

Review of the Public Service Vehicles Accessibility Regulations 2000

Introduction

Thank you for responding to our call for evidence to gather information on the current effectiveness and potential evolution of the Public Service Vehicles Accessibility Regulations 2000 (the PSVAR).

Closing date is 4 September 2023.

Accessibility statement

Read our [accessibility statement for SmartSurvey forms \(opens in a new window\)](#).

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this call for evidence to gather information on the current effectiveness and potential evolution of the PSVAR. View our [DfT online form and survey privacy notice \[opens in a new window\]](#) for more information on how your personal data is processed in relation to this survey.

In addition for:

- organisations we are asking:
 - the size of your organisation
 - primary activity of your organisation
 - if a coach operator the type of services being run and if using 'small passenger carrying vehicles'
 - if a coach, bus or accessibility affiliated organisation the primary location of your services, areas services are mainly provided and the frequency of use both generally and by non-disabled people with mobility challenges
 - if a representative organisation the focus of the organisation being represented, the number of members of that organisation and if for disabled people then the kinds of disabilities they represent
- individuals we are asking:
 - age
 - living location, type of location and if urban the type of urban area and location in that area
 - disability status and, if relevant, type of disability
 - bus and coach use, if any, including frequency, mobility aids used if any, challenges experienced, barriers experienced, reasoning and future use

As information concerning health is a special category of personal information, a further section of the UK GDPR applies namely [Article 9\(2\)\(g\) – substantial public interest \[opens in a new window\]](#). Processing is necessary for statutory and government purposes.

Personal Details

1. What is your name?

Keith McNally

2. What is your email address?

Keith.mcnally@cpt-uk.org

3. Are you responding on behalf of an organisation? [Select an option] *

- Yes
- No (Go to 'Individual details')

Organisation details

4. What is the size of your organisation? [Select an option]

- 1 to 9 people
- 10 to 49 people
- 50 to 250 people
- Above 250 people:

5. What best describes the primary activity of your organisation? [Select an option]

- You are a United Kingdom representative organisation (Go to 'Representative organisation' Q12)
- You are a bus operator supplying local and scheduled services in scope of the PSVAR within Great Britain (Go to 'Location of services')
- You are a coach operator supplying services within Great Britain
- You are both a bus operator supplying local and scheduled services in scope of the PSVAR plus a coach operator supplying services within Great Britain
- You commission bus or coach services (Go to 'Location of services')

- You manufacture buses or coaches (Go to 'Location of services')
 - You repair or retrofit buses or coaches (Go to 'Location of services')
 - You manufacture accessibility features for buses or coaches, such as lift systems (Go to 'Location of services')
 - You manufacture or produce mobility aids, such as wheelchairs or crutches (Go to 'Location of services')
 - Another type of organisation: (Go to 'PSVAR call for evidence')
-

Coach operations

6. What coach services does your organisation provide? [Select multiple options]

- Long distance services
- Rail replacement services
- Home to school services
- Tour services
- Charter services
- Demand response services
- Another service:

We are asking about your use of 'small passenger carrying vehicles'.

We define 'small passenger carrying vehicles' as vehicles that carry 9 to 22 passengers, such as minibuses. These vehicles are outside of the current scope of the PSVAR.

7. Do you use 'small passenger carrying vehicles' to provide your services? [Select an option]

- Yes, for all services
- Yes, for some services
- No

Location of services

8. In which location are your services primarily provided? [Select an option]

- The East Midlands
- The West Midlands
- London
- Yorkshire and the Humber
- The north-east of England
- The north-west of England
- The south-east of England
- The south-west of England
- The east of England
- Wales
- Scotland
- Across Great Britain
- Prefer not to say
- Another location:

9. In which areas are your services mainly provided? [Select an option]

- In urban areas
- In rural areas
- In both urban and rural areas

10. At what frequency would you say that disabled people make use of your organisation's services? [Select an option]

- Daily
- Weekly

- Monthly
- A few times a year
- Not at all
- Prefer not to say

We are stating a 'mobility challenge' as to mean a person who has difficulty accessing and moving around a bus or a coach, for example some older people.

