

Future of Transport Regulatory Review: Call for Evidence

Response from The TAS Partnership Ltd

Department for Transport

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The TAS Partnership Limited
Passenger Transport Specialists

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The TAS Partnership Ltd is an employee-owned SME committed to public service excellence. We have provided research and consultancy services to the land-based public passenger transport industry since 1989. We work almost exclusively in this field, from voluntary car share and lift-giving schemes through to heavy rail. This covers community transport, taxi / private hire, all forms of statutory transport (home to school/college; social work; non-emergency patient transport), conventional and unconventional (DRT, etc.) bus, BRT, tram, light and heavy rail. We use a mixture of in-house staff and associates who can bring a wide range of specialist technical knowledge to bear.

Our client portfolio includes governments across the UK, Ireland and crown territories, EU Commission, local and other public authorities in UK and beyond, a large part of the commercial UK bus industry, CPT(UK), CTA, Transport Focus and many other intermediate agencies, community transport groups of all kind, and many charities and other public interest groups.

We are grateful to the Department for providing this opportunity to comment on some of the regulatory reform issues raised in the Future of Mobility field.

We bring particular expertise to bear:

- a) Micromobility - we undertook a recent regulatory review for States of Jersey, looking at international practice. We also work for disability organisations and therefore have an understanding of some of the issues that their members may face as road and pavement users.
- b) Flexible services - we have been involved in designing Demand Responsive services since we were established, including early generation taxibuses, shared taxi and hire car services, various forms of flexibus and the latest app-based DRT schemes. We have also designed and supported dedicated dial-a-ride services for people with mobility difficulties and have a strong focus on rural service development.
- c) MaaS - we have worked with bus companies that are integrating additional services into their offer through flexible payment and integrated information provision.

2.1 Do you think micromobility vehicles (such as those in Figure B) should be permitted on the road? Please explain why.

In principle, yes, because they are a legitimate eco-friendly means of travel that will continue to evolve and proliferate, and if road space is not granted more will be used on pavements and pedestrian areas. To prevent this it will be important to create a legitimising regulatory framework that channels their use away from pedestrians.

However, there are a number of requirements:

- a) There needs to be an enforcement regime in respect of their use
- b) There will need to be a new section in the Highway Code
- c) There will need to be specific construction and use regulations, partly to protect the consumer but partly to mitigate the inherent risks involved in their road-going use as these vehicles offer less protection to their users than even pedal cycles do. For construction, there are issues concerning speed limitation, lights, indicators, stopping ability, and a requirement for them to be audible in use so that people with reduced vision will be aware of their existence. For use, there are issues around personal protection, particularly mandatory use of helmets, and signalling - similar to pedal cyclists, as well as consideration of whether a minimum age should be introduced.
- d) It may therefore be the case that some of the vehicles in Figure B cannot be adequately adapted for road use. In this case it may be appropriate to create different classes of vehicle, as has been done with mobility scooters, with the non-road-going (i.e. allowed to use pavements and cycle lanes) Class having a severely restricted maximum speed limit. We have in mind the use of lightweight powered scooters by young children - it would not be sensible to force this group onto the road.
- e) Consideration needs to be given to whether there should be a requirement for basic third party insurance. We understand the problem of inequity that this might create in respect of bicycles. To comment effectively we would need to see the accident data and outcomes and match this against the need to introduce a licensing regime to enforce mandatory insurance. Given how little accident data exists currently, this is probably premature.
- f) Consideration needs to be given to introducing a basic road use training package that could cover all speed restricted vehicles including cycles - in essence an expansion of the Bikeability scheme.

- g) There will be some roads (e.g. Motorways) where, as with bicycles, use is inappropriate. Our perception is that most of the vehicles in Figure B are likely to be used in urban settings. Consideration might be given to branding them as urban vehicles to reinforce this, linking this to clearer urban boundaries within which there is a universal 20mph speed limit apart from the access/feeder roads. We do not think, however, that it would be feasible to limit their use to such areas.

2.2 If you can, please provide evidence to demonstrate the potential:

a) Benefits of micromobility vehicle use.

Eco-alternative to car use for short urban journeys – the different types of micromobility vehicle will have differing power consumption and performance standards, but all are battery-powered and emission-free at point of use (often urban areas where there is an air quality problem). This is likely to be much more environmentally-friendly per mile of travel than standard fuel private cars, and public transport.

More affordable than a car, and therefore potentially a means of placing private, powered transit being within reach of those who are economically deprived – this is assuming that unit costs of micromobility vehicles will fall (they are currently still a relatively expensive item). In this context, they have some potential to be introduced as one of the options in Wheels to Work schemes (along with training, insurance and safety equipment). We note that the government has very recently introduced e-scooter trials but were disappointed that there is no mention of Wheels to Work schemes - we think this should be corrected, otherwise the focus will be perceived to be solely about legitimising the business model of the large international scooter rental operations with a particular focus on London. The proposed driving licence requirements during the trials would fit in well with such schemes that also cover Wheels to College / Training targeted at apprentices as minimum age for a provisional Moped licence is 15 years 9 months.

Many of the models offer easy portability when not in use. They can be used in combination with bus, rail, tram services for multi-modal journeys. They can be carried in a car to complete the final leg of journeys in urban areas (e.g. protected zones).

Potential for urban light-goods delivery work / courier services, especially in city centres for clean last-mile delivery. Possibility that some newly designed forms of power assisted mobility could benefit people with walking difficulties, although none very obvious as yet.

Storage, parking and accommodation of micromobility units when not in use requires considerably less space than a car or bicycle.

b) Risks of micromobility vehicle use.

Vulnerability of user on roads, sharing space with heavier, faster vehicles – this is a risk already shared by cyclists and mobility scooter users, and indeed pedestrians in areas without footpaths. The proposed scooter trials should be carefully monitored to establish whether scooter users are happy to take on the personal risk of travelling on roads amongst mixed traffic, or in cycle lanes or whether they divert to pavement use.

Need for user competence – otherwise accidents through user error will be more commonplace – therefore need for development of standards and enforcement through basic training and understanding of Highway Code.

Significant danger to pedestrians if used on pavements and footpaths – these locations are in principle not available to cyclists but in practice the last ten years has seen a significant shift to pavement cycling with a collective understanding that this practice will not be policed. In the proposed e-scooter trials there should be a clear risk to the users that if they are caught riding on pavements they may lose their licence. Use of powered micromobility vehicles (excepting any separate class of very low speed vehicles that might be created - see answer to 2.1) on pavements and footpaths should be outlawed and will need robust enforcement. The biggest problem may occur on shared cycle / pedestrian routes where cycle lane markings are indeterminate.

