

Response from Bus Users UK to the Review of the Public Service Vehicles Accessibility Regulations 2000

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

Yes

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

Bus and coach design should include a consultative approach with people with a variety of disabilities, physical and cognitive.

All buses within scope should cater for the most common disabilities and those which experience the most barriers to using public transport, such as dementia, neurodivergence and learning difficulties.

Design requirements should be updated regularly to address the speed at which design of mobility aids moves and funding should be made available to operators to retrofit accordingly.

All school and rail replacement transport should be required to be fully compliant.

All leisure coach operators should offer a minimum percentage of accessible excursions per season

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?

Yes, it should be expanded

41. Why?

Given the expansion of DRT services, there needs to be a concurrent expansion of PSVAR to smaller vehicles in order to ensure that new barriers to travel are not erected for people with disabilities. Most Community Transport vehicles are accessible, it makes no sense for other smaller buses not to be.

42. Which services do you think should be brought into scope?

- Free home-to-school services (for example when no fare is paid)
- Tour services
- Charter services
- Demand responsive services

- Small passenger carrying vehicles

45. 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.

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

Yes

49. Which vehicles do you think that the approach needs to be altered for?

Buses and coaches

50. For buses do you think the accessibility features for wheelchairs needs to be altered?

Yes

51. What changes to wheelchair use in buses would you like to see?

- 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 signs and markings
- Changes to the wheelchair communication devices
- Bell call for services

Why?

Many popular wheelchairs are not able to mount buses because of ramp angle issues. (This also relates to kerbside problems)

Once inside the bus, it's often difficult to manoeuvre into spaces because of inappropriately placed poles, inadequate turning circles or footplates on wheelchairs not being able to fit. Specifications do not take such required add-ons into account. Many people can only travel with heavier and sometimes wider wheelchairs which take up more space and are hard to fit into the allocated space with arm-rests which do not move.

Many people feel sick facing backwards in a moving bus so the standard space does not meet all passengers' needs.

Rear facing spaces generally do not allow users to see the destination screen. While the AIR will address this, it may take until 2030 for many users to be able to see information that others take for granted.

It should be made clear that wheelchair users have priority over the space(s) designated for them. Despite the unhelpful Supreme Court ruling, nobody should be dependent on the kindness or

reasonableness of others in order to travel. Signs should make it clear that buggies, luggage or standing passengers must move if the space is needed for a wheelchair user.

There should be a mechanism for all wheelchair users in the space(s) to request assistance from the driver.

Bell call devices should be larger and require less pressure to activate.

52. Do you think that the current approach towards other accessibility features on buses needs to change?

Yes

53. What change to other accessibility features on buses would like to see?

- 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

Why?

A bus should be accessible to all to live up to its name: Omnibus = For All

54. For coaches do you think the accessibility features for wheelchairs needs to be altered?

Yes

55. What changes to wheelchair use in coaches would you like to see?

- 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 rearward-facing
- Changes to the wheelchair signs and markings
- Changes to the wheelchair communication devices
- Changes to the wheelchair lighting

Why?

Currently many coach access lifts for wheelchairs are not accessible to people who rely on an assistant, have a larger wheelchair or cannot propel or manoeuvre themselves in tight spaces. Lifts have weight limits which can be reached by a single person in a wheelchair, especially if it is one which has additional necessary equipment, such as oxygen tanks. The lifts are not built to accommodate someone to ride on the lift to push/manoeuvre a wheelchair user off the lift if they are unable to do this themselves. Design in this regard should be substantially improved.

The entry space can often be tight so anyone on board trying to assist the wheelchair user is often in a position which could be hazardous to themselves. Design in this regard should be substantially improved.

Wheelchair spaces should be required to be forward-facing.

Wheelchair access points and spaces should be clearly marked, which is not always the case. It should be clear to all passengers that they need to make room for and not impede access to those spaces, as a priority.

An accessible call point should be available at the wheelchair space and its accessibility checked prior to starting each journey. A mobile accessible device should be given to all users who cannot use the fixed call point.

Wheelchair users should be able to access lighting and fan control in the space. A mobile accessible device should be given to all users who cannot use the fixed control point.

56. For coaches do you think other accessibility features need to be altered?

Yes

Why?

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?

- 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 handrails
- Changes to the handholds
- Changes to the communication devices

Why?

