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Chair
Senedd Climate Change, Environment and Infrastructure Committee
Welsh Parliament
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23 April 2025

Dear Llyr,

Scrutiny of Bus Services (Wales) Bill: concerns regarding consultation period

I am writing to express concerns about the short consultation period for the long-awaited Bus Services (Wales) Bill.

The closing date of 13 May 2025 for submissions of written evidence is only six weeks in total and includes three bank holidays. This is an extremely narrow timetable for an important piece of legislation. It does not allow enough time for groups, including older people's groups, who may wish to respond to meet and compile responses, especially when the Explanatory Memorandum runs to over 200 pages.

The current consultation deadline of 13 May 2025 provides little time for stakeholders to give the Bill the attention it requires. Issues relating to transport, particularly buses, are often raised with me by older people and I am very keen to ensure that there is sufficient time for meaningful consultation on the Bill and that older people's voice are heard.

I have accepted an invitation from the Committee to provide oral evidence on 22 May but was initially asked to provide written evidence by Wednesday 30 April. This would have been an even shorter deadline, which includes the Easter bank holidays, especially as my office would need to factor in translation time in order to be able to provide evidence in both Welsh and English. Translation services may be impacted by bank holidays and staff annual leave which also applies to my own team. It is not unreasonable for staff in many sectors to have planned annual leave during this time of year.

I am pleased that my office has now agreed an extension with the Committee, and that we will provide evidence by the consultation's overall closing date of 13 May 2025.

I appreciate that the timescale was not determined by the Climate Change, Environment and Infrastructure (CCEI) Committee and that the Senedd's Business Committee gave the Committee 11 weeks to consider and report on the Bus Services (Wales) Bill, which is in line with their standard practice. I understand that such a compressed timetable has led to a short consultation period in order for the views of respondents to be reflected during oral evidence sessions with stakeholders and the Cabinet Secretary for Transport and North Wales.

It is my view, however, that 11 weeks is insufficient to undertake the scrutiny process, especially on such a significant piece of draft legislation as the Bus Services (Wales) Bill. The timetable does not allow for meaningful consultation with stakeholders, including members of the public and particularly older people, and for responses to be submitted for the CCEI Committee to consider.

I am aware of the Business Committee's current review of the Bill scrutiny process. This review should reflect on the time needed to support and enable genuine and meaningful consultation, as well as engagement with groups who have an interest in legislative proposals. Future timetables should also take into account bank holidays and other factors that may impact on people's ability to respond. Changes to allow more time for consultation should be made to the timetable for scrutinising legislation as a result.

Older people often tell me that they want a voice in decision-making, but that digital exclusion often acts as a barrier to this, and it is important to recognise that over 100,000 people aged 75+ in Wales do not use the internet.

I was therefore pleased that the CCEI Committee is making changes to the consultation webpage to more clearly promote the other ways that people can have their say on the Bus Services (Wales) Bill than completing the online form.

The Business Committee's review of the scrutiny process should also result in action to ensure that all future scrutiny arrangements are improved to ensure that digital exclusion is not inadvertently built in. It is essential that citizens who do not use the internet, or who are not confident users of the internet, can take part in consultations and non-digital options should be of equal quality.

I would be very grateful if the CCEI Committee would take my comments into account as it prepares to respond to the Business Committee's review.

I look forward to meeting the Committee next month and ensuring that the views and experiences of older people on the Bus Services (Wales) Bill are heard and reflected in this important piece of legislation.

Yours sincerely,



Rhian Bowen-Davies
Older People's Commissioner for Wales