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Consumer Policy Team
 Office of Rail and Road
 25 Cabot Square
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12th February 2020

Dear Team,

Consultation on Accessible Travel Policy Guidance - accessibility of rail replacement services

TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing all public transport users in North West England. We welcome the opportunity to respond to this consultation.

The principle underlying any approach is that passengers with impairments should be able to make journeys with as much independence as possible and with a level of pre-journey planning as near as possible to that of passengers with no impairments.

Question 1

Can you provide any data or information beyond what is set out here on the availability and use of accessible buses and coaches for rail replacement services?

We broadly agree with the details of the proportion of buses, coaches, PSVAR compliant and non-compliant given in Chapter 1 of the consultation report. It is important to recognise the huge differences between London & South East and the rest of the UK, the latter being heavily dependent on coaches rather than buses.

Accessible taxis and minibuses have been observed being used as part of the rail replacement operation, suggesting they are used more than has been recorded.

It is difficult to give any indication of how many rail replacement users are disabled as many disabilities are not visible and many disabled people are able to use non-PSVAR compliant vehicles with assistance which is usually provided by rail staff, drivers or travelling companions

We agree that passengers prefer coaches to buses for longer journeys which of course exacerbates the problem of non-PSVAR compliance.

Question 2

How can rail operators prioritise the available accessible coaches to maximise the opportunities for passengers to make journeys on PSVAR-compliant vehicles?

Under the current arrangements the management of rail replacement services is fragmented with each TOC organising its own coaches, leading to sub-optimal use of the coaches. A line closure at Oxenholme illustrates this. Three operators, serving different destinations - Avanti, TPE and Northern - all source their own road transport. If only one of these TOCs is able to source a fully accessible coach, which is likely, then a wheelchair passenger for example may well be disadvantaged as coaches contracted to a TOC can only be used to serve destinations served by that TOC. To the travelling public this is inexplicable.

Similarly, rail replacement co-ordinators are provided by each TOC, this is inefficient as there is duplication of personnel and nobody in overall charge. It can also lead to poor use of rail replacement vehicles, eg with each TOC running half empty coaches to the same destination while other destinations are not served.

To overcome both these scenarios a different way of sourcing and managing rail replacement transport could be examined, perhaps by Network Rail or an independent company (they do exist and some TOCs use them). One organisation would provide the rail replacement co-ordinating staff and take responsibility for running the rail replacement operation.

Question 3

(a). Where you have experience of using rail replacement buses or coaches or taxis, what are your views on the importance and suitability of these services?

TWNW has for many years expressed concerns about the quality and organisation of rail replacement buses or coaches. Attached are a number of reports of surveys we have undertaken over the last few years. Though none are very recent it is likely that such scenarios exist today.

One example of successful replacement road transport provision was the arrangement made with Blackpool Transport during the closure of the line to Blackpool North in 2017/18 for electrification. The vehicles used were accessible to those with impaired mobility, audio announcements were made to assist those with impaired vision, visual displays allowed those with impaired hearing to know what was happening and progress on the journey. Blackpool Transport has implemented a programme of disability awareness raising for its employees.

However, un-planned use of bus and coach replacement services presents additional challenges. By their very nature, these have to be arranged at the last minute when operators might be using their accessible vehicles for other pre-planned purposes. Additional casual staff might have to be found to drive the buses/coaches (with implications for disability awareness raising). When this occurs, if the replacements are inaccessible to passengers with impairments of any kind, TOCs should be ready and willing to secure accessible taxis and should do so with a minimum of debate and delay thus avoiding additional hassle for passengers with impairments.

A recent experience of unplanned work from a passenger viewpoint relates to November 2019 when the railway was blocked with no warning due to the overhead wires coming down between Preston and Lancaster. Very few rail replacement coaches were available leading to a very long queue for them. The passenger was told the wait would be between two and four hours. He opted to catch a local bus from the bus station (10 minutes walk) to Lancaster.

(b). If you have a disability, please explain whether, and how, the service was appropriate for your needs.

No comment

(c). Do you have a preference for the type of replacement service you receive? If so, please explain why.

We note again that passengers prefer coaches for longer distances.

There is no mention of the obvious alternative to road - diverted rail services. Research by Transport Focus has shown that wherever possible passengers want to travel by train and are prepared to accept a longer journey time to avoid using a replacement bus. In recent times, TOCs have seemed reluctant to use diversionary rail routes to circumvent line blockages.

One example is the lack of use of the Settle to Carlisle line when the West Coast main line is blocked between Preston and Carlisle. We have been engaged in extensive correspondence with train operators and government ministers for a number of years on this issue. Taking into account time taken to change from train to road coach, this option adds little, if anything to the journey time and it does avoid problems for passengers with impairments.

Diversions on this route happened regularly during the 1980s with Pendolinos being pulled by diesel locos, but it no longer happens. With more bi-mode trains being delivered, including some for Avanti and TPE, diversions should be easier to arrange. We know that it no longer happens partly because of cost considerations – lack of route knowledge which would be costly to maintain. If the line is closed for engineering work or infrastructure failure, Network Rail pays the bill for rail replacement coaches. We are aware that franchise specifications encourage the use of trains as much as possible including, as well as diversions, running as close to the obstruction as possible to keep any replacement road element to a minimum.

