

Consultation on a Proposed Bus Franchising Scheme for the West Midlands

Executive Summary

Mayor of the West Midlands





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1. Introduction

1.1 The importance of buses to the West Midlands

Buses provide critical connectivity across our region; outside of London, the West Midlands Bus Network is the busiest in England, with 232 million boardings in 2023/2024. Around four out of every five public transport journeys in the West Midlands are made by bus.

As well as being a cornerstone of regional connectivity, buses support the journeys of our diverse communities and service industries that depend on access to good quality public transport connections, notably:

- Vulnerable groups, including low-income workers, or people out of work: a quarter of households in the West Midlands do not have access to a car and are therefore likely to rely on bus as their main travel option
- Ethnic minority groups: are less likely to have access to a car or van, and 11% of ethnic minority residents use the bus to access work compared to 6% of White British residents
- **Students:** over 50% of students in the region are frequent bus users and depend on bus to access training and education opportunities
- Rural communities: bus provides a critical option for residents in rural areas where other transport options are limited
- Evening services: play an important role in supporting the West Midlands' nighttime economy

As well as supporting people, buses play a significant role in supporting the West Midlands economy by providing access to jobs, education, and opportunities in its main economic centres. Modelling suggests that the West Midlands Bus Network has a total economic benefit of close to £4 billion, showing its importance to local, regional, and national economies.² There remains significant potential to further develop the role of the bus through better developing connections with the region's rail and metro services.

Despite the crucial role that buses play in the region, the West Midlands Bus Network faces several key challenges. Most notably, ridership has been in decline for many years and, exacerbated by post-Covid travel choices, more bus services are less attractive for private bus companies to operate. West Midlands Combined Authority (WMCA) is having to subsidise more services, or having to accept a withdrawal of services, to such an extent that vulnerable people may lose access to vital services, yet it does not manage the planning of the network which is down to the bus companies. We believe that WMCA must now step in and change the way local buses are run to achieve our ambitions for better buses in the West Midlands.

1.2 Our work to this point

In order that we have all the evidence necessary to make an informed decision on the future of buses in our region, we have undertaken a detailed assessment which:

- Sets out the Delivery Options which have been considered for bus reform in the region, including a Franchising Scheme and 'non-Franchising' options, as compared against the current status quo for Service provision in the region.
- Identifies and addresses the necessary trade-offs, central to WMCA's decision about which Delivery Option to pursue.

The full consultation document sets out the approach and summarises the findings of this assessment on aspects such as: how much different options may cost, how affordable they are to WMCA, what the risks might be of either not doing anything or moving to new approaches, and overall, what the costs and benefits would be.

Based on these considerations our assessment has concluded that Franchising is the best option for the future of the West Midlands' bus network.

To be fully confident in our recommendations, our assessment has undergone an independent audit, which concluded that information we are reliant on is of sufficient quality, is unbiased, and is sufficiently recent. The audit also deemed that the accuracy of modelling and analytical methods we used to calculate the impacts of options and to make recommendations is fit for purpose and meets the legal requirements as set out in the Bus Services Act (2017).

2. Why WMCA feels the need to change

2.1 How our buses are run now

Since 1986, bus services in England outside London have been deregulated. This means that in the West Midlands bus services are run by commercial bus companies who, for the most part, decide for themselves the routes, timetables, fares and standards. Currently privately owned bus companies receive the revenue from fares and retain any profits. For most services, there is no contractual agreement in place between the operators and WMCA, the local council or any other authority.

WMCA is responsible for holding the register of bus services within our region, but bus operators are able to register and de-register services at relatively short notice as they wish. WMCA currently has no power to compel operators to put on new or retain existing services where operators do not deem them to be commercially viable, and there are no requirements to properly consult passengers before any changes.

In the West Midlands around 90% of bus services are run commercially, by 14 different operators; albeit National Express has by far the largest market share (with 93% of patronage as of April 2024). The remaining 10% of bus services are what are known as Supported Services. These are local services that are not commercially viable but are deemed to be socially necessary, which WMCA subsidise to ensure they remain operational. Typically, these are less busy routes, to less populated areas or at quiet times of the day such as early mornings or late at night. These Supported Services are contracted out to private companies through a bidding process known as tendering.

On top of this, WMCA is currently providing a further £50m each year in support to operators to maintain their commercial services which have reduced in profitably due to passenger numbers falling during the Covid-19 pandemic and recent inflationary pressures.

