



UK Coach Operators Association

Little Owl Farm, Halebourne Lane, Chobham, Surrey GU24 8SL

Email: info@uk-coa.co.uk

Tel: 07802 679795

UKCOA – PSVAR Proposition - August 2023

The government launched a Call for Evidence on 12 June 2023 as part of the review of the Public Service Vehicles Accessibility Regulations 2000:

<https://www.gov.uk/government/consultations/review-of-the-public-service-vehicles-accessibility-regulations-2000>

The closing date is 4 September 2023 and the DfT are encouraging responses from individuals and organisations across the UK

The response includes a number of questions which we are encouraged to answer.

The statement below represents the UKCOA's view on the future of PSVAR and will be used as the basis for answering the questions posed.

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- All new coaches from a point in time should meet PSVAR existing 'partial' compliance standards, which excludes the requirement for wheelchair lifts and destination equipment. In practice most, if not all, coach vehicles built since 2006 already do so;
 - All new coaches from a point in time should also be built with capability for destination equipment and a new style lift (see below) to be installed at a later date, should that be required. Ideally both the destination equipment and the lift should be capable of being easily installed and removed depending on the use of the vehicle;
 - Many UKCOA Members regard the existing 'side' lifts on many coaches as 'not fit for purpose' as they can only carry wheelchairs, and are difficult, if not impossible to deploy at many locations. A new lift needs to be designed, capable of carrying both wheelchair and standing passengers, which minimises the loss of luggage space and seating. It is recommended that a working group be set up, consisting of representatives from DfT, DPTAC, Vehicle Manufacturers and Trade Body representatives to come up with a suitable design; The UKCOA will volunteer to be a member of that working group;
 - A working group should also be set up to develop a set of guidelines for local authorities, schools, tourist attractions and motorway service station providers amongst others to provide suitable infrastructure to allow the deployment of the lift on the coach, both

existing design and any new design in a revised set of PSVAR. The working group should consist of representatives from the DfT, Trade Bodies and those organisations mentioned above. The UKCOA will volunteer to be a member of that working group;

- PSVAR and Zero Emission technology must be considered in parallel and minimise the loss of luggage space and the increase in the weight of a vehicle and minimise increase in costs;
- The following rules should apply to those vehicles which are required to be fitted for PSVAR:
 - If an operator receives a request for a wheelchair to be carried on a coach for any purpose, then that operator must arrange for a fully specified PSVAR vehicle to be provided for that journey;
 - Other than for the above, full PSVAR should not be mandated on coaches that are not being used on scheduled services, as now; however, it is up to the operator as to whether they wish to provide one or not;
 - The current minimum levels of compliance contained within the medium-term exemptions (*see Appendix 2*) should continue until they are fully implemented on 1 August 2025. At this stage all coaches used on scheduled services (*which included Home to School (HtS) and Rail Replacement (RR) – see legal definition in Appendix 1*) must be partially compliant, and a proportion of vehicles, dependent on the operator's fleet size of the vehicles used on HtS and RR services, must be fully compliant. However, there should be no further requirement for increasing the proportion of fully compliant vehicles in a fleet after this date; it is up to the operator as to whether he wants to increase the proportions of fully compliant vehicles beyond that mandated (it should be noted that for HtS/RR fleets of over 30, 35% of vehicles must be fully PSVAR compliant by August 2025 which will be challenging in itself; it is also considered that there will be sufficient fully compliant vehicles in circulation to meet all travel needs for disabled passengers)
 - However, from a point in time any new vehicle that is either purchased to be used on scheduled services (including HtS and RR) or is subsequently used on scheduled services (including HtS and RR) must meet full PSVAR standards, but ideally with the redesigned lifts as mentioned above;
 - Any new requirements mandated in a new set of PSVAR should only apply to new vehicles from a point in time and not retrospectively be applied to older vehicles.
- For vehicles under 22 seats, a set of PSVAR standards for step heights, seat design, handrails and other such equipment should be developed, tested and applied to all new vehicles from a point in time. New vehicles from a point in time should also be designed to allow the fitting of destination equipment and lifts capable of carrying both wheelchair and standing passengers. However, unless the operator receives a request for a fully specified PSVAR vehicle to be provided for a journey, then their use should not be mandated. There should be no requirement for existing vehicles under 22 seats to be retrofitted to any new PSVAR standards.

Appendix 1

Definition of 'Scheduled Service' as contained in The Public Service Vehicles Accessibility Regulations 2000

"Scheduled service" means a service, using one or more public service vehicles, for the carriage of passengers:

- at separate fares,
- along specified routes,
- at specified times, and
- with passengers being taken up and set down at pre-determined stopping points,
- but does not include a tour service;

"Tour service" means a service where a public service vehicle is used for or in conjunction with the carriage of passengers to a particular location, or particular locations, and back to their point of departure

Appendix 2

Current PSVAR Medium Term Exemptions

Minimum levels of Compliance

Compliance schedule definitions

- 'Fleet' refers to the total number of vehicles used for HTS or RR services.
- Vehicles not used for either HTS or RR services should not be counted.
- HTS services with no paying customers are not in scope of PSVAR.
- A vehicle used for HTS or RR services that is temporarily out of service is still considered to be part of the fleet, subject to the judgment of DVSA during any inspection.

