

TravelWatch NORTHWEST

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Winner of CILT award for best practice in passenger transport (2013)

promoting quality public transport.....

Caitriona Moore
 Great Minster House,
 33 Horseferry Road,
 London, SW1P 4DR

12th September 2018

Dear Caitriona,

Bus Services Act 2017: Consultation on Accessible Information

Introduction

TravelWatch NorthWest is an independent Community Interest Company representing all public transport users in North West England. We are pleased to give our views.

Question AIR01. Do you agree that the Core Proposal is an appropriate response to the need for change identified in this document? Please explain your answer.

We do agree. There is a clear need to reverse the downward trend in bus patronage in our region. While recent trends show increases in London and in England overall, bus use since deregulation has gone down by 44% in Metropolitan areas outside London and increased by 105% in London which is not deregulated. Bus journeys per annum per inhabitant in London are 280 compared to 65 in the North West. The trend in our region has seen a drop of 11% from 2004/05 to 2013/14. Rural areas have been badly hit by wholesale service withdrawals.

These measures will go some way to making bus travel more attractive and hopefully contribute to reversing the decline. However we appreciate that any further burden of cost especially on smaller operators could seriously affect their viability. Therefore it is essential that appropriate funding is provided.

Question AIR02. Do you agree that the proposed list of required information is an appropriate use of the powers available? Please explain your answer.

We cannot find any reference in the consultation document to information at bus stations and bus stops. Accurate, up to date timetable and other information should be displayed in cases at bus stops. Many bus stops,

particularly rural, have no information of bus times displayed at all. The operator of all services should be shown, as some passengers may have operator specific tickets.

There should be real time information at bus stops and bus stations, especially at major stops - ideally at all bus stops. This must be “real-time”, not timetable times. With GPS now widespread digital real time displays should be mandatory at all locations.

We agree with the point about diversions. But again information at the **bus stop** is crucial.

For example a recent road closure in Lancashire did not produce any information about diversion of bus services either from the LTA or the Operator. An approach to the Council engendered a very unhelpful response basically saying bus services were nothing to do with them and to approach the operator (Stagecoach). This lack of information and indeed clarity of rerouting in road closure circumstances is not uncommon.

We wish to take the opportunity to comment on physical accessibility issues - quite simply enabling everyone to actually get on and off the bus. Investment by bus operators has resulted in all stage carriage bus services being operated by accessible vehicles, that means low floor, kneeling facility, wheelchair/buggy ramp, designated spaces for wheelchairs, priority seating and appropriate handholds. However, in many areas the bus stops have not been upgraded to match this. As a result there are many bus stops which lack raised kerbs, dropped crossings and surprisingly often, do not even have a hardstanding area. Due to the failure to upgrade the bus stops by Local Authorities, many bus services are not accessible, or accessible only with great difficulty by many people. This must be addressed as a priority.

Question AIR03: Do you agree that the proposed information timing requirements are appropriate? Please explain your response.

Agree - with the addition of our points concerning bus stops as set out above. Driver behaviour is important in supplementing automatic information where needed and proper training should be given.

Question AIR04: Do you agree that the proposed use of a Specimen Person is the most appropriate way to ensure information provision is of an adequate quality to be useful to passengers? Please explain your response.

Question AIR05: Do you agree that the regulations should require that a person using a hearing aid in conjunction with an audible induction loop system should be able to discern audible information? Please explain your response.

Both of these requirements are reasonable and will help, taking into account the needs of people with special needs.

Question AIR06. Do you agree that it would currently be inappropriate to require passengers to purchase or possess smart devices in order to access required information? Please explain your response.

We agree – not all passengers possess smart devices and your reasoning is perfectly correct.

Question AIR07. Do you agree that vehicles operated under Section 19 and 22 permits should be exempt from the requirements in full? Please explain your answer.

Question AIR08: Do you agree that vehicles carrying fewer than seventeen passengers should be exempt from the requirements in full? Please explain your answer.

Question AIR09: Do you agree that tour services, as defined in the Public Service Vehicles Accessibility Regulations 2000 (PSVAR) should be exempt from the requirements in full? Please explain your answer.

Question AIR10: Do you agree that heritage vehicles should be exempt from the requirement to provide visible information; and heritage vehicles should be defined as those first used before 1st January 1973.

As far as Community Transport is concerned we aspire to its integration into the network of commercial and supported services. We feel it to be essential that such services are open to all users and that their existence is well publicised nationally as well as locally to ensure maximum awareness. This is especially important as visitors from other areas e.g. the towns and cities - to attractions; walking etc - are an important rural economic benefit.

Until this comes about we are content for the exemption to apply subject to a review at a future date. We have no comment on the other exemptions.

Question AIR11: Do you agree that the proposed implementation option indicated above is the most appropriate of the three options identified? Please explain your response.

We agree. Due regard has to be made to the age of vehicles and ability to absorb the costs. As far as the latter is concerned, as previously stated, any burden of increased cost must not lead to any reduction of service as a consequence of that cost. In these circumstances appropriate funding should be provided.

Question AIR12: Do you agree with our proposal to define “small operators” as those operating 20 or fewer vehicles? Please explain your response.

Agree

Question AIR13: Do you agree with our analysis of the costs and benefits of the preferred option, as indicated in the consultation-stage Impact Assessment? Please explain your response.

No comment

Question AIR14a: We are aware of at least one operator which has subsidised the ongoing costs of providing audible and visible information by using visible information displays to show advertisements.

Please explain how effective you think such an approach could be in mitigating the costs of providing audible and visible information for other operators?

It would be worth looking at provided it did not distract from the main function of providing up to date and accurate information.

Question AIR14b: We also understand that the cost of installing systems to provide accessible information can vary depending upon the vehicle and method of installation.

Please comment on the difference in cost between procuring new buses with systems to provide audible and visible information already installed, and retrofitting related equipment.

No comment.

Thank you for the opportunity to respond

Yours sincerely,

John A Moorhouse

John Moorhouse, Company Secretary