In 2015 WMCA and bus operators established the West Midlands Bus Alliance. This is a voluntary partnership with the intention to 'deliver high levels of passenger satisfaction and drive forward investment in our buses'. The Bus Alliance partnership is underpinned by the West Midlands Enhanced Partnership (EP) Scheme which WMCA is using to secure passenger benefits. The EP is a formal agreement between Local Authorities and bus operators in which all parties commit to various measures to enable better bus services. The EP was designed to improve bus services for the West Midlands and give WMCA greater control through formal and binding partnerships with operators. Notwithstanding this agreement, and some non-binding improvements in the network, the West Midlands Bus Network remains essentially deregulated with limited opportunities for WMCA to intervene to get better outcomes for passengers, except through negotiation with operators.

The Bus Services Act 2017 provides powers to move away from this model and introduces the concept of 'Franchising'. Under a Franchising system, instead of operators determining routes, timetables, fares and service standards themselves, these would instead be set by WMCA and contracts awarded to operators on a competitive basis to run services in line with agreed performance standards. Fares revenue would be retained by WMCA to reinvest in the bus network and there would be a common look and feel across all public transport services. This is how the bus network is operated in London, and Greater Manchester is in the process of transitioning to a Franchised system too.

There are many challenges to how buses are run today, which are set out in more detail in the full consultation document. WMCA believes these challenges severely hinder our ability to deliver our vision for how the network should be run for the benefit of communities and passengers, and why Franchising is a better option.

2.2 Our main challenges

We have found that there are five main challenges to meeting our vision for buses in the way that they are owned and operated now. These are:

1. The long-term decline in patronage places an increasing burden on the public purse

Bus patronage within the West Midlands has been declining since the 1950s, decreasing at approximately 2% per year.³ All of our modelling and forecasts, as with national projections, show that bus patronage is likely to continue to decline. A continued reduction in patronage will result in reduced revenue which will result in commercial network cuts and/or increased requirement for public sector funding. This becomes a vicious circle: as the network contracts so patronage falls and as patronage falls so the network contracts.

The proportion of the bus network that is commercially viable is declining. In November 2023, only around 50% of pre-Covid-19 bus service distance (i.e. the total miles travelled by buses) in the West Midlands Bus Network could be considered commercially sustainable.⁴ WMCA is having to provide significant amounts of public sector funding support to operators to prevent cuts to the bus network.

As operating costs are forecast to increase and revenue is expected to decline, WMCA may have to make the difficult decision to either significantly increase public subsidy to maintain the network or stand by as the commercial network is continually reduced and services lost.

^{3.} Transport for West Midlands. Travel Trends

^{4. &}lt;a href="https://www.gov.uk/cma-cases/referral-of-the-proposed-west-midlands-bus-recovery-grant-by-the-west-midlands-combined-authority">https://www.gov.uk/cma-cases/referral-of-the-proposed-west-midlands-bus-recovery-grant-by-the-west-midlands-combined-authority

2. Rising costs in operating bus services could force fare rises

Data shows that bus operating costs have increased rapidly in the recent past, with a 35% increase above inflation per mile between 2005 and 2022. This is due to several factors including increased congestion on the roads slowing services (which means operators need to put more buses on to maintain the same frequency), increased labour costs, and general cost pressures since the Covid-19 pandemic.⁵ As bus patronage is expected to decrease further, it can be assumed that operating costs per vehicle mile will increase for operators which may result in them increasing fares for passengers.

3. The network is not as efficient and 'joined-up' as it could be

Specifically, because the network is open to competition it has become inefficient; which has led to the system as a whole being more expensive to operate than it needs be. Examples include 'over-bussing' on some routes (where operators put on more buses than are necessary, to maintain or compete for market share), inefficient use of resources (such as vehicles, drivers and back office systems spread across operators), a lack of timetable integration on competing operators' services resulting in irregular gaps between services and overlapping of routes from different operators but with different end destinations and different ticket acceptance (which can offer poor experience for passengers).

Whilst these issues are not as prevalent in the West Midlands compared to some other UK cities due to the dominance of National Express, it still leads to some wasted resource and can also lead to negative perceptions of bus provision for existing and potential passengers.

