

Chartered Institution of Highways & Transportation response to the Bus Services Act 2017: Consultation on Accessible Information

Theo Naidoo, Policy Officer, Chartered Institution of Highways and Transportation (CIHT), Tel: 020 7336 1581, Email: Theo.Naidoo@CIHT.org.uk

CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and four international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Our vision is for world-class transportation infrastructure and services. Our values are to be Professional, Inclusive, Collaborative and Progressive.

CIHT believe that the future of transport infrastructure must be recognised as a key policy and investment priority. Fit for purpose infrastructure will:

- support economic growth, create jobs and improve the UK's competitiveness
- improve connectivity of society – enabling services to be provided (with health, social and environmental benefits)
- be inclusive and meet the needs of all groups in our society from the youngest to the oldest
- be safe for operators and users
- encourage innovation and technology to deliver infrastructure fit for the future

Q1. Do you agree that the Core Proposal is an appropriate response to the need for change identified in this document? Please explain your answer.

CIHT supports the core proposals in the consultation document as being proportionate and practical in supporting passengers with disabilities to use local bus services. However, CIHT would urge that these standards are applied to new entrants to the market as well, so traditional service providers are not disadvantaged. Further, the technologies for presenting information accessibly are well known and used in practice by bus operating companies worldwide, so should not be considered unduly burdensome.

CIHT's document 'Buses in Urban Developments' (2018)¹ notes that bus services should enable everyone regardless of income or disability to reach a wide choice of destinations within a reasonable time and distance.

Q2. Do you agree that the proposed list of required information is an appropriate use of the powers available? Please explain your answer.

CIHT recognises that bus operating companies are in a low margin operating industry and that significant upgrades to vehicles will be an unwelcome cost. We also acknowledge the importance of allowing operators flexibility and independence in operating their services however the limited and targeted nature of the information described is justified in the case of;

- a. The name or designation of the local service;
- b. The direction of travel;
- c. Stopping places;
- d. Diversions;

With regards to point e. *Connecting local services* there is the possibility for confusion in areas of the country which have multiple service providers operating at a single stop, may impact on commercial

¹ CIHT's 'Buses in Urban Developments' (2018) <https://www.ciht.org.uk/knowledge-resource-centre/resources/streets-and-transport-in-the-urban-environment/>

concerns and in areas with many connections may cause more confusion than benefit. There are also issues with keeping companies up to date with changing routes and diversions as software or trained drivers may not know the full list of connecting services when routes are diverted or changed.

Therefore CIHT does not agree that listing all connecting local services is justifiable at the present time.

Q3. Do you agree that the proposed information timing requirements are appropriate? Please explain your response.

CIHT agrees that the timing of information provision is reasonable but believes that as much flexibility as possible should be allowed for service providers as they, in conjunction with user groups, are most likely to be aware of local circumstances.

Q4. 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.

CIHT acknowledges that using a specimen person is a common way of monitoring the impact of design on end users and overall supports its usage here, especially as it allows service operators the flexibility to shape their own assets.

We would encourage the specimen environment to include full buses with a normal background audio level to ensure that real world usage matches what is intended.

Q5: 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.

CIHT agrees that audible information should also be usable by those using hearing aids and induction loops. This is an example of an appropriate use of technology which is provided for free on the NHS and commonly used by many segments of society.

Q6. 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.

CIHT agrees that it will not achieve the intended aims of this legislation if accessing the information is dependent on a smart device. Applications and services to assist bus passengers is a thriving market and is more likely to be aided by the accompanying consultation on open data than in this consultation on accessible information.

Q7. Do you agree that vehicles operated under Section 19 and 22 permits should be exempt from the requirements in full? Please explain your answer.

CIHT has no further comment

Q8. Do you agree that vehicles carrying fewer than seventeen passengers should be exempt from the requirements in full? Please explain your answer.

Q9. 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.

CIHT agrees with the exemption due to similar reasoning as the above, and that given the non-critical nature of such services passengers are able to make decisions prior to booking.

Q10. 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.

CIHT agrees that such vehicle may be exempt from displaying visible information however this should be communicated to passengers prior to boarding.

Q11. Do you agree that the proposed implementation option indicated above is the most appropriate of the three options identified? Please explain your response.

CIHT has no further comment

Q12. Do you agree with our proposal to define “small operators” as those operating 20 or fewer vehicles? Please explain your response.

CIHT has no further comment

Q13. 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.

CIHT has no further comment

Q14a. 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?

CIHT is not opposed to the use of advertising as long as does not reduce the usefulness of navigational information or worsen the overall passenger experience. We note that a number of other services in European cities such as Copenhagen already use such systems.

Q14b. 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.

CIHT has no further comment

Q15. Do you agree with our proposed content for the guidance? Please explain your answer, providing examples of potential content where appropriate.

CIHT agrees with the proposed contents of the guidance and suggests that it be broad enough to allow varied approaches.

Q16: Do you agree with our proposed enforcement principles? Please explain your response.

CIHT believes that proper regulatory enforcement is key for this legislation to achieve it's stated aims of enabling more people to use public transport. Inconsistent or regularly broken implementations can in often create a worse user experience than not providing that service at all.

It is also necessary for any new mandates on local authorities should be accompanied by sufficient resources for them to carry out that duty, and that the consequences for non-compliance are clear.

Q17. Do you agree that the Accessible Information Regulations should apply consistently across England, Scotland and Wales? Please explain your answer.

CIHT has no further comment