11. At what frequency would you say that non-disabled people with mobility challenges make use of your organisation's services? [Select an option]

- Daily
- Weekly
- Monthly
- A few times a year
- Not at all
- Prefer not to say

[After answering go to 'PSVAR call for evidence']

Representative organisation

12. Who is the focus of that organisation? [Select multiple options]

- Disabled people
- Bus operators** (Go to 'Representative organisation' Q14)
- Coach operators** (Go to 'Representative organisation')
- Manufacturers** (Go to 'Representative organisation')
- Other: (Go to 'Representative organisation')

Disability group type

13. What kind of disability group are they? [Select multiple options]

- Sensory, such as a visual impairment
- Physical and constant, such as a spinal condition
- Physical and fluctuating, such as rheumatoid arthritis
- Cognitive, such as dementia
- Developmental, such as autism
- A learning disability
- A mental health condition
- Another type of disability:

Representative organisation

14. How many members are part of your representative organisation? [Select an option]

- Under 999 members
- 1,000 to 9,999 members
- 10,000 to 100,000 members
- Above 100,000 members:

[After answering go to 'PSVAR call for evidence pp13 after Q34]

Individual details

15. What is your age? [Select an option]

- Below 16 years
- 16 to 19 years

- 20 to 34 years
- 35 to 49 years
- 50 to 64 years
- 65 to 79 years
- 80 or over
- Prefer not to say (Go to 'Individual details')

16. Where do you live? [Select an option]

- The East Midlands
- The West Midlands
- London
- Yorkshire and the Humber
- The north-east of England
- The north-west of England
- The south-east of England
- The south-west of England
- The east of England
- Wales
- Scotland
- Prefer not to say
- Another location:

Type of location

17. How would you describe the area that you live in? [Select an option]

- An urban area

- A rural area (Go to 'Individual details')
- Prefer not to say (Go to 'Individual details')
- Another type of area: (Go to 'Individual details')

Type of urban area

18. How would you describe the urban area you live in? [Select an option]

- As a city
- As a town
- Prefer not to say (Go to 'Individual details')
- Another way: (Go to 'Individual details')

Location within urban area

19. What would you say best describes where you live? [Select an option]

- In the centre
- Outside of the centre (for example the suburbs or outskirts)
- Prefer not to say

Individual details

We are asking about your personal circumstances. The term disability is used as the [definition of disability under the Equality Act 2010 \[opens in a new window\]](#).

Do you have a 'disability' that affects your ability to do normal daily activities? [Select an option]

- Yes
- No (Go to 'Individual details')

Don't know (Go to 'Individual details')

Type of disability

20. How would you describe your disability or disabilities? [Select multiple options]

- Sensory, such as a visual impairment
- Physical and constant, such as a spinal condition
- Physical and fluctuating, such as rheumatoid arthritis
- Cognitive, such as dementia
- Developmental, such as autism
- A learning disability
- A mental health condition
- Another type of disability:

Individual details

21. Do you use buses? [Select an option]

- Yes
- No (Go to 'Not using buses')
- Don't know (Go to 'Future bus use')

Challenges when using buses

22. How frequently do you use buses? [Select an option]

- Often
- Occasionally

- Rarely
- Prefer not to say

23. When using a bus, what, if any, mobility aids do you use? [Select multiple options]

- A wheelchair
- An electric wheelchair
- A mobility scooter
- Crutches or a walking frame
- An assistance animal (such as a guide dog)
- Assistance from someone travelling with me (such as a carer or companion)
- Assistance from someone else (such as a bus or coach driver or staff)
- Another mobility aid:

24. When using buses how often do you experience access challenges that make it difficult to travel? [Select an option]

- Always
- Often
- Occasionally
- Never
- Prefer not to say
- Don't know

25. When using buses how often do you experience access barriers that make it difficult to travel? [Select an option]

- Always
- Often
- Occasionally

- Never
- Prefer not to say
- Don't know

[After answering go to 'Future bus use']

Not using buses

26. Why do you not use buses? [Select multiple options]

- They do not meet my access needs
- I prefer alternative transport
- I don't like buses
- Another reason:

