does not stand to benefit financially from the proposals, they ensure better value for the public purse by giving the public sector more control over bus services. Even before the impacts of the COVID-19 pandemic, over half of overall bus revenue was government funded. For example, in 2018/19 the Welsh Government and local authorities contributed around £115m to the £210m bus operator revenue in Wales. Despite contributing significant funding to bus services, the Welsh Government and local

authorities currently have very little control over bus routes and times. Bus operators decide when and where most core bus services will operate and tend to focus upon those which generate most revenue. Under the proposals in the Bill, the Welsh Ministers will be able to specify the provision of bus services, including the network, timetables, and fares.

Organising the provision of bus services so that Welsh Ministers work collaboratively with key partners, including local authorities, to deliver a co-ordinated local bus network across Wales will also provide an opportunity to give citizens improved access to education, training, and jobs, as well as to businesses.

4.3 Third Sector

The 'Third Sector' includes community and voluntary transport schemes. These community transport schemes are very locally focused, with individual services tailored to the needs of passengers and specific communities who would otherwise be unable to use or access conventional public transport services. These schemes typically consist of community minibuses and volunteer car schemes and are heavily reliant on volunteer drivers. There are over 110 community transport organisations providing services which enable people to stay independent, participate in activities and access public services. Community transport organisations currently provide transport for over 750,000 passengers in Wales every year.

To help co-ordinate and develop capacity within the sector, we continue to provide core grant funding to the Community Transport Association (CTA). This enables the CTA to maintain a full time Office in Wales to support and encourage the further development of community and voluntary transport schemes in Wales and to represent the sector in discussions with local authorities and Welsh Government. The CTA are understood to be supportive of the objectives of the Bus Services (Wales) Bill and are keen for the Welsh Government and TfW to continue to work closely with the sector to ensure synergies of operation are maximized between franchised bus networks and community and voluntary transport schemes.

Local authorities are encouraged to use some of their Bus Services Support Grant (BSSG) currently worth around £25m annually and allocated to them by the Welsh Government, to support local Community Transport schemes in their respective areas. The current minimal requirement is for at least 5% of each local authority grant award to be spent on community transport schemes, and there is no upper limit on this value.

Community transport organisations are able to operate scheduled local bus services on a special permit system using provisions contained in the Transport Act 1985. This enables community transport providers to register local bus services under a section 22 permit with the Traffic Commissioners. There are very few section 22 permit local bus services operated in Wales. Some community transport operators have set up arrangements to operate local bus services under the standard PSV requirements. Community transport organisations can also operate community minibuses using section 19 permits under the Transport Act 1985, and these services are available to members of the public who are registered to use the service.

The Bill does not include any provisions to change the way community transport operators are licensed. There are no proposed changes to either the section 19 or section 22 permit

system in the new proposed legislation. Community transport organisations will continue to be able to operate both scheduled local bus services using section 22 permits or community minibuses using section 19 permits. Community Transport operators will also be encouraged to bid to operate franchised local bus services.

In implementing reform the Welsh Ministers (via TfW) will work closely with community transport operators to look for synergies between franchised bus networks and community transport schemes. A good start on this new approach has already been made in Wales, through the work TfW has been doing to introduce more demand responsive fflecsi bus services, and in some cases, this has involved integrating community transport bus services operated under section 22 permits with the fflecsi branded operations promoted by TfW. This has helped to strengthen the operations of the community transport sector.

The provisions will allow third sector providers to continue delivering those services already provided for their users, but it will also present an opportunity for some third sector community transport organisations to grow the depth of their operations.

The Roadmap to Bus Reform jointly published by the Welsh Government and TfW sets out the proposed approach to implementation of the Bill. It acknowledges that community transport services will be able to continue operating without needing to obtain a franchise contract or local bus service permit. The Welsh Government and TfW are committed to working with local authorities and the CTA Cymru to explore opportunities for community transport schemes to thrive and continue delivering social benefit.

This proposal is thought to generate a moderate positive impact on the community and voluntary transport sector in Wales, as it will offer the sector more opportunities to diversify operations into PSV compliant local bus services operated as part of a wider franchise.

4.4 Justice Impact

The Bill will prohibit a person from providing a local bus service otherwise than in accordance with the Bill. The restriction will be enforced by the Traffic Commissioner. The Bill makes provision about the penalties that may be imposed by the Traffic Commissioner, and about appeals against these penalties

The Bill will enable Welsh Ministers to grant local bus service permits and to revoke or suspend permits. There will be a right of appeal to the First Tier Tribunal against the Welsh Ministers' refusal to grant a permit, conditions attached to a permit, the revocation of a permit, the suspension of a permit, the length of the suspension, or the conditions that are required to be met before the expiry of the suspension.

The Bill will enable Welsh Ministers to require specific information relating to local bus services to be provided and enable the Traffic Commissioners to impose sanctions for failure to comply. There will be right of appeal to the Upper Tribunal against the sanction.

The Bill will enable Welsh Ministers to make regulations to specify the circumstances in which arrangements made under the Bill will be treated as involving TUPE transfers. This

has implications in terms of the employment rights that will be engaged in the context of such transfers, and the potential for claims to be brought to the Employment Tribunal and EAT.

We have assessed the impact of these sanctions and appeal provisions and have concluded that they will have a minimal impact on the justice system.

A full Justice System Impact Identification (JSII) assessment has been shared with the Ministry of Justice (MoJ).

SECTION 5. WHAT WILL BE THE EFFECT ON ENVIRONMENTAL WELL-BEING?

The provisions within these legislative proposals will enable the Welsh Government and local authorities to work together to plan bus routes which run through central locations and public transport interchanges and connect outside of central locations. This will create an efficient and practical alternative to the car, enabling people to get where they need to go, when they need to get there, by public transport.

This supports the goals of the Natural Resources Policy by improving infrastructure land management, resource efficiency, and supporting health and well-being.

The most effective way of reducing CO₂ emissions in the near-term will be to replace car journeys with those using the existing public transport system and active travel. This will require a suite of infrastructure and behaviour change measures working in tandem.

The legislative proposals could accelerate steps to green the existing bus fleet in Wales. Increased use of public transport leading to reductions in use of private cars will contribute to the Welsh Government's environmental well-being duties and the reduction of emissions. A reduction in vehicle emissions would help contribute to the Welsh Government's carbon reduction targets and would support reductions in air pollution with associated biodiversity benefits.

Overall, the proposals are anticipated to result in a positive effect on environmental well-being, with the magnitude of that effect ranging from minor to moderate subject to the scale of change during implementation of the legislative changes.

5.2 Biodiversity

A biodiversity impact assessment has been carried out (Annex E) which considers how the proposals within the Bill may impact on the biodiversity of Wales. Consideration has been given to the following strategies and legislation:

- Nature Recovery Action Plan (NRAP) 2020-21
- The Environment (Wales) Act, 2016
- Natural Resources Policy Wales 2020-21
- Wellbeing of Future Generations (Wales) Act, 2015
- Clean Air Zone Framework

The legislative proposal could create an environment for better quality of services, modern vehicles, and sufficient funding. This could provide the opportunity for delivery of an integrated transport system that uses zero emission vehicles.

Given the current stage of legislative proposals, the information available to inform an assessment means that there can only be a high-level consideration of potential effects. However, as further detail is likely to emerge at the future development and implementation stage of the legislation, an updated assessment could be carried out at that stage.

5.3 Climate Change

5.3a Carbon

Officials have conducted a full carbon impact assessment of this advice. We consider there will be a significant net decrease in emissions of 570,090 tonnes CO₂e up to 2050. We have low confidence in our assessment given the enabling nature of the Bill and its impact on carbon emissions occurring indirectly.

1. Action plan

This proposal is consistent with the Welsh Government's latest plan to reduce emissions, [Net Zero Wales](#).

2. Just transition

The Welsh Government is committed to a just transition to net zero by 2050. The implications of this proposal from a just transition perspective have been considered.

The Just Transition perspective has been considered as part of the wider transport strategy, of which the Bus Services (Wales) Bill forms just one part. Llwybr Newydd: the Wales Transport Strategy sets out the priorities for an accessible sustainable and efficient transport system with the aim of reducing the transport emissions from private cars and investing in sustainable modes of transport.

A strategically designed bus network, designed in the public interest, can play an important role in making the transition to a carbon neutral transport infrastructure. It can also play an important role in making public transport a more affordable, attractive and practical alternative to the car. It dovetails with the other services – rail and active travel - to enable people to have access to an integrated system which is based on users' needs and encourages a shift away from cars to more sustainable modes of transport which are affordable, reliable and regular.

In Llwybr Newydd there is a commitment to take the needs of rural communities into account in planning transport.

Our Carbon Delivery Plan makes a commitment to:

- Invest in active travel routes and facilities to help local authorities create a comprehensive network of routes
- develop an integrated, multi-modal public transport system, which results in a seamless and effortless experience for passengers
- to deliver new bus legislation to create a legislative basis that ensures that bus networks can be planned in their entirety in the best public interest.

5.3b Climate resilience

Understanding the climate change scenarios

Projections of average global temperature rises range from increases of 5° degrees at the highest to 1.5 ° degrees if the Paris agreement scenario is achieved, which means “to limit the temperature increase to 1.5° degrees above pre-industrial levels”. Global temperature increases are likely to exceed the 1.5-degree threshold, unless significant and rapid action is taken globally. The first global stocktake, undertaken by the UNFCCC secretariat affirmed that the parties to the Paris agreement are not on track to limit global warming to 1.5 degrees Celsius and the window for meaningful change is quickly closing. The stocktake outlines bold actions for Governments and stakeholders to urgently undertake in this critical decade to keep 1.5 degrees within reach, securing lives and livelihoods.¹³

Depending on the temperature range, the changing climate and weather conditions will mean:

- More frequent days of extremely hot weather,
- Less frequent days of extremely cold weather,
- an increase in the number of days with extremely heavy rainfall and more occurrence of drought.

Data on Temperature change to date – Wales¹⁴

Variable	Observed change in Wales
Average annual temperature	Increase in 0.9°C from mid-1970s to mid-2010s
Annual mean rainfall	Increase in 2.0% from mid-1970s to mid-2010s
Sunshine	Increase in 6.1% from mid-1970s to mid-2010s
Weather extremes	UK-wide increase in extreme heat events Little evidence yet on changes in extreme rainfall
Sea level rise	UK-wide increase of ~1.4mm per year since 1901 (16cm to date)

Risks to Transport Sector

The UK Climate Change Risk Assessment summarises the risks to the Transport sector in Wales from climate change as being:

¹³ [Global Stocktake | UNFCCC](#)

¹⁴ [Summary for Wales \(CCRA3-IA\) - UK Climate Risk](#)

- Risks to transport from high and low temperatures, high winds, lightning.
- Risks to infrastructure networks (water, energy, transport, ICT) from cascading failures.¹⁵

The Climate Change Committee recommends the mitigations for the transport sector risks as being the mainstream climate change adaptation into planning and design of new infrastructure, to avoid future retrofitting, alongside improved monitoring, maintenance practices and operations, to avoid lock-in.

Existing Mitigations

These mitigations have already been considered in the *Llwybr Newydd: the Wales Transport Strategy (2021)*. The findings of the Integrated Sustainability Appraisal (ISA) of *Llwybr Newydd* were that the strategy aims to future-proof existing infrastructure, which will help to make the transport system more resilient to the potential effects of climate change, particularly as a result of the Well-Being Ambitions and the Mini Plans. The Mini Plans for Bus, Rail and the Third Sector would see public transport improved in terms of its adaptability and its emergency procedures to protect from flooding and other unexpected events.¹⁶

The Monitoring Framework for *Llwybr Newydd* contains the following reporting measures:

- Measure 6 - greenhouse gas emissions from the transport sector
- Subsidiary measure 21 - % transport infrastructure in good condition
- Subsidiary measure 22 - % transport infrastructure at risk of flooding.

Overall, the ISA considered it to be likely, with a medium level of certainty, that the proposals in *Llwybr Newydd* would cumulatively result in long term minor positive (not significant) effects, including directly (e.g. by improving the resilience of transport infrastructure to extreme weather events) and indirectly (e.g. by reducing the causes of climate change), on climate change resilience.

The Bus Services Bill and the risks to the Bus Network

The Bill sets out a new structure to plan and deliver bus services in Wales. The proposals in the Bill support our aims and ambitions expressed in *Llwybr Newydd* of mode shift and carbon reduction with the aim of encouraging more people to use the bus rather than their cars.

¹⁵ [Summary for Wales \(CCRA3-IA\) - UK Climate Risk](#)

¹⁶ As set out in Chapter 7 of *Llwybr Newydd*

The Bill proposes to give the Welsh Ministers duties and powers to redesign the bus network and make better use of the existing transport network to manage demand, facilities and capacity, together with TfW and other key stakeholders.

In discharging their duty to secure provision of local bus services, the Bill stipulates that the Welsh Ministers must have regard to the six objectives set out in the Bill. One of the objectives is to reduce greenhouse gas emissions and waste from road transport.

The specific climate risks for the bus network part of the public transport system are:

- The overheating of buses and the subsequent effect of that on passengers.
- The effects of extreme weather on the infrastructure of transport hubs including bus stops.
- Potential disruption to the bus service owing to road flooding or power outages.

The planning of the provision of bus services centrally offers the possibility that services can be future proofed and consideration can be given as to what adaptations might be feasible to adopt through the process set out in the Bill – of securing services through franchising, direct provision, permitting or relying on the provision of certain other services.

The expectation is most of the bus network will be secured through franchising. There is therefore the possibility of using contractual standards as a means to further the adaptation measures needed to make the bus network sector more resilient generally. For example, installing air conditioning on buses to offset the dangers of high temperatures for passengers on public transport or making provision for lower emission buses. It should be noted the outcome of decarbonisation of the bus fleet is addressed more fully in *Bus Cymru*.

We have not made any changes to the proposals in the Bill as a result of this climate change assessment because, as outlined above, consideration has already been given to the climate change aspects of the wider bus reform and in the transport strategy generally. The adaptations required for the transport sector are, in general, outside the scope of the Bill.

The Bill fits within the already existing strategies to reduce the carbon footprint and to reduce greenhouse gas emissions from transport emissions.

Reduction of risks

The Welsh Government is promoting a more sustainable road transport network and a modal shift away from roads for people and freight. This will help reduce emissions and the impact transport has on our environment and our health. The Bill proposals will contribute to this goal.

Transport is our third largest greenhouse gas emitting sector after the energy supply and business sectors. Transport accounted for 16% of Welsh emissions in 2017.¹⁷

Over half of all transport emissions are due to car usage and practically all transport emissions are emissions of carbon dioxide. Although vehicles are increasingly efficient, we are also travelling more, so overall sector emissions have changed little since the 1990 baseline.¹⁸

Transport is a key contributor to carbon and greenhouse gas emissions. Greener, lower emission buses could be secured as part of standards introduced via local bus service contracts, which would help contribute positively to the decarbonisation agenda.

Increased use of public transport leading to reductions in use of private cars would also contribute to the Welsh Government's environmental well-being duties and the reduction of emissions.¹⁹

5.4 Strategic Environmental Assessment (SEA)

The legislative proposals are unlikely to have implications for land use. They will not require consent under the Habitats Directive (see below) and although changes to the public transport system (buses) are intended to reduce reliance on the private motor vehicle for transport reducing harmful emissions into the environment, it is unlikely that this will result in *significant* effects on the environment.

On this basis, an SEA is not considered to be required but will be kept under review as work progresses on the legislative changes.

5.5 Habitats Regulations Assessment (HRA)

The legislative proposals will not affect any European designated sites; therefore, a Habitats Regulations Assessment (HRA) is not required under the Conservation of Habitats and Species Regulations 2010 (Consolidated in 2017).

5.6 Environmental Impact Assessment (EIA)

The proposals would not require EIA by virtue of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

¹⁷ [Greenhouse gas emissions: infographic | GOV.WALES](#)

¹⁸ [NID_90-22_Main.pdf](#)

¹⁹ [reducing-emissions-in-wales-progress-report.pdf](#)

SECTION 6. SOCIO-ECONOMIC DUTY WHAT WILL BE THE IMPACT ON SOCIO-ECONOMIC DISADVANTAGE?

6.1 The Socio-economic Duty

The socio-economic duty requires relevant public bodies, including Welsh Ministers, to have due regard to the need to reduce inequality of outcome that results from socio-economic disadvantage. This duty applies only to decisions which are of a strategic nature.

A full Social-Economic Impact Assessment can be found at Annex G.

SECTION 7. RECORD OF FULL IMPACT ASSESSMENTS REQUIRED

Impact Assessment	Yes/No	
Children's rights	Yes	
Equality	Yes	
Socio-economic Duty	Yes	
Rural Proofing	Yes	
Health	Yes	
Privacy	No	
Welsh Language	Yes	
Economic / RIA	Yes	
Justice	Yes	

Biodiversity	Yes	
Climate Change	Yes	
Strategic Environmental Assessment	No	
Habitat Regulations Assessment	No	
Environmental Impact Assessment	No	

SECTION 8. CONCLUSION

Discussions with the industry and other stakeholders, including the public, on the subject of bus reform have been on-going since 2017, and have taken place in the form of bus summits, working groups and public consultations. Two bus summits have taken place in 2017 and 2018 followed by eight detailed workshops across Wales.

We consulted on our transport strategies Bws Cymru, published in 2022, and Llwybr Newydd by holding a total of 65 online meetings and three face to face workshops to capture people's experience and perception of transport.

The 5 Welsh Commissioners were consulted, as were the:

- Equality and Human Rights Commission
- Disability Equality Forum
- Wales Race Forum
- Refugee and Asylum Seeker Task Force
- Strengthening and Advancing Equality and Human Rights steering group
- Ministerial Advisory Forum on Ageing
- Gypsy and Road Traveller representatives
- Transport for Wales Accessibility and Inclusion Panel

The consultation on our White Paper *One network, one timetable, one ticket: planning buses as a public service for Wales* was published on 31 March 2022 and was open for consultation until 24 June²⁰. We were pleased to receive a large number of responses to our consultation on the White Paper; we published a summary of those responses on 6 December²¹.

