



Members Newsletter

Issue 2019/2 – May / June

2019 WELL UNDERWAY

I am sure there are many of you that cannot believe how quickly this year has gone. We are now in our busy season and I hope there is plenty of work for you all. As ever the Association is here to support you in all that you do in London and across the UK.



FROM THE CHAIRMAN – STEPHEN TELLING

There is plenty going on in London at present, both in terms of events and policy changes. Many of the events and road changes are listed in the **London Latest** column in **Bus and Coach Buyer**, which our Director of Administration and Development, **Peter Bradley**, puts together each week. This information will also be included on our new website to be launched shortly.

In this edition of the newsletter you will find details of the proposed new cycle lanes between **Wood Lane and Notting Hill Gate**, which will slow down the speed of traffic on this important artery in and out of London. Peter has a meeting with those in TfL who are leading the consultation early in June. Also, on the horizon, are the **DDA requirements** for coaches operating scheduled services, which will affect many of us from 1 January 2020 and, later that year, the upgrading of the **London Low Emission Zone** to Euro VI requirements for coaches over the whole of the London area.

The workshop format of meetings appears to be popular with members. We will follow up our April look at the Ultra Low Emission Zone on 23 September with the topic **Operating in London workshop – Can we deliver the service our customers expect?** I hope to see you there and support those who are coming to speak with us and answer your questions.

Welcome to New Members

We welcome a further new member to our Association.

- **Abbey Travel**

We look forward to seeing them at future events.

LTCOA Operator Interview – Davian Coaches

Peter Bradley shares another one of his recent interviews, as featured in Bus and Coach Buyer

I had the pleasure of spending time recently with **Darren and Gareth Wardell** of Davian Coaches based in the Edmonton area of north London. Formed in 1971, they are well established as a recommended local operator who are driven to provide the highest standard of coach travel.

PB - *How many Coaches do you operate?*

D&GW – We have a fleet of fifteen vehicles; mainly a mix of Scania / Irizar and Yutong. Most of our work is private hire, although we do hold a few contracts.

PB – *Looking back over the past few years, what do you consider to be the achievement you are most proud of?*

D&GW – Over the past three years we have concentrated in upgrading the business to modern standards. This is included renewing our IT infrastructure and establishing a test station. We are in this business for the long haul. But if we are to remain competitive and provide the highest standard of customer service you need to ensure that your business continues to evolve and develop.

PB – *From looking back to looking forward. What do you think will be your biggest challenge in the next 12 months?*

D&GW – To be honest for us is maintaining financial growth. Our customers want us to do more for less, while our costs continue to rise. We need to continue to minimise our cost increases whilst finding ways of continuing to deliver excellent customer service to those who hire our coaches at an affordable price.

PB – *And finally when looking at the industry as a whole, what do you think is the greatest opportunity for coaches in the future?*

D&GW – Undoubtedly the coach industry is going to change in the next few years not least because of the Low Emission Zone in London and clean air zones around the rest of the country. We believe that this will throw up some opportunities and gaps in the market, which the shrewd coach operator will look to fill. There is therefore, as I have said already, a great opportunity to evolve and develop: not just us but other like-minded operators too.



TfL launch consultation on changes along the A402 between Wood Lane and Notting Hill Gate

TfL have just launched a new consultation on changes along one of the key West London corridors; the busy A402 between Wood Lane, Shepherds Bush, Holland Park and Notting Hill Gate. The proposals centre on improving facilities for those who walk and cycle, by:

- upgrading the public spaces to make them more attractive;
- improving pedestrian crossings;
- Making some side roads entry or exit only to help the safe and timely movement of traffic

However, the key component of the proposals is to provide **a new two-way segregated cycle track throughout between Wood Lane and Notting Hill Gate**, which will keep people cycling separated from motor traffic. In order to do this a lane of traffic will be removed along most of the highway, together with some mature trees. One or two bus stops will also be lost along the corridor whilst others will be moved.

TfL have done some modelling on traffic times and although in many cases they predict little change, westbound in the morning peak journeys could take up to ten minutes longer. Stagecoach's Oxford Tube currently uses the corridor along with a number of local bus routes and is a popular access point for central London for a number of tourist and private hire coaches.

The consultation for these changes is open until 12 June for people to have their say and is available on the TfL website at <https://consultations.tfl.gov.uk/roads/wood-lane-notting-hill/>.

Some coach operators have already commented about the loss of carriageway, which reduces capacity overall, and have expressed concerns over the potential delays in and out of London, especially whilst the works are underway.

Your Association will be responding to the consultation.