Controls on micromobility vehicle parking will be required as they are likely to be left on the pavement rather than in the road, especially as there is no parking infrastructure in place. If they are left on pavements or footpaths they will create a significant trip hazard, particularly to pedestrians with reduced vision, and will add to the obstacle course that wheelchair users already have to negotiate in traversing pavements.

There is some danger that micromobility vehicle use could reduce active travel for some – displacing walking or cycling journeys - and so be counter-productive to many health-related initiatives to stimulate walking or cycling.

Unit costs are still high for many people – this is ultimately beyond the immediate regulatory consideration. Legalisation for use would potentially create more demand and grow the market, and therefore competition and scale advantages in production would lower costs to end user. However, type approval could mean a higher specification or modification to existing models which may increase production costs and therefore costs to the end user. Consideration of affordability needs to take into account that these vehicles are primarily used by people at the start of their earning career and who will have low disposable income.

2.3 If micromobility vehicles were permitted on roads, would you expect them to be used instead of:

Vehicle type	Often	Sometimes	Never
Private vehicles		X	
Taxi or private hire vehicles		X	
Public transport		X	
Delivery vehicles	X		
Cycling		X	
Walking	X		
Other (please specify)			

The critical factor is the likely age profile of users who are less likely to hold current driving licences and access/use private cars. We can envisage that micromobility vehicles will be used for commuting, visiting, access to recreation and for hot food and similar delivery. There will be limited transfer from private car, greater transfer from public transport and more from non-powered cycling and walking.

2.4 a. In your opinion, which of the following micromobility vehicles should be permitted, if any, on roads, lower speed roads, and/or cycle lanes and cycle tracks?

- **All types** *Cycle lanes and cycle tracks*
- **Electric scooters** *Roads, lower speed roads*
- **Electric skateboards** *Cycle lanes and cycle tracks*
- **Self-balancing vehicles** *Cycle lanes and cycle tracks*
- **Electrically assisted cycle trailer** *Roads, lower speed roads*
- **Segway** *Cycle lanes and cycle tracks*
- **Other (please specify)**

b. Please explain your choices for using micromobility vehicles (or not) on roads and/or only lower speed roads, providing evidence where possible.

Electric scooters and electrically assisted cycle trailers have the potential for manual and rear wheel braking (whilst front wheel can steer) and the user is able to hold on with their hands. Skateboards, monowheels, and other self-balancing vehicles do not and therefore are inherently less controllable in any incident in mixed traffic.

c. Please explain your choices for using micromobility vehicles (or not) on cycle lanes and tracks, providing evidence where possible.

It is difficult to argue that cycles should have exclusive precedence given that powered cycles are accepted. The properties of the electric bicycle may not be too different to some forms of micromobility vehicle. Speed is the key differential in that this directly correlates to frequency and severity of potential accidents. We would suggest, therefore, that micromobility vehicles are not permitted to exceed 15.5 mph, the speed at which a powered cycle is capped. Otherwise the micromobility user experience is likely to be similar on cycle lanes and tracks to that of cyclists. Even cycle lanes delineated only by painted lines provide some protection from general road traffic.

d. What impact do you think the use of micromobility vehicles on cycle lanes and cycle tracks would have on micromobility vehicle users or other road users?

Off road cycleways would be a useful first stage of use. However cycle lanes on main road routes are not always continuous and may have sections that require users to share the road space, which is not a problem for a cycle but would be difficult for a micromobility vehicle. The upgrading of cycle lanes following the pandemic may improve this situation however. All users will have to exercise more caution. We would recommend that micromobility users wear protective headgear and high-visibility clothing.

2.5 Mobility scooters and pedestrian operated street cleaning vehicles are already permitted on the footway. Should any other micromobility vehicles be permitted to use the pavement or pedestrian areas? If so, which types of devices should be permitted and in what circumstances?

No - the risk to pedestrians is too great. Use of micromobility vehicles on pavements will have a deterrent effect for pedestrians resulting in those with private cars transferring to using them to obtain protection, whilst for others it will simply reduce the frequency with which they venture out - precisely the opposite effect to what is required.

2.6 a) What do you think the minimum standards for micromobility vehicles should be?

All micromobility vehicles' upper speeds need to be capped, in a similar way that mobility scooters and battery-assisted cycles have been. Beyond this, hand controlled braking, lights and reflectors. Braking capacity needs to reflect the weight of the vehicles which, for example, will often be heavier (and therefore possess significantly greater momentum at any given speed collision with a pedestrian) than bicycles. It

also needs to reflect the tyre area in contact with the pavement - this may have implications for minimum wheel size. A requirement for manual control i.e. a handlebar of some kind with physical linkage to braking (not 'fly by wire').

b) Should different standards be set for different types of micromobility vehicle? Please provide evidence.

There may be some benefit in a lower speed Class of micromobility vehicle along the lines of "Class 2 Invalid Carriages". This would depend upon the development of new designs more attractive to older people.

Although one could argue that vehicles that would be restricted to cycle lanes and cycle tracks, such as monowheels and electric skateboards should not need additional braking, lights and reflectors, the problem is that most cycle lanes are delineated but not segregated and are not continuous - consequently users will end up at various points coming into mix with general road traffic. Only where the use is on segregated tracks should lower standards be acceptable.

2.7 Are there other vehicle design issues for micromobility that you think we should be considering? Please provide examples.

Micromobility vehicles should be required to generate an identifiable noise at a minimum level so as to provide an audible warning of their presence to pedestrians with restricted vision. The shape of the noise should be set down in construction regulations so that it is common across different types and makes.

2.8 In your opinion, what should the requirements be for micromobility users, with regard to:

User requirements	Like EAPCs	Like mopeds	Other requirements (please provide details)
Vehicle approval	X		
Vehicle registration and taxation	X		
Periodic vehicle testing	X		
User driving licence	X		
Insurance			X - third party

Helmet use			X "pedal cycle" type
Minimum age		X	
Speed limits			X - 15.5mph

If you believe regulating micromobility vehicles like EAPCs or like mopeds would be problematic, please explain why.

Regulation at present is challenged by the different forms of micromobility vehicles – Segway, Hoverboard, E-Scooter have very different designs and capabilities. It will be difficult to cover all these under a single regulation. Moreover, development will continue rapidly - for example, the current requirement for e-scooters to have 2 wheels, 1 front and 1 rear, aligned along the direction of travel can be met by a monowheel with a trailing stabiliser.