96% of respondents agreed with the need for change in how we deliver bus services. This highlights the scale of the need and appetite for change. 66% of respondents agreed that franchising is the right solution to the challenges we face, and 76% agreed with our proposed model. Some local authorities and operators raised comments about how franchising will work in practice, and we will carry on working with them to deliver a bus system which works for people in Wales.

As part of Bws Cymru consultation there was engagement with stakeholders representing the interests of children and young people, including the Children's Commissioner for Wales, Sustrans, Ethnic Minorities and Youth Support, and Bus Users Cymru.

²⁰ [One network, one timetable, one ticket: planning buses as a public service for Wales \[HTML\] | GOV.WALES](#)

²¹ [One Network One Timetable One Ticket Planning Buses as a Public Service for Wales Consultation Summary of Responses \(gov. Wales\)](#)

Further details of our consultations can be found within Chapter 4 of the Explanatory Memorandum.

The main significant impact of the legislative proposals will be to create a bus network designed in collaboration with local authorities. A regulated bus network will allow people in all parts of Wales to access reliable public transport, enabling them to access employment, education and training, business, and leisure opportunities. It will achieve a greater connectivity with other transport options with associated improved access.

Establishing a strategic planned network will help promote access to culture and heritage, which will encourage people to participate in the arts, and sports and recreation. Welsh speaking and non-Welsh speaking communities will be better connected.

It will also enable improved access to places of work, education, healthcare, retail, entertainment, tourism etc., contributing to economic growth by connecting people and businesses, and creating a more prosperous Wales.

An improved bus network offers an effective way of reducing CO₂ emissions in the near-term through investment in sustainable options, such as low carbon/zero emission vehicle fleets. These measures would help to reduce pollution and improve air quality. Increasing bus use will improve air quality, helping to create a healthier environment for everyone in Wales.

We recognise that legislation alone will not reverse long-term trends in bus usage. This is due to the complexity and diversity of the factors that influence whether people travel by bus. However, it is considered that by improving the legislative framework, the public sector will have the tools and flexibility to tailor their approach and target limited resources more effectively to meet those local needs and circumstances.

The Seven Wellbeing Goals

1. A prosperous Wales	<ul style="list-style-type: none">• People in all parts of Wales can access employment and educational opportunities.
2. A resilient Wales	<ul style="list-style-type: none">• Reducing reliance upon cars will ease road congestion.• Increasing the number of journeys made by bus instead of car will reduce air pollution. The proposals aspire to reduce this even further with the use of buses which use alternative fuels, such as electricity or hydrogen.
3. A healthier Wales	<ul style="list-style-type: none">• Improving access to parks, leisure centres, gyms, or other areas which promote and provide opportunities for physical activity and exercise. Improved access to wider services and opportunities, including a wider range of food choices.
4. A more equal Wales	<ul style="list-style-type: none">• Increased opportunities for people living in rural areas to access employment and education.• People without access to a car have the same opportunities as those who do.

	<ul style="list-style-type: none"> • The Bill will enable more informed and better co-ordination of bus services and the infrastructure required to reduce barriers for users.
5. A Wales of more cohesive communities	<ul style="list-style-type: none"> • The provision of more affordable transport options would increase opportunities for groups who cannot afford private transport options. This would reduce feelings of isolation and exclusion for these individuals, allowing them to access a wider range of opportunities and improve their social network.
6. A Wales of vibrant culture and thriving Welsh language	<ul style="list-style-type: none"> • Access to Welsh education, both schools and adult courses. • Information provided in Welsh will allow those who would prefer to access the information in Welsh to do so; and provide non-Welsh speakers with the opportunity to read and learn some of the Welsh language. • Welsh speaking and non-Welsh speaking communities are better connected.
7. A globally responsible Wales	<ul style="list-style-type: none"> • By reducing car journeys and decarbonisation of the bus fleet, the proposals would reduce emissions, contributing to greater air quality providing benefits to biodiversity.

Well-being Objectives

Provide effective, high quality and sustainable healthcare	The Bill will not directly impact this objective; however, the proposals aim to make it easier for people to access healthcare.
Continue our long-term programme of education reform, and ensure educational inequalities narrow and standards rise.	The Bill will not directly impact this objective; however, the proposals aim to make it easier for children, young people, and adults to access educational opportunities.
Protect, re-build and develop our services for vulnerable people.	The Bill will not directly impact this objective; however, a more reliable bus network will help vulnerable people access the services they need.
Celebrate diversity and move to eliminate inequality in all of its forms.	The proposals will help to ensure those without access to a car can have the same opportunities as those who do.
Build an economy based on the principles of fair work, sustainability and the industries and services of the future.	The proposals will help to ensure those without access to a car can have the same opportunities as those who do. People in rural areas will have improved access to services.
Push towards a million Welsh speakers, and enable our tourism, sports and arts industries to thrive.	The Bill will not directly impact this objective, however, a reliable bus service will enable people to access Welsh education opportunities, as well as creative and sporting events. Information provided in Welsh will allow those who would prefer to access the information in Welsh to do so; and provide non-Welsh speakers with the opportunity to read and learn some of the Welsh language.

Build a stronger, greener economy as we make maximum progress towards decarbonisation.	The provisions in the Bill will reduce reliance upon the car, supporting the decarbonisation process. Ultimately, it is hoped that it will be possible to run the bus fleet on zero-emission fuels.
Make our cities, towns and villages even better places in which to live and work.	Providing an efficient and reliable alternative to the car will reduce congestion on the roads and improve air quality.
Embed our response to the climate and nature emergency in everything we do.	Decarbonisation and improving air quality are a key part of these proposals.
Lead Wales in a national civic conversation about our constitutional future and give our country the strongest possible presence on the world stage.	The Bill will not directly impact this objective. However, the provisions in the Bill will make it easier for people visiting Wales to get around, helping to strengthen Wales's international reputation.

The Bill will include statutory provisions which will set out how the bus network will be monitored and reviewed. Local bus service contracts will include clauses setting out how the performance of operators and services will be monitored.

We recognise that it will be necessary to gather data to monitor and evaluate the impact of the Bill upon the public, including those sharing protected characteristics, and the environment. We are reviewing how best to do this, in keeping with GDPR and any other relevant legislation and guidance.

SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director:

Alex Walters

Department:

Economy, Energy and Transport

Date:

FULL IMPACT ASSESSMENTS

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

Analysing the evidence and assessing the impact

It is assessed that the direct impact of the Bill on Children's Rights is not significant and is generally positive.

In broad terms, this assessment considers that changes to the co-ordination and management of bus services across Wales will positively impact on children, in terms of their access to buses for education, leisure and general transport requirements. No substantive negative effects specific to children and young people have been identified.

In reaching this conclusion, this assessment noted a number of consultations and other work undertaken by Welsh Government and its partners, which looked at the impact of access to bus services on children and young people.

A review of the available research has helped understand potential issues and opportunities associated with the implementation of the proposals for children and young persons. We have gathered details from a number of studies and research papers on the issues surrounding children and young people and transport. We are also conducting a review of the Learner Travel Measure 2008 - [Learner Travel Measure Review](#). Whilst learner travel provision is outside the scope of the Bill, there is potential positive impact in relation to children, young people and their parents/ carers in a more co-ordinated system of bus services.

Pertinent points from the studies include:

- a) Young people, particularly those aged between 17 and 20 are more reliant on buses than any other group, largely using services between educational establishments and home²².
- b) Those who rely on bus services include young people, and affordable bus services enable young people from all backgrounds to access positive activities before and after school.²³

²² Equality and Human Rights Commission - The state of equality and human rights 2018 - [Is Britain Fairer](#)

²³ Making the connections: the cross sector benefits of supporting bus services (2014) (urbantransportgroup.org)

- c) Those most likely to be without a car include younger people and the importance of buses is greater for under 17-year-olds living in households without a car.²⁴
- d) The cost of travel is a key barrier to accessing employment (and contributing to youth unemployment).²⁵
- e) 33% of young adults say they could not access employment without the use of a bus service, compared to 8% of 55-64-year-olds. 40% of young adults also said that the bus had given them greater independence (this research finding refers to young adults between 16-24).²⁶
- f) For many young people, public transport is their preferred mode of travel, largely due to the ability to use technology on buses and they are more aware of the benefits to physical activity linked to using public transport and to avoid the cost of running a car.²⁷

We also considered responses and other evidence gathered as a result of public consultation on the [Bws Cymru Plan](#) and [Llwybr Newydd](#), the withdrawn Bus Services (Wales) Bill 2020, and the work done on our behalf by [Children in Wales](#). Children in Wales are the national umbrella body for organisations and individuals who work with children, young people and their families in Wales. They have produced a summary report on behalf of Welsh Government on work undertaken to assess the impact of bus reform.

There is potential positive indirect impact in relation to children, young people and their parents/carers arising from the broader improvements to access and availability of local bus service provision as a result of bus reform. This Bill is a mechanism for enabling these improvements to be implemented more consistently across Wales.

[The Bus Passenger Survey \(autumn 2017\)](#), undertaken by Transport Focus on behalf of Welsh Government, showed that 752 bus passengers surveyed between the age of 16-34 are less satisfied with the overall bus journey than people aged 35 to 59. And similarly, they are less satisfied with the value for money for bus travel.

²⁴ [The Role of Transport in Supporting a Healthy Future for Young People \(sustrans.org.uk\)](https://www.sustrans.org.uk)

²⁵ Fare's Fair? Concessionary travel policy and social justice (2015) [\(PDF\) Fare's fair? Concessionary travel policy and social justice](#)

²⁶ Liberty Bus different thinking 2017 [libertybus-social-impact-report-2017-spreads.pdf \(socialvalueuk.org\)](https://socialvalueuk.org/libertybus-social-impact-report-2017-spreads.pdf)

²⁷ On the move: Exploring attitudes to road and rail travel in Britain (2015) [ITC-ORR-Road-Rail-Attitudinal-Report.pdf \(theitc.org.uk\)](https://theitc.org.uk/ITC-ORR-Road-Rail-Attitudinal-Report.pdf)

Another study undertaken by Transport Focus (but not specifically for Wales, including the UK) looked at young peoples' expectation of public transport. The main improvements to bus services that young people wanted were:

- a) Cheap and easier to understand fare deals.
- b) Punctuality and reliability.
- c) Supporting better use of the time on buses by providing free wi-fi and at seat charging.
- d) Using mobile technology to provide smart ticketing and journey planning.

As part of the Bws Cymru consultation there was engagement with stakeholders representing the interests of children and young people, including the Children's Commissioner for Wales, Sustrans, Ethnic Minorities and Youth Support, and Bus Users Cymru. This consultation highlighted the need to target and encourage young people onto buses.

Drawing from the engagement that was undertaken with children and young people as part of the withdrawn Public Transport (Wales) Bill consultation exercise, the Children's Commissioner for Wales highlighted the views of children and young people that she had gathered over the course of her term, regarding improvements required for public transport. This included the need for coherent and consistent national provision of quality and reliable transport, particularly for children and young people due to their limited options for individual travel arrangements.

The Children's Commissioner for Wales shared the following relevant points for consideration which had been obtained through consultation with children and young people:

- a) Young people living independently find things like transport costs a particular barrier to taking up a course or training that they may have wanted to pursue, due to the need to budget their finances to pay for bills and living costs as well as transport and the costs of the course materials.
- b) Children under 17 are particularly dependent upon public transport as they are unable to drive and even at age 17 and over, the costs of learning to drive and maintaining a car, with insurance and running costs, can be prohibitively expensive.
- c) The most common barriers to accessing structured activities for children are finances, lack of variety, and transport. Transport and getting to places are identified as a significant challenge in all contexts; going to play or hang out with friends or to take part in more structured activities. Lack of local provision for play, cultural and leisure activities meant that public transport becomes a necessity for many.
- d) The Children's Commissioner for Wales Annual report 2020/2021 highlighted travel to education settings can be a cause of concern for many children and young people, with issues relating to safety and availability of transport.

Disabled Children and Children with Learning Impairments

In 2018 the Children's Commissioner for Wales worked with Community Action in Research and Policy (CARP) Collaborations²⁸ to engage with children and young people with learning impairments and their families and to inform the CARP Collaborations report '?', 'Young people and friendships, What matter to us?' which focused on friendship patterns and social isolation of young people with learning impairments. Young people who participated were very clear about the things they wanted help with as they moved towards independence as they got older:

- a) Questions were open ended, but transport often featured. A survey of parents found that 83% replied 'yes' to the question 'Are you are worried that your child may be socially isolated?'. Transport was identified as a factor in this worry.
- b) Transport poses a massive barrier for young people with learning impairments to see each other.
- c) Barriers including cost and availability apply to this group of young people too, but they also face additional barriers including accessibility, understandable information on times and routes, and support for travelling independently.
- d) Transport is an issue for more than just socialising. Transport to college and work placements can also be a barrier. Parents note the heavy reliance on them to provide transport, and the impact that needing to be available to provide transport could have on their ability to work.

These survey results were also echoed in the Children's Commissioner's 2018 report: Don't hold back, transitions to adulthood for young people with learning impairments.²⁹ Here it is highlighted young people wanted help with practical things including help using public transport, and the lack of confidence young people had in using public transport left them feeling socially isolated.

Between 2020-2021 the Children's Commissioner engaged in person with at least 694 children and young people across Wales.³⁰ Whilst this engagement was not specifically related to the Bill, it helped identify projects which support young people with travel when transitioning to adulthood, often helping them to understand timetables and routes, working with local bus companies on disability awareness and accessibility, supporting

²⁸ Community, Action, Research and Policy Collaborations (CARP Collaborations), 'support social inclusion through diverse project work and by promoting active participation and engagement.' Further details available at: [CARP - Home](#)

²⁹ [Dont-Hold-Back.pdf \(childcomwales.org.uk\)](#)

³⁰ [Home - Children's Commissioner for Wales \(childcomwales.org.uk\)](#)

young people to apply for a disabled person's bus pass and providing travel buddies or lift share opportunities.

A Charter for Change: Protecting Welsh Children from the Impact of Poverty³¹ also explains that professionals working with children and young people found the experience of using public transport difficult for some children, such as those on the Autistic spectrum. They highlighted the Orange Wallet scheme, which helps those children and young people communicate through words and pictures written and drawn in the wallet. The wallet also contains emergency contact details.

Intersectional Protected Characteristics and Socio-economic status

Sex

[Women's and girls' views and experiences of personal safety when using public transport](#) (Transport Scotland)

"One young woman (under 18) spoke about different 'levels' of feeling safe depending on who she was travelling with, with female friends offering some support, whereas male companions provided an even greater level of comfort." (Pg. 18)

"There were mixed views around how safe different modes may be, with some feeling safer on buses (mainly due to the accessibility of the driver and the potential to alight at regular intervals) and others feeling safer on trains (because of their direct route and the presence of staff other than the driver on board)." (Pg 67)

"Young women were most likely to report being victims of sexual harassment, disabled women were most likely to report general anti-social or intolerant behaviour from fellow passengers and women from ethnic minorities were most likely to report extreme examples of verbal abuse (including both sexist and racist abuse)." (Pg 69)

A report³² published in 2022 by Transport for the West Midlands (TfWM), the UK's Violence Against Women and Girls Transport Champions, details findings from Transport Focus regarding the experiences of women and girls using transport.

Of the 1,282 women who responded to the survey:

- Two-thirds stated that they 'avoid travelling alone when it is dark'
- 568 responded to the question "Which ways of travelling do you avoid?". Of these, 36% stated they avoid using buses.

³¹ [A-Charter-for-Change-Protecting-Welsh-Children-from-the-Impact-of-Poverty.pdf](#) (childcomwales.org.uk)

³² [Women-and-girls-experiences-of-safety-on-transport-FINAL.pdf](#) (d3cez36w5wymxj.cloudfront.net)

Experience of incidents described included sexual assaults, intimidating/predatory encounters, being physically assaulted or threatened and feeling unsafe due to antisocial behaviour (which included fighting, verbal abuse and vandalism).

The report states “participants who had used public transport were asked: ‘When using public transport, have you ever had an experience or seen something happen which made you feel unsafe?’. The majority of participants named an occasion or a type of incident or journey. For some women this was several years ago and they noted that they had subsequently changed their travel habits.”

Race

Members of the Wales Race Forum provided officials with anecdotal evidence relating to the experiences of people from black and ethnic minorities of bus service provision in Wales.

Gypsies and Travellers Wales (GTW) “aims to support and enable Gypsies and Travellers to achieve a high and sustainable quality of life, within their own culture, through improving access to suitable accommodation, public services and employment skills”.³³ GTW representatives at the forum reported difficulties, in particular for children and other vulnerable users, to accessing bus services because of the lack of bus stops, and pavements providing access to bus stops, located adjacent to communities.

Other forum representatives at the forum also stated that they were aware of at least four recent instances of women and girls wearing hijabs who were standing at bus stops but passed-by by drivers for no explicable reason. They also explained safety concerns expressed to them by men and women, young and old, who use public transport.

Children in Poverty

The Children’s Commissioner for Wales’ Annual Report 2020/21 identified that young people continued to raise concerns about access to reliable and affordable transport options across Wales.³⁴ Access to transport is related to children’s ability to attend education or training places, to access employment opportunities and to socialise. This was particularly prevalent for children in poverty and those experiencing social-economic disadvantage as explained in The Children’s Commissioner for Wales’ report: A Plan for all Children and Young People 2019-2022.³⁵

In March 2019 the Children’s Commissioner for Wales published A Charter for Change: Protecting Welsh Children from the Impact of Poverty.³⁶ This was the culmination of work with 550 children and young people, as well as professionals and parents/ carers, seeking

³³ [Gypsies and Travellers Wales \(dewis.wales\)](https://www.dewis.wales/)

³⁴ [Children’s Commissioner for Wales Annual Report 2020/21 \(childcomwales.org.uk\)](https://childcomwales.org.uk/)

³⁵ [Three-Year-Plan-19-22.pdf \(childcomwales.org.uk\)](https://childcomwales.org.uk/Three-Year-Plan-19-22.pdf)

³⁶ [A-Charter-for-Change-Protecting-Welsh-Children-from-the-Impact-of-Poverty.pdf \(childcomwales.org.uk\)](https://childcomwales.org.uk/A-Charter-for-Change-Protecting-Welsh-Children-from-the-Impact-of-Poverty.pdf)

to find the practical changes that could be made in Wales to ease the impact of child poverty on families. The Welsh Government has been urged to consider the 'pinch points' of costs for families living on a low income, including transport costs. Children and young people and parents/ carers discussed the costs of after-school clubs where the option of a free bus from school is not available. This can mean that families on a low income, or who rely on public transport, are excluded from these activities. For families experiencing food poverty, and relying on donations from food banks, public transport can also be essential in order for them to access food.