Question 4

Can you provide any additional data on the number of disabled passengers, and passengers overall, using rail replacement services?

No comment.

Question 5

We are particularly interested to understand more - including through provision of relevant data - regarding the potential impact on Network Rail possessions identified by some train operators. What further information is available to support this point?

We recognise the need for the railway to carry out engineering works in order to maintain and improve the network. However, planning should be based around sufficient alternative transport being available. It is imperative that passengers are able to complete their journeys without significant delay. Ideally this would be by diverting trains over other routes, but where diversions are not possible it is vital that sufficient road transport is provided. While disabled people must be catered for, it is not necessary for every coach used to be fully accessible.

Question 6 Do you have any views on our proposal not to duplicate the enforcement of PSVAR by mandating compliance with PSVAR in the ATP Guidance?

We agree this should not be duplicated.

Question 7 How can train operators use contractual arrangements to incentivise suppliers to increase the provision of PSVAR-compliant vehicles?

There is a difficulty here. It may well be the case that coach operators will only invest in PSVAR compliant vehicles if there is a business case for doing so. Given that rail replacement work is not guaranteed and only likely to happen on a handful of days each year the rail industry may have to pay the coach operators large premium payments to encourage investment in PSVAR compliant coaches.

As the document says – “Unplanned disruption is, by its nature, unpredictable, and we do not think there are specific incentives for it”. Such disruption should be mitigated by keeping passengers on trains as much as possible by diversions and working as close as possible to and from the point of obstruction (see above question 3 (c)). Hopefully the increased numbers of PSVAR-compliant vehicles over time in response to DVSA enforcement will also help.

Question 8 Do you have a view on the 12-week time limit we have proposed for a train operator to demonstrate that it has taken appropriate steps to assess the requirement for, and to procure the use of, PSVAR-compliant vehicles?

This seems reasonable

Question 9 What do you see as the advantages and/or disadvantages of each of the proposals? Do you have a preferred ranking or view as to whether some or all could be used in combination?

Proposal 3 & 4 – agree. This should always be implemented as far as possible.

Proposal 5 - the key to this is operators working together, a scenario often notably absent as exemplified in our reply to question 2.

Question 10 Are there any other measures that you consider would assist in incentivising the use of PSVAR-compliant vehicles for rail replacement services that we have not included here?

No further comment

Question 11 Do you have any additional information not given above which you consider we should take into account in our equality and regulatory impact assessment, whether in relation to impacts on those with the protected characteristic of disability or any other protected characteristic?

Whilst the consultation appears to focus mainly on the accessibility needs of passengers with a range of mobility impairments, meeting the requirements resulting from a range of other impairments must not be overlooked. For example, routes from train to bus/coach should consider how people with impaired vision could be supported. So too, passengers with intellectual impairments might need to have the situation explained to them in ways which they can understand. There is a need for clear, unambiguous signage to assist those with impaired hearing.

Many impairments are not immediately obvious at first meeting, staff from the bus and coach operators might benefit from basic or additional participation in disability awareness raising. Note that the term “training” has not been used since experience shows that this can result in mechanical, unthinking responses which fail to take into account the needs of particular individuals. This should also include drivers of vehicles as well as co-ordination staff. This will also benefit **all** passengers. Route knowledge of drivers, which has shown to have been lacking on a substantial number of occasions over many years, is another area in need of attention.

Question 12 Do you have further data, information or comments relevant to our proposed approach or to the information or evidence of the impact of our proposals on passengers or rail, bus and coach industries outlined in this consultation document?

The consultation is focused on the needs of people with disabilities. While these needs clearly must be catered for, it is equally important to consider the

needs of people without disabilities and find a way of meeting everyone's needs. These include people with luggage, prams, baby buggies and cycles.

There are a significant number of people (most who are not registered as disabled) who have difficulty getting on and off buses and coaches even when they meet the PSVAR requirements, simply because the step from roadway to vehicles is too great for them to manage comfortably or at all. For stage carriage bus services this is overcome by having a high kerb which matches the low floor of the bus. Observations at railway stations in North West England indicate that the vast majority do not have raised kerbs (or even no kerb) to enable this large group of people to board rail replacement buses and coaches. Furthermore, in many cases it is difficult for people, especially mobility impaired, to get from the rail station to the bus boarding point (and vice versa), for example because of steps, steep gradients, lack of dropped crossings or lack of tactile paving. This is a fundamental issue - there is no point in having a PSVAR compliant vehicle if people cannot board or alight it due to the lack of a raised kerb or an inaccessible walking route.

Bearing the above in mind, the following criteria are critical for all passengers especially the mobility impaired -

- the location of the boarding and alighting points – ideally on a level area at as short a distance as possible from the train's arrival/departure platform taking into account health and safety and also available parking space for multiple vehicles;
- the route from train to bus/coach which should be as direct as possible and might include use of lifts or graded pathways if there are steps to negotiate;
- the provision of information about the route including clear signage but also recognising the needs of passengers with visual and intellectual/learning impairments and the difficulties created for passengers with impaired hearing if public address is used;
- the allocation of time allowed to move between train and bus/bus and train so that additional anxiety is not created for passengers with impairments;
- the awareness of staff about the range of impairments and their potential impact on the situation of some passengers transferring between trains and road vehicles.

Thank you for the opportunity to respond.

Yours sincerely,

John

John Moorhouse
Company Secretary