

Bus Services (Wales) Bill: Public Consultation

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Bil Gwasanaethau Bysiau (Cymru) | Bus Services (Wales) Bill

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

Evidence from: RNIB Cymru

1. What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

We welcome the introduction of the Bus Services (Wales) Bill and the intention to create a more integrated, efficient, and sustainable public transport system in Wales. RNIB Cymru wants to see the creation of fully accessible bus network that enables the 112,000 people living with sight loss in Wales to get around confidently and safely.

Bus travel is a lifeline for blind and partially sighted people. Sight loss affects a person's ability to drive or cycle independently, so they have fewer transport options available to them. For many, buses are their only way of accessing services, getting to work, meeting family and friends and connecting with their communities.

Blind and partially sighted people in Wales are far more likely to use buses than the general population.¹ An RNIB Cymru survey found that nearly half of respondents (48 per cent) travel by bus several times a week and a quarter (23 per cent) travel at least three times a month.¹

However, we know that making a journey by bus poses unique challenges to passengers with sight loss.

In 2024, RNIB Cymru surveyed 146 blind and partially sighted people from across Wales to understand their experiences of travelling by bus. We aimed

¹ [1](#) Welsh Government (2024) Transport (National Survey for Wales): April 2022 to March 2023

to identify common trends, pinpoint the specific challenges they face and develop suggestions for how their journeys could be improved.

Our research showed that just one in ten people with sight loss were able to make all of the journeys they wanted to by bus.

Nearly half (43 per cent) find familiar journeys to be “fairly” or “very difficult” and unfamiliar journeys are even more challenging with nine in ten (87 per cent) finding them “fairly” or “very difficult.”

The key barriers our research identified at each stage of the journey are:

Journey planning

- Difficulty finding real-time, accessible information about bus services and timetables to plan journeys.
- Bus operator apps and websites being incompatible with assistive technology, including screen readers.
- A lack of non-digital journey planning tools.

Getting to the bus stop and catching the bus

- Difficulty with walking routes to and from bus stops due to pavement obstructions, lack of safe road crossings and challenges identifying bus stop locations.
- Dangerous bus stop designs which force pedestrians to cross a cycleway to board or alight from a bus.

On board accessibility

- Audio announcements, which are vital to help passengers identify the correct stop, are not reliably available and often of poor quality.
- Inconsistencies in bus designs and layouts, including poor lighting and insufficient priority seating areas with space for guide dogs.

Driver and passenger behaviour

- Blind and partially sighted bus users told us that bus drivers lack suitable training to support them.
- Other bus passengers can be both a help and a hindrance to blind and partially sighted people in bus journeys.

All of this serves to highlight that the act of travelling by bus presents too many unnecessary barriers for blind and partially sighted people.

The Bill has the potential to significantly improve the accessibility of bus services if it incorporates specific measures to address the unique needs of blind and partially sighted people. Including specific provisions relating to accessibility requirements within the primary legislation is crucial. While guidance can offer recommendations and best practices, it often lacks the enforceability and consistency that legislation provides.

Primary legislation is necessary to guarantee that accessibility measures are uniformly adopted and rigorously enforced. By mandating accessible information, driver training, and inclusive infrastructure, the Bill can help create a more equitable and inclusive bus network. However, it is essential that these measures are effectively implemented and enforced to ensure that the intended benefits are realised. Consistency and familiarity are key factors which determine whether blind and partially sighted people are able to make the journeys they want and need to by bus. Without proper enforcement, even the best-intentioned reforms can fall short. Therefore, the Bill should include mechanisms for monitoring compliance and penalising non-compliance, ensuring that accessibility improvements are not just theoretical but are tangibly experienced by blind and partially sighted people.

2. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

Part 1 - Key concepts and general objectives (sections 1 to 4)

We appreciate the need to reform local bus services in Wales to ensure they are safe, integrated, sustainable, efficient, and economical. The second objective in the Bill states Welsh Ministers have regard to "continuously [...] improve the reliability, safety, affordability and accessibility of local bus services." This indicates a commitment to enhancing accessibility as part of the overall aim for reforming local bus services in Wales. However, it does not provide specific details on how accessibility will be improved or what achieving the objective could look like. We believe expanding on the objective, through specific improvements and measures would make this more workable and deliver the intended policy changes.

To further strengthen provision for disabled people, including blind and partially sighted people, formal proposals or amendments to the Bill should outline specific accessibility requirements:

- Legislate to ensure all digital information about bus services on the national network adheres to the WCAG 2.2. 'AA' accessibility standard as a minimum.