The cost and availability of transport was something that children and young people felt passionately about. This was particularly the case for children and young people in rural areas but was evident for those living in city or town suburbs too.

Parents also noted that some bus companies allow a child under the age of five to travel for free, but this only applies to the first child, so for families with more than one child under that age there is only a fee exemption for the first child.

Parents/ carers told the Children's Commissioner for Wales of the cost of public transport to leisure or cultural activities restricting their ability to provide stimulation for their children. There were also several reports of the high cost of buses in circumstances when children and young people have to pay for travel to school and education.

Free public transport or reduced fares, where available, were therefore very important to the families which were spoken to. Several mentions were made of the Traws Cymru service, for example, which provides free travel on the weekends. Families from North Wales described using this service to travel from Wrexham to Barmouth in the summer, while the Merthyr Tydfil to Cardiff service was frequently used on the weekend by the children and young people in the South Wales Valleys.

The My Travel Pass scheme, which offers one-third off bus fares for 16-21-year-olds, was mentioned by several professionals as a helpful reduction in costs but it is notable that young people did not particularly mention this and may not be aware of the discounts available.

Amongst many recommendations that form part of a wider call for Government to have a concrete delivery plan on child poverty in Wales, 'A Charter for Change: Protecting Welsh Children from the impact of poverty' has made a specific recommendation in relation to transport, that "Welsh Government and local authorities should extend their investment in free or affordable and accessible transport schemes for children and young people

(Actions 18 and 19 of Bws Cymru), and look to make these more regular, covering both rural and more metropolitan settings.³⁷

Children and the Climate Emergency

Llwybr Newydd highlights the need to place people and climate change at the front and centre of the Welsh transport system, this includes the importance of achieving net zero by 2050 to protect the lives of Welsh children. A joint statement by The Future Generations Commissioner and The Children's Commissioner for Wales also highlights there is concern and frustration among children and young people surrounding climate change and that there is a need for public transport to be a viable option for most journeys to address children's concerns.³⁸ A literature review has found that the effects of climate change have detrimental effects on children's health and well-being and that present and future generations of children will bear and continue to bear the burden from climate change, including exposure to air pollution on children's respiratory systems and increasing risk of disease.³⁹

The Bus Services (Wales) Bill is the culmination of our policy development work. Engagement with children and young people was undertaken as part of the consultations on the Bws Cymru plan, Llwybr Newydd the transport strategy and as part of the withdrawn Bus Services (Wales) Bill 2020, as cited in the foregoing paragraphs.

Children in Wales, produced a summary report on behalf of the Bus Legislation Team, which summarised the findings of "Young Wales", a Children in Wales initiative that amplifies and supports the voices of children and young people across Wales. Young Wales drew upon data sourced between 2020 and 2023 from the following consultations and networks for the purposes of this summary report:

- UN Report
<https://www.childreninwales.org.uk/news/young-wales-report-united-nations-committee-rights-child/>
- Young Carers Network
- Children in Wales annual Poverty Survey
<https://www.childreninwales.org.uk/news/children-wales-launches-its-6th-annual-child-family-poverty-survey-findings-report/>
- Children and Young People's Consultation on the Ministerial Play Review
- 20MPH speed limit consultation
- Transport planning consultation

³⁷ [A-Charter-for-Change-Protecting-Welsh-Children-from-the-Impact-of-Poverty.pdf](#) (childcomwales.org.uk)

³⁸ <https://www.childcomwales.org.uk/2019/02/taking-action-on-climate-change/>

³⁹ [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(20\)30274-6/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(20)30274-6/fulltext)

UNCRC articles or optional protocols which relate to our proposed legislation

Based on the evidence collated to date, we expect the Bill to positively impact on the lives of children by addressing some of the issues identified and barriers to travel for children and young people in the research findings and consultation work.

Welsh Government officials have considered the intended and unintended consequences of the proposals on the rights of the child, and the approach to progressing the legislation has and will continue to consider the rights of children and young people (for example, by helping ensure no discrimination takes place (Article 2)). However, the Articles that are considered to be most relevant in terms of likely impact on children and young people are Article 12, Article 15, Article 23, Article 28 and Article 31.

Article 12 – Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account. With respect to Article 12 the Welsh Government provided opportunities for children to express views on how the development of the Transport strategy, including the previous Bill, would affect them by holding events specifically aimed at children.

Article 13 – Children have the right to get and to share information as long as the information is not damaging to them or to others.

Article 15 - Children have the right to meet together, and to join groups and organisations.

Article 23 - Children who have any kind of disability should have special care and support so that they can lead full and independent lives.

Article 28 - Children have a right to an education.

Article 31 - All children have a right to relax and play, and to join in a wide range of activities to achieve this.

Officials consider that a bus system designed on a national basis to operate in a more strategic way will benefit children and young people, in particular those living in rural areas which are currently not served well by public transport. It will facilitate more opportunities to use bus services to travel, socialise and take up training and employment opportunities than under the existing more fragmented system.

The Bill proposals could help combat the barriers highlighted by the Children's Commissioner during the consultation on the withdrawn Bus Services (Wales) Bill (as noted above) by enabling Welsh Ministers and Transport for Wales to provide more affordable and fairer travel costs by offering integrated ticketing and a national fare structure.

The Bill aims to help young people feel more confident in using the bus with potential improvements such as integrated ticketing and easy to pay fares, improved information

provision on the bus, at bus stops and on-line, and punctual and reliable bus services. Nationally planned and secured local bus services should provide a sustainable long-term option for young people. A coordinated system of contracting out services will provide opportunities for better driver training and more consistent passenger information, which should help remove the barriers identified for disabled children and children with learning impairments in the CARP Collaborations report referenced above.

How the Bill proposals will support each of the relevant UNCRC articles identified are set out below.

We recognise that legislation alone will not deliver the enhancement of each article. However, it is considered that by improving the legislative framework, the public sector can be given the tools and flexibility to tailor their approach and target limited resources more effectively to meet those local needs and circumstances to enhance each of these UNCRC articles to deliver real world improvements.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 12 - Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account.	X		With respect to Article 12 the Welsh Government provided opportunities for children to express views on how the development of the Transport strategy, including the previous Bill, would affect them by holding events specifically aimed at children.
Article 15 - Your right to meet with friends and join groups and clubs.	X		A good, reliable bus network which is punctual will assist young people to meet with friends and join groups and clubs.

Article 13 - Children have the right to get and to share information as long as the information is not damaging to them or to others.	X		There will be a requirement for the provision of clear and accessible bus timetabling and information, which would benefit children and young people, particularly disabled children and young people.
Article 23 – Your right to special care and support if you have a disability so that you can lead a full and independent life.	X		The proposals seek to improve the accessibility and quality of bus services through more effective management and operation, protecting the long-term availability and improvement of routes. Improved access to information about bus services could also help children and young people to understand their travel options better, thus improving their access to bus services.
Article 28 - Your right to learn and go to school.	X		A nationally planned and secured and reliable bus service network, that has taken account of learner travel requirements, will have a positive impact on children and young people because it will provide opportunities to secure services that provides access to education, training and recreation.
Article 31 - Your right to relax and play.	X		An improved national bus network which provides an easy to understand and use, coordinated network of routes and timings could also improve access to

			opportunities for children to relax and play.
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It is not considered that the Bill will have specific impact upon EU, EEA or Swiss citizens (whose rights are protected by the Citizens Rights Agreements) compared to other persons living in Wales, including those up to the age of 18.

The impacts identified in this assessment will form part of the Regulatory Impact Assessment for the Bus Services (Wales) Bill which will be considered by Ministers as part of the Bill approval process prior to introduction to the Senedd.

Parts 1 and 8, and the CRIA will be published on the Welsh Government website as part of the Bill pages. Transport for Wales have established an engagement structure to aid implementation of the wider bus reform package. Advice from officials has included ensuring engagement with children and young people is part of this.

This Children's Rights Impact Assessment has considered the potential impacts arising from the enabling powers of the primary legislation. Future policy developed as a result of the Bus Services (Wales) Bill, including the development of franchising and awarding of contracts, will be subject to further impact assessment. As such, this CRIA will be kept under review as detailed proposals for implementation are developed and stakeholder views and evidence are incorporated into our assessment of potential impacts.

The Bill will support the delivery of more frequent, more convenient and more reliable bus services. Decisions that will have a direct impact on children and young people will predominantly be made during the implementation stage. Effective engagement with representative bodies, including the Children's Commissioner, is being considered as part of implementation planning.

B. EQUALITY IMPACT ASSESSMENT

The following baseline data has been collected to help build up a picture of Wales in order to consider the issues and needs of those with and sharing protected characteristics within Welsh society.

Population and age structure

The population of Wales for mid-year 2023 is recorded as 3,132,700⁴⁰, with a population density of 150 persons per square km. According to 2021 census data Wales has a slightly higher female population, representing 51% of the population with 49% being male⁴¹.

Data shows that overall the population of Wales is increasing, by 44,000 since the last census in 2011. The proportion of the population aged 65 years and over has increased to 21.3%.

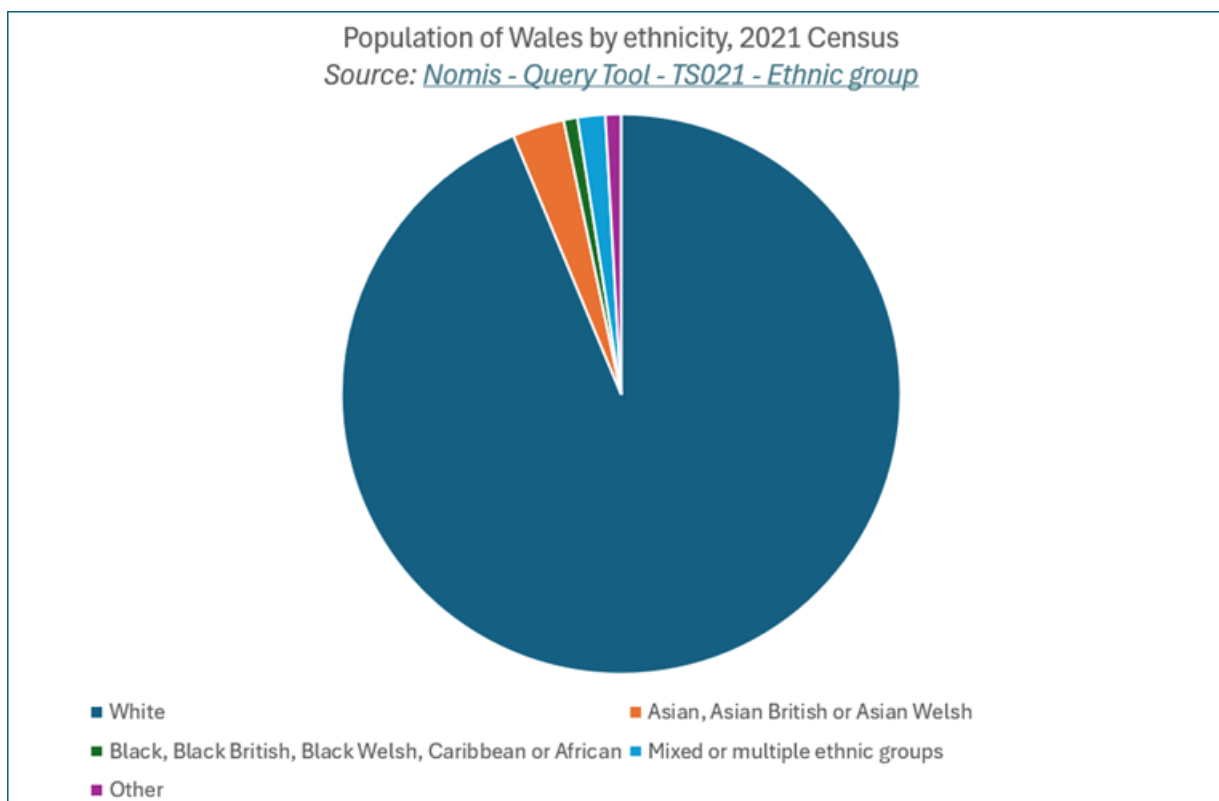
Ethnicity

Figure 1 below shows the population of Wales by ethnicity. It demonstrates that the dominant ethnicity in Wales is White, followed by Asian/Asian British. The majority of households in Wales have English as a main language.

Figure 1 Population of Wales by Ethnicity

⁴⁰ Population estimates for the UK, England, Wales, Scotland and Northern Ireland - Office for National Statistics

⁴¹ [Population and household estimates, Wales - Office for National Statistics](#)



Religion

At the time of the 2021 census 47% of the Welsh population considered themselves to have no religion. This compares to 44% of the population stating that they were Christian, 2% of the population stating that they were Muslim with Judaism, Buddhism, Hinduism and Sikhism each accounting for less than 0.5% of the total population⁴².

Disability

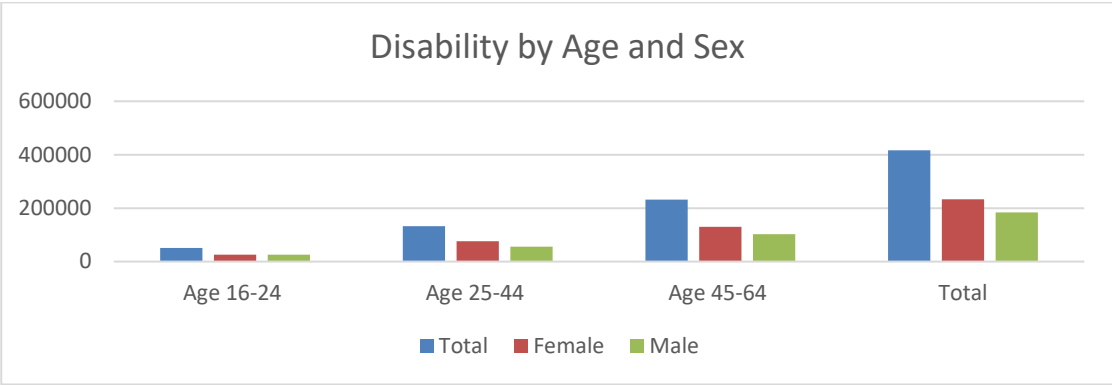
Data from the Annual Population Survey estimates that there is a total of 416,600 people in Wales who are disabled. Of this population, 55.9% are female and 44.1% are male.⁴³ The majority of those with an impairment in Wales are over the age of 55 with numbers decreasing with age as demonstrated in Figure 7 below. There are an estimated 311,000 registered carers in Wales with research by Carers Wales estimating that 147,600 carers are juggling this responsibility with paid work.⁴⁴

⁴² [Religion, England and Wales - Office for National Statistics](#)

⁴³ Welsh Government, 2019. Stats Wales: Disability by Age and Sex. Available online at [Disability by Age and Sex](#)

⁴⁴ Carers Wales, 202 [Key facts and figures | Carers UK](#)

Figure 2 Disability by Age and Sex



Marriage, Civil Partnership and Sexual Orientation

According to 2021 census data the percentage of the Welsh population who are married or in a civil partnership is 44%.⁴⁵ Data obtained from Welsh Government states that there are an estimated 34,500 people in Wales identifying as lesbian gay or bisexual.⁴⁶ ONS data has found that in the UK statistically 16-24-year-olds are the most likely to identify as lesbian, gay or bisexual and a higher proportion of men identify as gay.⁴⁷

Economy and the Labour market

The employment rate for people aged 16 to 64 in Wales was 73.2% in the year ending June 2024. The economic activity rate for people aged 16 to 64 was 75.6%, whilst the economic inactivity rate was 24.4%⁴⁸.

The table below shows a breakdown of economic inactivity in Wales by reason for the year ending June 2024⁴⁹.

⁴⁵ [Demography and migration in Wales \(Census 2021\) \[HTML\] | GOV.WALES](#)

⁴⁶ Diverse Cymru, 2019. Sexual Orientation Inequality in Wales. Available online at: https://www.diverseecymru.org.uk/protected-characteristics/sexual-orientation/?doing_wp_cron=1566568103.3083140850067138671875#references

⁴⁷ Welsh Government, 2021. Sexual Orientation. Available online at: <https://gov.wales/sexual-orientation-2019>

⁴⁸ Annual Population Survey, 2024. Stats Wales: Economic activity rate by Welsh local area and year. Available online at: <https://statswales.gov.wales/Catalogue/Business-Economy-and-Labour-Market/People-and-Work/Employment/Persons-Employed/economicactivityrate-by-welshlocalarea-year>

⁴⁹ Annual Population Survey 2024

<i>Reason for economic inactivity</i>	<i>% of total economic inactivity, 16-64</i>
<i>Student</i>	<i>24.9</i>
<i>Looking after family/home</i>	<i>16.7</i>
<i>Temporary sick</i>	<i>1.7</i>
<i>Long-term sick</i>	<i>33.5</i>
<i>Retired</i>	<i>13.4</i>
<i>Other</i>	<i>9.6</i>

Source: Annual Population Survey - Economic Inactivity by Reasons

A survey by DfT shows that in the UK, car ownership levels are lower amongst Black, Asian and Minority Ethnic groups. 29% of Black people had no access to a car or van compared to 14% of White people in 2020.⁵⁰

Disabled people are more likely to be in a household without access to a car and in households with access to a car they are less likely to be a driver. 55% of disabled people aged 17-64 held a full driving licence in 2020, compared with 83% of non-disabled people.⁵¹

⁵⁰ Department for Transport, 2021. Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. [Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC - GOV.UK](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf)

⁵¹ Department for Transport, 2021. Transport: Disability and Accessibility Statistics, England 2020 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf

It has also been reported that women only account for 35% of registered car keepers in the UK⁵² and that 27% of adults aged 17 years and over did not hold a full car driving licence in 2016.⁵³

The majority of those in employment in Wales drive to work by car or van (38.4%), 5.7% travel to work on foot, whilst 2.7% commute by bus.⁵⁴

Urban areas have higher bus usage, Cardiff (11%) and Newport (10%) have double the number of residents using the bus to get to work.⁵⁵

In terms of accessing other services (outside of employment), the National Survey for Wales carried out by the Welsh Government surveyed how easy people found accessing key infrastructure. This research found that older people (particularly those aged 75 and over) found it more difficult to get to hospital compared to younger people, and that getting to hospital was generally considered to be easier by those who had access to a car. For example, of those surveyed only 3% of those with a car said it was 'very difficult' to get to hospital, compared to 10% of those without.⁵⁶

It has also been reported that public transport is a particular challenge for those from Black, Asian and Minority Ethnic backgrounds due to language barriers and not having the confidence to ask for help⁵⁷.