Future bus use

27. What statement best describes your views on potentially using buses more if you felt that your access needs were better met? [Select an option]

- I would increase my bus use if they met my access needs
- I would not increase my bus use even if they met my access needs
- Another statement:

Individual details

28. Do you use coaches? [Select an option]

- Yes
- No (Go to 'Not using coaches')

Don't know (Go to 'Future coach use')

Challenges when using coaches

29. How frequently do you use coaches? [Select an option]

- Often
- Occasionally
- Rarely
- Prefer not to say

30. When using a coach, what, if any, mobility aids do you use? [Select multiple options]

- A wheelchair
- An electric wheelchair
- A mobility scooter
- Crutches or a walking frame
- An assistance animal (such as a guide dog)
- Assistance from someone travelling with me (such as a carer or companion)
- Assistance from someone else (such as a bus or coach driver or staff)
- Another mobility aid:

31. When using coaches how often do you experience access challenges that make it difficult to travel? [Select an option]

- Always
- Often
- Occasionally
- Never

- Prefer not to say
- Don't know

32. When using coaches how often do you experience access barriers that make it difficult to travel? [Select an option]

- Always
- Often
- Occasionally
- Never
- Prefer not to say
- Don't know

[After answering go to 'Future coach use']

Not using coaches

33. Why do you not use coaches? [Select multiple options]

- They do not meet my access needs
- I prefer alternative transport
- I don't like coaches
- Another reason:

Future coach use

34. What statement best describes your views on potentially using coaches more if you felt that your access needs were better met? [Select an option]

- I would increase my coach use if they met my access needs

I would not increase my coach use even if they met my access needs

Another statement:

PSVAR call for evidence

We are carrying out this call for evidence to gather information on the current effectiveness and potential evolution of the [Public Service Vehicles Accessibility Regulations 2000 \(the PSVAR\)](#) [opens in a new window].

We are seeking your views on:

- whether the current range of services covered by the regulations is appropriate
- how well the current accessibility features facilitate access to buses and coaches
- the suitability of the current, prescriptive approach to regulating buses and coaches
- the opportunities and challenges that decarbonisation offers for accessibility
- enforcement of the PSVAR and how compliance with the regulations might be improved
- the importance of roadside infrastructure for ensuring access to regulated buses and coaches, and main issues in this area

We are particularly interested in:

- your
- others

opinions, insights and experiences that you deem relevant, although you should avoid providing any information concerning:

- health

- disability

and other details that would enable the identification of yourself or a third party.

General approach to PSVAR and listed topics

We are asking you if the 'current approach towards accessibility' requires changing.

By the 'current approach towards accessibility' we mean the PSVAR as a whole, including all related topics such as enforcement, decarbonisation and roadside infrastructure.

35. Do you think that the 'current approach towards accessibility' in the PSVAR should be changed in some respect? [Select an option]

- Yes, I would like to change something in the 'current approach towards accessibility' (Go to 'Agreement to change' Q38)
- No, I don't want to change anything in the 'current approach towards accessibility'
- Don't know (Go to 'Stay in survey')

Against change

36. Why not?

Stay in survey

You have indicated that you:

- do not want to alter
- are unaware if you want to alter

- are non-committal about altering

the 'current approach towards accessibility' in PSVAR.

Subsequent questions in this survey are about altering the PSVAR which you have not a preference to do. As a consequence you may now either:

- go to the final comments section

or

- continue answering the survey questions

37. Do you want to answer the rest of the PSVAR questions? [Select an option] *

- Yes, answer the questions (Go to 'PSVAR scope')
- No, skip the questions and go to the final comments section (Go to 'Any other comments')

Agreement to change

38. How, in your view, should the 'current approach towards accessibility' in PSVAR change?

Currently the Regulations apply to vehicles with a capacity exceeding 22 passengers that are used to provide local and scheduled services. We believe that this 'scope' should change such that vehicles on some services that are currently in scope would only need to comply where there is demand, whilst some other services that are currently outside the scope would offer a compliant vehicle but only where there is demand. We shall explain this further in our answers to later questions.