Disability Discrimination Act (DDA) for Coach Services – 1 January 2020

One piece of legislation perhaps overlooked by the focus on the Ultra Low Emission Zone and other clean air initiatives throughout the UK is the implementation of the final deadline arising from DDA legislation from 1 January next year. This affects all coach vehicles used on local and scheduled services across Great Britain which, from this date must be 'fully accessible'.

The DDA accessibility requirements arise from the Disability Discrimination Act 1995, which lead to the PSV (Accessibility) Regulations in 2000 and 2005. This gave a series of dates by which Buses and Coaches on scheduled services must meet these requirements. These started on 1 January 2015 for Buses and Coaches up to 7.5 tonnes and moved on to full sized single and double deck Buses in subsequent years. The final piece of the jigsaw, in just over seven months' time, affect the remaining single and double deck coaches used on scheduled services.

What is meant by being fully accessible? Well in brief you need wheelchair access and accommodation, slip resistant flooring, meet the required dimensions of steps and seats, and provide armrests / handrails. More details can be found in a Guidance Document <https://www.gov.uk/government/publications/bus-coach-accessibility-faq>

Most of the large coach operators, such as National Express and Megabus running scheduled services already use fully accessible vehicles. However, there are a number of registered coach services (or

perhaps some that are not but should be) providing home to school / work transport, which are not necessarily open to the general public, but charge separate fares. They may also serve bus stops with traffic regulations attached which only allow their use by local bus / coach services. **Do you operate one of these? If so, read on.**

Now it may be that you have to look at how your service operates. If your service meets all the following criteria, then it **may** not require a registration / London Service Permit (and therefore accessible coaches), so long as there is no issue with set down and pick up arrangements at bus stops:

- All passengers are taken to OR from the same location (generally the school or workplace etc);
- The service is not advertised in advance to the general public;
- The same fare is charged irrespective of distance travelled;
- Someone other than the operator is responsible for bringing the passengers together (i.e. the school or work employer)

However, if your service does not meet all these requirements then that service **will** require an accessible coach / bus from 1 January 2020. Our information is that the Government is not in the position to delay or postpone the implementation of this piece of legislation, as they will claim you have had 20 years to prepare for it.

First and foremost, do check your contract if you are operating the service on behalf of someone. If you need further informal advice contact **Peter Bradley** on **07802 679795**. We are here to help you.

Members Meeting – Visit by Traffic Commissioner Sarah Bell

We welcomed Sarah Bell, Traffic Commissioner for London and the South East to the London Tourist Coach Operators Association Members meeting on Monday 13 May 2019.

Section 19

Miss Bell reminded members that the DfT have updated their guidance on Section 19 and Section 22 Permits (Transport Act 1985), which cover 'not for profit' provision of transport for hire and reward without the need for a full public service vehicle operator's (PSV 'O') licence.

<https://www.gov.uk/government/publications/section-19-and-22-permits-not-for-profit-passenger-transport/section-19-and-22-permits-not-for-profit-passenger-transport>

Further guidance is waiting for the outcome of a judicial review process currently underway. In the meantime, Traffic Commissioner Nick Denton is reviewing all new Permit Applications that are made to any Traffic Commissioner area office.

Miss Bell also confirmed that S19 permits issued now have an expiry date, but there is still no central database of who currently holds permits.

Interim Licences for PSV Operators

The DfT are currently consulting on changes to the Public Passenger Vehicles Act 1981, which would allow public service vehicle operators, who have met the necessary criteria for licensing, to commence vehicle operations as soon as possible. There are a number of options put forward, one includes the issue of an interim licence, which is currently the case for Heavy Goods Vehicles (HGV). This is one of the recommendations that came out of the Governments Triennial Review of the Traffic Commissioners back in 2015 and forms part of the implementation plan.

The consultation closes on 25 June 2019. <https://www.gov.uk/government/consultations/public-service-vehicle-operator-licensing-and-tribunal-rules-legislative-changes>

The other change included in the consultation is whether to create the power to **introduce formal tribunal rules** for the tribunal functions carried out by Traffic Commissioner. This would include, for example, where an operator turns up for a public enquiry with paperwork that should have been submitted in advance. Often this causes a delay or adjournment to the proceedings, but there is currently no comeback on the operator concerned.