3.1 Should an updated regulatory framework for flexible bus services allow for each category of service to be regulated differently? If so, how do you think it should be regulated differently?

The approach to service regulation taken so far starts by looking at the size of the vehicle and how it is licensed - we thus have flexible services delivered by:

Up to 8 passenger capacity:

- Shared taxis booked 'in advance' - fares to be agreed
- Immediate sharing of taxis when operating in a zone made by a licensing authority - possible fare scale but not mandatory
- Shared private hire cars booked 'in advance' - fares to be agreed
- Taxibuses - requiring registration, a special restricted O licence and set fares
- PHVBuses - requiring registration, a special restricted O licence and set fares
- Small vehicles used under a s19 Permit - cannot carry 'general public' but can carry everyone in an isolated community with no other relevant public transport service

Note the distinction between 'advance booking' and 'immediate hire' that may have made sense in 1985 when telephone booking from landlines was the norm, but no longer serves any useful purpose given the widespread use of Apps by consumers to access demand-responsive services.

Usually 9 passenger capacity or more, although it is possible to operate smaller vehicles as PSVs:

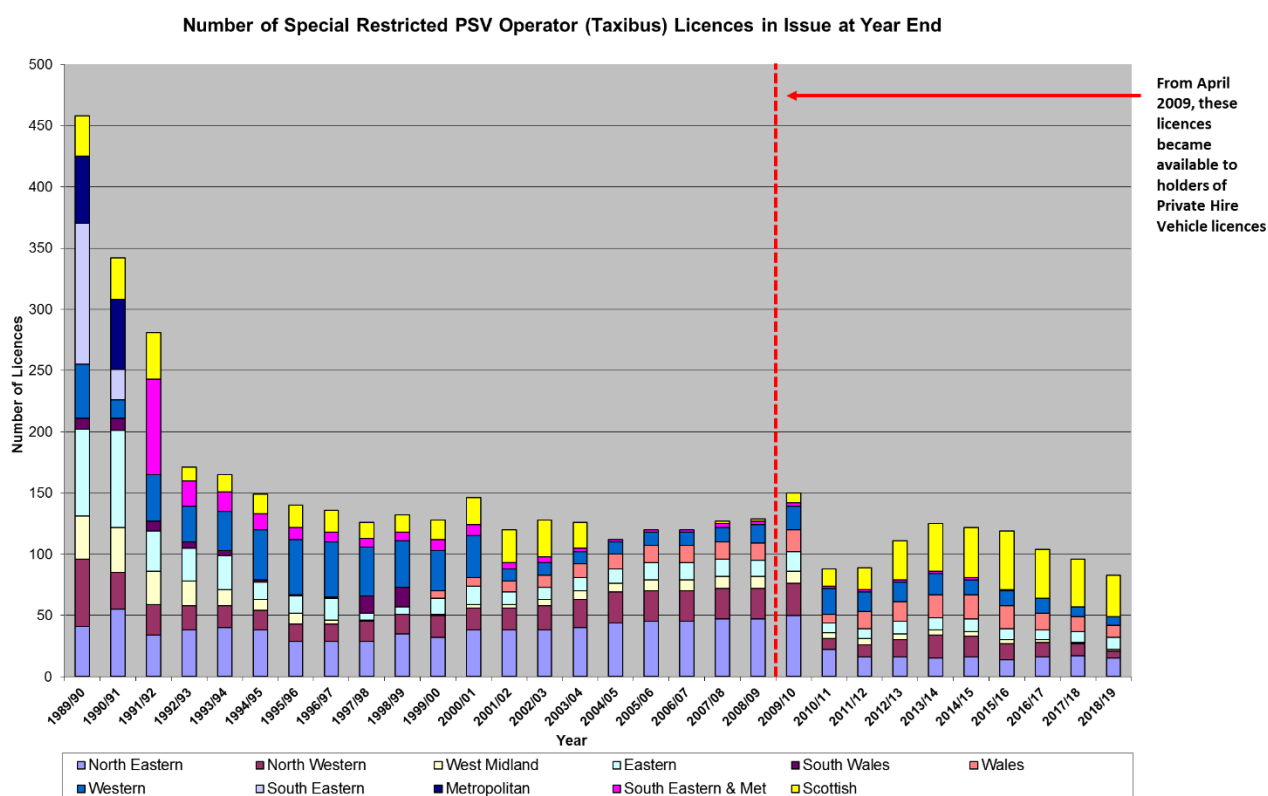
- PSVs of any size registered as flexible services:
 - Many to many
 - Many-to-one
 - One-to many
- S22 Community Buses registered in the same way
- S19 Permit minibuses (possibly larger) serving isolated communities in a 'dial-a-ride' basis (booked in advance)

In addition, the community transport sector operates flexible services that serve those members of the public who are not able to make use of either conventional services or the services above. These commonly include:

- Dial-a-ride services for older and disabled people. These are usually:
 - Many to many
 - Many-to-one
- Social car schemes - these promote journey sharing where possible and may serve either or both of:
 - Older and disabled people
 - People in rural areas without access to a public transport service

Finally, there is the promotion of more general car-sharing - increasingly app-based, rather than through formal schemes related to workplaces. The apps may suggest appropriate fares that, in principle, meet the non-profit constraints in s1 PPVA1981.

We hope that the above illustrates the complex nature of the current arrangements and in our view this, combined with unnecessary bureaucracy has stifled development of more flexible offers. The chart below shows how the attempt to engage the taxi and private hire vehicle sector has failed, with fewer than 100 licences in issue, set against a 2018 vehicle parc in England alone of 73,000 taxis and 212,000 PHVs.



This question talks about categories of service using the three categories from the flexible service registration form, but these categories are simply not those that would be used by consumers or be easily understood by them. Moreover, they require the provision of information to the Traffic Office that cannot actually be used effectively for either feeding transport information databases or monitoring service provision.

There are a variety of other categorisation schema that could have been used such as area-based flexibility, flex-corridors, flexible extension, many to few and so on. These might provide more or different information than the existing categories but suffer from the same problem of trying to predetermine the models of flexibility.

We recommend that, once core safety issues (vehicles, drivers, etc. - not related to service licensing) are dealt with the approach should move away from category regulation and focus on consumer needs.