PSVAR scope

We are asking about the range of services the PSVAR currently applies to (or are "in-scope" of) and whether it is appropriate.

For example, most buses and coaches seating 22 or more passengers are in-scope of the PSVAR, so they must meet the accessibility requirements of the regulations.

We are seeking views from respondents on if they would like to see changes to the application of the PSVAR.

39. In your opinion should the scope of the PSVAR be changed? [Select an option]

- Yes, it should be expanded (Go to 'Expanded vehicles')
- Yes, it should be reduced** (Go to 'Reducing vehicles' Q43)
- No, it should remain the same
- Don't know (Go to 'Accessibility features of public service vehicles')
- Do not want to answer

PSVAR scope remains the same

40. Why?

[After answering go to 'Accessibility features of public service vehicles']

Expanded vehicles

41. Why?

We define 'small passenger carrying vehicles' as vehicles that carry 9 to 22 passengers, such as minibuses. These vehicles are outside of the current scope of the PSVAR.

42. Which services do you think should be brought into scope? [Select multiple options]

Free home-to-school services (for example when no fare is paid)

Tour services

Charter services

Demand responsive services

Small passenger carrying vehicles

Another service:

[After answering go to 'Accessibility features of public service vehicles']

Reducing vehicles

43. Why?

We could only choose one option in Q.39 but our proposal involves both a partial reduction and a partial expansion of effective scope.

The current scope is problematic and results in enormous costs being incurred for very little benefit. We believe that changes in scope to enable an outcomes-based approach for closed door regular services would offer a more proportionate response to the needs of passengers with accessibility needs with a net benefit for passengers.

We believe that all open-door services should be required to comply (as now, if there weren't exemptions in place) and where all closed-door regular services including home-to-school (whose passengers are known in advance) would be required to comply where a passenger has an accessibility need.

This approach would have a range of benefits as set out in Attachment 1. We don't believe it would have any negative impact on users of these services in reality and would save the enormous cost of equipping vehicles with wheelchair lifts that are never used. We believe levels of wheelchair use on services that would be affected by this change in approach are negligible.

CPT asked a sample of 20 local authorities across Great Britain about the home-to-school (HTS) services that they contract. 15 of these responded within the FOI deadline, of which 13 provided data and these confirmed that they procure 2377 PSVs for HTS services but that

only three of these regularly transport a wheelchair user. These same LAs make significant provision for wheelchairs using taxis or other vehicles with 1528 wheelchair users being transported. We believe that all of these should have the option of travelling on a bus/coach where the infrastructure is in place to allow that. However, the alternative (taxi, etc) provision should be made where the users prefer that due to journey time considerations or other factors.

This data suggests to us that provision of PSVAR-compliant PSVs only where there is a need is the correct approach.

We believe the costs of equipping the entire fleet that is used to undertake closed-door home-to-school services is £486 million. We shall explain this calculation later in our answer to Q.58. We believe this cost is highly disproportionate to the benefits and believe that an outcomes-based approach is much more appropriate.

A regular service is defined in existing legislation as one “which provides for the carriage of passengers at specified intervals along a specified route and where passengers are taken up and set down at predetermined stopping points”. The PSVAR legislation currently applies to ‘local and scheduled services’ which encompass the payment of separate fares.

We now have “closed door home to school service” defined in the Accessible Information Regulations as a service for the carriage of eligible passengers to and from an educational establishment, and which can only be used by eligible passengers (with further definitions of ‘eligible passengers’ and ‘an educational establishment’). We believe that such a definition could be adapted to cover other types of regular service.

Under the current Regulations, a service may be out of scope on one day if there are no passengers who pay a fare but come into scope the next day if there is a passenger who pays a fare. The regular service approach that we are recommending provides much greater clarity.