^{5.} Department for Transport. September 2023. Costs, fares and revenue (BUS04)

4. Ticketing offers and daily capping of fares across multiple operators is not possible

We currently do not have a fully unified fares and ticketing system nor a common set of bus fares and fare capping technology (often termed 'London style ticketing'; where passengers can tap their bank card across different transport modes, and be capped at a daily rate). The current regulatory arrangement does not enable WMCA to deliver contactless capping which, if implemented, would provide passengers with the best value fare across rail, bus and tram.

5. A lack of competition works against the customer

The West Midlands Bus Network is dominated by a single operator. This dominant position has resulted in a lack of competition in the market which means that the benefits of competition (such as demonstrating best value for money of public subsidies) may not be realised. Whilst there is some limited competition, this can lead to some inefficiencies and passenger confusion. The lack of competition allows operators to potentially make higher than typical margins on services – their primary motivation being to maximise profit and not necessarily maximise patronage or ensure wider accessibility, and under the current arrangements operators are not obliged to invest these profits into the local bus network.

2.3 If we did carry on with today's operating model, then what would this mean?

We have undertaken modelling to look at what the future might look like if we did not change the way that buses are operated. A snapshot of the results reveals:

- Passenger journeys are forecast to decrease from 167 million journeys in 2027/2028, to 100 million in 2041/2042 (40% lower) due to decreasing demand.
- Because ridership reduces this will further reduce the viability of commercial services, and result in an increase in Supported Services.
 These services, which WMCA has to pay for, could increase to 97% in 2041/2042 (from a projected 55% in 2027/2028).
- The overall subsidy cost per passenger journey payable by WMCA is forecast to increase over time from £0.43/journey in 2027/2028 to £0.71 in in 2041/2042 (a 68% increase). This is due to the increased number of Supported Services which will require greater subsidy from WMCA.

For these reasons WMCA decided to examine what the opportunities might be for different options/models from how the bus network operates today. The Assessment compares Options on a like-for-like basis, assessing their impacts with the same amount of budget available to allow for comparison across the options.

S1. There are several challenges facing the West Midlands Bus Network which means that it is not performing as well as it could. Do you have any comments on this?

2.4 Our vision for buses

WMCA is working to deliver a transport system that the region will be proud of, connecting our communities to opportunities in employment, education, housing and leisure. Buses have a vital part to play within a integrated and joined up transport system which brings together the £1 billion investment in heavy rail and Metro, the preparation for HS2 arriving in the West Midlands and fitting into a transport network which connects all communities through a single system. Setting our vision for buses is necessary to enable us to assess the opportunities presented to us now and in the future. We have published our Local Transport Plan (LTP) Core Strategy, which sets a bold vision for the region and buses are a vital component of that.

We do not believe we can achieve the vision set out in our LTP under current arrangements. Reform is required to resolve the challenges faced by the West Midlands Bus Network. As we see it, the case for reform can be summarised under three arguments: Operational, Efficiency, and Visionary, as set out in Figure 1 below.

Figure 1: Three Strategic Arguments for change

Operational

Enabling 'quick win' improvements for passengers, such as an enhanced network, changes to fares, and improved fleet, without additional public-sector funding

Efficiency

Allowing TfWM to efficiently manage the West Midlands Bus Network on a day-to-day basis, and deliver more Services for the same current level of public subsidy

Visionary

Supporting the ability for bus reform to enable 'transformational' changes to the network, such as higher frequencies, new routes, and greater integration with rail and Metro

2.5 Changing national policy

In 2017 the Government delivered The Bus Services Act which provided the opportunity for Local Transport Authorities (WMCA performs that role in the West Midlands) to deliver a range of solutions with the aim of improving bus services. At that time the option for Franchising was only available to Mayoral Combined Authorities (MCAs), such as the West Midlands. In the Act there is a prescribed process which must be followed if an MCA wants to set up a Franchising scheme; which we are following and which this consultation forms a part of.

S2. Reform is considered to be the right thing to do to address the challenges facing the local bus market. To what extent do you agree or disagree with this?

3. What are the options?

In our assessment we have considered three options for how buses might be operated in the future:

- Carry on as they are (termed the 'Reference Case') with privately owned companies running bus operations on routes and to timetables of their choosing, with some binding and some non-binding agreements between WMCA and operators. All fares revenue is retained by operators to use as they see fit;
- 2. A 'Future Partnership', expanding on the existing EP but the privately owned bus companies would still determine routes, timetables and fares. Fares revenue retained by operators to use as they see fit, except on services financially supported by WMCA (about 10% of the network in 2023/24);
- 3. A 'Franchising Scheme'. WMCA would take the power to specify the routes, timetables, fares and quality standards and award contracts to operators to run these services in line with agreed service specifications and performance measures. All fares revenue retained by WMCA to reinvest in the network.