In general any service that cannot explain adequately to consumers where it might take them, when and at what cost is going to fail. Organising the information into a coherent form is a job for the operator, not the registration authorities. The need for

state intervention through regulation should focus on ensuring that services are inclusive:

- a) In the information that they provide
- b) In their delivery

We note that in respect of a), neither the Traffic Area Offices nor local authorities nor Transport Focus have been effective in respect of monitoring public transport information provision for inclusivity or indeed effectiveness. With the growth in App-based provision this can be expected to become even more of a problem as there is no regulatory or consumer authority standing up for those people who may have difficulty reading timetables or managing web-based or smartphone access.

In respect of b) as regards inclusive service delivery the government has over the years segregated off people with more significant mobility disabilities to be provided for under a different licensing system and with virtually no 'on-the-ground' liaison between community transport flexible services and PSV flexible services. We thus have completely different standards and, as importantly, fares in operation. It cannot possibly be equitable for the group of people who have most difficulty using conventional or even flexible bus services to be provided with a lesser alternative service for which they have to pay more because they are in practice excluded from the ENCTS concessionary travel scheme.

If there is any move to area-based franchises or even extended partnerships under the Bus Services Act 2017, these should be required to incorporate the provision of alternative services for those people who have difficulty using conventional services. This should also extend to the provision of flexible services - it is understood that given the significant pressure on flexible services to operate with the utmost efficiency (we note that the two commercially developed services that the consultation document cites on pp32 and 33, Oxford PickMeUp and Arriva Click Sittingbourne both failed to achieve the necessary efficiency and collapsed) operators will not want to encourage use by passengers who require personal care and assistance when boarding the vehicle and who make considerable time to do so. However, the way to deal with this is not to design them out, as is currently the case, but to ensure that there is an adequate or equivalent parallel service that is more appropriate for them. This will inevitably require public financial support under current arrangements.

3.2 How do you think we should define the area of operation for a flexible bus service?

There is no need for a regulatory authority to define the area of operation - this will come through the service design.

Those with long memories will recall that following the introduction of taxibus and flexible services under the 1985 Act, and before the formalisation of flexible registration arrangements, a service registration was accepted by the North West Traffic Commissioner that covered the entire North West Traffic Area as a pick-up and drop-off catchment zone. Needless to say, this service never operated on that basis because it was an incoherent consumer offer. It is not the role of the registration

process to ensure that applicants have a robust business model for flexible service delivery.

There is no benefit to consumers from artificially constraining the offer or, for example, requiring operators to make multiple registrations of different zones.

3.3 In your opinion, does the 20 minute time window to arrive at each passenger pick-up remain appropriate? If not, how should the time window be altered?

We can see why there is a temptation for a regulator to think that they would be acting in the consumer interest by trying to set criteria but actually this would require the regulator to become involved in the service design detail and would act as a constraint. Any particular window will be too large for one area or circumstance and too small for another one. An urban service user travelling to work may find a 20 minute window unacceptable. A patient travelling home from a hospital appointment on a flexible bus service may well find a 40 minute window acceptable, particularly compared to the 2 hour window they would have been offered if travelling on a non-emergency ambulance.

The acceptability of a window will alter depending upon whether the passenger is provided with up-to-date information about where the bus is and when it might arrive. A 'plus or minus 10 minutes' window is acceptable when I know that the bus is on its way, but rather less so if I am worried that I may have missed it.

We are not aware of any significant problems with time windows. Flexibility is required in regulating this issue - the important issue is that the operator should do whatever they say they will do, not that they have to stick rigidly to 20 minutes.

The most important thing that government could do to improve matters for the consumer is to improve reliable high-speed mobile data coverage.

3.4 Do you think operators of flexible bus services should be required to provide real-time progress updates? Please provide evidence.

As this becomes cheaper to activate and automate it should become standard practice. But note that where there is any competition then it is likely already to be in place, and that it is also likely to be in place where commercial operators have developed the service.

It is less likely to be in place in rural areas where the services are commissioned by local authorities from smaller local operators, and in community transport services such as s22 Permit flexible bus services. However, this may in practice reflect poor mobile phone coverage which makes real-time information provision impossible, patchy or unreliable.

It does not seem unreasonable to require operators to provide real-time progress updates, but the implication will be that some rural or community-based services will require financial assistance to implement this, and that in some areas, the reliability of

the information provided may still not be adequate. In that case it will be hard to penalise operators for failure to provide progress updates.

Note that this should not be seen as an alternative to having a contact telephone number for customer enquiries.

3.5 In your opinion, how could the carriage of more ad-hoc bus passengers be encouraged without impacting negatively on the service received by passengers who have booked in advance?

This question is posed the wrong way round and from an entirely metropolitan perspective. To improve service efficiency with flexible services, we either require:

- a) Significant operational scale
- b) Maximum advance booking

The former can be seen with Uber in London - the reason that they can offer such flexibility and short-notice variation is because there is so much available capacity in an area. As Uber (or similar services) moves out towards less densely populated areas, the poorer its service offer becomes, until in rural areas there is no distinction between its offer and any other large or small taxi/PHV operation.

The reason that a conventional bus is generally likely to be more operationally and financially efficient than a flexible bus is precisely because it 'forces' users to cooperate collectively by altering their time planning to fit in with the bus timetable.

The model of flexible bus service that attempts to cater for more and more ad hoc users is heading down an unsustainable path - we cannot continue to plan in this way as a society facing the climate change emergency that is increasingly recognised by central and local government. We are trying to replicate car-based mobility choice which has turned out to be excessive.

So the more important question should be, "How can we promote more collective travel behaviour?"

In practice, your consultation document points out correctly that in urban areas there is little difference between pre-booked and 'ad hoc' passengers when the booking can be made seconds before the vehicle arrives. There doesn't need to a distinction between the two groups provided that whatever arrival windows that have been promised in the published service offer are maintained. That should be assured by effective algorithms in the scheduling software that are regularly calibrated and that, where possible, apply smart information i.e. real-time congestion and traffic data to calculate journey times.

3.6 What sort of fare structure do you think should apply to flexible bus services?

We do not think that regulatory establishment of particular types of fare structure is very effective. This is an area where minimum basic intervention only is called for.