44. For which vehicles do you think the PSVAR scope should be removed? [Select an option]

- Buses only (Go to ‘Accessibility features of public service vehicles’)
- Coaches only
- Buses and coaches
- Don't know (Go to ‘Accessibility features of public service vehicles’)
- Do not want to answer (Go to ‘Accessibility features of public service vehicles’)

Coach type removal

45. Which type of in-scope PSVAR coach services do you think should be removed?
[Select multiple options]

Paid home-to-school services

Rail replacement services

Other types of in-scope PSVAR coach services:

All closed-door regular services would be removed from automatic compliance but would comply on-demand through an outcomes-based approach

Accessibility features of public service vehicles

We are asking about the requirements or accessibility "features" of the PSVAR, such as those that relate to wheelchair spaces and lift systems.

We are seeking evidence about if respondents feel that the current requirements support the accessibility needs of passengers, and what alternative or additional requirements they might want to see.

The [list of accessibility features \[opens in a new window\]](#) for PSVAR vehicle as well as the [differences between buses and coaches is stated in our information \[opens in a new window\]](#).

46. Do you think the current approach towards the accessibility features of public service vehicles (PSVs) needs to change? [Select an option]

Yes (Go to 'Changing PSVs approach')

No

Don't know (Go to 'Accessibility features of public service vehicles')

PSV: no change to features on vehicles

47. Why?

We now have an established fleet of vehicles – virtually all buses and many coaches meet the specifications set out in the 2000 Regulations. This developed over time but the 'end dates' meant that past the relevant dates, users of open-door services had certainty that

their vehicle would be accessible and that it would accommodate a wheelchair meeting the 'reference' dimensions.

Many CPT members and other operators have signed up to the mobility scooter code, opening up bus services to many people with mobility impairments who choose to use one of these devices. Again, the code is built upon the reference wheelchair dimensions and the capability of the fleet to accommodate users of devices that meet the criteria. Research by RIDC in 2021 indicated that there were still many mobility scooters available that meet the criteria. The public can search for a scooter that meets the dimensional requirements here: <https://www.ridc.org.uk/features-reviews/out-and-about/scooter-search/results?open=Transport>

If the dimensional requirements changed for new vehicles, we should then have a mixed fleet where some vehicles could accommodate larger wheelchairs and scooters, and others could not. This could lead to real problems at the roadside or on board where passengers may not be able to board or may get stuck between the bulkheads/poles.

Larger wheelchairs will inevitably be heavier, and changing the specification might also require expensive modifications to existing wheelchair lifts as current design capabilities could be exceeded.

In addition to fleet issues, larger wheelchairs could encounter problems with some roadside/bus or coach station infrastructure which is designed with the current reference wheelchair in mind.

We understand that some advocate provision of a second wheelchair space on buses. On many bus services, it is rare for one wheelchair to be carried so occasions where two wheelchair users wish to travel on the same service are very rare. Our members do recognise that this is a problem where two wheelchair users (friends, partners or family members) wish to travel together. However, bus operators do carry many older travellers and many who are ambulant disabled. Creating more wheelchair space means more tip-up seats, which are generally unpopular and more open space for ambulant passengers to navigate between the front of the bus and the first fixed seats. We also need to consider the implications for shorter single-deck buses where a larger wheelchair space leaves very few seats in the low floor section.

We believe the other accessibility features generally work well and do not require change.

48. What, if any, aspects of the current approach do you think work well?

We believe that bus passengers can access services relatively easily and current arrangements balance the needs of different passengers including those who are ambulant disabled.

There are relatively low incident rates – nothing would indicate that additional features or an alternative approach is needed to improve safety.

We acknowledge that coach lifts are a compromise. Coaches are built with a range of purposes in mind but fundamental is the need to provide an elevated view for travelling passengers and the requirement to carry significant amounts of luggage. It is difficult to devise a solution for a vehicle, which by its nature has a floor high above the ground, that

enables wheelchairs to be carried. Many of the current lifts are ingenious but do not provide the most dignified approach for customers. However, manufacturers have not yet been able to identify any obvious alternative approach. We shall continue to work with the industry to explore options.