'Fully compliant' refers to a vehicle that complies with all paragraphs of the following parts of PSVAR:

- schedule 1, concerning facilities for wheelchair users
- schedule 3, concerning other accessibility features

'Partially compliant' refers to a vehicle that is not fully compliant, but as a minimum complies with the following parts of PSVAR schedule 3:

- paragraph 2 (floors and gangways)
- paragraph 3 (seats)
- paragraph 4 (steps, excluding sub-paragraphs 1d, 1e, 1f, and 5)
- paragraph 5 (handrails)

ie: it does NOT include any requirement for a wheelchair lift or destination equipment.

Band changes

A change in fleet size could lead to a band change. For example, if an operator's fleet size expanded from 5 to 6 vehicles as a result of acquiring a new vehicle, they would move from band A to band B.

It is the operator's responsibility to determine whether a band change has occurred and if it has, they must notify the DfT within 5 working days at psvar@dft.gov.uk. This is also the email address to be used in the event of any questions.

Number of vehicles

When determining the number of fleet vehicles required to comply via percentage calculation, numbers must always be rounded up, even when the percentage is a decimal

point of less than 0.5. For example, a calculation of 1.3 vehicles would mean 2 vehicles must comply.

The tables on the following pages outline the minimum compliance level required. Operators are encouraged to exceed these minimum requirements where possible.

Band A requirements

For Home to School and Rail Replacement fleet sizes between 1 and 5 vehicles.

You must reach the following minimum levels of compliance.

Date	Level of compliance
By 1 August 2023	At least 25% of fleet partially compliant.
By 1 August 2024	At least 50% of the fleet partially compliant.
By 1 August 2025	At least 1 fully compliant vehicle, with the rest of the fleet partially compliant.

So, for example, an operator with 5 vehicles that are used on Home to School and Rail Replacement services

- by August 2023 will need 0 fully compliant, and 1 partly compliant vehicle;
- by August 2024 will need 0 fully compliant, and 2 partly compliant vehicles;
- by August 2025 will need 1 fully compliant, and 4 partly compliant vehicles.

Band B requirements

For Home to School and Rail Replacement fleet sizes between 6 and 9 vehicles.

You must reach the following minimum levels of compliance.

Date	Level of compliance
By 1 August 2023	At least 25% of fleet partially compliant.
By 1 August 2024	At least 1 fully compliant vehicle and at least 50% of the rest of the fleet partially compliant.
By 1 August 2025	At least 2 fully compliant vehicles, with the rest of the fleet partially compliant.

So, for example, an operator with 9 vehicles that are used on Home to School and Rail Replacement services

- by August 2023 will need 0 fully compliant, and 3 partly compliant vehicles;
- by August 2024 will need 1 fully compliant, and 5 partly compliant vehicles;
- by August 2025 will need 2 fully compliant, and 7 partly compliant vehicles.

Band C requirements

For Home to School and Rail Replacement fleet sizes between 10 and 29 vehicles.

You must reach the following minimum levels of compliance.

Date	Level of compliance
By 1 August 2023	At least 25% of fleet partially compliant.
By 1 August 2024	At least 15% of the fleet fully compliant and at least 50% of the rest of the fleet partially compliant.
By 1 August 2025	At least 25% of the fleet fully compliant, with the rest of the fleet partially compliant.

So, for example, an operator with 29 vehicles that are used on Home to School and Rail Replacement services

- by August 2023 will need 0 fully compliant, and 8 partly compliant vehicles;
- by August 2024 will need 5 fully compliant, and 12 partly compliant vehicles;
- by August 2025 will need 8 fully compliant, and 21 partly compliant vehicles.

Band D requirements

For Home to School and Rail Replacement fleet sizes of 30 vehicles or more.

You must reach the following minimum levels of compliance.

Date	Level of compliance
By 1 August 2023	At least 15% of fleet fully compliant and at least 25% of the rest of the fleet partially compliant.
By 1 August 2024	At least 25% of the fleet fully compliant and at least 50% of the rest of the fleet partially compliant.
By 1 August 2025	At least 35% of the fleet fully compliant, with the rest of the fleet partially compliant.

So, for example, an operator with 40 vehicles that are used on Home to School and Rail Replacement services

- by August 2023 will need 6 fully compliant, and 10 partly compliant vehicles;
- by August 2024 will need 10 fully compliant, and 20 partly compliant vehicles;
- by August 2025 will need 14 fully compliant, and 26 partly compliant vehicles.