However, for public transport services to be inclusive it is critical that the cost of a journey is known long in advance because this is the basis for organising one's life and travel movements. A regular service will be a 'lifeline' for some and is not to be treated as simply facilitating discretionary recreational activity and therefore subject to short notice fare variation. This does not prevent a higher fare at peak times in order to minimise PVR, or indeed lower fares at off-peak times to encourage use of spare resources but it does mean that real-time yield management approaches are not acceptable. There is a significant danger that flexible bus services, particularly with a move to contactless payments, would then exclude those on low fixed incomes, for whom predictability is absolutely critical to keeping the weekly budget under control. Note that travel costs makes up a much higher proportion of the weekly household budget for this group than for better-off households.

3.7 a. Do you think there should there be less rigid registration requirements around notice periods for flexible bus services?


b. Which elements of the registration requirements do you think could be improved to enable flexible bus services?

a. Given the shift to digital communication and information provision there is no obvious basis for requiring the length of time currently required for notice periods, which currently reflect the use of postal services, manually entered forms together with manual retyping and transcription of data, combined with a traditional lag in the ability of local authorities to respond at a time when they had more involvement than they currently do. It should be possible to significantly reduce the time period for registration of changes or expansion, subject to the requirement of reasonable publication. However, there should be a longer period of notice in respect of service withdrawal from an area to enable passengers to organise alternative means of travel.

b. Whilst the desire to move to an entirely Open Data approach, using tools such as TranXchange and NAPTAN, is understood and supported, the fact is that we do not yet have an adequate schema for describing flexible services electronically in ways that the public can understand. This is a significant barrier to the wider take-up of flexible services. Note that the community transport sector faces far less of a problem in this respect because they operate on a quasi-membership basis and can therefore invest a lot more time in one to one or direct explanations of how their service works and this is promoted through the relevant peer group communities.

To illustrate the problem, compare the information available through Traveline and/or the Operator for a conventional bus service and that available for a many-to-many registered flexible bus service - in this case using services in a similar area - North Lincolnshire, starting with their CallConnect flexible DRT in the zone that covers Barton-upon-Humber and followed by the equivalent information for the service 450 operated by Stagecoach.

Call Connect Timetable

 **CC4B** Callconnect Ferry Ward - Barton CallConnect

Use radio buttons to select timetable by direction and day-type


	Mon-Fri	Sat	Sun
Outbound	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inbound	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The information on this timetable is expected to be valid until at least 29th July 2020. Where we know of variations, before or after this date, then we show these at the top of each affected column in the table. Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays
[All Stops](#) [Print Version \(PDF\)](#) [Map](#) [Map PDF](#) [Close Window](#)


Notes	NS	C	C	C	C	C	C	C	C	C	C
	C										
Barton-upon-Humber, adj Railway Station	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	1
Barrow upon Humber, Demand Responsive Area (DRT)	0702	0802	0902	1002	1102	1202	1302	1402	1502	1602	1
Barrow Haven, Demand Responsive Area (DRT)	0704	0804	0904	1004	1104	1204	1304	1404	1504	1604	1
Burnham, Demand Responsive Area (DRT)	0707	0807	0907	1007	1107	1207	1307	1407	1507	1607	1
New Holland, Demand Responsive Area (DRT)	0711	0811	0911	1011	1111	1211	1311	1411	1511	1611	1
Thornton Curtis, Demand Responsive Area (DRT)	0715	0815	0915	1015	1115	1215	1315	1415	1515	1615	1
Goxhill, Demand Responsive Area (DRT)	0719	0819	0919	1019	1119	1219	1319	1419	1519	1619	1
Goxhill, Demand Responsive Area (DRT)	0723	0823	0923	1023	1123	1223	1323	1423	1523	1623	1
Wootton, Demand Responsive Area (DRT)	0728	0828	0928	1028	1128	1228	1328	1428	1528	1628	1
Thornton Abbey, Demand Responsive Area (DRT)	0733	0833	0933	1033	1133	1233	1333	1433	1533	1633	1
Goxhill, Demand Responsive Area (DRT)	0739	0839	0939	1039	1139	1239	1339	1439	1539	1639	1
Ulceby, Demand Responsive Area (DRT)	0745	0845	0945	1045	1145	1245	1345	1445	1545	1645	1
East Halton, Demand Responsive Area (DRT)	0751	0851	0951	1051	1151	1251	1351	1451	1551	1651	1
North Killingholme, Demand Responsive Area (DRT)	0757	0857	0957	1057	1157	1257	1357	1457	1557	1657	1
South Killingholme, Demand Responsive Area (DRT)	0804	0904	1004	1104	1204	1304	1404	1504	1604	1704	1
Immingham, adj County Hotel	0812	0912	1012	1112	1212	1312	1412	1512	1612	1712	1

Call Connect Route Map

 **CC4B** Callconnect Ferry Ward - Barton CallConnect

Outbound Inbound
[Print Version \(PDF\)](#) [Close Window](#)

Navigation controls: ↑ ↓ ← →, zoom in (+), zoom out (-)



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Service 450 Timetable and Route Map



450 Bus Route & Timetable: Brigg Cary Lane - Barton Interchange



Favourite bus route



PDF



Print



Email

Next bus

Last refreshed at 13:48

LIVE

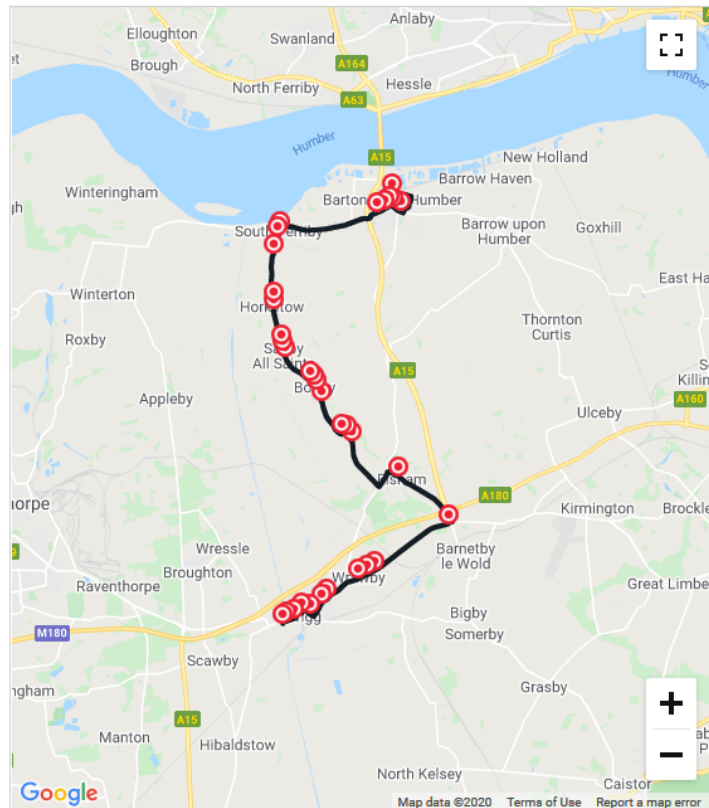
LIVE times only display when they are available - all other times are based on our bus timetables.