[After answering go to 'Accessibility features of public service vehicles'] pp26

Changing PSVs approach

49. Which vehicles do you think that the approach needs to be altered for? [Select multiple options]

- Buses (If not selected skip questions 'PSV: wheelchairs on buses only' to 'PSV: other features on buses only')
- Coaches (If not selected skip questions 'PSV: wheelchairs on coaches' to 'PSV: other features on coaches')

PSV: wheelchairs on buses only

50. For buses do you think the accessibility features for wheelchairs needs to be altered? [Select an option]

- Yes
- No (Go to 'PSV: other features on buses only')
- Don't know (Go to 'PSV: other features on buses only')

PSV: wheelchairs on buses only

51. What changes to wheelchair use in buses would you like to see? [Select multiple options]

- Changes to the wheelchair boarding lifts and ramps
- Changes to the wheelchair entrances

- Changes to the wheelchair exits
- Changes to the wheelchair spaces
- Changes to the wheelchair being forward-facing
- Changes to the wheelchair being rearward-facing typical of most buses
- Changes to the wheelchair gangways
- Changes to the wheelchair signs and markings
- Changes to the wheelchair communication devices
- Changes to the wheelchair lighting?
- Another feature:

Why?

PSV: other features on buses only

52. Do you think that the current approach towards other accessibility features on buses needs to change? [Select an option]

- Yes
- No (Go to 'PSV : wheelchairs on coaches only')
- Don't know (Go to 'PSV : wheelchairs on coaches only')

PSV: other features on buses only

The majority of buses currently are low floor, allowing for ground level entry and exit.

53. What change to other accessibility features on buses would like to see? [Select multiple options]

- Changes to the route and destination displays
- Changes to the kneeling systems
- Changes to the external steps
- Changes to the internal steps
- Changes to the priority seats
- Changes to the floors
- Changes to the gangways
- Changes to the handrails
- Changes to the handholds
- Changes to the communication devices
- Another feature:

Why?

PSV: wheelchair on coaches

54. For coaches do you think the accessibility features for wheelchairs needs to be altered? [Select an option]

- Yes
- No (Go to 'PSV: other features on coaches')
- Don't know (Go to 'PSV: other features on coaches')

PSV: wheelchairs on coaches

55. What changes to wheelchair use in coaches would you like to see? [Select multiple options]

- Changes to the wheelchair boarding lifts and ramps
- Changes to the wheelchair entrances
- Changes to the wheelchair exits
- Changes to the wheelchair spaces
- Changes to the wheelchair being forward-facing typical of most coaches
- Changes to the wheelchair being rearward-facing
- Changes to the wheelchair gangways
- Changes to the wheelchair signs and markings
- Changes to the wheelchair communication devices
- Changes to the wheelchair lighting?
- Another feature:

Why?

PSV: other features on coaches

56. For coaches do you think other accessibility features need to be altered? [Select an option]

- Yes
- No (Go to 'Accessibility features of public service vehicles')
- Don't know (Go to 'Accessibility features of public service vehicles')

PSV: other features on coaches

The majority of coaches currently are high-floor, requiring steps to enter and exit and do not have priority seats.

57. What change to other accessibility features on coaches would like to see? [Select multiple options]

- Changes to the route and destination displays
- Changes to the kneeling systems
- Changes to the external steps
- Changes to the internal steps
- Changes to the seats
- Changes to the floors
- Changes to the gangways
- Changes to the handrails
- Changes to the handholds
- Changes to the communication devices
- Another feature:

Why?

Accessibility features of public service vehicles

We are attempting to gather evidence on the cost of complying with the PSVAR.

For example, this:

- might include the cost to an operator for retrofitting a vehicle to ensure that it meets the relevant wheelchair requirements. It would also be helpful to gather evidence on potential costs if the PSVAR were to be amended in the future
- if the scope of the PSVAR were to be expanded to bring in a greater range of services
- if additional accessibility features were required, what cost implications this may have for operators

While we understand this is most relevant to operators and service commissioners, we welcome contributions from all correspondents, who may also have views or insights on what might constitute:

- reasonable
- proportionate
- necessary costs

58. What, if anything, in your view should we be aware of when it comes to the financial cost of complying with the PSVAR?