Our assessment has looked at many different aspects which might be most effective in supporting our goals and balances the risks around being affordable and deliverable.

3.1 How we have compared options

To assess each of these options and compare their opportunities and risks, WMCA has developed a set of objectives which describe what we seek from bus reform. The objectives can be grouped under the three strategic arguments for change shown in Figure 1 above:

The Operational objectives address the challenges the current system creates for passengers, as follows:

- Objective 1: Network: Ensure public transport is inclusive and meets the changing needs of diverse West Midlands communities, by all transport modes working together.
- Objective 2: Customer Experience: Improve customer experience when planning and making journeys.
- Objective 3: Fares and Ticketing: Increase traveller understanding and confidence through simple, and affordable, fares.
- Objective 4: Environment: Reduce the climate, air quality, and other environmental impacts of the bus fleet.

The Efficiency objective addresses the financial and managerial challenges that WMCA faces in procuring and delivering Services in the region as follows:

• Objective 5: Stability: Ensure that on a long-term basis, West Midlands bus services are financially stable and affordable.

The Visionary objective addresses the ability of bus reform to support WMCA in maximising the value of the West Midlands Bus Network in achieving wider policy goals, as follows:

• Objective 6: Transformation and Change: Enable WMCA to secure ambitious, transformational public transport improvements to deliver wider policy goals.

Our assessment looked at the performance of each Delivery Option against these objectives. We undertook detailed modelling to look at potential future forecast bus patronage, and a financial analysis of the capital and revenue costs associated with each option.

The Future Partnership option

Under this option the overall operation is similar to the Reference Case, but the existing EP between WMCA and operators is deepened with WMCA stepping in to fill some gaps where the market fails. Three principal areas of difference from the Reference Case would be:

- One of the barriers of entry into the bus market for new operators is
 the expense of purchasing depot space to store and service vehicles.
 To support increased competition for Supported Service contracts
 WMCA would purchase some depots, which would be leased back to
 operators; giving alternative service providers access to the space they
 need.
- 2. Currently, Supported Services are contracted as a fixed fee to operators, who keep all fares/revenue. This would change to an arrangement where the fee remains fixed (but higher) and revenues returned to WMCA. This would reduce risk for operators bidding for tenders and encourage more competition for contracts.
- 3. WMCA and operators would establish a jointly owned ticketing company to establish a single team to maximise ticket sales across the region, ensuring this activity is focused and more efficient. Competition laws would prevent this entity from setting fares, which would remain the responsibility of individual operators.

3.2 How do the results of the Future Partnership Option compare to the Reference Case?

According to our modelling, under the Future Partnership arrangement, by 2041/2042 ridership is forecast to be 102 million passengers per year, an increase of 2 million over the Reference Case. This is mainly due to the increased competition for Supported Services reducing contract costs and enabling the same budget to afford more network compared to the Reference Case, however, this remains a substantial reduction from today.

Because ridership is slightly higher, more services remain commercially viable and net expenditure on Supported Services is forecast to be on average 5% (£1m) less per year than the Reference Case by 2041/2042. Cost per passenger journey incurred by WMCA would be £0.69 by 2041/2042 - an improvement on the Reference Case, demonstrating a more efficient use of WMCA funding.

Under this arrangement, WMCA would receive farebox revenue for Supported Services, increasing the revenue flowing to WMCA. The net expenditure as a percentage of the gross expenditure is expected to decrease from 50% in 2027/2028 to 48% in 2041/2042. This indicates that the Future Partnership improves the financial efficiency of the Supported Services.

3.3 What are the benefits of the Future Partnership Option?

The new ticketing arrangements would benefit passengers to a degree by improving the legibility of the system as a whole, but the primary benefit is the increased competition for contracts, which should lead to lower costs and increased quality and enable more services to be affordable over the long term.

Our conclusion is that this option provides some improvement over the Reference Case in terms of ridership but only goes a small way to meeting our stated objectives for future bus services.