Show all stops

14:25		Barton-upon-Humber, Railway Station
	LIVE	
14:27		Barton-upon-Humber, Market Place
14:29		
	LIVE	
		View all stops
14:34		South Ferriby, Black Smiths
		View all stops
14:39		Horkstow, St Maurices Close
		View all stops
14:43		Saxby All Saints, Saxby Hall
		View all stops
14:47		Bonby, Sheepdyke Lane
		View all stops

[← Earlier](#)

[Later →](#)



It can be seen that the combination of the electronic registration data plus the real-time information provides almost no useful information to the would-be user of the Call Connect service.

We see this as a major design challenge for the industry. The main point here is that it is of little benefit requiring information to be provided at registration if we currently lack the means of transposing this into useful information for the consumer. Any improvements will need to work across a variety of media and be tested with a range of users before they are imposed on operators as a registration information requirement.

3.8 Do you think the Bus Service Operators Grant (BSOG) should be adjusted to accommodate the development of flexible bus services? If so, how?

Any alterations to BSOG should only take place within a more fundamental review of public financial support for the range of bus services that fall within the public transport mix. We understand that this is not a straightforward task. Any review will need to identify some means of discriminating between:

- a) Demand-responsive services that have been put in place as a response to low levels of demand, and those designed to provide additional consumer value and choice;
- b) Services that divert on demand as a necessity in sparse areas and those that divert on demand as a passenger convenience factor
- c) Services that pick-up and drop off at the person's origin / destination because of their mobility difficulties and those provided as a convenience

In each of these pairs the second part may be considered to have an element of 'premium provision' about it whereas the first part can be considered a 'necessary' service. It may be that such necessary services will need to receive public financial support, potentially through BSOG, and this may need to extend to some taxi or PHV-based services.

3.9 Do you think the record keeping requirements for flexible bus services are still appropriate? If not, what changes do you think should be made?

Flexible services have developed to become almost exclusively digital – even where there is telephone booking this is immediately converted into digital form. Consequently, record-keeping should not be onerous for the operator, provided some common standards are developed for data transfer which the software platforms could then incorporate in their systems.

However, we do have concerns about both the security of such data and its potential to be used for focused marketing which may be unwanted or exploitative. Automated data capture is very easy and includes the potential to track individual passenger movements and combines information about their use if payment systems. It is only a small step to this data being fed into an 'intelligent system' to provide insight into travel patterns and to predict individual movements. The bus sector needs to learn from data breaches and exploitation within the taxi and private hire industry and ensure that extreme care is applied to how such data is secured, controlled and processed. There is possibly a role for the Information Commissioner to provide guidance here.

3.10 Do you think we could use flexible bus services to improve transport in rural areas? Please provide evidence to support your response.

The Department needs to be much more realistic about the potential of flexible bus services to 'solve' the rural transport problem than it has been in the past. Since the RUTEX experiments of the 1970s it has financed wave after wave of demand-responsive services under pilot or challenge funds. Very, very few of the resulting services have proved sustainable. Unfortunately, hardly any lessons have been learnt about the underlying economics of bus services in sparse rural areas. The monitoring and reporting of these DRT pilots has been woeful given the extent of public funds

that have been invested. It always seems to be the case that the introduction of the latest 'sexy' comms technology or software platform is somehow going to tip the balance in favour of better local take-up and sustainability.

Our analysis is that area-based many-to-many DRT services that primarily rely on technological platforms to improve trip rates are bound to fail in a rural context because this approach cannot overcome the cost problems created by distance and time. To be successful the service design and marketing must channel passengers naturally towards trip consolidation i.e. the travel opportunities are constrained but meet enough common needs to pull sufficient travellers together. Traditional stand-alone DRTs have not been able to reach this 'sufficient' number, because the costs of the operation force high thresholds. The trick is to reduce costs, resulting in lower patronage requirements. The latest ICT, whilst undoubtedly helpful, cannot make the difference. The critical issue is the cost of the driver's time required to pick any one passenger up. Rural buses have fewer passengers and take longer to get them to their destination.

This analysis suggests that we should do much more to support and integrate into the public transport mix in rural areas community-based services that use volunteers to reduce wage costs and thus create the potential for financial sustainability and affordability. These services can in principle also benefit from the same technological advances in communications and scheduling that we are currently seeing, but will not be seen as a priority for technology developers. There could be a role for the government to facilitate this integration.

Put bluntly, the Uber model is not likely to extend into rural areas as it depends upon scale for its effectiveness. However, given the levels of vehicle ownership in rural areas the equivalent scale could be achieved by facilitating community-based sharing through socially-owned and locally controlled platforms that would generate enough trust.

Finally, we repeat that a further barrier to advanced technology in rural areas is the extent of broadband coverage and minimum 4G mobile phone coverage.

3.11 What do you think would be the correct requirement for Disclosure and Barring Service (DBS) checks on flexible bus services?

We do think that the same checks that apply to community transport, taxi and private hire services should apply to drivers of flexible bus services. The question arises whether a standard or enhanced DBS check should apply. We do not think we can assess the pros and cons of this choice without more information. We note that the standard for taxi and PHV drivers has in practice long been Enhanced and that this is the widespread standard within the community transport sector. In both cases this reflects the likely carriage of vulnerable passengers on a one-to-one or one-to-few basis. This is, perhaps, less likely in urban DRT bus services, but may well remain a possibility in rural areas.

3.12 a. What areas of the bus, taxi and private hire vehicle (PHV) framework should we consider in future stages of the Future of Transport Regulatory Review?

b. How else, in your view, can the Government support innovation in the bus, taxi and PHV sectors?