All passengers should be able to see/hear destination information and in-service announcements, especially those related to safety and any route changes/diversions. This is not always the case on coaches.

Audio announcements outside the coach to ensure disabled passengers catch the correct coach would be helpful. We have many complaints of people catching the wrong coach, even when their tickets have been checked by the driver. Clearly getting on the wrong coach is far more disruptive than going a stop or two on the wrong local bus.

External steps should not be an obstacle to accessing the coach. Where these are unavoidable, the drop must be minimised as far as possible.

Internal steps make parts of the coach inaccessible to many. Where they are needed to add more seats, there should be clearly visible non-slip handholds and the edges of steps should be marked in a contrasting colour.

Priority seats should be accessible with as few steps as possible from the entry door. These should be clearly signposted and the sign should make it clear that other passengers should give way to those who need a seat. Priority seats should allow leg room for those who cannot easily bend a knee.

Flooring should be dementia and autism friendly as standard.

Armrests should not interfere with the use of the wheelchair space.

Handrails should be clearly visible, spaced appropriately and be in a contrasting colour

Handholds should be available at the back of every aisle seat and be in a contrasting colour. They should be soft-grip and easy for people with problems with their hands (such as arthritis) to use.

Communication with the driver is not to be encouraged but, in an emergency, many coaches do not give the wheelchair the opportunity to signal for assistance. This should be addressed.

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?

Smaller operators will undoubtedly need support with the cost of changes. As 1 in 5 working adults has a disability, it seems entirely reasonable that some proportion of the tax they pay should be spent on improving their access to work and other life events.

Tour operators have never seen disabled travellers as “their problem” when their lack of provision means they are missing out on a proportion of the £274 billion in spending power from this market. A small investment from government sources should unlock new sources of income, which is needed in these difficult trading circumstances.

While it will inevitably take some time to bring all vehicles up to an accessible standard, a time limit of no more than 10 years should be set for all excursion/tour operators and no more than 7 years for all other operators as they should be starting from a higher base.

Disabled people should be involved in the process of redesigning bus and coach fleets. This consultancy should be paid for by the design companies and operators.

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?

Yes

60. Why?

A minimum standard is a useful base but there should be motivators to reach a higher and more inclusive standard, so we would advocate a mix of approaches, allowing for alternative designs which meet the specific needs of a group to be licensed.

61. For what do you want to change the regulatory approach?

For both buses and coaches

Regulatory Approach

An 'outcome focused regulatory approach' is when the regulation used are based mainly on the outcomes and 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?

An alternative approach:

A combination of approaches which allows the best option for the circumstances to be used. Guidance should allow for an outcome based approach in specific circumstances but set baseline targets for wider use.

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?

Yes

66. Why?

Disabled travellers should not be excluded because of a change of fuel. Many electric and hydrogen bus designs allow for additional space because of where the batteries are stored, so there can be no justification for inaccessible vehicles.

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

We need to ensure that new fuel vehicle design accounts for the current and foreseeable needs of all passengers

68. For what do you want to see these changes?

For both buses and coaches

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?

Yes

73. What vehicles do you think that the enforcement approach needs to be altered for?

Buses and coaches

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?

DVSA is insufficiently funded and officers not trained in detailed accessible design issues.

DVSA should partner with agencies which do have these skills and be given an appropriate budget to do so.

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

It would be useful to consider complaints about the accessibility of buses made both to operators and to 2nd tier Alternative Dispute Resolution bodies to see if there are patterns or clusters of problems.

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?

Accessibility requirements for coach should no longer be exempted from action. The deadline should be brought forward from July 2026 for any coach providing a regular service and BODS should be expanded to include this category of vehicle as this is essentially a bus and should be treated as such.

A Coach Service Improvement Plan would be useful in improving the accessibility of coaches.

DVSA is insufficiently funded and officers not trained in detailed accessible design issues
DVSA should partner with agencies which do have these skills and be given an appropriate budget to do so.

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

As per the response to Q76, Data collection should be submitted about all vehicles providing regular services, regardless of the type of vehicle as all those providing such services should be deemed “a bus”

It would be useful to consider complaints about the accessibility of coaches made both to operators and to 2nd tier Alternative Dispute Resolution bodies to see if there are patterns or clusters of problems.

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?