When looking at the full costs and benefits of this approach, our assessment determined that for every £1 spent, this would result in £4.20 back to the local economy as calculated following government guidance; and a total economic benefit of £338m over the 40-year assessment period which represents good value for money for public investment. The approach would be affordable to WMCA.

3.4 What are the risks of the Future Partnership Option?

This option would require WMCA to take on additional risk, particularly in relation to the revenue receipts for Supported Services which would now solely lie with WMCA. There is also liability risk associated with the new ticketing entity, and the depots which would be acquired by WMCA. This option does not change the legal status of the current deregulated system and whilst it will provide some improvements over the Reference Case it will not provide any fundamental change in the planning and control of services from the existing system.

4. The Franchising Scheme

4.1. What is Franchising?

Under this option, WMCA would have complete control over the bus system deciding on routes/services, frequencies, targets, pricing/ticketing, vehicles and customer service standards. Bus operators would bid to run services included in the scheme through a competitive procurement process managed by WMCA. The only exception to this would be where WMCA grants a service permit (a permit given to a service to allow operation within WMCA's region) to an Operator to run a commercial service mainly to places outside the region.

WMCA would undertake several new responsibilities and assume accountability for additional activities. These responsibilities would include all those which are currently shared with operators under the current EP, plus being accountable for the full procurement strategy for the bus network, taking on the full revenue risk, owning and developing the 'brand' and marketing, and procuring contracts with operators. This would enable a clear, coherent suite of fares, consistent branding across all services, full integration with other transport modes and a unified approach to customer service.

In order to ensure strong competition for contracts, WMCA would acquire the buses and depots and then lease those to the successful operators. This will help ensure a level-playing field for operators who do not currently have any presence in the region and whilst it will require upfront capital investment by WMCA this will be paid back through reduced service contract costs.

To deliver this option, WMCA would require additional roles, resources and new operating systems to both manage the transition and delivery. Because the cost of owning and operating the whole bus network would fall to WMCA there is a substantial increase in costs to WMCA. However, because all bus fares would come to WMCA there is also an offsetting increase in revenues.

Where Franchising results in the transfer of staff to different employers (e.g. from one Operator to another Operator), both employment and pension rights are protected via legislation.

S3. Do you have any comments on the approach to procuring, operating, and managing the Proposed Franchising Scheme?

4.2 How do the results of the Franchising Scheme Option compare to the Reference Case?

According to our modelling, under the Franchising Scheme arrangement, by 2041/2042 ridership is forecast to be 107 million passengers per year, an increase of 8 million over the Reference Case. The cost per passenger journey incurred by WMCA would be £0.62 by 2041/2042, which is an improvement on the Reference Case and the Future Partnership approach, showing a more efficient use of WMCA funding.

We would further expect Franchising to enable better alignment of public investment with outcomes in terms of improved bus services. For example, in a Franchised system, if WMCA were to invest in bus priority schemes that make bus services quicker, this would reduce operating costs (and thus contract costs) and also increase revenue by attracting more passengers, so there would be a direct financial benefit to the Authority which could be reinvested in further service improvements. Currently, any financial benefit arising from public sector investment in bus priority schemes is retained by the private sector. This realignment of costs and benefits will allow for a more transformational use of WMCA funding, which in turn would stimulate greater investment and better address the strategic challenges facing the bus network. This has not been taken into account in the financial modelling.

4.3 What are the benefits of the Franchising Scheme Option?

The conclusion of the above analysis is that the Franchising Scheme maintains a higher level of bus passengers than the Reference Case and the Future Partnership, for a similar level of affordability. Like the Reference Case, there would need to be a reduction in Services over time for the bus network is to remain affordable, but this would be lessened under the Franchising Scheme.

Overall, our assessment demonstrated that this option is the only one which meets our stated objectives for future bus services (see Table 1) and is affordable to WMCA. It would generate £2.10 back for every £1 spent; which is less than the Future Partnership, but the overall socioeconomic benefit of Franchising is more than double that of the Future Partnership at £683m over the assessment period. It has more non-monetised benefits too, and overall represents high value for money for public investment.

S4. It is suggested that the Proposed Franchising Scheme will offer value for money. Do you have any comments on this?