The National Survey for Wales also surveyed feelings of safety when using public transport after dark and analysed key variables such as age and gender. It was found that overall, 34% of those surveyed felt 'very safe' compared with 46% feeling 'fairly safe', 15% feeling 'fairly unsafe' and 5% feeling 'very unsafe'. When these results were broken down by age, results showed that feelings of safety generally decreased with age with only 25% of those aged 75 and over feeling 'very safe'. There was also considerable variation by gender, 43% of males responded that they felt very safe travelling after dark compared to

⁵² Department for Transport, 2021. Vehicle Licensing Statistics: Annual 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985555/vehicle-licensing-statistics-2020.pdf

⁵³ Department for Transport, 2021. Transport: Disability and Accessibility Statistics, England 2020 [Transport: disability and accessibility statistics, England: 2020 - GOV.UK](#)

⁵⁴ ONS, 2011. Census Data WD703EW - Method of travel to work [WD703EW \(Method of travel to work \(2001 specification\) \(Workday population\)\) - Nomis - Official Census and Labour Market Statistics](#)

⁵⁵ Experian. Commuting in and around Wales. The National Assembly for Wales. Available online at: <https://gov.wales/sites/default/files/statistics-and-research/2018-12/070327-commuting-in-and-around-wales-en.pdf>

⁵⁶ Welsh Government (2014) National Survey for Wales – Transport. Available online at: <https://statswales.gov.wales/Catalogue/Transport>

⁵⁷ British Red Cross (2019) Barriers to belonging: An exploration of loneliness among people from Black, Asian and Minority Ethnic backgrounds. [Barriers to belonging | British Red Cross](#)

24% of females. Whilst 2% of males responded that they felt 'very unsafe' travelling after dark compared to 9% of females.⁵⁸

Feelings of safety on public transport is also an issue amongst those who are LGBTQ+, with it having been reported that nearly a quarter of transgender people avoid the use of public transport out of fear of being harassed or identified as transgender⁵⁹. The National LGBTQ+ Survey also found that "65% of cisgender LGBT adults report that they avoid being open about their sexual orientation on public transport"⁶⁰.

The Bill and protected characteristic groups: assessment and evidence review

The Bill's proposals will reform the way bus services are planned and delivered in Wales and aim to better integrate buses into the wider transport network and to regulate the industry through a centrally organised system.

Local authorities, Corporate Joint Committees, Transport for Wales and the Welsh Government will work together to design bus networks and services within the funding available and secure services.

The available evidence indicates that the proposals have a neutral impact on the protected characteristics of marriage/civil partnership and religion/belief. For other protected characteristics, a planned and co-ordinated bus network is likely to be beneficial.

Age

Research carried out by Age Cymru has found that bus travel is a lifeline for older people in terms of reducing isolation and improving wellbeing⁶¹. As well as this Age Cymru has also reported that older people (particularly those without access to a car) do struggle to reach key services by public transport e.g. hospitals.

Disability

Disabled people are more likely to be in a household without access to a car and in households with access to a car they are less likely to be a driver. 55% of disabled people

⁵⁸ Welsh Government (2014) National Survey for Wales – Transport. Available online at: <https://statswales.gov.wales/Catalogue/Transport>

⁵⁹ Equality and Human Rights Commission (2018) The state of equality and human rights [Is Britain Fairer](#)

⁶⁰ Government Equalities Office (2018) National LGBT Survey [National LGBT Survey: Research report - GOV.UK](#)

⁶¹ Age Cymru, 2013. Buses – a lifeline for older people. Available online at: <https://www.ageuk.org.uk/cymru/our-impact/policy-publications/buses-a-lifeline-for-older-people/>

aged 17-64 held a full driving licence in 2020, compared with 83% of non-disabled people.⁶²

Confidence in using public transport among disabled people has become low and has had a negative impact on mobility, participation in everyday life and citizenship. In the Research Institute for Disabled Consumers' 4th survey (August 2020) 52% of respondents said they were unsure about returning to using public transport after COVID-19 travel restrictions have been fully removed.⁶³

Many disabled people find it difficult to access information when using public transport. In a DfT report on Disability and Accessibility for 2019/2020, it was reported that 54% of disabled people were satisfied with the provision of public transport information⁶⁴. In Wales there are approximately 70,000 people with a learning impairment⁶⁵ approximately 17,000 people are registered as having a sight impairment⁶⁶, and approximately 575,00 with a hearing impairment.⁶⁷

Disabled people may have problems accessing information in traditional formats or on websites, especially during irregular occurrences when there are disruptions or changes to services; this was echoed in responses to the Bws Cymru engagement.⁶⁸

Gender Reassignment

Feelings of safety on public transport is also an issue amongst those who are LGBT+ with it having been reported that nearly a quarter of transgender people avoid the use of public transport out of fear of being harassed or identified as transgender⁶⁹. The National

⁶² Department for Transport, 2021. Transport: Disability and Accessibility Statistics, England 2020 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf

⁶³ [Locked out: liberating disabled people's lives and rights in Wales beyond COVID-19 | GOV.WALES](#)

⁶⁴ Department for Transport: Disability and Accessibility Statistics, England 2019/2020. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/972438/transport-disability-and-accessibility-statistics-england-2019-to-2020.pdf

⁶⁵ Mencap Cymru. About Learning Disability. <https://wales.mencap.org.uk/about-ld-wales>

⁶⁶ RNIB. Key information and statistics on sight loss in the UK [https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics#:~:text=A%20total%20of%20173%2C735%20are,were%20last%20published%20in%202010\).](https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics#:~:text=A%20total%20of%20173%2C735%20are,were%20last%20published%20in%202010).)

⁶⁷ University of South Wales. Deaf Awareness: Deaf in Wales. <https://libguides.southwales.ac.uk/c.php?g=669129&p=4748832#:~:text=According%20to%20Action%20on%20Hearing,of%20Cardiff%20and%20Swansea%20combined.>

⁶⁸ [Transport: disability and accessibility statistics, England: 2019 to 2020 - GOV.UK](#)

⁶⁹ Equality and Human Rights Commission (2018) The state of equality and human rights [Is Britain Fairer](#)

LGBTQ+ Survey also found that 65% of cisgender LGBT adults report that they avoid being open about their sexual orientation on public transport⁷⁰.

Race

Black, Asian and Minority Ethnic groups have higher rates of bus and coach travel than any other group⁷¹, with car ownership levels lower amongst younger, older, disabled, Black, Asian and ethnic minorities, women and people on low incomes⁷². However, these groups are also reported to experience the greatest barriers to using the bus, particularly from a confidence and safety aspect.

A survey by DfT shows that in the UK, car ownership levels are lower amongst Black, Asian and Minority Ethnic groups. 29% of black people had no access to a car or van compared to 14% of white people in 2020.⁷³

Sex

As reported in the National Survey for Wales, older people, women and people on low incomes scored higher in the categories of feeling 'Fairly unsafe' or 'Very unsafe' travelling by public transport after dark. Also, young people, particularly 17–20-year-olds are reported to be more reliant on bus services than other age groups, primarily for journeys between school, educational establishments and home⁷⁴, therefore the bus system is essential for younger people to access education and see friends safely.

The intended outcome of the Bill is that bus services will be accessible, available and affordable to most society, regardless of their background. As such it could help to deliver significant social justice and equality of outcomes benefits.

This would entail collaborative work between the Welsh Government, the bus industry and representative passenger groups to bring forward a suite of initiatives, including around sharing information, to increase the confidence of all bus users and encourage greater patronage. Working with bus users would identify specific issues that different user groups, including those with protected characteristics face as a barrier to using bus services and work could be done with the bus sector to help address these barriers.

⁷⁰ Government Equalities Office (2018) National LGBT Survey [National LGBT Survey: Research report - GOV.UK](#)

⁷¹ Department for Transport, 2017. National Travel Survey 2017 [National Travel Survey: 2017 - GOV.UK](#)

⁷² Department for Transport, 2017. National Travel Survey 2017. NTS0707: Adult personal car access and trip rates by ethnic group: England [nts0707.ods](#)

⁷³ Department for Transport, 2021. Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. [Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC - GOV.UK](#)

⁷⁴ STC Ltd, 2016. School Transport Matters: A Report on school transport provision across the UK 2010-2016. Available online at: <https://bettertransport.org.uk/sites/default/files/research-files/16.05.25.school-transport-matters.pdf>

The proposals set out in the Bill aim to create a bus service with better network coverage, which serves more communities.

Record of Impacts by protected characteristics

The table below summarises the findings of this EqIA by protected characteristic.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age	<p><i>Older people</i></p> <p>Positive Impacts</p> <p>An integrated national bus network would provide an easier to understand, consistent service that improves legibility and understanding for older people who can be reliant on public transport.</p> <p>Potential to play an important role in increasing health and wellbeing of older people by connecting communities and tackling isolation.</p> <p>Delivery of new public transport interchanges and simpler and affordable ticketing options will make connecting journeys easier, better value of money and safer.</p> <p>Integrated ticketing through on-line products and apps could leave older people at a disadvantage if they are unable to access the best tickets / information.</p> <p>As noted above, the importance of bus travel for older people in terms of reducing the risk of loneliness and isolation, and improving health and well-being is significant.</p>	<p>Wales is experiencing an aging population as outlined in the statistics provided.</p> <p>Age Cymru reported that bus travel is a lifeline for older people in terms of reducing isolation, improving wellbeing and to reach key services such as medical appointments ⁷⁵.</p> <p>The National Survey for Wales found that older people feel more unsafe travelling by public transport than any other age group.</p>	<p>Any new integrated ticketing services will consider the impact on older people. These types of electronic ticketing will be implemented alongside more traditional method of physical tickets to ensure older people do not feel excluded.</p>

⁷⁵ Age Cymru, 2013. Buses – a lifeline for older people. Available online at: <https://www.ageuk.org.uk/cymru/our-impact/policy-publications/buses-a-lifeline-for-older-people/>

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate impacts?
	<p><i>Younger People</i></p> <p>Positive Impacts</p> <p>Affordability and accessibility of proposed bus services may provide additional necessary provisions for school age children and young people looking to attend employment, education or training, in addition to social aspects. Subsequent confidence could lead to establishing public transport as their preferred mode of transport, securing the future delivery of bus services.</p> <p>Improvements to air quality will have a positive impact on the health and wellbeing of young people.</p>	<p>Young people, particularly 17–20-year-olds are reported to be more reliant on bus services than other age groups, primarily for journeys between school and educational establishments and home.⁷⁶</p> <p>Younger people are statistically more reliant on bus services to access education and have low levels of car ownership.</p>	<p>Learner travel is outside the scope of this Bill. However there has been a review and revision of the Learner Travel Measure (Wales) and the associated guidance</p>
	<p><i>People aged 21-64 years</i></p> <p>Positive impacts</p> <p>An integrated national bus network would provide an easier to understand, consistent service that improves legibility and understanding for people aged 21-64 who use public transport to access work, training and/ or leisure.</p> <p>Potential to play an important role in increasing health and well-being of people aged 21-64 by connecting communities,</p>	<p>There are differences by region and age in bus usage, however after controlling for other factors, the relationships disappear – this suggests the differences are explained by factors other than age and the region someone lives in. 9% of those aged between 45 and 64 used the bus at least once a week compared with 14% of those aged 65 or more and 13% of those aged 16 to 44. Additionally, 13% of those living in North West Wales and 14% in South East Wales used the bus at least once a week compared with 7% in Mid Wales.</p>	

⁷⁶ STC Ltd, 2016. School Transport Matters: A Report on school transport provision across the UK 2010-2016. Available online at: <https://bettertransport.org.uk/sites/default/files/research-files/16.05.25.school-transport-matters.pdf>

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate impacts?
	<p>better enabling individuals (particularly those reliant on public transport) to live independently and access education, training, employment or leisure and who may not otherwise have access to do so.</p> <p>Delivery of new public transport interchanges and simpler and affordable ticketing options will make connecting journeys easier, better value of money and safer.</p>	<p>Overall, including those who didn't use buses, 52% of people (aged 16+) were satisfied with bus services and 23% were dissatisfied. Those aged 16 to 44 and those aged 45 to 64 both had satisfaction rates around 50%.⁷⁷</p> <p>There is limited research, both nationally and internationally to assess the impact of commuting to work on pregnant women to support a comprehensive assessment of the impact on this groups of people. However, pregnancy is associated with hormonal and physical changes, physical symptoms as well as psychological symptoms. Stress can impact the health of expectant mothers and their developing fetuses (Hobel et al., 2008).⁷⁸</p>	
Disability (consider the social model of disability ⁷⁹ and the way in which your proposal could inadvertently	Improvements to access, including physical access to the desired bus stop, interchange and subsequent access to the bus itself will improve passenger confidence. Using the information sharing provisions in the Bill, the WMs	There are an estimated 416,600 disabled people in Wales. ⁸⁰	N/A

⁷⁷ [Transport \(National Survey for Wales\): April 2022 to March 2023 \[HTML\] | GOV.WALES](#)

⁷⁸ [Pregnancy and commuting on public transport - ScienceDirect](#)

⁷⁹ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

⁸⁰ StatsWales (2019) Disability by Age and Sex, available online at [Disability by Age and Sex](#)

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate impacts?
cause, or could be used to proactively remove, the barriers that disabled people with different types of impairments)	will be able to better co-ordinate infrastructure with local bus service provision under the new model. Additional measures such as safety of wheelchair users, priority seating, accommodation for assistance dogs as well as audible and visual information, alongside driver knowledge and training will ensure users feel safe and comfortable using the bus network. These are all things that the WMs can achieve through conditions in contracts and permits. Change won't be overnight but the Bill expands our ability to reduce barriers for users.	Disabled people rely on public transport and have low levels of car ownership. ⁸¹	
Gender Reassignment (the act of transitioning and Transgender people)	Training and knowledge undertaken as a condition under contracts and permits could provide opportunities for improving staff confidence and interaction with Trans people and may create opportunities to diversify the workforce. Subsequent positive impact on those experiencing gender reassignment in relation to feeling safe and comfortable.	Research shows that LGBT+ groups have reported avoiding public transport out of fear of being harassed. ⁸²	N/A
Pregnancy and maternity	Improved bus services and strategic bus interchanges would have a positive impact when traveling to see family, friends, access to shops and	A 2020 investigation reported a significant association between air pollution and heat exposure with negative pregnancy outcomes. ⁸³	To mitigate the potential conflict of interests between pram/ wheelchair users regarding access to space

⁸¹ DfT (2021) Transport: Disability and Accessibility Statistics, England 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf

⁸² Equality and Human Rights Commission (2018) The state of equality and human rights [Is Britain Fairer](#)

⁸³ Bekar et al., 2020. Association of Air Pollution and Heat Exposure with Preterm Birth, Low Birth Weight, and Stillbirth in the UK: A Systematic Review. Available online at: https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2767260?utm_source=For_The_Media&utm_medium=referral&utm_campaign=ftm_links&utm_term=061820

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate impacts?
	<p>public services including health.</p> <p>Skills training for drivers would ensure that drivers receive training in responding to the needs of pregnant passengers sensitively.</p> <p>Improvements to air quality will have a positive impact on pregnant women.</p> <p>Potential negative impact is increased bus usage could result in increased competition for pram/wheelchair spaces. The law is not clear on whether wheelchair users have priority.</p> <p>Positive impact:</p> <p>Commuting via public transport may be especially challenging for expectant mothers as it can be unpredictable (e.g., delays, cancellations), can involve multiple changes of transport methods, and involve negative conditions (e.g. overcrowding, lack of seating, high temperatures). A negative commuting experience may induce stress and impact on pregnancy. An integrated national bus network would provide an easier to understand, consistent service that improves legibility and understanding for expectant mothers and people with newborn infants who are reliant on public transport.</p>	<p>Improvements to the bus services will enable easier access to key services such as medical appointments.</p>	<p>on buses we propose that bus operators need to communicate policies clearly and bus drivers need full training to enable them to resolve on-board conflicts effectively and fairly</p>
Race (include different ethnic minorities, Gypsies and	Improved and integrated bus services would positively benefit Black, Asian and Minority Ethnic users as this	Black, Asian and Minority Ethnic groups have higher rates of bus and coach travel than any other group ⁸⁴ , although these groups	N/A

⁸⁴ National Travel Survey 2017 [National Travel Survey: 2017 - GOV.UK](https://www.gov.uk/national-travel-survey-2017)

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate impacts?
Travellers and Migrants, Asylum seekers and Refugees)	group are particularly reliant on public transport. Delivery of Welsh Language standards and training to bus drivers will benefit users who prefer to use Welsh on services.	also report low confidence and concerns over safety on buses. 1.7% of Welsh households do not have English or Welsh as a main language. ⁸⁵	
Religion, belief and non-belief	Proposals may increase access for those who wish to attend religious services.	As set out in the evidence above, there is a reliance on the car to access religious services and improved access by public transport will help more groups of people practice their faith and access faith services.	N/A
Sex / Gender	Positive generally but in particular for female users following improvements to bus services. Training and knowledge undertaken as a condition under contracts and permits could improve user experiences on buses and potentially provide opportunities to enhance diversity within transport workforce by removing perceived barriers.	Women in the UK have lower levels of car ownership than men and are therefore more reliant on public transport. ⁸⁶ Women generally feel less safe using public transport particularly after dark ⁸⁷ .	N/A
Sexual orientation (Lesbian, Gay and Bisexual)	Training and knowledge and training undertaken as a condition under contracts and permits could provide opportunities for training staff in equality and may create opportunities to diversity the workforce. Subsequent positive	Research shows that LGBT+ groups have reported avoiding public transport out of fear of being harassed. ⁸⁸	N/A

⁸⁵ ONS 2011 Census data [2011 Census - Office for National Statistics](#)

⁸⁶ DfT (2021) Vehicle Licensing Statistics: Annual 2020
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985555/vehicle-licensing-statistics-2020.pdf

⁸⁷ Welsh Government, 2014. National Survey for Wales – Transport. Available online at:
<https://statswales.gov.wales/Catalogue/Transport>

⁹¹ Welsh Government, 2014. National Survey for Wales – Transport. Available online at:
<https://statswales.gov.wales/Catalogue/Transport>

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
	impact for users to feel safe and comfortable.		