- Require all bus operators who are awarded contracts to deliver services on the bus network to give passenger information including timetables, route details and changes to services in accessible formats such as large and giant print, braille, audio, and accessible digital files.
- Require all bus operators that are awarded contracts to deliver services on the national network to provide consistent audio announcements on board their buses.

By taking these steps, the Welsh Government can demonstrate its commitment to improving accessibility of local bus services and ensuring that the objectives of the Bus Services (Wales) Bill are met.

3. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

Part 2 - Functions of the Welsh Ministers relating to local bus services (sections 5 to 20)

The Bus Services (Wales) Bill specifies that Welsh Ministers are responsible for preparing and publishing the Welsh Bus Network Plan, which outlines the essential characteristics of services needed. The requirement for a Welsh Bus Network Plan is a positive step, but we urge that this plan explicitly includes provisions for accessibility, ensuring that bus services are designed and operated with the needs of disabled people, including blind and partially sighted people, in mind.

While amending the wording of the Bill to embed accessibility into legislation would be an ideal step, it is equally crucial to ensure that the Welsh Bus Network Plan (the Plan) outlines detailed steps to achieve these improvements. The Plan should specify the actions required to enhance accessibility, such as those mentioned in the previous answer, conducting regular accessibility audits and establishing robust monitoring and reporting mechanisms. This level of detail would aid in transparency and trust-building, ensuring that the commitments made in the Bill translate into tangible improvements.

The emphasis on a coordinated approach and the creation of a Welsh Bus Network Plan are particularly crucial. The Plan offers another opportunity to be more specific about the measures needed to improve accessibility. As well as the recommendations included in the previous questions, we would like the plan to include the following recommendations for Transport for Wales (TfW), Local Authorities and Corporate Joint Committees (CJCs).

The Plan should place a duty on Transport for Wales to:

- Make sure content on journey planning apps and websites is compatible with assistive technology, contains alternative text for images, captions for videos, audio descriptions for multimedia elements and supports offline functionality.
- Design digital ticket purchasing systems to accommodate screen readers and assistive technology, maintaining options to purchase physical tickets in person, on board, and at staffed service points.
- Work with blind and partially sighted people to co-design digital services.
- Offer real-time information on bus arrivals, route changes, and cancellations in a range of accessible formats, not just visual maps.
- Ensure all social media content is inclusive by following [RNIB's Top Tips for Accessible Social Media](#).
- Create accessible feedback channels for blind and partially sighted passengers to report any issues they encounter.
- Work proactively with bus operators and vehicle manufacturers to ensure buses have a consistent design across the network, including key elements such as tactile indicators and evenly distributed lighting, standardising the placement of colour contrasted card readers, and ensuring that accessible priority seating is suitable and comfortable for guide dogs.

The Plan should place a duty on CJC's to:

- Follow [RNIB Cymru's Key Principles of Inclusive Street Design](#) when developing new street designs, particularly in areas near bus stops.
- Stop building any shared-use bus stops, where passengers must cross or stand in a live cycle lane to get on or off a bus.
- Existing bus stops layouts which intersect with cycle lanes should be retrofitted to allow full accessibility features, such as detectable kerbs, tactile paving, clear signage, high tonal and colour contrast, and any crossing points must be signal-controlled.
- Monitor and maintain pavement quality in the areas surrounding bus stops.
- Minimise street obstacles (such as overhanging greenery, poorly placed street furniture and pavement parking) in the areas surrounding bus stops.
- Improve lighting at bus stops for their detectability, personal safety and to help bus drivers identify waiting passengers who may not be able to flag down the bus they need.

These specific measures would help create a more inclusive and user-friendly bus network for all passengers.

Section 10 of the Bill gives powers to make supplementary provisions about local bus service contracts that may relate to various matters, including reliability, safety, fares, and ticketing. However, there is no specific mention of accessibility in this list. We recommend that the provisions relating to contracts go a step further than merely ensuring compliance with statutory requirements. They should explicitly state specific accessibility criteria, such as providing all travel information in accessible formats, implementing clear audio-visual announcements on all buses, and mandating disability equality training for bus drivers to better understand and communicate with passengers with sight loss. These specific criteria would ensure that accessibility is a core component of all local bus service contracts, leading to a more inclusive and equitable bus network.

By incorporating detailed and specific measures into the Welsh Bus Network Plan and the provisions for local bus service contracts, Welsh Ministers can demonstrate a strong commitment to improving the accessibility of local bus services. A comprehensive and holistic approach can help ensure that bus service reform includes accessibility as a key aspect of design and operation.

5. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?

