

## ORR Accessibility of Rail Replacement Services: Response by Railfuture

Consultation Question No	Railfuture Response
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 would confirm the tendency to use coaches rather than buses outside the main urban areas. This is partly due to the availability of vehicles – especially at peak times – and also because buses have limited provision for luggage and are often unsuitable for longer journeys. The disadvantage of using coaches is that the drivers are no familiar with the location of stations and rail operators do not always provide adequate signage of replacement bus stops or sufficient staff to direct and supervise these arrangements.
2 How can rail operators prioritise the available accessible coaches to maximise the opportunities for passengers to make journeys on PSVAR-compliant vehicles?	Early discussions should be held with coach operators, CPT and coach builders. Rail operators' contracts should specify that accessible coaches are required. But in view of the lead time needed for complete fleets of such vehicles to become available – especially in some areas – a sliding scale to be agreed with ORR for each operator should be agreed with ORR e.g. 80% in year 1, 90% in year 2, 100% in year 3.
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?	Most passengers would prefer a rail journey by an alternative route, even if it takes a lot longer, rather than a replacement road service. Local buses can sometimes provide an alternative for short journeys in urban areas. Particular problems seem to occur with obtaining suitable vehicles in rural areas or when replacement vehicles are required at short notice e.g. due to emergency engineering works. Coaches or buses without seat belts and sometimes with inadequate luggage capacity are often used. Delays often occur in the extra time taken for passengers to load their luggage into storage areas beneath the coach.
3 (b) If you have a disability, please explain whether, and how, the service was appropriate for your needs.	Our experience is that replacement road services -especially when arranged at short notice – don't take into account the needs of disabled passengers. This includes access from/to stations or replacement bus stops, which can often be situated in a road nearby with poor signage, no shelter and often no lighting.
3 (c) Do you have a preference for the type of replacement service you receive? If so, please explain why.	Coaches are, in general, preferred for longer journeys and also for their greater comfort.
4 Can you provide any additional data on the number of disabled passengers, and passengers overall, using rail replacement services?	It is clear that such services are disliked by rail passengers, who prefer a re-routed rail journey. Even though the number of disabled passengers using these services is a fairly low proportion of the total users, there are

	often significant numbers of older passengers with luggage.
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?	Rail operators’ ability to provide replacement services – whether by diverting their rail services or by use of road vehicles – can have a major impact on when and where Network Rail possessions are established. Some major possessions e.g. closure of Kings Cross can cause significant issues for rail travellers because of the difficulty of offering alternatives. The use by operators of “Do Not Travel” publicity is misleading when there are alternatives and unhelpful to those who have to make a journey during the possession period.
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 support your preferred approach of amending the ATP Guidance to influence train operators’ behaviour to encourage and support the greater availability and use of PSVAR-compliant vehicles in rail replacement services, but not to mandate compliance with PSVAR. To mandate compliance could cause replacement services to be reduced or not provided – particularly in less populated areas.
7 How can train operators use contractual arrangements to incentivise suppliers to increase the provision of PSVAR-compliant vehicles?	By the use of long-term call-off contracts which reward suppliers by offering higher prices to those who can commit to (e.g.) 90% of their vehicles being accessible.
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?	We support this proposal. There may be a case for making the time limit higher where major possessions have been agreed much further in advance, but this would depend on operators having resources to be able to plan their requirements earlier. We recommend consultation with operators if a longer time limit is being considered.
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?	We strongly support all these three proposals. The disadvantage of Proposal Three is that it would only help those passengers who had booked assistance in advance of travel. But this would still be an important step forward for those who had booked. Proposal Four would certainly be much better than operators’ current reliance on generic information. Much more advance information – including times of replacement services – should form part of the operators’ publicity. Proposal Five could be of great help in making adequate accessible vehicles available at times of peak demand and would also improve communication between rail operators who are running replacement services between the same stations to cover the same possessions. All three proposals should be implemented, but Proposal Four would seem to be top priority, followed by Proposal Three.
10 Are there any other measures that you consider would assist in incentivising the use of PSVAR-compliant vehicles for rail replacement	An approach at high level to the bus and coach industry to address the general issue of the lack of PSVAR-compliant coaches would be very

services that we have not included here?	helpful. Both DfT and ORR should back this approach. See also answers to Questions 2 and 7.
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?	Operators should not assume a physical disability – hidden disabilities may also affect the type of help required.
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?	<p>1. Rail operators should co-operate to minimise the need to use road transport. This should include ensuring that rail staff have the required training and route knowledge to be able to operate trains over alternative routes.</p> <p>2. Operators should make use of existing alternative local buses and coach services where appropriate (mainly in urban areas where higher frequency bus services operate) by offering ticket acceptance. In these cases, good communication with local services operators is essential.</p> <p>3. Operators should ensure that the replacement vehicles used are suitable for the roads that will be used: urban roads could use low floor buses: motorways and high speed roads need coaches with proper luggage space and seatbelts.</p>

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