Human Rights and UN Conventions

Do you think that this policy will have a positive or negative impact on people's human rights?

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
	Overall, it is considered that the proposals of the Bill would have a positive impact on people's human rights.	<p>The implementation of the Bill would support the delivery of more frequent, more convenient and more reliable bus services. This would increase people's quality of life, and physical and mental health.</p> <p>Improvements to bus services would enable easier access to key services such as access to timely medical appointments and healthcare provision. It would also help people to meet family and friends and could potentially improve people's access to religious services and events. Especially for those wholly reliant on public transport.</p> <p>Buses are a greener mode of transport and are key to reducing people's reliance on cars. Reducing carbon</p>	

		<p>emissions now will help to have immediate and long-term benefits including, but not limited to, improved air quality and health.</p> <p>The legislation would have either neutral or beneficial impact on target groups, maintaining or improving people's access to education, training, work, religious practice and leisure in accordance with Articles , 9 (freedom of thought, belief and religion), 10 (freedom of expression), 11 (freedom of assembly and association) and Protocol 1, Article 2 (right to education) of the Human Rights Act 1998 and Article 9 (Accessibility) of the UNCRPD.</p>	
Article 6 (right to a fair hearing in determination of civil rights)	There are provisions of the Bill which may engage Article 6. The Bill provides for the enforcement of permit conditions via the suspension or revocation of permits and the enforcement of the restriction and information requirements through civil penalties.	Such provision is required to ensure services are operated to a certain standard.	If permits are suspended or revoked or civil penalties are imposed operators will be entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal.
A1P1 (Protection of property)	There are provisions in the Bill which may engage A1P1 on the basis that they control the use of property (conditions imposed on local bus service permits, the suspension or revocation of permits and the imposition of a	Such provision is required to ensure services are operated to a certain standard.	The interference of property rights is justified by being in the public interest and lawful. The provisions in the Bill have a reasonable foundation and strike a fair balance between the demands of the general interest of the community and the protection of an individual's fundamental

	restriction prohibiting operators from providing services)		rights.
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EU/EEA and Swiss Citizens' Rights

We do not expect the Bill to have a negative impact on the rights of EU/EEA and Swiss Citizens. With regards to EU/EEA or Swiss Citizens who reside and work in Wales, the bus network will be available to all the population, regardless of nationality.

Residency – the right to reside and other rights related to residence: rights of exit and entry, applications for residency, restrictions of rights of entry and residence.

The proposal will have no effect.

Mutual recognition of professional qualifications – the continued recognition of professional qualifications obtained by EU/EEA/Swiss citizens in their countries (and already recognised in the UK).

The proposal will have no effect.

Access to social security systems – these include benefits, access to education, housing and access to healthcare:

The proposal will have no effect.

Equal treatment – this covers non-discrimination, equal treatment and rights of workers.

The proposal will have no effect.

Workers' rights - Workers and self-employed persons who are covered under the Citizens Rights Agreements are guaranteed broadly the same rights as they enjoyed when the UK was a Member State. They have a right to not be discriminated against due to nationality, and the right to equal treatment with UK nationals.

The proposal will have no effect.

C. RURAL PROOFING IMPACT ASSESSMENT

The provision of rural public transport services can be comparatively more expensive and less commercially viable. Anecdotal evidence from recent actual and threatened cancellations of bus services across Wales suggests that the potential impact on individuals and communities are particularly acute in rural areas.⁸⁹ In rural areas, services are generally subsidised as they are often not as attractive to commercial providers.⁹⁰ Recent challenging financial settlements for local authorities and the Welsh Government have put pressure on the funding available to subsidise bus services. The Welsh Government has provided funding during Covid-19 under the Bus Emergency Scheme (BES) and its successor, the Bus Transition Fund. By the end of 2023/24 financial year, the bus industry had received over £200m in Government support to help them manage the impact of the covid pandemic, rising costs and lower passenger numbers.

Public transport in rural and remote areas is crucial to ensuring people can access community services and facilities, employment opportunities and education. Rural residents are more likely to need to travel further to access services such as education, employment, health and leisure, plus connections to other transport.⁹¹

Reduced public transport in rural areas can lead to higher car dependency and multiple car ownership⁹², and people in rural areas are some of the worst affected by transport poverty⁹³. Where public transport is available, the longer distances travelled often results in higher fares being paid⁹⁴.

The introduction of centrally planned services, in consultation with local authorities, is intended to enable public funding, which currently supports bus services, to be better and more efficiently deployed. For example, in Gwynedd, Transport for Wales worked with the local authority to consider how their bus services could be redesigned into a coordinated network. A modelling exercise showed that nearly 40% of households would benefit from higher frequency services in the region. It showed that the number of households that would have access to key locations such as Barmouth High Street, Ysbyty Alltwen NHS Wales and Bangor University could more than double with the proposed changes. Bus services have continued to face cost challenges in recent years, so the extent of the network has reduced, but this highlights the benefits a more coordinated public service bus network can offer.

⁸⁹ Heart-breaking' end of lifeline rural bus service serving three Welsh counties - Wales Online: [Public transport in Wales: "Now they've even stolen our bus" \(bylines.cymru\)](#)

⁹⁰ Examples include –[fflecsi buses | Transport for Wales](#) and Bwcabus. Both rely on TfW and/or local authority funding.

⁹¹ [phw.nhs.wales/services-and-teams/observatory/data-and-analysis/ad-hoc-publications/a-profile-of-rural-health-in-wales-pdf/](#)

⁹² Commission for Rural Communities, 2012. Barriers to education, employment and training for young people in rural areas [Barriers-to-education-employment-and-training-for-young-people-in-rural-areas.pdf](#)

⁹³ https://www.sustrans.org.uk/media/10425/transportpovertypaper-sustrans_eng.pdf

⁹⁴ [The-Future-of-Rural-Bus-Services.pdf \(bettertransport.org.uk\)](#)

The intention of the legislative proposals is to provide a better public transport network to encourage more people out of their cars by facilitating more efficient and attractive bus services. This in turn could help achieve annual decreases in travel costs for passengers, reduce transport disadvantage and contribute to a reduction in rural poverty.

Social Isolation

The proposals and actions set out in the Bill will enable the Welsh Ministers and TfW to work with local authorities to plan for bus services that link people with their communities. Securing and potentially increasing access to rural services by better planning the network would help combat social isolation and contribute to better mental and physical well-being by enabling people to socialise and connect.

Lower Income or Unemployed Individuals

Through more co-ordinated planning of bus services there will be greater opportunities to better meet the needs of individuals on lower incomes, to access employment, education and improve socio-economic mobility.

Young people

Young people, particularly 17–20-year-olds, are more reliant on bus services than other age groups, especially for journeys between school and home but also for Employment, training and social and leisure activities⁹⁵. The proposed provisions will enable planning and provision of more opportunities for young people in rural communities.

To avoid a disproportionately aging population in rural areas, in particular Welsh language heartlands⁹⁶, young people in rural communities need to be able to access jobs, training and education. This would increase the chances of gaining secure employment, attracting new businesses, and help existing businesses to grow within rural areas. This will help to retain skills and talents in these areas, creating socially sustainable communities, as well as retaining the economic benefits in Wales.

A more frequent, more reliable and better integrated bus network would also benefit young people living in peri-urban and rural areas who rely on connectivity to urban areas where there are generally greater levels of economic, education, training and cultural opportunities.

The reforms aim to improve connectivity and information provision regarding bus services and would benefit young individuals both economically and socially by allowing them access to better digital information about bus services and helping them to increase their confidence in using public transport services.

⁹⁵ Equality and Human Rights Commission - the state of equality and human rights (2018) [Is Britain Fairer](#)

⁹⁶ The importance of nurturing communities with high densities of Welsh speakers is set out in the Welsh Government's [Commission for Welsh-speaking Communities: position paper, 2023](#).

Older people

The World Health Organisation (WHO) describes age-friendly communities as being places in which older people, communities, policies, services, settings and structures work together in partnership to support and enable us all to age well.⁹⁷ Transport is identified as one of the eight essential features of age-friendly communities by the Older People's Commissioner – "Affordable, reliable and convenient transport options enable people to get out and about and continue to do things that matter to them. Whether going shopping, visiting the cinema, meeting friends or attending a GP appointment, good transport is essential to everyone, particularly in rural areas and for people who do not drive."

Rural communities in Wales tend to have the highest percentage of older people. For example, in 2022 Conwy and Powys had the highest percentage of older people aged 60 or over, at 35% while Cardiff had the lowest, at 19%, followed by Newport with 23%.⁹⁸

The proposals offer the opportunity to design and develop a bus network that can help address the problems that older people experience. Research carried out by Age Cymru has found that bus travel is a lifeline for older people in terms of reducing isolation and improving wellbeing⁹⁹, and that older people struggle to reach key services.¹⁰⁰

The legislative proposals should allow older people to access services more easily, visit friends and relatives, as well as allowing them to travel further afield to access health, cultural and community services and facilities. For example, there would be opportunities to make improvements to key bus routes such as those to hospitals, which has previously been identified as a barrier to older people accessing the care, they may need¹⁰¹.

Disabled People

The proposals should provide an opportunity to place requirements on providers to improve local bus services for disabled individuals who live in rural areas. This includes improvements to the provision of information on services and amenities, including the development of onboard audio-visual equipment, and enable the WMs to co-ordinate bus services and infrastructure to aid improvements to accessibility, including physical access to bus stops, interchanges, and to buses. These will improve user confidence and capacity for independence using bus services.

⁹⁷ What are Age-friendly communities? - Older People's Commissioner for Wales, Older People's Commissioner for Wales.

⁹⁸ Understanding Wales' ageing population: key statistics, The Older People's Commissioner for Wales, November 2022

⁹⁹ Age Cymru, 2018. Buses – a lifeline for older people. Available online at: <https://www.ageuk.org.uk/cymru/our-impact/policy-publications/buses-a-lifeline-for-older-people/>

¹⁰⁰ The social and economic benefits of community transport in Scotland. Case studies on Transport Policy, Volume 5 (2), March 2015 [Research Into the Social and Economic Benefits of Community Transport in Scotland | Transport Scotland](#)

¹⁰¹ Welsh Government, 2014. National Survey for Wales – Transport. Available online at: <https://statswales.gov.wales/Catalogue/Transport>

The legislative proposals should also help to alleviate the impact of transport poverty which affects some demographic groups disproportionately - alongside income and locality, those most affected are disabled people¹⁰²

The proposals would help achieve potential indirect benefits to carers in rural areas by improving the reliability and consistency of bus services. As this would help carers commuting by bus to be able to communicate their journey to their dependents with knock on benefits to the children, older people or disabled people who they may care for. Improved access to public transport would also give carers increased choices about how to travel to and with their dependants.

Furthermore, the proposals should help an increased number of vulnerable individuals within their communities gain independence and access potentially more convenient means of travel.

Impact on Businesses

The present bus market in Wales is a mixture of large multi-national operators, Small and Medium Enterprises (SMEs) which includes two municipal operators, Cardiff Bus and Newport Bus, and the community transport providers. The intention is to sustain a thriving market with a mixture of operators, to deliver high quality services and social value. The regional system for rolling out franchising, as detailed in the [Roadmap the Bus Reform](#), will ensure that franchising delivers opportunities to attract investment by large multi-national companies as well as supporting SMEs and community transport providers that provide wider benefits to local communities. The procurement process will seek to allow operators to compete for contracts most suited to their size and nature of business. They will be designed in collaboration with local authorities and CJs and in consultation with bus operators and passenger representatives.

Additionally, the legislative proposals should help combat the problem of the quality of local transport connections which has been seen to be a barrier to one in four businesses in the UK¹⁰³.

With the rural economy being generally characterised by SMEs, services and rural enterprises¹⁰⁴, ensuring better planning and coordination of the bus network through bus reform will provide opportunities to employers. It should allow a wider recruitment pool, improved staff retention, easier management of staff rotas as well as a greater chance of appointing staff from local areas. This is particularly relevant in Wales where the Census

¹⁰² [People in Wales facing transport poverty reality, says Sustrans report - Sustrans.org.uk](#)

¹⁰³ Making the connections: The cross- sector benefits of supporting bus services. 2014
[Making the connections: The cross-sector benefits of supporting bus services | Urban Transport Group](#)

¹⁰⁴ Welsh Government, 2019. 2. Data and Definitions Report. Available online at:
https://gov.wales/sites/default/files/publications/2019-08/appendix-02-data-and-definitions-report_0.pdf

2021 shows that over 36% of people 16 years old and over travel less than 10km to their place of work.¹⁰⁵

Infrastructure

The legislative proposals would allow the public sector to have greater control in the planning of rural bus services, with the power to take an approach which best meets the needs of people and businesses in our communities. With the increased uptake of bus journeys that the proposals aim to bring, this could have an indirect benefit to SMEs and micro-enterprises within rural areas.

Transferring more journeys to public transport reduces congestion around key rural beauty spots, enhancing people's enjoyment of these places¹⁰⁶. Not only would this encourage visitors and tourists to return to the area, but it would also decrease travel times, potentially reducing congestion on the roads, encouraging a growth in the number of visitors and potentially increasing economic activity in rural areas as a result.

An improved bus network and transport infrastructure will help businesses meet and respond to changes in market demand and availability with the introduction of improved service information and data availability.¹⁰⁷

Monitoring

The Bill will require the Welsh Ministers to report to the Senedd on the ways in which, and the extent to which, the exercise of their functions under the Bill over the reporting period have contributed to achieving the objectives set out in the Bill.

The report must be published and laid before the Senedd no later than 12 months after the end of the reporting period. In relation to the first report, the reporting period is the period of two years starting on the date the core duties in the Bill come into force. Subsequent reporting periods are successive periods of four years.

The reporting duty provides appropriate accountability mechanisms for the Senedd to scrutinise the Welsh Ministers.

Further details on the monitoring arrangements can be found in Chapter 10 of the Explanatory Memorandum,

Conclusion

This Rural Proofing Impact Assessment has considered objectively the needs of the people who live, work, socialise and do business in rural areas. While new regulation in

¹⁰⁵ [Travel to work, England and Wales Census 2021](#)

¹⁰⁶ Making the connections: The cross- sector benefits of supporting bus services. 2014 [Making the connections: The cross-sector benefits of supporting bus services | Urban Transport Group](#)

¹⁰⁷ [Rural Development Programme document 2014 to 2020 | GOV.WALES](#)

itself will not directly introduce more frequent bus services or a more extensive bus network in the short term, it is intended that better planning and coordination will mean the funding spent on bus services will be better distributed to ensure more appropriate and fair services with better public information on timetables and amenities/infrastructure. It is envisaged that this will ultimately lead to higher passenger numbers. Ongoing assessment of the impacts of implementation of these reforms will be required as further detail is developed and delivery decisions made should the legislation be passed by the Senedd.

D WELSH LANGUAGE IMPACT ASSESSMENT

1. Welsh Language Impact Assessment reference number (completed by the Welsh Language Standards Team, email: Safonau.Standards@gov.wales):

06/02/2024

2. Does the proposal demonstrate a clear link with the Welsh Government's strategy for the Welsh language? – [Cymraeg 2050 A million Welsh speakers](#) and the related Work Programme for 2021-2026? [Cymraeg 2050 work programme 2021-2026](#)

Yes. By creating more connected public transport networks across Wales, the proposal ties into Cymraeg 2050's theme of 'increasing the use of Welsh', by supporting the social use of the Welsh language amongst Welsh-speaking communities. The proposal also supports the theme of 'creating favourable conditions – infrastructure and context', by improving access to cultural sites and developing the economies and social opportunities of Welsh-speaking communities.

3. Describe and explain the impact of the proposal on the Welsh language and explain how you will address these impacts in order to improve outcomes for the Welsh language. How will the proposal affect Welsh speakers of all ages (both positive and/or adverse effects)?

The proposal will better connect Welsh-speaking communities physically, supporting wider use of the language. A more integrated public transport network will help deliver improved access to Welsh-medium education and training, helping meet Cymraeg 2050's targets on increasing the proportion of each school year group receiving Welsh-medium education and increasing the number of teachers who can teach Welsh and teach in the medium of Welsh.

The proposal will not directly affect Welsh language services, however by giving the public sector a stronger role in planning and securing bus service provision, we can ensure that bus services align more closely with the Welsh Language Standards. The proposal will also improve access to wider public services in Welsh-speaking communities. The proposals also have the potential to facilitate access for Welsh speakers, in particular in rural areas, to more employment opportunities.

Communities across Wales, including Welsh-speaking communities, will have a role in the network design of franchises as part of our commitment to embed the passenger voice in networks, helping shape bus services that best meet their needs.

The Bill will of course be subject to the Well-Being of Future Generations (Wales) Act 2015 and will therefore adhere to the 'A Wales of vibrant culture and thriving Welsh language' well-being goal. Local bus service contracts may include terms about customer service

training for bus drivers involving the use of basic Welsh phrases to ensure that a warm Welsh welcome is felt across the bus network.

Cymraeg 2050 highlights the importance of developing “a new regional focus to economic development to help all parts of Wales to benefit from prosperity and support each area to develop its own distinctive identity.” Collaborating with local authorities and the wider public sector will support the development of bus franchises that best meet the needs of Welsh-speaking communities.

The information sharing aspect of the Bill will also champion Cymraeg 2050's ambition to “transform the Welsh language digital landscape”, with improved digital services allowing passengers to access improved information on the timetable and availability of buses across Wales, all of which will be available in the Welsh language.