Flexible shared services lie at the interface between the PSV, Taxi/PHV and Community Transport sectors. This raises a significant number of issues concerning:

- employment safety - drivers' hours and records, DBS standards, average working days
- employment conditions - minimum wage not applying in practice to those who are self-employed or working in the gig economy
- fair competition - the continuing dispute about s19/s22 Permit use, effective large operator market influence
- access standards - vehicles below 22 passenger seats not subject to PSVAR and many licensing authorities still do not require taxis to be wheelchair accessible
- fares and affordability

This suggests that a broad review will be needed. We have comments on a couple of these issues:

- a) employment conditions have a significant impact on the poor experiences that some disabled and vulnerable users have had with the taxi/PHV sector.
- b) the Department has been promising to review the regulations made under s19 and s22 Transport Act 1985 for some years. It has allowed itself to be caught by a dispute about fair competition when it should be focusing on consumer benefit. Given how important the use of Permits is in respect of specific services for people with a range of disabilities, as well as others who cannot make effective use of available public transport because either it isn't available at all or it is unaffordable, this regulatory review would appear to be the ideal opportunity to bring those Permit services within the wider family of public passenger transport services. Any residual competition issues can then be decided at a local level by the organisations that are best placed to consider public and social value within the legal constraints of procurement rules that apply – local transport authorities. This is the proper location for resolving the current problem, not with the Department trying to develop a high level interpretation of non-commerciality from a regulatory perspective.

4.1 In your opinion, in the development of Mobility as a Service platforms, what should be the role of local authorities, central government, or other transport authorities?

The development of Mobility as a Service (MaaS) should not be concentrated in the hands of local / transport authorities: this is an innovative field which requires an entrepreneurial approach with which public bodies are poorly aligned. However, we also believe it is desirable that there should be a co-ordinated approach in each area, as a number of competing offers would be confusing and unlikely to attract users away from private transport.

Many of the metropolitan areas have a Ticketing Company which is in charge of the multi-operator or multi-modal period tickets, such as MetroCard in West Yorkshire. The shareholders of these companies are the local bus and rail operators along with the relevant Combined Authority. These Ticketing Companies allow for issues around product range and pricing to be discussed, and pooled revenues to be distributed, without fear of breaching competition rules. As such, they offer an appropriate model to organise MaaS and ensure equitable commercial results for all participants. We can envisage a Ticketing Company operating MaaS directly, or letting a concession to a commercial app developer working to contracted standards.

There may be scope for a National Ticketing Company with a rather different makeup at board level. It is likely that bus operators would be represented by the Confederation of Passenger Transport UK and the Association of Local Bus Managers, while the Rail Delivery Group would represent rail. The Urban Transport Group and Association of Transport Co-ordinating Officers could speak for Combined and Local Authorities respectively. The 'new' modes would need appropriate representation, although Sustrans might represent the cycle hire providers. The involvement of taxi and/or private hire operators as part of the MaaS package is likely to be facilitated by the growth of large platform providers such as Uber. However, there are several significant regional taxi/private hire operators using Apps with equivalent functionality to Uber's offer so care will need to be taken not to exclude any operator indirectly through the package design. Moreover, MaaS will be yet another mode that offers little in rural areas without significant participation from the community transport sector, the private hire sector and car clubs / car-sharing. This part of the package is as yet significantly underdeveloped and as it is less likely to be entrepreneurially driven will require state support - certainly to provide pump-priming.

Traveline already acts as a conduit for multi-modal journey planning. It should be re-invented to act as the public face of the National Ticketing Company, providing journey planning results which include fares information and a web portal / smartphone app enabling purchase of those fares as a through ticket. This would enable some MaaS benefits to be extended beyond the areas of more ambitious, local schemes, and could offer a single revenue distribution service on behalf of local schemes (akin to the Rail Settlement Plan).

If it is to offer a coherent alternative to private car use we believe that a single, simple option is essential in any given area. This suggests that as a fall-back position if the above approaches fail to result in a unified approach, there may need to be a concession let by the LTA.

4.2 a. Can you provide evidence for further measures that are required for the standardisation and interoperability of data, for example the routing, ticketing and timetabling data, to deliver Mobility as a Service?

b. Who should lead these further measures (e.g. central government, local government, industry, or other)? Please explain why.

We are not aware of any further measures required in interoperable data; multi-modal journey planning has been well-established since the days of Transport Direct. However, it is important that any data specifications should be standardised throughout the UK, so government should lead any development.

4.3 In your opinion, is the roll out of the integrated style of ticketing required to facilitate Mobility as a Service prevented by any regulatory or commercial barriers? If so, please provide details.

There are two key issues to overcome when looking at integrated ticketing, these are:

- a) How is the price set? and
- b) Who collects the revenue and how is it redistributed?

In regard to setting the price, the main conversations are around whether the price is just the sum of standard prices for a multi-leg journey or if a discount is offered. For example, in the simple case of a one-way journey from Penwortham, Lancashire to Etihad Campus, Manchester, is the price for a ticket just £1.90 (Penwortham – Preston; bus) + £13.00 (Preston – Manchester Piccadilly; train) + £2.80 (Piccadilly – Etihad Campus; Metrolink) = £17.70, or should a discount be applied for buying a through ticket (say 5% = £16.81)? This question becomes far more complex when considering period-based entitlements to travel incorporating, say, a monthly bus season ticket alongside unlimited bike hire and specified credits for car club or minicab use. A process will need to be in place to agree pricing and any discounts without breaching competition regulations.

The second issue of who collects the revenue and how it is distributed may have an effect on the first question. If the provider of the MaaS customer interface is not jointly owned by the operators (e.g. a Ticketing Company), then it will need to cover its costs and any profit either by retaining part of the 'fares' it collects or by a service charge to the operators, and the prices offered might be artificially increased. The revenue collected will inevitably go into a pot for subsequent distribution, requiring

clear processes and safeguards. The existing provisions of the Ticketing Block Exemption overseen by the Competition & Markets Authority are unlikely to be flexible enough to cater for these requirements, and may also overlap and conflict with the regulatory responsibilities of the Office of Rail & Road.

4.4 What competition concerns do you think Mobility as a Service might present that could be difficult to address through existing regulations?

As suggested in 4.1, the use of local and national ticketing companies may mitigate some competition issues. Local bus partnerships should be expanded to include other transport providers (renamed 'Mobility Partnerships' as 'MaaS Partnerships' will not mean anything to those outside the industry) to allow conversations about integrating services and modes.

The key issue is that there are no significant barriers to entry for new operators to join in MaaS Partnerships and the Ticketing Company. As we are trying to promote sustainable transport use, then there should be common standards around quality of service.

The National Ticketing Company should allow licensing of its systems so that independent app providers are not put at a disadvantage in developing potential offers for adoption within a particular area.