Senior Traffic Commissioner – Revised Statutory Guidance

Following Consultation carried out in 2018, the Senior Traffic Commissioner has now reissued all statutory guidance on the following topics:

- good repute and fitness
- finance
- transport managers
- operating centres, stable establishment and addresses for service
- legal entities
- impounding
- delegations
- case management
- principles of decision making
- format of decisions
- appeals
- small PSV operations
- local bus services

Miss Bell reminded the meeting that for Transport Managers (TM) there is only a period of grace for six months between one TM finishing and another one starting unless the previous TM had passed away. Both the operator and the TM have a responsibility to tell the Central Traffic Office in Leeds if they part company. This has been an area where the Traffic Commissioners spend a disproportionate amount of time. The Traffic Office will now inform operators that if no visible action is taken to replace the TM then the operator's licence could be revoked from a specific date.

Other useful items covered included:

- The DVSA operate a whistleblowing hotline to report errant operators - 0300 123 9000
- Operators should undertake a risk assessment of checks on drivers on an individual basis. For example, if a driver has had points on his licence in the past, you may wish to consider doing monthly checks on that person;
- Continuing Professional Development (CPD) is for all, not just drivers. Attendance at a Trade Body members meeting can be counted as CPD for example. We (the LTCOA) may need to consider issuing certificates of attendance!
- All written decisions by the Traffic Commissioners are now published
- Bridge Strikes – the Network Rail website now has some excellent guidance - <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/bridges-tunnels-viaducts/risk-bridge-strikes/>

A return visit by Miss Bell for 2020 is planned.

FROM THE DIRECTOR OF ADMINISTRATION & DEVELOPMENT'S DESK



Peter Bradley

As our Chairman Stephen Telling has pointed out in his opening remarks there is plenty going on at the moment. Perhaps the issue that I am most concerned about are the **DDA requirements for Coaches from 1 January 2020**. I know that a number of you operate contracts on behalf of local authorities, schools and other bodies. If any of these journeys charge fares, even if you are not directly responsible for them, and run to a regular schedule, then potentially they will need to be operated with an accessible bus or coach from the new year. As we have said earlier in this newsletter, I suspect that with all the concentration on Ultra Low Emission Zone; the accessibility requirements have been put on the back burner.

However, they cannot stay there any longer. This happens well before we waive two of the London Low Emission Zone and my guess is that it could affect quite a number of you.

Please can I encourage you to check the position on any contracts that you operate. I am happy that you run any of these through me. Although I am not a legal expert, I may be able to give you advice as to what to do next.

And finally, from me, I am delighted to be working on another workshop, our second this year entitled **Operating in London Workshop; Can we deliver the service our customers expect?** I am currently in the process of inviting speakers, but we aim to have someone from the Mayor's office, a speaker from a Cycle lobby group and a representative from the City of London. More details in the next newsletter; however please put the date in your diary.

- **Date: Monday 23 September**, 10:30 for 11:00 until 14:00
- **Location:** To be confirmed.
- Booking is easy – just email ltcoa2@gmail.com to say how many are coming for catering purposes
- All are welcome; no charge
- A buffet lunch will be served

I wish you all a great summer.

LTCOA MEMBERS EVENT SCHEDULE 2019-20

Monday 23 September at 10:30 for 11:00

Operating in London Workshop; Can we deliver the service our customers expect? - Hilton Garden Inn, Eastern Perimeter Road, Hatton Cross, London, TW6 2SQ
(Location to be confirmed)

Wednesday 2 and Thursday 3 October

Coach and Bus UK 19 – NEC Birmingham – **LTCOA to have a presence on the Wrightsure stand.** Please come and say hello.

Friday 18 to Wednesday 23 October

Busworld 2019 – Brussels Expo, Belgiëplein, 1020 Brussels, Belgium – **The LTCOA will be organising a visit to the Show.** Further details to be announced.

Monday 18 November at 19:30

Hilton Garden Inn, Eastern Perimeter Road, Hatton Cross, London, TW6 2SQ. Speaker to be announced

Tuesday 3 December; 18:45 for 19:15

LTCOA Christmas Dinner – The Pheasant, 98 West End Lane, Harlington, UB3 5LX

Monday 20 January 2020 at 19:30

Hilton Garden Inn, Eastern Perimeter Road, Hatton Cross, London, TW6 2SQ. Speaker to be announced.

Saturday 1 February 2019 18:15 for 19:15

The LTCOA 33rd Annual Dinner Dance – The Palace Suite, The Royal Garden Hotel, 2-24 Kensington High Street, W8 4PT

Monday 10 March 2020 at 19:30

AGM - Hilton Garden Inn, Eastern Perimeter Road, Hatton Cross, London, TW6 2SQ

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AND FINALLY.....



A Coach in Caravan livery, operated by Capital Coaches in Ashley Road, Hampton (by Hampton Station)

Taken by John Howat