



**Evidence for the future of transport regulatory review:
call for evidence on micromobility vehicles, flexible bus
services and mobility as a service**

**Submission from the
National Pensioners Convention**

FAO Future of Transport Regulatory Review
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Dear Future of Transport Regulatory Review Team

NPC EVIDENCE FOR THE CONSULTATION for the Future of Transport Regulatory Review

Introduction

The National Pensioners' Convention (NPC) is Britain's biggest independent organisation of older people, representing around one thousand local, regional, and national pensioner groups with a total of 1.5 million members. The NPC is run by and for pensioners and campaigns for improvements to the income, health and welfare of both today's and tomorrow's pensioners and this response is based on the views and experiences of our members. We wish to submit views to the Department for Transport for the consultation for the Future of Transport Regulatory Review.

Consultation

We do not have the resources to respond in detail to all of the individual questions in the document. Therefore, our contribution is couched in general terms with areas of concern specifically mentioned. It has, however, been compiled by our Transport Working Party whose members have significant experience, often at a very senior level, in the transport industry as well as our Campaign Officer and Information Officer.

For ease of reference, our responses to this inquiry relate to the topic headings set out in the consultation document.

Section 2 Micromobility

As a general point most of the alternative micromobility vehicles shown require the user to have a good degree of balance control. It is hard to see how they would benefit many older and mobility disabled people as claimed (the document incidentally uses the term handicapped throughout its text and many people find that term offensive).

In many places the consultation document talks about “road” which is a non-specific term. Why not use the correct terminology – footway or carriageway – then there is less scope for confusion and misunderstanding? On the same theme, what is a cycle track? Is it a shared footway, an advisory on road lane or a statutory on road lane? It should be clear.

If approved the use of micromobility machines on footways and in pedestrian or shared areas would become widespread to the detriment of pedestrians despite what the document says. This problem can already be seen with pedal cycles being used indiscriminately on footways. There is reference to Police Enforcement, but clearly the failure of the Police to enforce current legislation prohibiting the riding of pedal cycles on the footway indicates this is unlikely to happen. In addition, there is a section entitled “Use on pavements” - another nonspecific term. At present mobility scooters used on footways are restricted to 4mph and the walking speed of pedestrians is usually taken as a maximum of 3 mph. In the document reference is made to micromobility machines having their speed limited to between 12.5mph and 15.5 mph when used on “pavements”. Many hazards both on footways and carriageways are related to excessive speed or size differential: - motor cars v cyclists, cyclists v pedestrians, goods vehicles v motor cyclists and so on, and this suggestion once more would create a wide speed differential with the obvious danger to older pedestrians in particular.

In our view the most important consideration is road safety for all highway users. In many cases the riders of some of these machines (for example electric scooters, skateboards, self-balancing machines) would be extremely vulnerable if mixed with other vehicles. Consequently, whatever rules are applied their users will inevitably use footways to the detriment of pedestrians – the most widely used method of transport in the country. Many pedestrians have mobility problems, sometimes physical, sometimes because they are accompanied by children or pets, or have visual / hearing difficulties. Our conclusion therefore is that the hazards such types of micromobility machine represent to their users and to others mean that they should not be approved for use anywhere on the highway. Other types of micromobility machines based on conventional cycle designs are inherently more stable and should be no more hazardous on carriageways or on specified cycle facilities than pedal cycles but again would not be appropriate on footways.

In total, 618 incidents involving e-scooters, Segways and hoverboards were reported in the first half of 2019, compared with 1,017 reported incidents in 2018, 1,123 incidents in 2017 and 1,275 incidents in 2016. The first reported death occurred in September 2019 and there have been many serious injuries recorded.

However, the actual number of incidents is likely to be much higher as only 27 forces out of the 45 territorial forces and the British Transport Police revealed figures for each year, while Britain's biggest force - the Metropolitan Police - did not provide information. ¹

If despite these hazards any type of micromobility machine is to be allowed to use footways or areas shared with pedestrians, they should be restricted to 4mph – the same as mobility scooters – with severe penalties for those who modify the machines to permit higher speeds. Finally, there is no reference to use of such

machines on footpaths – another area of potential conflict often abused by pedal cyclists.