4.4 What are the risks of this Option?

The Franchising Scheme carries different risk for WMCA, including cost and revenue uncertainties for all services. WMCA would take on assets (bus fleets, depots etc) and more staff; it is estimated that between 160 and 170 additional staff would be required to manage the scheme, however the majority of these would be in roles that currently sit within bus companies that they would no longer require because activities would be performed centrally and should provide efficiencies. Achieving the desired outcome under Franchising depends on the successful management of risk in transitioning to the Franchising Scheme. However, our assessment has carefully looked at the risks to WMCA and considers them to be manageable and affordable. In order to compare options, the Assessment assumes the same amount of budget is available across all options, with that funding able to afford more network under the Franchising option. Additionally, the Franchising option requires £22.5m of transition costs which will be funded through borrowing and paid back from future fares revenue. These transition costs are largely due to costs being incurred to implement Franchising ahead of fares revenue starting to flow into WMCA. Even taking this into account, due to the greater number of services that can be afforded, by 2041/2042 passenger numbers are forecast to be 8 million and 5 million higher compared to the Reference Case and the Future Partnership respectively.

S5. It has been concluded that the WMCA could afford to introduce and operate the Proposed Franchising Scheme, but this carries additional financial risk. Do you have any comments on this?

5. Overall which Option best meets our objectives?

In the sections above we have provided an overview of what our assessment and modelling have determined are the differences between the two Delivery Options (Future Partnership and Franchising) and how they compare to a continuation of today's model for bus services. Whilst both show an improvement on the Reference Case, ridership still declines from today (continuing the trend from recent decades), largely because of external factors beyond the control of WMCA.

However, improving bus ridership and the overall costs of operating the system to WMCA are only part of the motivation and need for change. We have set out our five objectives for the future bus system which we believe will meet the needs of our region going forward. In our assessment only the Franchising model enables us to meet these objectives. The full Consultation document goes into detail to explain how Franchising best meets these objectives but as a summary Table 1 below provides our assessment of each option.

Table 1: Strategic Fit of the Reference Case and Delivery Options against Objectives

Objective	The Reference Case	The Future Partnership	Franchising
Objective 1: Network	Low level	Low level	High level
Objective 2: Customer Experience	Low level	Medium level	High level
Objective 3: Fares and Ticketing	Low level	Medium level	High level
Objective 4: Environment	Medium level	Medium level	High level
Objective 5: Stability	Low level	Low level	High level
Objective 6: Transformation and Change	Low level	Low level	High level

As things stand, The West Midlands bus market is no longer commercially viable and significant public subsidy is required to continue to offer our residents a comprehensive bus network, but currently with very limited control over the services, frequencies, fares or routes. The lack of competition in the market is holding back customer satisfaction whilst at the same time driving up cost.

If operators are not provided with the required subsidy, the bus market will reduce to the extent that WMCA and local authorities will not be able to achieve their vision or objectives across the board.

The risk remains for significant and immediate negative social and economic impacts with more vulnerable residents who are more likely to rely on buses being disproportionately affected.

Franchising provides the opportunity to coordinate and integrate the bus and wider public transport network to significantly increase the customer experience across all of the public transport network.

The Assessment demonstrates that for current levels of funding, Franchising is the option that provides best value for money and protects more of the network from cuts over the long term. It is also the option that will ensure that if more funding is available to support the network in future it can be best targeted to secure more improvements.

S6. To what extent do you support or oppose the introduction of the Proposed Franchising Scheme?

S7. Are there any changes that you think would improve the Proposed Franchising Scheme?

6. Health and Equity Impact Assessment

A Health and Equity Impact Assessment (HEIA) was conducted to evaluate the impacts of the development, management and operation of local bus services in the West Midlands. The HEIA highlights any potential impacts of the objectives of the Delivery Options on protected characteristic groups (under the Equality Act 2010), socio-economic differences and deprivation, and vulnerable and inclusion health groups.

6.1 Summary of Health and Equity implications

- Health Outcomes: Improved bus services are anticipated to reduce social isolation, increase physical activity, and enhance access to healthcare services, with likely positive impacts on multiple groups.
- Equity Considerations: Policies are designed to benefit a diverse range
 of individuals without disadvantaging any specific group, including
 providing a more accessible, convenient, and affordable network with
 better access to opportunities and essential services.

At this stage no apparent negative impacts have been noted to any of the groups. However, once a final option is agreed, a more in-depth HEIA will be undertaken. Further steps will then be taken in collecting additional data and consider ways the agreed option may affect different groups of people.

S8. Do you have any comments on the Health and Equity implications as set out in the Health and Equity Assessment?

S9. Do you have any further comments?