Whilst there are no current Welsh language standards regulations specifically applying to the bus sector, new Welsh language standards are being developed for the transport sector which will apply to bus franchises. Services that cross the border from England into Wales will also be expected to adhere to certain standards, including those relating to the Welsh language.

Questions on the Welsh language were asked as part of the Bill's White Paper consultation, ‘[One network, one timetable, one ticket](#)’. There were 739 total responses to the consultation, with 91% of respondents stating that they lived in Wales. Respondents highlighted that greater Welsh language use on public transport would “encourage a sense of community and shared ownership and have a positive effect on people's sense of identity, including their linguistic identity” and would also have benefits in promoting the language amongst tourism and visitors to local areas. Organisations that responded to the consultation also highlighted the opportunity to connect isolated Welsh speaking communities. However, questions were raised on how the Welsh language would be applied on cross-border services, and some respondents expressed concern that prioritising the Welsh language could affect the cost and complexity of delivering services, or risk exacerbating driver shortages.

E BIODIVERSITY IMPACT ASSESSMENT

The aim of the Bus Services (Wales) Bill is to enable a stable and coherent network of bus services which is:

- Easy to access – through economic extensive networks, good infrastructure and welcoming drivers;
- Easy to use – through simple ticketing and a network that meets demand;
- Easy to navigate – with fully integrated journeys and clear accessible information.

The proposals in the Bill will legislate for bus services to be planned and secured by the Welsh Ministers. Services may be secured through franchising with bus operators running the services awarded to them through a competitive procurement process.

The Bill will introduce a strategic structure for the planning and delivery of bus services in Wales.

This affords the opportunity for the consideration of relevant biodiversity issues as part of the wider planning process for the bus network. This will enable the Welsh Ministers to fulfil their duty under [Section 6 of the Environment \(Wales\) Act 2016](#).

The Bill does not necessarily present an opportunity to improve understanding or raise awareness of biodiversity, but it does enable biodiversity issues to be considered as part of the process.

An integrated public transport network will improve access to key destinations and better meet the needs of passengers. In implementing the new operating model, an increase in travel by bus may be anticipated. The Bill is part of the policy of encouraging a modal shift from the private car to public transport.

This could help to reduce transport emissions and thereby lead to improvements in air quality. Evidence shows air pollution including that from transport affects the condition of ecosystems and biodiversity of an area¹⁰⁸, therefore air quality is important for the protection or enhancement of ecosystems.

Overall, encouraging a modal shift from the private car and increasing bus travel also fits in with objective 4 of the Nature Recovery Action Plan¹⁰⁹ which is concerned with tackling

¹⁰⁸ Natural Resources Policy 2017 [natural-resources-policy.pdf \(gov.wales\)](#)

¹⁰⁹ Nature Recovery Plan 2016 [Nature recovery action plan | GOV.WALES](#)

key pressures on species and habitats. Reducing CO₂ emissions is a key way to reduce pressure on species and habitat.

Promoting long-lasting improvements to bus services and rising bus patronage could contribute to a reduction in car use and a reduction in subsequent carbon emissions. A typical petrol or diesel car emits around 170g of CO₂ per passenger kilometre, compared to 27g of CO₂ per passenger kilometre for a bus¹¹⁰. This can lead to improved air quality and ultimately improve biodiversity.

Decisions made under the new model introduced through the Bill will do so in accordance with the best available information on environment impact. With greater opportunities for the public sector to shape and influence bus service provision, bus services could be promoted or planned which are less polluting and more sensitive to the unique diversity of their area.

Through the proposals, the Welsh Ministers would have opportunities to plan the bus network to deliver environmentally sensitive bus routes, e.g. provide services which are not within proximity or likely to adversely impact key environmental designations.

Buses have a crucial role to play in transport achieving net zero, not just through increasing the modal share of public transport, but also through the decarbonisation of the bus fleet. Bus operators in the UK have already invested in cleaner and greener electric and hydrogen buses in recent years, supported by UK Government initiatives such as the Low and Ultra-Low Emission bus schemes¹¹¹. However, there is more action required to increase the zero-emission bus fleet to help achieve net zero. This could be done by contractual means under the proposed model.

Other than the potential indirect impacts described above, biodiversity is not significantly impacted by the Bill proposal other than by ensuring decisions made as part of the regime introduced by the Bill are made in the context of national policy.

The Bill does not make provision regarding monitoring of air quality or changes in the habitat quality of the local area. However, the protection of biodiversity through the use of public transport, bus fleet decarbonisation and reduction in emissions, can be promoted, raising awareness of biodiversity conservation and having a positive impact on biodiversity.

¹¹⁰ Greenhouse gas reporting: conversion factors 2022 - GOV.UK (www.gov.uk)

¹¹¹ Department of Transport 2021 Decarbonising Transport – a better greener Britain
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

F SOCIO-ECONOMIC DUTY ASSESSMENT

Inequalities of outcome experience as a result of socio-economic disadvantage

The overall aim of the socio-economic duty is to deliver better outcomes for those who experience socio-economic disadvantage.

The aims of the Bill are intended to improve the socio-economic circumstances of bus users, and wider communities. The Bill aims to create a bus network that is:

- Easy to access – through economic extensive networks, good infrastructure and welcoming drivers
- Easy to use – through simple ticketing and a network that meets demand
- Easy to navigate – with fully integrated journeys and clear accessible information

One inequality experienced by those of socio-economic disadvantage is poorer access to transport. We have considered the evidence about the way transport and socio-economic disadvantage are linked. The powers and duties in the Bill will enable Ministers to secure bus services that will be accessible, available and affordable to more members of society, regardless of their background or socio-economic status¹¹².

A review of the evidence in the “Transport and Inequality” report for the Department for Transport (DfT), expressed the underlying factors that influence the relationship between transport and inequality as: “1) The way people are distributed geographically, and across social classes. 2) The way opportunities are distributed, including jobs and education. 3) How accessible the transport system is, in terms of cost, geographic accessibility and the time and reliability of different transport options.” In other words, transport systems have the potential to connect people with opportunities in ways that can mitigate socio-economic disadvantage.

It also found different socio-economic groups have differing levels of access to transport and there is a relationship between membership of certain population groups and the risk of poverty and income inequality.¹¹³

Differential access to Transport and Travel

¹¹² [Evidence review: socio-economic disadvantage and inequalities of outcome | GOV.WALES](#)

¹¹³ Transport and inequality (publishing.service.gov.uk) [Transport and inequality - GOV.UK](#)

For journeys beyond walking or cycling distance, reliance on public transport varies inversely with access to a private car or van. Such access is unevenly distributed across the population. 23% of households in Wales have no access to a car or van. It is reported that 42% of Welsh households have one car or van in their household and 26% of households have two cars in their household.¹¹⁴

Car ownership varies considerably amongst different groups. The National Survey for Wales shows that of those in the 20% most deprived households in Wales, only 65% of households have use of a car compared to 89% of households within the 20% least deprived.¹¹⁵

Research reported by Sustrans found that unemployed people were 3.8 times less likely to own a car than those in employment. It follows that they are likely to be proportionately more dependent on public transport to find work and training opportunities.¹¹⁶

A survey by DfT shows that in the UK, car ownership levels are lower amongst Black, Asian and Minority Ethnic groups. 29% of Black people had no access to a car or van compared to 14% of white people in 2020.¹¹⁷

Disabled people are more likely to be in a household without access to a car and in households with access to a car they are less likely to be a driver. 55% of disabled people aged 17-64 held a full driving licence in 2020, compared with 83% of non-disabled people.¹¹⁸

¹¹⁴ [QS416EW \(Car or van availability\) - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk/qs416ew)

¹¹⁵ Welsh Government (2014) National Survey for Wales – Transport [National Survey for Wales: April 2013 to March 2014 | GOV.WALES](https://gov.wales/national-survey-for-wales-transport)

¹¹⁶ sustrans.org.uk/media/10425/transportpovertypaper-sustrans_eng.pdf

¹¹⁷ [Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC - GOV.UK \(www.gov.uk\)](https://www.gov.uk/travel-by-vehicle-availability-income-ethnic-group-household-type-mobility-status-and-ns-sec)

¹¹⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019477/transport-disability-and-accessibility-statistics-england-2020.pdf

It has also been reported that women only account for 35% of registered car keepers in the UK¹¹⁹ and that 27% of adults aged 17 years and over did not hold a full car driving licence in 2016.¹²⁰

The majority of those in employment in Wales drive to work by car or van (38.4%), 5.7% travel to work on foot, whilst 2.7% commute by bus¹²¹

The DfT report found that people who depend more on the bus network for work tend to be lower paid, live in more deprived areas, and are more likely to turn down jobs due to transport issues, than those on higher incomes, who tend to use cars and trains more often.

Gypsy and Traveller communities in Britain experience wide-ranging inequalities, including socio-economic disadvantage. In the 2021 Census, females who identified as Gypsy or Irish Traveller were more likely to be economically inactive than employed across all age groups. This was the opposite of the pattern found in most age groups for males in the Gypsy or Irish Traveller ethnic groups. It is also opposite to the situation in most age groups for both sexes in the England and Wales population.¹²²

Individuals from the Roma community were often in low-paid waged employment, faced discrimination in employment agency work, and worked informally for 'cash in hand' work¹²³

Gypsy and Traveller sites are often tucked away out of sight. Located far from shops and schools, they frequently lack suitable public transport links (including bus routes), which would enable Gypsy and Traveller people to access jobs and essential services¹²⁴

¹¹⁹ [Vehicle licensing statistics: 2022 - GOV.UK](#)

¹²⁰ Department for Transport, 2021. Vehicle Licensing Statistics: Annual 2020
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985555/vehicle-licensing-statistics-2020.pdf

¹²¹ ONS, 2011. Census Data WD703EW - Method of travel to work [2011 Census: Detailed characteristics on travel to work and car or van availability for local authorities in England and Wales - Office for National Statistics](#)

¹²² [Gypsy or Irish Traveller populations, England and Wales - Office for National Statistics](#)

¹²³ [Ryder, A and Cemlyn, C \(2014\) Civil Society Monitoring on the Implementation of the National Roma Integration Strategy in the UK – Decade for Roma Inclusion Secretariat | Request PDF](#)

¹²⁴ [Discrimination facing Gypsies, Roma and Travellers in the UK today: A Discrimination Law Briefing paper - Friends, Families and Travellers](#)

In summary, we know that people experiencing socio-economic disadvantage are more likely to rely on public transport (including buses). It follows that improvements to the way bus services are planned and delivered could particularly benefit such groups and facilitate their taking action to mitigate disadvantage (such as access to training, education and employment).

Engagement with those effected by the proposal/decision and specifically those who suffer socio-economic disadvantage

We have conducted four major consultations in relation to these proposals. Two on our transport strategies Llwybr Newydd and Bws Cymru published in 2021 and 2022 respectively, one on the withdrawn Bus Services (Wales) Bill introduced in 2019 and the most recent consultation on our white paper in March 2022.

As part of these consultations, we conducted online meetings, face to face workshops and face to face engagement events with organisations that represent bus users, operators and other stakeholders. The consultation did not specifically consider socio-economically disadvantaged communities as a separate group. However, as demonstrated above, bus users are likely to include a disproportionately high number of people experiencing deprivation.

The events and consultation responses have identified some of the issues that are important to bus users. The common themes identified that centre specifically on socio-economic status were:

- Availability and reach of services: Stakeholders raised issues regarding the convenience of having a service/route that is in close vicinity to where people live and want to go. This is particularly pertinent amongst people who do not have access to a car including young people and disabled people.
- Ticketing and affordability: Stakeholders raised ticketing as a consistent issue within the bus sector and highlighted the need for integrated ticketing with other transport modes, particularly rail. The price of a ticket was also highlighted as a key influencing factor in a person making the choice between using a car or the bus. Emphasis was placed on needing to ensure that those who rely the most on public transport in general to get around can afford to do so in the future. As noted above, this group will include a disproportionate number of people experiencing socio-economic disadvantage. Many people stated they were completely dependent on public transport in order to work, to access education, to get to vital health services and of course for leisure. For them, a good public transport system is absolutely essential to their quality of life.

Protected characteristics

For further detail on how we expect the Bill to impact on different demographic groups, including those who share protected characteristics, please refer to the Equality Impact Assessment in Annex B

Welsh Index of Multiple Deprivation

The Welsh Index of Multiple Deprivation (WIMD) measures relative deprivation for small areas (measured as Lower Super Output Areas (LSOA)) of Wales. It is made up of eight separate domains of deprivation (income, employment, health, education, access to services, community safety, physical environment and housing).

The 2019 WIMD shows that there are pockets of high deprivation in the South Wales Valleys, larger cities and in some North Wales border towns. Communities that are in the most deprived areas are likely to gain the most from improvements to public transport services that would enable people who experience socio-economic disadvantage to reach opportunities for education, training, and employment, as well as for social and cultural activities.

Future trends, Demographics

Future demographic change is likely to be unevenly distributed across Wales¹²⁵. Current projections show that, for instance, by 2040 the population of Newport is expected to increase by over 9%, the Vale of Glamorgan by over 7% and Bridgend by almost 6%, while the populations of Anglesey, Blaenau Gwent, Ceredigion and Wrexham are expected to fall. This will create differential changes in demand for bus services which will need to be addressed strategically, especially if they relate to demand for travel across local authority boundaries (e.g., if some of the increased population of Newport, the Vale of Glamorgan and/or Bridgend commutes to Cardiff for work). Static or falling populations also present a challenge in maintaining viable services on which people and communities depend. The Bill provides the framework in which such decisions can be taken and implemented effectively.

Climate Emergency

The Welsh Government declared a climate emergency in 2019 and a nature emergency in 2021. The *Inequality in a Future Wales: Areas for action in work, climate and demographic change* report emphasises the link between climate change and inequality, noting that the poorest and most marginalised populations are expected to be the most impacted by climate change.

¹²⁵ [Population projections by local authority and year \(gov.wales\)](https://gov.wales/population-projections-by-local-authority-and-year)

For climate damaging emissions, transport has been the worst-performing sector of the economy.

Bus reform will enable the design of an attractive network that gets people where they want to go easily and reliably, and drive vehicle decarbonisation standards.

Achieving a bus system that boosts social equity and is capable of delivering the scale of modal shift required by the climate emergency is key to supporting the scale of modal shift necessary to hit our climate targets. It will also support ambitions to cut emissions from buses, moving people around as sustainably as possible.

Transport has a significant role to play in helping Wales reach net zero and generating wider benefits across health, air quality, accessibility and the economy. The Bill makes provision for the Welsh Ministers to specify the terms that must be included in local bus service contracts which may include vehicle emission standards. This will support the journey to Net Zero.

Data Sources

We have considered a wide variety of data sources and other sources of evidence throughout this impact assessments. These include data such as the Welsh Index of Multiple Deprivation, Census and survey data from the Office for National Statistics and academic literature

Evidence and Links

Inequality in a Future Wales: Areas for action in work, climate and demographic change:
https://www.futuregenerations.wales/wp-content/uploads/2021/11/FGCW_Equalities-Report_proof_08.pdf

Transport use Welsh Government, 2014. National Survey for Wales – Transport.
Available online at: <https://statswales.gov.wales/Catalogue/Transport>

Statistics 2019 Welsh Index of Multiple Deprivation 2019
<https://wimd.gov.wales/explore?lang=en#domain=overall&z=11&lat=51.4681&lng=-3.1730>

Transport and inequality: An evidence review for the Department for Transport

[Transport and inequality \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/844442/transport-and-inequality-evidence-review.pdf)

Making the Connection: Why Wales must act now to tackle transport poverty and ensure access for everyone

sustrans.org.uk/media/10425/transportpovertypaper-sustrans_eng.pdf

Could the proposals exacerbate inequality of outcome experienced as a result of socio-economic disadvantage?

It is not expected that the Bill will exacerbate inequality of outcome due to socio-economic disadvantage for any significant group.

We do recognise that the Bill represents a substantial change in bus policy in Wales, and this will need to be considered as the proposals for the Welsh bus network are developed to minimise the risk of any groups being adversely affected, particularly with regard to those who already experience socio-economic disadvantage.

There will be a transition period when moving from the current deregulated system to a nationally planned system. Policy work is ongoing with bus operators, local authorities and other stakeholders to manage this transition period to ensure that funding is distributed to support the delivery of bus services.

As part of this work, we will be exploring the ramifications of any reductions in the level of provision and what mitigations could be put in place.

Potentially improve outcomes for those who experience socio-economic disadvantage

The legislative framework of the Bill is designed to align with existing legislation and the Welsh Government's commitments in Llywybr Newydd, to the Climate emergency, and the Wellbeing of Future Generations.

As noted by Welsh Centre for Public Policy in a report produced for Welsh Government in September 2022, transport disadvantage is one facet of social disadvantage and any policy initiatives to reduce poverty and social exclusion need to be concentrated on a framework with four areas of focus. Transport disadvantage is classed within "pathways out of poverty" within their suggested prioritisation framework.

The report notes that "poor, or lack of, access to transport increases the risk of poverty and social exclusion through limiting access to job opportunities, in work progression and access to further education and skills, training, and childcare provision."

Amongst other suggestions, the report suggests that a whole transport system can improve community integration.

The Bill will support improved outcomes for those who experience socio economic disadvantage by providing more opportunities to access employment, education and socio-economic mobility through improved services.

As low-income individuals are more likely to travel by bus a more accessible public transport has the potential to alter overall distribution of disposable income.

More affordable and well-connected bus routes would benefit low-income groups, given their greater reliance on public transport than those on higher incomes.

Evidence and Links

[Wales Centre for Public Policy, Poverty and social exclusion: A way forward](#)

Valuing the social impacts of public transport final report March 2013.20

[Social benefits of buses: valuing the social impacts - GOV.UK \(www.gov.uk\)](#)

Welsh Government, 2014. National Survey for Wales – Transport. Available online at: <https://statswales.gov.wales/Catalogue/Transport>

This consideration of the socio-economic duty is based on the potential impacts arising from primary legislation. Future policy developed as a result of the Bus Services (Wales) Bill, including the development of franchising and the awarding of contracts, will be subject to further impact assessment. As such, this Socio-economic assessment will be kept under review as proposals are developed and that stakeholder views and evidence are incorporated into our assessment of potential impacts.