We believe the costs of equipping the entire fleet that is used to undertake closed-door home-to-school services to full PSVAR specification is £486 million. This is based on a fleet of 16,206 (The number of vehicles covered by Special Authorisations supplied by DfT to Route One magazine 12/7/22) and an average cost of £30,000. The £30,000 is based on a median retrofit cost of £32,000 and a price differential of £20,000-£30,000 for a PSVAR-equipped new coach (compared to a non-PSVAR-equipped new coach); these figures are based on CPT research and a recent member survey – further details can be supplied upon request.

There are also significant costs associated with maintaining wheelchair lifts, including safety inspections and driver checks.

Regulation of the PSVAR

We are asking about the current regulatory approach that underpins the PSVAR.

Currently the [PSVAR requires adherence to a detailed set of specifications \[opens in a new window\]](#). For example, the PSVAR specifies, to the millimetre, the exact minimum width of

priority seats on buses and sets out precisely how they should be measured.

We are seeking views on the suitability of this regulatory approach.

59. Do you want us to change the regulatory approach towards accessible public service vehicles? [Select an option]

- Yes
- No (Go to 'Regulation approach: no change')
- Don't know (Go to 'Decarbonisation and the PSVAR')

Regulation approach: change approach

60. Why?

61. For what do you want to change the regulatory approach? [Select an option]

- For buses only
- For coaches only
- For both buses and coaches
- Another way:

An 'outcome focused regulatory approach' is when the regulation used are based mainly on the:

- outcomes

- principles

produced rather than detailing a specific action, process or feature at the outset.

An example of the 'outcome-focused regulatory approach' that is already present in the PSVAR is the requirement to be able to manoeuvre wheelchairs from the entrance of a bus to the wheelchair space. The regulations do not require that a specific set of steps are taken, or mandate that the wheelchair must move a specific distance in a designated direction. Rather, the requirement is for the outcome of getting the wheelchair onboard and into the wheelchair space.

62. How what do you want to change the regulatory approach? [Select an option]

An 'outcome focused regulatory approach'

An alternative approach:

[After answering go to 'Decarbonisation and the PSVAR']

Regulation approach: no change

63. Why?

Q.59 offers a Yes/No option. In general, we believe the current approach with detailed specifications does work as it means that an operator can have confidence that they are compliant. However, we support an outcome-focussed approach for closed door-services regular services as we have previously set out. Please refer to our response to Q43 for further details.

64. In your opinion what aspects of the current approach do you think work well?

An operator can have confidence that they are compliant whilst passengers travelling on open-door services have confidence that their vehicle will have the features they need.

Decarbonisation and the PSVAR

We are asking about decarbonisation, the process of reducing the amount of carbon dioxide we release into the atmosphere, and seek to explore its relationship with bus and coach accessibility. For example, how the use of electric vehicle technology impacts the design and accessibility of PSVs.

We are seeking views on if changes to the accessibility requirements for buses and coaches should be aligned with the [transition to zero emission vehicles \[opens in a new window\]](#) and, if so, how might this be done.

65. Should we align the transition to zero emission vehicles with our potential changes to the accessibility requirements of public service vehicles? [Select an option]

- Yes**
- No (Go to 'Decarbonisation and the PSVAR: no change')
- Don't know (Go to 'Enforcement of PSVAR')

Decarbonisation and the PSVAR: change

66. Why?

We really don't believe there should be changes to accessibility requirements in general as these could cause real problems for the reasons we have set out elsewhere. However, given how the questions have been worded, we have answered 'yes' to Q.65 as if the Department does proceed with changes, these do need to consider the impacts on fleets of decarbonisation, including resultant changes to vehicle weights.

CPT is doing a lot of work to understand the transition to ZE vehicles and is working closely with the Department in this area.

Operators do not want to find themselves in a position where they are compliant under accessibility regulations but are not compliant as far as decarbonisation is concerned, or vice versa. Operators much prefer an approach that focusses on new vehicles; retrofit to comply with one or other requirement is best avoided.

67. What would you like to see changed and how should we approach this process?

68. For what do you want to see these changes? [Select an option]

- For buses only
- For coaches only
- For both buses and coaches

[After answering go to 'Enforcement of PSVAR']

Decarbonisation and the PSVAR: no change

69. Why not?

70. What alternative approach, if any, would you propose?

Enforcement of PSVAR

We are asking about how the PSVAR is currently enforced.