The Regulations on the Rights of Passengers in Bus and Coach [The Rights of Passengers in Bus and Coach Transport \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(legislation.gov.uk\)](#) requires all passenger-facing staff to be trained in disability awareness, which happens reasonably often, AND in disability assistance, which happens only rarely. This needs to be put right and ALL drivers must understand their obligations in this regard.

All medium and large companies should consider a taxi guarantee for disabled users unable to board (See Brighton & Hove and others)

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

The unhelpful and unclear Supreme Court decision re the use of a wheelchair space has left the impression with some that wheelchair users are legally entitled to require other passengers to move

and other people believe it proved the reverse. As it only required drivers to attempt to persuade passengers in the space to move, this can get very fractious and can affect the running time of the service. Drivers have no powers to effect a change of mind by a passenger and generally are not trained to either, so have been left to carry the can which can sometimes lead to them being put in danger themselves. Making the refusal to move a civil offence which could lead to a fine might be of use in some cases.

It would be helpful to mandate signage on vehicles which clearly states that wheelchair users have priority over the use of this space.

In priority seating, it would help to also state that passengers who are able to stand should give way to others who are unable to do so.

Regular announcements to this effect would also help to set the scene.

This may help all but the most belligerent to consider others.

Roadside infrastructure should be brought within the scope of PSVAR for all regular bus stops as existing regulation has clearly failed to provide a joined-up approach to accessible bus stops. In the same way that railway stations are considered part of the necessary transport infrastructure, all bus stops should be considered an integral part of the public transport system.

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

Audible announcements are key, as are trained and knowledgeable staff at all operating times of the station, including those able to operate lifts, ramps and open disabled toilets as needed.

Level access to all areas is essential, so is good lighting and signage and available, accessible toilets.

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

Roadside infrastructure should be brought within the scope of PSVAR for all regular bus stops as existing regulation has clearly failed to provide a joined-up approach to accessible bus stops. Railway stations are considered part of the necessary infrastructure and bus stops should be considered an integral part of the public transport system.

Rural stops are a particular problem, for which a design solution could potentially be found but even in London there are many stops where one cannot safely board or alight.

Hail and Ride stops cannot be practically brought into scope.

Drivers who do not pull into the kerb to allow passengers to board or alight without major effort should be reprimanded. Understanding that this saves time on busy routes, it also renders them impassable for many. If late running is demonstrably because of accessibility needs, that should be a reason acceptable to any compliance officer or Traffic Commissioner.

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

Audible announcements are key, as are trained and knowledgeable staff at all operating times of the station, including those able to operate lifts, ramps and open disabled toilets as needed.

Level access to all areas is essential, so is good lighting and signage and available, accessible toilets.

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

There are many stops made by coaches in order to interchange with other services, such as Golders Green which interconnects with the London Underground and local buses and many users prefer to avoid the often long drive into Victoria coach station. However, it's not possible to alight there if you are a wheelchair user on a National Express coach as there isn't enough room for the accessible coach lift. This is obviously unhelpful and needs to be addressed by terminal managers in such locations.

Safe and well-lit areas to wait or interchange with other modes are always needed, with staff during operating hours and access to toilets and public phones.

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

It's a timely review and needs to be repeated at shorter regular intervals. Technology updates at a very swift rate and this means the expectations of disabled people and the design of mobility aids change very speedily. When the current standards were set, they were based on the very best of mobility assistance on the market. Now this is sadly lacking and whatever we do, we will always be one step behind. A commitment to review every 3 years will at least give some confidence to disabled people that transport will catch up as soon as possible.

85. Any other comments?

Bus Users UK provides bus compliance monitoring in Wales and Scotland in partnership with their governments, the Traffic Commissioners and the DVSA. We would be happy to discuss how we can provide practical support in England to enable higher standards of accessibility to be maintained.

Bus Users is a charity that campaigns for inclusive, accessible transport. We are the only approved Alternative Dispute Resolution Body for the bus and coach industry and the designated body for handling complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of a Sustainable Transport Alliance, a group working to promote the benefits of public, shared and active travel.

Alongside our complaints work we investigate and monitor services and work with operators and transport providers to improve services for everyone. We run events, carry out research, respond to consultations, speak at Government Select Committees and take part in industry events to make sure the voice of the passenger is heard.

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