G. HEALTH IMPACT ASSESSMENT

The Bus Services (Wales) Bill sets out the new structure for the operation and delivery of bus services in Wales. The Bill will include duties and powers to enable the introduction of a purposely designed bus network to serve the public interest, support an integrated transport system and contribute towards tackling the climate change emergency through providing a sustainable alternative to the car. The bus network will be planned and delivered by Welsh Ministers via Transport for Wales.

The proposed legislation has been considered against the Health and Determinants Checklist in the Wales Health Impact Assessment Support Unit (WHIASU)¹²⁶ Guidance to understand if the proposed primary legislative powers could impact certain population groups. The following health determinants, which are those most relevant to transport and access, and their relevance to this Bill, are included in this assessment:

- a) Diet and physical activity.
- b) Social networks and social isolation.
- c) Living environment.
- d) Access to employment and education.
- e) Access to services.

The methodology followed has been adapted from the WHIASU practical guide and was undertaken in the following stages:

Population Profile

A high-level population profile provides an overview of the existing population, health profile and socio-economic conditions of Wales. It uses publicly available data including the Office for National Statistics (ONS) (such as Census data and annual reports), StatsWales, the Welsh Index of Multiple Deprivation (WIMD) and Public Health Wales.

Evidence Review

The evidence review provides a high-level commentary on the links between the health determinants (environmental, social and economic factors known to influence health) that are assessed in the health assessment and the resulting effects on health and wellbeing, based on a review of available primary and secondary literature. The purpose of this is to provide an overview of the scientific consensus on the types of health outcome associated with impacts on health determinants.

Population Profile

¹²⁶ [Home - Wales Health Impact Assessment Support Unit](#)

Population

The population of Wales for mid year 2023 is recorded as 3,132,700¹²⁷ with a population density of 150 persons per square km. Life expectancy is estimated to be 78.3 years for males and 82.2 years for females¹²⁸.

Ethnicity: approximately 94% of the population of Wales state they are from a white background¹²⁹.

Deprivation

The WIMD measures relative deprivation for small areas (measured as Lower Super Output Areas (LSOA)) of Wales. It is made up of eight separate domains of deprivation (income, employment, health, education, access to services, community safety, physical environment and housing).

The 2019 WIMD shows that there are pockets of high deprivation in the South Wales Valleys, larger cities and in some North Wales border towns¹³⁰.

The health domain specifically measures lack of good health, considering the population of residents with long-term illness, death rates, low birth rates and cancer incidence. Across Wales, there were high pockets of health deprivation in the South Wales Valleys, larger cities and in some North Wales coastal and border towns. Merthyr Tydfil had the highest proportion of LSOAs in the most deprived 10% in Wales for the health domain. The Isle of Anglesey, Ceredigion and Monmouthshire had no LSOAs in the most deprived 10%.

Healthy behaviours

In Wales 61% of adults are classified overweight or obese and the prevalence is higher in males (66%) than females (56%)¹³¹. Specifically, 69% of adults in the 45-64 age category are overweight or obese. 75.9% of working-age adults (aged 16-64) in Wales were reported to be in good health and 56.7% of older people (aged 65 and over)¹³².

¹²⁷ [Population estimates for the UK, England, Wales, Scotland and Northern Ireland - Office for National Statistics](#)

¹²⁸ Public Health Wales Observatory. 2015-2017 life expectancy data. [Life Expectancy and Mortality in Wales \(2020\) - Public Health Wales](#)

¹²⁹ StatsWales. Ethnicity by area and ethnic group, 2020. [Ethnicity by Region](#)

¹³⁰ Statistics for Wales, 2019. Welsh Index of Multiple Deprivation 2019. <https://wimd.gov.wales/explore?lang=en#domain=overall&z=11&lat=51.4681&lng=-3.1730>

¹³¹ [Adult lifestyles by age and gender, 2020-21 \(gov.wales\)](#)

¹³² Public Health Wales Observatory. Working age adults in good health, 2016/17 - 2017/18. [Observatory - Public Health Wales](#)

Data from the Public Health Wales Observatory shows that just over seven in every ten children have a healthy weight, however, there has been a small but statistically significant rise in obesity prevalence in children between 2012-13 and 2018/19. Children are also significantly more likely than the Welsh average to be obese if they live in areas of higher deprivation. The gap between obesity prevalence in the most and least deprived quintiles has increased from 5.9% in 2017/18 to 6.9% in 2018/19¹³³.

26.9% of children in Wales are overweight or obese, compared to 22.6% in England and 22.4% in Scotland in this age group¹³⁴. Almost 1 in 5 (17%) young people meet the recommended physical activity guidelines of at least 60 minutes per day. Boys are more likely than girls to meet the daily recommended guidelines (21% vs. 13%), as were young people who identified as neither a boy nor a girl (22%). Physical activity also declined with age; 23% of students reported undertaking at least 60 minutes of physical activity per day in year 7, falling to 11% by year 11¹³⁵.

14% of adults smoke and 17% drink more than the recommended weekly guidelines^{136 128}. Only 51% of adults were reported to be meeting recommended physical activity guidelines, with more men (54%) meeting guidelines than women (49%). Only 31% of adults are reported to eat the recommended five fruit or vegetables per day, which falls to 19% of adults in the most disadvantaged areas in Wales.

The student Health and Wellbeing survey 2019/20 found the amount of time young people reported spending sitting during their free time on weekdays ranged from none (1%) to 7 or more hours a day (16%), with over half (52%) sitting for at least 4 hours a day. Boys were more likely than girls to be sedentary for 7 or more hours per day (17% vs. 14%), but less likely than those who identified as neither a boy nor a girl (36%). Time spent sedentary increased with age and declined with family affluence. In all year groups, young people who identified as neither a boy nor a girl had the highest rates of sedentary behaviour; in year 7, over 2 in 5 (42%) students reported sitting for 7 or more hours in their free time on weekdays¹³⁷.

Mental health and wellbeing

¹³³ [Child Measurement Programme - Public Health Wales \(nhs.wales\)](#)

¹³⁴ [Child Measurement Programme - Public Health Wales \(nhs.wales\)](#)

¹³⁵ [SHRN-NR-FINAL-23_03_21-en-AMENDED06.08.21.pdf](#)

¹³⁶ [Adult lifestyles by age and gender, 2020-21 \(gov.wales\)](#)

¹³⁷ National Survey for Wales 2019-2020 [SHRN-NR-FINAL-23_03_21-en-AMENDED06.08.21.pdf](#)

The National Survey for Wales 2019-2020 found 78% of respondents reported to not experience a general sense of emptiness and 83% of respondents reported having high or very high overall satisfaction with life¹³⁸.

Results from the 2015 Welsh Health Survey indicated that 13% of adults in Wales received treatment for mental health problems, with a higher proportion of women (16%) than men (10%)¹³⁹. Between 2015 and 2017, Wales had a suicide rate of 12.7 (per 100,000 persons)¹⁴⁰, which was higher in males (20.6) compared with females (5.1).

The National Survey for Wales 2019-2020 (latest available date for these statistics) indicates that 15% of people surveyed were lonely¹⁴¹. Material deprivation and age were identified as two characteristics strongly associated with those who identified as lonely. Those who were considered materially deprived were found to be more than three times as likely to identify as lonely as those who were not. In terms of age, those aged 65+ were less likely to identify as lonely than those in the 16-64 age category.

Education and employment

The Annual Population Survey records an average employment rate in Wales of 72.0%. The economic activity rate is 75.4% of those of working age (16-64) whilst the economic inactivity rate is 22.6%¹⁴². The table below shows a breakdown of economic inactivity in Wales in 2021 (June - August).

Reason for Economic Inactivity	Percentage of Population Aged 16-64
Student	24.8
Looking after family/home	20.1
Temporary sick	1.9
Long-term sick	28.0
Discouraged	0.4
Retired	15.1
Other	9.9

¹³⁸ National Survey for Wales 2019-2020 [SHRN-NR-FINAL-23_03_21-en-AMENDED06.08.21.pdf](#)

¹³⁹ Mental Health Foundation, 2016. Mental Health in Wales: Fundamental Facts 2016. [Fundamental Facts about Mental Health 2016 | Mental Health Foundation](#)

¹⁴⁰ Office for National Statistics, 2019. Suicide in Wales. <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/datasets/suicideinwales>

¹⁴¹ Wales Centre for Public Policy. Loneliness in Wales. Available at: [National Survey for Wales: results viewer | GOV.WALES](#)

¹⁴² <https://stats.wales.gov.wales/Catalogue/Business-Economy-and-Labour-Market/People-and-Work/Employment/Persons-Employed>

5.2% of the Welsh population claim some type of out-of-work benefits¹⁴³ with the majority being those being aged 18-21.

The employment WIMD domain aims to capture lack of employment across Wales¹³⁰. The 2019 WIMD show that there are pockets of high employment deprivation in the South Wales valleys, large cities and in some North Wales coastal towns.

In terms of qualifications, 41.4%% of the Welsh population have an NVQ Level 4 and above compared to 7.3%% of the population who have no qualifications¹⁴⁴. The education WIMD domain considers the extent of deprivation relevant to education, training and skills¹⁴⁵. Blaenau Gwent had the largest proportion of LSOAs in the most deprived 10% in Wales for education. Across Wales, there are pockets of high deprivation in the South Wales Valleys and larger cities and in some North Wales border towns.

In relation to physical access to employment, the majority of those in employment in Wales drive to work by car or van (38.4%), 5.7% travel to work on foot, whilst 2.7% commute by bus¹⁴⁶. The average distance to work is more than 3 miles but less than 15 miles. The National Survey for Wales¹⁴⁷ showed 60% of adults walked more than once a week for active travel purpose and this was more likely in urban areas. For education, the National Survey 2018-19 showed 43% of children walked to primary school, falling to 33% for secondary school. Children were more likely to travel to secondary school by bus than primary¹⁴⁸.

Transport and access

Less than half (42%) of people in Wales have access to a car or van, with 18.3% having one car or van in their household, and 10.9% of households having two cars in their household¹⁴⁹.

¹⁴³ ONS (2021) ONS Claimant Count – seasonally adjusted September 2021 [CLA01: Claimant Count - Office for National Statistics](#)

¹⁴⁴ <https://statswales.gov.wales/Catalogue/Education-and-Skills/Post-16-Education-and-Training/Data-For-Regions-of-Wales/highestqualificationlevelofworkingageadults-by-region-localauthority>

¹⁴⁵ WIMD - Blaenau Gwent (gov.wales)

¹⁴⁶ ONS (2011) 2011 Census Data WD703EW - Method of travel to work [WD703EW \(Method of travel to work \(2001 specification\) \(Workday population\)\) - Nomis - Official Census and Labour Market Statistics](#)

¹⁴⁷ National Survey for Wales. 2017 <https://gov.wales/national-survey-wales>

¹⁴⁸ National Survey for Wales 2018-2019 [SHRN-NR-FINAL-23_03_21-en-AMENDED06.08.21.pdf](#)

¹⁴⁹ ONS (2011) 2011 Census Data - QS416EW - Car or van availability QS416EW (Car or van availability) - Nomis - Official Census and Labour Market Statistics

The 2014 National Survey for Wales shows that of those in the 20% most deprived households in Wales only 65% of households have use of a car, compared to 89% of households within the 20% least deprived¹⁵⁰.

The 2018-2019 National Survey for Wales results found 81% generally thought they had good access to services¹⁵¹. However, the 2013-14 results identified that older people (particularly those aged 75 and over) found it more difficult to get to hospital compared to younger people and getting to hospital was generally considered to be easier for those who had access to a car¹⁵².

The 2014 WIMD access to service domain looks at access to nine different services (including education, post offices, libraries, GP surgeries etc.). The results showed that deprivation is widespread across rural Wales¹³⁰, with some pockets near large urban areas.

Transport safety

The National Survey for Wales surveyed feelings of safety when using public transport after dark and analysed key variables such as age and gender¹⁵³. It was found that, overall, 34% felt 'very safe' compared with 46% feeling 'fairly safe', 15% feeling 'fairly unsafe' and 5% feeling 'very unsafe'. When these results were broken down by age, results showed that feelings of safety generally decreased with age with only 25% of those aged 75 and over feeling 'very safe'. There was also considerable variation by gender, 43% of males responded that they felt very safe travelling after dark compared to 24% of females. Whilst 2% of males responded that they felt 'very unsafe' travelling after dark compared to 9% of females¹⁵⁴.

Air quality

Each year in Wales an equivalent of 1604 (5.4%) deaths can be attributed to PM^{2.5} exposure and 1108 (3.7%) deaths to NO₂ exposure¹⁵⁵. Air pollution has been shown to

¹⁵⁰ Welsh Government (2014) National Survey for Wales - Transport [National Survey for Wales: April 2013 to March 2014 | GOV.WALES](#)

¹⁵¹ National Survey for Wales. 2018/19 results – access to health services. [National Survey for Wales: NHS and social care | GOV.WALES](#)

¹⁵² National Survey for Wales 2013-14 <https://statswales.gov.wales/Catalogue/Transport>

¹⁵³ National Survey for Wales. 2017 Survey results <https://gov.wales/national-survey-wales>

¹⁵⁴ <https://statswales.gov.wales/Catalogue/Transport>

¹⁵⁵ Welsh Government. Air Quality in Wales health advice' [Health Advice | Air Quality In Wales](#)

vary across Wales and those living in the most deprived areas typically experience the highest mean concentration of air pollutants.

Vulnerable groups

Based on the characteristics of the population described above, the table below summarises the most disadvantaged and/or vulnerable groups present. This is based on Appendix 2 of the WHIASU Guidance. It should be noted that the most disadvantaged and/or vulnerable groups are those that will exhibit a number of characteristics, for example, children living in poverty. Those groups that have been included in the scope of this assessment are those that are identified as likely to be differentially affected by the Bill

Group	Sub-Group	Affected by the Bill
Age related groups	Children and young people	Y
	Older people	Y
Groups who suffer discrimination or another social disadvantage		
	People with physical or learning disabilities/difficulties	Y
	Refugee groups	N (inherently covered in age or income-related groups)
	People seeking asylum	N (inherently covered in age or income-related groups)
	Single parent families	N (inherently covered in age or income-related groups)
	Religious groups	N (inherently covered in age or income-related groups)
	Lesbian and gay and transgender people	N (inherently covered in age or income-related groups)
	Black and minority ethnic groups	N (inherently covered in age or income-related groups)
Geographical groups	People living in areas known to exhibit poor economic and/or health indicators	N (inherently covered in age or income-related groups)
	People living in isolated/overpopulated areas	Y
	People unable to access services and facilities	Y

Evidence Review

Active travel and physical activity

Active travel applies to modes of transport that require physical activity (i.e. walking, wheeling and cycling), in contrast to modes that require little physical effort such as motor vehicles. It is therefore the physical activity associated with active travel that brings about health effects.

The positive effects of physical activity on health are summarised in the Department of Health's 2011 report¹⁵⁶ which suggests that: "Regular physical activity can reduce the risk of many chronic conditions including coronary heart disease, stroke, type 2 diabetes, cancer, obesity, mental health problems and musculoskeletal conditions. Even relatively small increases in physical activity are associated with some protection against chronic diseases and an improved quality of life."

There is a large body of evidence linking physical activity with improved physical and mental health. The WHO¹⁵⁷ defines physical activity as "any bodily movement produced by skeletal muscles that requires energy expenditure" and states that "physical activity has significant health benefits and contributes to prevent non-communicable diseases". These benefits are identified as reduced risk of hypertension, stroke, diabetes, coronary heart disease, breast and colon cancer, depression and the risk of falls, improved bone and functional health, and weight control.

The WHO also states that: "beyond exercise, any other physical activity that is done during leisure time, for transport to get to and from places, or as part of a person's work, has a health benefit. Further, both moderate- and vigorous-intensity physical activity improve health."

In relation to bus travel, studies showed that people with a free bus pass are more likely to walk frequently and take more 'active travel' journeys¹⁵⁸. A study of 100 participants recording their steps when taking the same journeys by bus and car found that bus usage resulted in more walking than the equivalent door-to-door car journey¹⁵⁹. A longitudinal study of 9,000 people in England found that free bus passes for older people had increased their public transport use and that older people who used public transport had reduced odds of being obese compared with those who did not¹⁶⁰. It found that those who used public transport, or took advantage of free bus travel, were 25% less likely to be obese in 2008 than those who did not.

¹⁵⁶ CMO (2011) Start Active, Stay Active: A report on physical activity from the four home countries' Chief Medical Officers, Department of Health, Physical Activity, Health Improvement and Protection
https://laterlifetraining.co.uk/wp-content/uploads/2011/07/Start-Active_Stay-Active_CMO_UK-PA-Guidelines_2011.pdf

¹⁵⁷ World Health Organization, Physical activity (2017) [Publication Item](#)

¹⁵⁸ Coronini-Cronberg, S., Christopher Millett, C., Lavery, A., Webb, E., 2012. The impact of free older persons' bus pass on active travel and regular walking in England, Imperial College London [The impact of a free older persons' bus pass on active travel and regular walking in England. - Abstract - Europe PMC](#)

¹⁵⁹ Mindlab International, for Greener Journeys, 2011. Why taking the bus is good for your health?

¹⁶⁰ Journal of Epidemiology & Community Health, 2011. Free bus passes, use of public transport and obesity among older people in England [Free bus passes, use of public transport and obesity among older people in England | Journal of Epidemiology & Community Health](#)

Access to services and social networks

Public transport can provide direct access to a wide range of facilities, services opportunities and social networks. It has been found that a 10% improvement in local bus service connectivity¹⁶¹ is associated with a 3.6% reduction in deprivation¹⁶².

Access to services and community facilities

Access to services and community facilities can affect health and wellbeing directly, through access to treatment and care and indirectly by increasing access to social networks. This was highlighted in the Bws Cymru engagement responses which emphasised the need for improved accessibility of bus services in Wales.