Buses, Taxis and Private Hire vehicles

The English National Concessionary Travel scheme (ENCTS) is highly valued by older people and many studies have shown that it contributes to their general health and well-being. Additionally, it creates an overall monetary benefit to the community. These can only be sustained if bus services are kept at a useable level and enhanced by better provision in less well serviced areas.

Many older people value the predictability of a fixed route bus service and since they are less likely to have access to a Smartphone would be disadvantaged by the unpredictability both in route and timing of a so called “flexible” service. The consultation document is silent on the possible disbenefits of such services – one of which is clearly the possibility of abstraction for existing services.

The document suggests that flexible bus services could have benefits for those living in rural areas especially if they could be coordinated with other forms of demand responsive transport. However, experience shows that integration with, for example, hospital non-emergency transport is highly unlikely to succeed.

1.45 million of those 65 and over in England find it difficult to travel to hospital, whilst 630,000 of those 65 and over find it difficult or very difficult to travel to their GP. It is the oldest old who find it the hardest - less than half of people over 80 find it easy to travel to a hospital. It is the people with the worst health and the lowest incomes who struggle the most to travel to health services.²

Such transport often requires a user to be ready at least an hour in advance and cannot provide a return time. In the past there have been proposals that taxis should be allowed to function as buses in rural areas, but nothing has come from them.

Whilst online journey planners can be helpful for people who are not regular public transport users. Such tools are not directly available to many people – including older people - without internet access, or those who are not confident in using the internet. The development of alternative ways of accessing such services, perhaps over the phone, would make them more inclusive, so long as they were properly publicised.

Our view is that any registration of a local bus service, flexible or not, should include a guaranteed minimum operational period of at least 6 months to maintain the benefits of the ENCTS. There are also areas where bus services are “irregular” or have wide service intervals with the result that passengers may be faced with a service departing slightly before the 09.30 watershed with the next service more than 2 hours away. In such cases we recommend that operators should build flexibility into their fares policy so that the ENCTS is valid on the earlier service. Many operators, after all, value the ENCTS revenue as a means of supporting their operations.

Finally, our view is that the Regulatory Review should also consider the following: -

- DfT have largely abandoned an effective overarching policy leaving it to individual Transport Authorities (TAs) to make up their own. This means that those with more financial resources can provide a better system whilst their poorer brethren are left behind. In particular Government financial restraints have resulted in a continuing deterioration in services outside the major City regions and ring-fenced financial support must now be redirected towards the non-Integrated Transport Authority areas.
- Route planning: The continuing reduction in finance available to support socially desirable bus services suggests that Local Transport Authorities and bus companies should work together with older peoples' organisations within their area to develop an integrated strategy linking locally important facilities and encompassing rural and semi-rural communities wherever possible. Such an approach would minimise social exclusion for older people by providing a greater opportunity to access major destinations either directly or indirectly. The DfT should make it compulsory for each TA to submit a detailed and costed Bus strategy which should be revised at least every 5 years.
- Under the present temporary public transport arrangements many bus services have been suspended. Our view is that it should be mandatory for such services to be reinstated once this legislation is ended.

Mobility as a service

We support the general thrust of this part of the consultation, and the statement that transport (by road, rail and in some instance air and ferries) is vital to our health, wealth and social cohesion. However, all too often Government discussions and finance are focussed on the more populated areas and can lead to barriers being placed between them and surrounding communities. Clearly, thinking of mobility as a service will need to ignore false barriers such as local authority boundaries and consider issues more widely, perhaps regionally, as some far-sighted authorities already do.

There are also some less strategic but nonetheless individually important areas that need to be considered. Here are two examples of many: -

1. The continuing push to remove "guards" from trains which has detrimental consequences for the safety of those travelling on the train and for any mobility disabled person wishing to board or alight at unstaffed stations on the route.

There is a significant variation in levels of train and station staffing across the network and where there are no staff to assist on trains calling at unstaffed stations, it is not possible to provide un-booked boarding and alighting assistance. According to a recent ORR survey⁸, only 9% of a sample of disabled people, and those assisting them, had heard of the Passenger Assist system. The huge majority of disabled rail travellers, and non-rail travellers, do not know that they can get

assistance free of charge. It would seem likely that this suppresses demand to a significant degree.^{3 4}

2. Absence of assurance of the “right” for users of appropriate mobility scooters to carry them on buses.

Yours sincerely

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