4.5 In your opinion, does the current framework for consumer protection need to be expanded to include liability for multi-modal journeys? If yes, please provide evidence.

No; each operator should retain responsibility for its own services.

However, there may be a need for operators within a MaaS network to agree arrangements to allow completion of a multi-leg journey where the planned itinerary fails, say owing to a missed connection. Such arrangements would need to include compensation from the blameworthy operator for any additional costs incurred by another participant. These arrangements could be contractual, and might form part of the standards of service required in any MaaS offer to the co-ordinating authority.

4.6 Could Mobility as a Service present any particular accessibility and/or inclusivity concerns which might be difficult to address through existing regulations? If yes, please provide evidence.

The major concerns are around booking and payment. According to Finder, 21% of adults do not have access to a smartphone, this includes 27% of those aged 55-64¹. Meanwhile 1.2m people in the UK are classed as "unbanked", meaning they do not

¹ <https://www.finder.com/uk/mobile-internet-statistics>

have access to a bank account. This in turn means they are unlikely to be able to pay for travel via a MaaS payment portal; they will currently pay for travel in cash, which will include at PayPoint providers or similar.

4.7 a. What actions could help to ensure all sectors of the population can access Mobility as a Service applications?

b. Who do you think should be responsible for delivering these actions (e.g. central government, local government, industry, or other)? Please explain why.

c. What do you think government could do to encourage, incentivise or enforce the delivery of these actions?

- a) To cater for those without smartphone or home internet access, or those who are unable to use electronic devices, there will need to be a telephone line for both information provision and booking purposes. There should be an ability to book through railway station booking offices and outlets for bus ticket sales (such as travel shops or other agencies), to allow those without a debit or credit card to purchase tickets.
- b) This would be part of the National Ticketing Company's remit to facilitate.
- c) The government will need to ensure that the technology is in place, and cover at least some of the cost of providing it along with the telephone enquiry / booking line.

The involvement of new modes (micromobility) in the service package will result in exclusion of older people and disabled people from that part of the package, and it is not obvious how this can be compensated for. We think that the government should commission a research study to examine how MaaS can comply with both the letter and the intentions of Equalities legislation - without dealing with this issue properly we can expect significant court action. At the very least, the MaaS offer must include the ability to travel from A to B at equivalent cost by able bodied travellers as well as those with different disabilities. It is appreciated that this may not be by the same modes and may not take the same time but any time differences should be minimal. This may mean motorising walking or cycling journeys.

4.8 In your opinion, what further action is necessary, if any, to ensure that Mobility as a Service platforms provide:

a. Safe and appropriate use of data?

b. Protection of an individual's information?

The use of data should be similar to current travel planning platforms such as operators' smartphone apps. Particular care will be necessary with payment data and records, but robust solutions already exist for these. The main difference will be the potential for data on individuals' personal details and travel patterns to leak beyond

the systems of the MaaS provider, whether for operational reasons or to facilitate audit of the payments made to operators.

While we believe that the general principles of GDPR will remain appropriate to protection of such data, particular attention may have to be given to this in considering the offers made to co-ordinating authorities.

4.9 a. Can you provide any further evidence of the positive or negative impacts of MaaS on active travel and/or sustainable modes? Please provide examples.

b. Can you provide evidence of measures that could be incorporated into MaaS platforms to encourage active travel and/or sustainable modes?

- a) There has to be integration with other modes of transport. Whilst TfL's bike hire scheme has docking stations at or near all major railway stations in central London, an Oyster Card cannot be used to pay for hire – this currently creates a barrier to those who have used an Oyster Card for their inbound rail or tube journey, but then have to use a different payment device for onward travel by bike.
- b) There should be a requirement for MaaS planning apps to prioritise walking and cycling options as standard - users may subsequently set their own priorities.

4.10 Do you think guidance or a Code of Practice for the Mobility as a Service industry would be useful? If so, what content do you believe would be beneficial to include in a Code of Practice?

Yes. The code of practice needs to cover the following:

- How the revenue should be distributed;
- Operating standards for each mode;
- How standards are monitored;
- Compliance with Equalities legislation;
- How unfair advantages are avoided, including in multi-modal journey advice;
- How complaints should be handled, including definition of an independent arbiter.

Question 5a.1

Can you provide evidence of how regulatory frameworks outside of the UK have explicitly sought to improve access to transport for people with protected characteristics?

Whilst there are lots of interesting examples of doing things differently and in some cases better in other countries it is not clear that this is a result of different regulatory approaches to transport as compared to the allocation of funding or different structures for organising public intervention generally. One observation is that the Nordic nations, particularly Sweden, Norway and Finland, appear to be more successful than the UK in taking a Total Transport approach to integrating their passenger transport in comparison to our continued separation between school transport, social services transport, non-emergency health transport and community transport. Our segregation is inefficient and confusing to disabled people.

The Dutch Buurtbus model of small, local and sometimes flexibly-routed service provision within franchises demonstrates an approach to integrating public and community-based provision that we could learn from.

In general our perception is that UK compares well from a technical access standards point of view in respect of vehicles, equipment and safety systems, and that we engage well on an international stage.

We think that the rights-based approach requiring reasonably barrier-free access to services inherent in our Equalities legislation is a better approach than a piecemeal working of standards. It also has the potential to take into account the development of new technology and changed operating practices when it comes to identifying what is currently 'reasonable' i.e. to an extent it self-updates.

Question 5a.2

In your opinion, how can regulation of future transport technologies and services secure equitable access to transport for people with protected characteristics? Please provide examples.

Several years ago, we were commissioned by the Department for Transport to review how well the requirements and intentions of the Disability Discrimination Act had been implemented in small to medium-sized capital transport projects funded by the Department through local authorities. We examined a wide sample of 43 projects and the results were extremely disappointing with a range of failings from technical errors in implementing access features through to totally ignoring the needs of disabled people. At the same time as auditing the implemented outcomes we also examined the planning processes that each authority had undertaken in developing its project.

This led very clearly to an obvious and straightforward conclusion - those authorities that had poor results were the authorities with minimal or ineffective engagement with local disability groups. The need for engagement, not merely consultation, is well understood and set out in almost every piece of guidance that the Department puts out but there continue to be failures.

So our strong recommendation in answer to this question is for the Department to put extra effort into engagement with organisations of and for people with the protected characteristics and to require this level of engagement all the way down the delivery chain.

Trials of New Modes

Local leadership of new transport services

Further areas of focus for the Regulatory Review

We have no useful evidence or comment on these topics.