A study carried out in 2010¹⁶³ on Leisure and its effects on mental health across the globe, suggests that access to social infrastructure including leisure and cultural facilities plays a key role in the recovery of people with mental illness and has an overall positive impact on health and wellbeing. A report by the New Zealand Government in 2007¹⁶⁴ identified a number of reasons for participation in cultural and leisure activities including personal growth and development, to learn new skills for enjoyment and for entertainment, all of which can benefit health and wellbeing.

A survey on Measuring National Well-being carried out in 2008¹⁶⁵ found that 5% of adults felt isolated due to difficulties accessing local shops and services, and 22% of adults knew someone who felt this way. The survey also highlighted that alongside crime and cleanliness, the most important factor that made a place suitable to live was access to services, particularly health services.

¹⁶¹ As measured by public transport journey times to access employment centres, GPs, hospitals and town centres where buses are the only public transport.

¹⁶² KPMG and University of Leeds Institute for Transport Studies, for Greener Journeys, 2016. A Study of the value of local bus services to society [The-Value-of-the-Bus-to-Society-FINAL-1.pdf](#)

¹⁶³ Iwasaki, Y. Coyle, C. and Shank, J. (2010), Leisure as a context for active living, recovery, health and life quality for persons with mental illness in a global context, Health promotion international [Leisure as a context for active living, recovery, health and life quality for persons with mental illness in a global context | Health Promotion International | Oxford Academic](#)

¹⁶⁴ Ministry of Social Development, New Zealand Government (2007), Social Report: Leisure and Recreation, [The Social Report 2007](#)

¹⁶⁵ Randall, C. (2012), Measure national well-being: Where we live 2012, Office for National Statistics Report [Measuring National Well-being - Where we Live - 2012 | Semantic Scholar](#)

A 2011 literature review¹⁶⁶ focusing on transport and community severance found that, the accessibility of local shops, community services and healthcare facilities may be affected by:

- effects on the capacity of existing services;
- physical accessibility (i.e. distances travelled and transport connections);
- social and/or cultural access (i.e. communication issues); and
- separation imposed by a new piece of physical infrastructure.

A study on improving patient access to health services in 2004¹⁶⁷ suggested that groups impacted by disability and older people may experience greater barriers to health and social care services.

Evidence shows a relationship between public transport and accessing services, particularly healthcare services. The likelihood of missing an appointment increases with levels of deprivation and is more common for the young and old¹⁶⁸, groups for which buses are an important transport mode. Additionally, a study by Defra showed that 44% of people without access to a car find it difficult to get to the doctors or to hospital¹⁶⁹. A study by the West Midlands Integrated Transport Authority looked at one 'Ring and Ride' service in the West Midlands serving 31,000 active registered blind and disabled users. It is estimated to save the health sector between £13.4m and £58.5m in reduced need for care, home help and meals; reduced use of taxi and other district, community or NHS transport, escorts and improved access to employment¹⁷⁰.

Access to social networks and social capital

¹⁶⁶ Quigley, R. and Thornley, L. (2011), Literature Review on Community Cohesion and Community Severance: Definitions and Indicators for Transport Planning and Monitoring, Report to New Zealand Transport Agency [Literature review on community cohesion and community severance: definitions and indicators for transport planning and monitoring](#)

¹⁶⁷ Hamer, L. (2004), Improving patient access to health services: a national review and case studies of current approaches, Health Development Agency [Improving patient access to health services: A national review and case studies of current approaches](#)

¹⁶⁸ Doctor Foster Health and the NHS Information Centre, 2009. "Outpatient appointment no-shows cost hospitals £600m a year"

¹⁶⁹ Defra, 2009. Sustainable Development Indicators in your Pocket [Sustainable development indicators in your pocket 2009 - GOV.UK](#)

¹⁷⁰ West Midlands Integrated Transport Authority, internal briefing

A 2014 ONS paper, Measuring Social Capital¹⁷¹, provides the following definition of social capital: “In general terms, social capital represents social connections and all the benefits they generate. The benefits for people having these social connections can occur either at an individual level (for example, through family support) or at a wider collective level (for example, through volunteering). Social capital is also associated with values such as tolerance, solidarity or trust. These are beneficial to society and are important for people to be able to cooperate.”

The ONS has looked at social capital as part of its Measuring National Well-being (MNW) programme. This identifies four aspects of social capital, based on work undertaken by Scrivens *et al* in 2013 for the Organisation for Economic Co-operation and Development (OECD)¹⁷². These aspects are:

- personal relationships;
- social network support;
- civic engagement and trust; and
- cooperative norms.

The ONS paper includes a review of academic studies on social capital and its effects on health. The evidence suggests that social capital makes a positive contribution to a range of well-being aspects such as personal well-being, health and crime rates, and that these benefits occur at individual, community, regional and national level.

Access to education and employment

There is a large body of evidence linking education, employment and income levels with health. The WHO identifies a list of health determinants¹⁷³ that combine to affect the health of individuals and communities. Included in this list is: “education – low education levels are linked with poor health, more stress and lower self-confidence”.

An evidence review by the Joseph Rowntree Foundation on reducing poverty in the UK¹⁷⁴ states that improved qualifications can lead to better wages and employment, providing greater access to the health benefits associated with good and secure employment.

¹⁷¹ Siegler, V. and Office for National Statistics (2014), Measuring Social Capital, Office for National Statistics ([PDF](#)) [Measuring Social Capital in the UK, July 2014 \(Office for National Statistics\)](#)

¹⁷² Scrivens, K. and Smith, C. (2013), Four interpretations of social capital: an agenda for measurement, OEDC [Four Interpretations of Social Capital | OECD](#)

¹⁷³ World Health Organization (2017), Health Impact Assessment- The determinants of health, [Health impact assessment](#)

¹⁷⁴ Rowntree, J. (2014), Reducing Poverty in the UK: A collection of evidence reviews, Joseph Rowntree Foundation [Reducing poverty in the UK: a collection of evidence reviews | Joseph Rowntree Foundation](#)

A University of London report in 2008¹⁷⁵ on the social and personal benefits of learning states that *“people with better qualifications are more likely to have healthy lifestyles, to be fitter and slimmer – and such health advantages can be transferred to the next generation at the earliest age”*.

In terms of employment and income, the Marmot Review, published in 2010¹⁷⁶, was commissioned by the Department of Health to look into health inequalities in England and focused on correlations between health and wellbeing and the socio-economic status of communities. The report identified six evidence-based policy objectives to reduce health inequalities, one of which was to create fair employment and good work for all. The Review stated that *“being in good employment is protective of health. Conversely, unemployment contributes to poor health”*. This study also identifies links between educational attainment and physical and mental health.

Transport and health

Air quality:

Outdoor air pollution is defined as a mixture of gases and particles that have been emitted into the atmosphere by man-made processes¹⁷⁷ and has an adverse effect on human health. The WHO recognises outdoor air pollution as a major environmental health problem for all countries including high-income countries¹⁷⁸. By 2035, it is estimated that the health and social care costs of air pollution could reach up to £5.3 billion¹⁷⁹, this includes diseases that have a strong association with air pollution such as childhood asthma, coronary heart disease, lung cancer and stroke. In the UK alone, the overall population burden of air pollution is estimated to be equivalent to nearly 23,500 deaths per year¹⁸⁰.

¹⁷⁵ Vorhaus, J., Duckworth, K., Budge, D. and Feinstein, L. (2008), The Social and personal benefits of learning: A summary of key research findings, Centre for Research on the Wider Benefits of Learning, Institute of Education, University of London, London [\(PDF\) The Social and Personal Benefits of Learning: a summary of key research findings](#)

¹⁷⁶ Marmot, M., Allen, J., Goldblatt, P., Boyce, T., McNeish D., Grady, M. and Geddes, I. (2010), Fair society, healthy lives: Strategic review of health inequalities in England post-2010, The Marmot Review [Fair society, healthy lives : the Marmot Review : strategic review of health inequalities in England post-2010. - GOV.UK](#)

¹⁷⁷ Air Quality England. <http://www.airqualityengland.co.uk/air-pollution>

¹⁷⁸ WHO Topic Sheet. (2018) Ambient (outdoor) air quality and health. [Ambient \(outdoor\) air pollution](#)

¹⁷⁹ UK Health Alliance on Climate Change. (2018). Moving Beyond the Air Quality Crisis. Realising the health benefits of acting on air pollution.

¹⁸⁰ DEFRA and Public Health England (2017) [Air Quality - A guide for directors of public health](#)

According to the Lancet Commission on pollution and health¹⁸¹ children are at high risk of pollution related disease and even extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy can result in disease, disability, and death in childhood and across their lifespan.

An evidence and policy review by the UK Health Alliance on Climate Change (2018)¹⁸² notes that transport is a major cause of air pollution. In 2016, emissions from road transport accounted for 12% of PM¹⁰ and PM^{2.5} in the UK and were the third largest source after industrial processes. Furthermore, road transport is responsible for 80% of No² levels near roadsides.

Outdoor air pollution has also been shown to influence productivity and contribute to social costs such as increasing days off work and school due to restricted health¹⁸³. Additionally, where there is a perception that there is air pollution this appears to constitute a barrier to participating in outdoor physical activity and active transport¹⁸⁴.

Noise:

According to the WHO¹⁸⁵, *“excessive noise seriously harms human health and interferes with people’s daily activities at school, at work, at home and during leisure time. It can disturb sleep, cause cardiovascular and psychophysiological effects, reduce performance and provoke annoyance responses and changes in social behaviour”*.

The WHO issued guidelines on Environment Noise for the European Region ¹⁸⁶in 2018. These guidelines were the result of two independent groups of experts who undertook a series of systematic reviews synthesising exposure and associated impacts on health in order to develop a set of guidelines on how to protect human health. The systematic reviews concluded that there was evidence for an association of railway noise and road traffic noise on cardiovascular disease (CVD), sleep disturbance, annoyance, and

¹⁸¹ Landrigan, P.J., et al (2018), The Lancet Commission on pollution and health, The Lancet 391:462-512 [The Lancet Commission on pollution and health - PubMed](#)

¹⁸² UK Health Alliance on Climate Change (2018). Moving Beyond the Air Quality Crisis. Realising the health benefits of acting on air pollution.

¹⁸³ IOM Working for a Healthier Future. Scotland’s Environment (2015) Air Quality, Health, Wellbeing and Behaviour, [iom-seweb-aq-health-behaviour-review.pdf](#)

¹⁸⁴ Annear, M., Keeling, S., Wilkinson, T., Cushman, G., Gidlow, B., & Hopkins, H. (2014). Environmental influences on healthy and active ageing: A systematic review. Ageing & Society, 34 (4), 590-622 [Environmental influences on healthy and active ageing: a systematic review | Ageing & Society | Cambridge Core](#)

¹⁸⁵ World Health Organization (2017), Noise, [Environmental noise guidelines for the European Region](#)

¹⁸⁶ World Health Organisation Regional Office for Europe (2018) Environmental Noise Guidelines for the European Region. [Environmental noise guidelines for the European Region](#)

cognitive impairment, with suggestive but weaker evidence (often due to lack of studies) for effects on mental health and birth weight.

Assessment

The table below sets out a high-level health impact assessment of the Bill’s proposals based on the methodology described above.

Health determinant Key guiding questions (will the Bill	Positive (+) or Negative (-) impact	Relevant vulnerable groups	Assessment
Diet and physical activity: <i>Provide opportunities to access to active forms of travel?</i> <i>Increase access to physical exercise and outdoor space?</i> <i>Increase access to healthy and affordable food choices?</i>	+	People on low income People living in isolated/overpopulated areas People unable to access services and facilities People with disabilities	<p>The population profile demonstrates that a large percentage of adults and children in Wales are overweight or obese and levels of physical activity are low.</p> <p>As shown in the evidence review, there is a large body of evidence to demonstrate the benefits increased physical activity has on physical and mental health and wellbeing. Improving direct access to physical exercise (gyms, parks etc.) would deliver health benefits. Indirectly, bus travel has been associated with increased active travel and any form of exercise has been demonstrated to improve health. Improved service provision that meets a wider range of needs could contribute to more people choosing this mode of transport and therefore increasing physical activity bringing associated health benefits.</p> <p>Integrating the bus network with other transport options (including railways, walking and cycling), and providing a more accessible and reliable bus service, would increase access to wider services and opportunities. This could include access to parks, leisure centres, gyms, or other areas which promote and provide opportunities for physical activity and exercise.</p> <p>In some locations, improved access to wider services and opportunities could also improve access to a wider range of food choices, including healthier or more affordable options.</p>

<p>Social networks and social isolation:</p> <p><i>Reduce social exclusion?</i></p> <p><i>Increase opportunities to access social networks?</i></p> <p><i>Reduce severance?</i></p>	<p>+</p>	<p>People on low income</p> <p>People living in isolated/overpopulated areas</p> <p>People unable to access services and facilities</p> <p>Children and young people</p> <p>Older people</p> <p>Economically inactive</p> <p>People with physical or learning disabilities/difficulties</p>	<p>The provision of improved transport services which offer more affordable transport options, would increase opportunities for groups who cannot afford and/or are unable to access private transport options (for example they are too young, have a disability or have no driving licence). This would reduce feelings of isolation and exclusion for these individuals, allowing them to access a wider range of opportunities and improve their social network. An individual's social capital is closely linked to mental health and wellbeing and therefore improving access to socialising could result in positive health impacts on many vulnerable groups.</p> <p>Ensuring an effective bus network in rural and urban areas which is co-ordinated and fully integrated with other forms of public transport would also improve access for more vulnerable and isolated groups. This is of particular importance for individuals in rural areas and would help to reduce severance and feelings of isolation, which is shown to negatively impact health and wellbeing.</p> <p>Improvements to bus services in terms of improved provision of information and travel data, such as the use of audio or visual announcements, would help to make travelling on the public bus network easier for many groups. This includes older people, people not local to an area (e.g. recently moved into an area) and those with an impairment. This could support individuals to feel less isolated and increase their confidence in the public transport networks, allowing them to access wider social networks and therefore benefit from the associated positive health outcomes.</p>
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<p>Living environment:</p> <p><i>Contribute to improvements in air quality?</i></p> <p><i>Reduce the number of people exposed to poor air quality?</i></p> <p><i>Reduce the number of people exposed to high levels of traffic noise?</i></p>	+	<p>People living in isolated/overpopulated areas</p> <p>Children and young people</p> <p>Older people</p> <p>People with physical or learning disabilities/difficulties</p> <p>People who suffer with respiratory disease</p>	<p>Encouraging the use of buses could help to reduce private vehicle use. Alongside investment in sustainable options, such as low carbon/zero emission vehicle fleets, these measures would help to reduce pollution and improve air quality. A wide range of evidence is available to demonstrate the negative impact pollutants have on health. Therefore, this intervention would provide health benefits, especially in built-up areas which are typically more polluted. It would be of particular importance for groups more vulnerable to the health-effects of poor air quality, such as children or older people and those with existing health conditions.</p> <p>Reducing private vehicle use and encouraging a modal-shift to the public transport network would also help to reduce the number of overall vehicles on the road. This could reduce the impact of traffic-related noise which is shown to negatively impact health by increasing disturbance and causing annoyance and sleep deprivation. This would be of particular importance in more urban areas and those that live near to large roads.</p> <p>With reduced numbers of private vehicles on the roads, there is potential for road safety generally (especially in existing busy trafficked areas) to improve therefore bringing overarching benefits to living environments.</p>
<p>Access to employment and education:</p> <p><i>Allow individuals to access places of work and employment opportunities?</i></p> <p><i>Increase the range of employment opportunities for individuals?</i></p> <p><i>Allow individuals to access a range of educational opportunities?</i></p>	+	<p>People on low incomes</p> <p>Unemployed</p> <p>Children and young people</p> <p>Older people</p> <p>People living in isolated/overpopulated areas</p> <p>People with physical or learning disabilities/difficulties</p>	<p>There are pockets of deprivation across Wales related to employment and educational opportunities.</p> <p>The provision of an improved bus service across Wales which offers transport options that are available and affordable to all members of society could increase access to wider employment and educational opportunities for those who rely on public transport. This would include low-income groups, young people and older people, particularly for those in more isolated and rural areas. Similarly, ensuring an effective bus network across rural and urban areas, which is co-ordinated and fully integrated with other forms of public transport would increase physical access to a much wider range of employment. In most cases, it would increase the number of places reached by public transport and would reduce the time taken to reach them. This could provide access to a wide range of employment and educational opportunities, including a greater variety of jobs, schools, training courses, learning centres and apprentice schemes.</p> <p>Unreliable public transport networks can limit people accessing employment if they are unable to reliably attend a place of work or education. Improving the reliability of the transport network and using smart technology (such as apps and bus stop</p>

			<p>infrastructure) could make it easier to access live data about the bus network, helping individuals to plan their routes to education or employment.</p> <p>The evidence review demonstrates that access to education and employment has positive impacts on both physical and mental health and wellbeing. It can reduce feelings of stress and anxiety and provide direct access to health benefits associated with secure employment.</p>
<p>Access to services:</p> <p><i>Improve access and equity of access to health and social care services and facilities?</i></p>	+	<p>People on low incomes</p> <p>Children and young people</p> <p>Older people</p> <p>People living in isolated/overpopulated areas</p> <p>People with physical or learning disabilities/difficulties</p> <p>People unable to access services and facilities</p>	<p>The population profile shows that access to services across Wales is generally poor and particularly effects those in rural areas, low-income groups and older people.</p> <p>The provision of more affordable transport options could increase direct access to healthcare and social services and facilities, particularly for those who rely on public transport. Indirectly, it could also help to provide more reliable services for carers and healthcare professionals who rely on public transport for visiting those in need of at-home care and support.</p>

Conclusion

Overall, this high-level assessment of the health impacts of the Bill demonstrates a generally positive effect on health.

Improving the reliability of bus networks, improving affordability for users, increasing the provision of public transport and optimising routes to meet local needs would improve access to a wide range of services, opportunities, education, employment, social networks and recreational spaces, all of which can contribute positively to health and wellbeing.

Given the benefits of the new operating model will be fully realised during the implementation phase, a more detailed consideration of Health Impacts could be undertaken once implementation has taken place.

Welsh Government and Transport for Wales will continue to engage with stakeholders including bus users and protected characteristic groups on a regular basis to understand the issues and challenges they face and discuss ways of improving services together.