Currently enforcement is done by:

- inspection which is undertaken by the [Driver and Vehicle Standards Agency \[opens in a new window\]](#), which can occur during vehicle safety testing or at the roadside
- 'data collection', collecting information on the number of bus and coaches providing local and scheduled services, and their compliance with the PSVAR

We have currently found that there is a lack of robust data being provided by coach operators compared to bus operators. This limits the scope and effectiveness of enforcement action and are asking you for your views.

71. Do you think that the enforcement approach needs to be altered for PSVAR vehicles?
[Select an option]

- Yes (Go to 'Vehicle types')
- No**
- Don't know (Go to 'Roadside infrastructure, conduct and other issues')

No change to enforcement approach

72. Why not?

DVSA generally adopts a balanced and proportionate approach.

[After answering go to 'Roadside infrastructure, conduct and other issues']

Vehicle types

73. What vehicles do you think that the enforcement approach needs to be altered for?
[Select multiple options]

- Buses (If not selected skip 'Buses enforcement')

Coaches (If not selected skip 'Coaches enforcement')

Buses enforcement

74. What, if anything, would you like us to consider about the way that the PSVAR are enforced, including complaints about the physical accessibility of buses?

75. What, if anything, would you like us to consider about our approach to data collection of buses?

Coaches enforcement

76. What, if anything, would you like us to consider about the way that the PSVAR are enforced, including complaints about the physical accessibility of coaches?

77. What, if anything, would you like us to consider about our approach to data collection of coaches?

Roadside infrastructure, conduct and other issues

We are asking about the impact on the accessibility of bus and coach services that are related to the PSVAR but not regulated by it. This includes:

- the [conduct of PSV staff \(including drivers\) and passengers \[opens in another window\]](#)
- roadside infrastructure, such as:
 - bus stations and stops, although these are generally the responsibility of local authorities which are not regulated by the PSVAR
 - coach stations and place where coaches stop which are not regulated by the PSVAR

We are seeking views on these and other related PSVAR issues as they relate to the accessibility of buses and coaches.

78. What, if anything, would you like us to consider about the conduct of public service vehicle staff?

78: We don't believe it would be appropriate to add to the burden of driver's responsibilities in this area. We believe it would increase conflict and make a driver's job more difficult; the industry is working hard to make the role more attractive and retain existing staff but this would likely exacerbate the existing driver shortage. Instead, the onus should be on passengers.

79. What, if anything, would you like us to consider about the conduct of passengers?

79: We believe that failure to move from the space if unreasonable should constitute an offence by the passenger who would then be open to legal action.

80. What, if anything, would you like us to consider in relation to the accessibility of bus stations?

81. What, if anything, would you like us to consider in relation to the accessibility of bus stops?

We believe it is really important that indicators are added to the NAPTAN database <https://www.data.gov.uk/dataset/ff93ffc1-6656-47d8-9155-85ea0b8f2251/national-public-transport-access-nodes-naptan> of bus stops (and anywhere else you can get on or off public transport) to show the accessibility of bus stops/stations and the routes to them.

Many locations used by closed-door school services are inaccessible for wheelchair users yet without the current exemptions, all such services that meet the definition of a local or scheduled service and that are operated with vehicles with a capacity exceeding 22 passengers would be required to meet full PSVAR specification. It makes no sense that vehicles are required to comply but that services are inaccessible due to the stop infrastructure.

We attach images of a range of sample locations where coach wheelchair lifts cannot be used. These are just examples amongst what we believe are the majority of stops used by home-to-school services across the UK.

82. What, if anything, would you like us to consider in relation to the accessibility of coach stations?

83. What, if anything, would you like us to consider in relation to the accessibility of places where coaches stop?

Please refer to our response to Q81

Any other comments

84. What, if any, comments do you have on the review of the PSVAR?

We are keen to continue to work constructively with Government to ensure a pragmatic long-term solution to the problem that has emerged in relation to some coach operations and believe that PSVAR should be revised to ensure a proportionate solution to the needs of those who use a wheelchair and want to travel on in-scope services.

85. Any other comments?