Part 4 - Information and data (sections 25 to 31)

The proposed information-sharing requirements in Part 4 of the Bill will help different partners to work towards better planning and management of the bus network. One of the key aspects of Part 4 is the duty of the Welsh Ministers to ensure that information about local bus services is made available to the public. This includes details about the facilities available to passengers on vehicles, which should explicitly include accessibility features. We would strongly call for this information to be made available in accessible formats, such as large print, Braille, audio, and accessible digital files, to ensure equitable access. Additionally, any information shared digitally or online should be compatible with screen readers and other assistive technology. This will ensure that all passengers can access essential information about bus services.

To ensure that the provisions are workable and deliver the stated policy intention, it will be crucial to adhere to guidelines and standards for the accessibility of information. This includes specifying the formats in which

information should be provided and ensuring that all relevant stakeholders, including bus operators and local authorities, are aware of and adhere to these standards. Regular monitoring and evaluation should be conducted to assess effectiveness and identify any areas for improvement.

When information is readily available and easy to understand, it reduces the barriers that passengers face when using public transport. This aligns with the broader policy intention of the Bill to create a more inclusive and equitable public transportation system.

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

The Bus Services (Wales) Bill has the stated aim and potential to significantly improve the accessibility of the bus network. However, inadequate or poorly enforced policies and legislation can hinder progress in improving accessibility and removing barriers for disabled people, including blind and partially sighted people. It is important to identify and address potential barriers to accessibility so that the Bill's objective of improving the reliability, safety, affordability, and accessibility of local bus services can be met.

Our survey found that:

- Nearly two thirds (64 per cent) of the people we surveyed said that bus timetables are inaccessible and just two per cent said they can read timetables at the bus stop.
- One in three have difficulty in accessing bus apps (38 per cent) and bus company websites (34 per cent)
- Four in five (80 per cent) say that audio announcements are “sometimes, rarely, or never” present
- Three in four (71 per cent) say bus drivers don’t have suitable training to support blind and partially sighted people

Understanding these challenges will help identify barriers to implementing legislation and in developing effective targeted solutions.

Insufficient funding and resources pose a challenge to enhancing accessibility. Improving infrastructure and technology to support accessibility requires significant investment, so allocating sufficient ringfenced financial resources to support initiatives, such as installing audio-visual announcement systems on buses and designing bus stops to be more accessible, is essential for the successful implementation of accessibility measures.

Without robust monitoring and enforcement mechanisms, there is a risk that accessibility measures may not be fully realised. Establishing clear guidelines for monitoring progress, reporting on the effectiveness of measures, and penalising non-compliance is necessary. Regular audits and public reporting can help ensure transparency and accountability, making sure that the intended benefits of the legislation are achieved.

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

There is a risk that accessibility measures may be implemented inconsistently across different regions or bus operators if duties are not embedded into legislation. This could lead to a fragmented experience for blind and partially sighted passengers, where some areas have fully accessible services while others do not. Familiarity and consistency are key factors which enable blind and partially sighted people to use buses independently, so ensuring uniform standards and enforcement across all regions is essential to avoid this issue.

While technology can greatly enhance accessibility, an over-reliance on digital solutions may exclude those who have limited access to technology. Blind and partially sighted people are less likely to be daily internet users than non-disabled people. In fact, 28 per cent say they either have never used the internet or do not have access to it.² Consideration must be given to this significant minority who rely on non-digital means to plan their bus journeys.

Implementing accessibility measures requires significant investment in infrastructure and technology. If resources are not allocated adequately, there may be delays or incomplete implementation of these measures. This could result in blind and partially sighted people continuing to face barriers in using bus services.

Without robust monitoring and accessible feedback mechanisms, it may be difficult to identify and address issues that arise during the implementation of the Bill's provisions. Blind and partially sighted passengers may encounter problems that go unreported or unresolved, undermining the effectiveness of the accessibility measures. Establishing clear and accessible channels for feedback and regular monitoring is essential to ensure continuous improvement.

Welsh Government, Transport for Wales, Corporate Joint Committees, and local authorities will need to work together in good faith and ensure that a

² RNIB (2024), [Sight Loss and Technology](#)

whole life-course approach (the integrated analysis of individuals' mobility decisions in the context of individuals' lives) is taken when designing transport services.

Ultimately, not taking the opportunity to embed specific accessibility requirements in bus reform legislation will likely mean that Wales will miss a critical opportunity to become an inclusive and equitable society.

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

When looking to incorporate accessibility requirements and specific measures, we urge you to consider the actionable recommendations in our bus report, 'All Aboard? The challenges blind and partially sighted bus users face in Wales.' Key insights should be used to inform the development and implementation of the Bus Services (Wales) Bill to ensure that it effectively addresses the needs of blind and partially sighted people.

We are launching our report on 21st May 2025, and will be pleased to share a copy with Committee Members. We are also available and willing to give oral evidence to the Committee.

Many thanks for reading,

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