

RHA

Coaching Ahead

A manifesto for the coach industry



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The vital role of coach

Coach travel plays a unique and underappreciated role in the UK economy and environment. With tourism being the most preeminent example, the coach industry plays a significant role in wider economic activity. School travel and emergency rail replacement are just two additional examples where, without the coach industry, significantly more car journeys would be made, and productivity would be reduced.

The coach offers huge potential to reduce carbon emissions on our roads. If everyone in the UK switched just one car journey a month to coach, there would be a billion fewer car journeys and a saving of 2 million tonnes of carbon dioxide per year.

The coach carries millions of visitors to destinations and attractions in the UK and beyond, as well as essential trips supporting public transport across the country. There are around 3,000 coach operators in the UK, directly employing approximately 42,000 people and contributing £16 billion to the UK economy. The contribution to the UK economy through coach tourism alone is over £8 billion. Coach tourism is a significant market and for many, the most important element to building a buoyant local tourism economy and making visitor attractions into successful businesses.

Coaches transport 600,000 pupils to schools every day across the UK. They also play a significant role in moving people around the country for large cultural events such as music festivals and sporting events.

At every level of politics, from Parliament to Mayoral offices, to local councils, our Government needs to understand the challenges facing the coach industry – as well as the vital role it plays in the wider economy.

Tourism.

Rail replacement.

Sports.

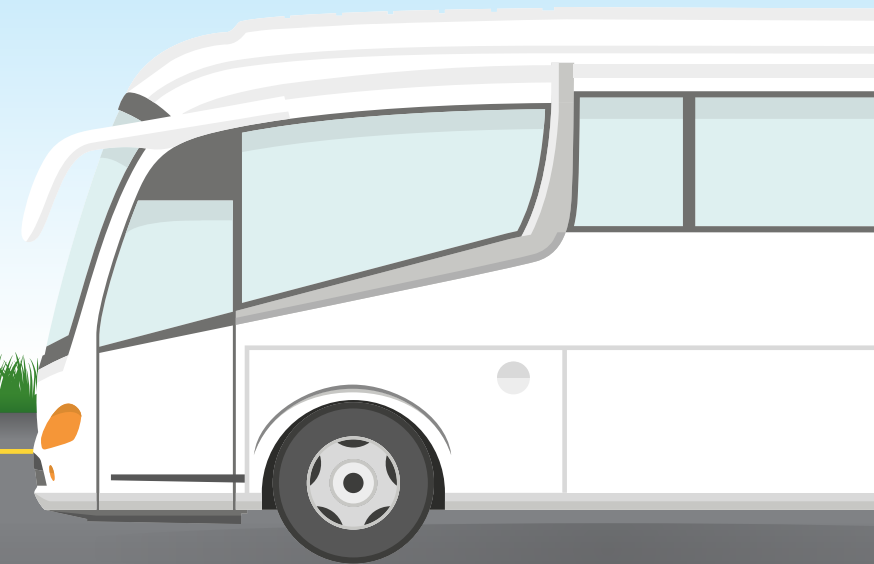
**Home to school
transport.**

Inter-city travel.





A coach carrying
50 passengers
takes the place of
more than **20** cars



International coach travel

The prospect of more stringent passport checks and a lack of capacity and infrastructure in the face of impending border changes is damaging international coach travel.

Post-Brexit arrangements mean coach drivers can only spend 90 days out of any 180 in the EU. Therefore, in practice as there is no visa available for this type of work, a driver specialising in European tours cannot work for 6 months of the year. Also, there are simply not enough experienced drivers willing to work such a pattern to maintain coach as a viable transport method for European tourism.

With the impending EU Entry/Exit system and European Travel Information and Authorisation System, the risk of further damaging delays only increases.

Once introduced, all passengers entering the EU will need to go through a passport booth, either manned or automatic, provide their facial image and fingerprints and answer some questions about their travel in the EU.

Coaches will be significantly impacted by this due to the numbers of passengers they typically carry, the amount of information the new border schemes require from each passenger and the method EU border forces are choosing to acquire it.

The European Travel Information and Authorisation System (ETIAS) will require most travellers to apply online for a travel authorisation prior to entering the EU. In order to help speed up border processing it should be possible to provide the information required for EES at the same time as an ETIAS is applied for, streamlining the checks that need to be made at the border. The impact this could have on international coach operators must be carefully considered as the change is introduced.

Recommendations

- Government should work with the EU to introduce pre-registration and online documentation to speed up border crossings, ensuring that coach travel remains a viable option for international journeys.
- Visa rules for drivers also need to be changed to allow drivers who are beginning and ending their tours within the UK (and therefore not directly competing with European drivers) to work consistently and regularly.

Infrastructure for coaches

Coach operators require almost daily access to urban centres for their main sources of revenue which are tourism, hospitality, public service replacement services and leisure.

Local authorities, sub-national transport bodies and national Governments must consider the needs and role of coaches in infrastructure projects, as well as in our cities and major tourist areas. Barriers to building passenger drop-off zones and coach parking must be lowered and planning applications for developments which are of interest to group travellers must include robust transport plans which include facilities for coaches.

We're calling for our road infrastructure to be made fit for purpose, and greater consideration for the needs of coaches in the design and planning of new developments and road upgrades. Nationwide, potholes, and poor roads create dangers for drivers, passengers, pedestrians, and other road users. Additionally, time-based parking restrictions inhibit the flexibility required for coach tourism.

A lack of coach parking and adequate rest stops – particularly in high travel areas like Kent – make it difficult for drivers to comply with the strict time regulations they must follow to keep their passengers and other road users safe.

Increased costs and restrictions for coach access to major transport hubs, in particular airports, is problematic. Airport operators have varied access and charging procedures. Open access to airports for coach and bus operators should be a specific requirement. This would open competition for services and incentivise the modal shift to both bus and coach, as prices reduce and reliability increases.

Recommendations

- The Government must work with industry partners and local authorities to invest in our road infrastructure including improved port and border facilities, roadside facilities and parking.
- Motorway service areas should place greater priority on coaches, giving priority service to drivers to allow them to meet schedules and having parking areas more conveniently located for coach passengers to access services.
- Local authorities should work with major tourist attractions, hotels and leisure facilities to ensure they provide sufficient coach parking and rest stops and should ensure that no traffic bans are introduced to coaches in their jurisdiction to enable frictionless movement of people.
- Government should issue clear guidance to local authorities to set out best practice for traffic management to improve the operating environment for coach travel.





■ The transition to zero emission coaches

In the drive to net zero, the industry needs actions to stimulate the development of electric and hydrogen coaches, with a focus on the distinct role coaches play compared to buses and other vehicles.

It is essential that a roadmap is developed to chart how Net Zero for coaches can be delivered. This is so operators are given the certainty they need to invest with confidence in new and unproven technologies and can realise a return on their investments given an average 18-year lifespan of a coach.

Per passenger, coach travel is one of the lowest-emission forms of long-distance and international travel, comparable to rail travel. The environmental benefits derived from a coach should be seen in the same vein as public transport. A single coach can take up to one mile's worth of cars off the road.

As we start planning for the introduction of zero emission vehicles, lessons must be learnt from the backlash against London's Ultra Low Emission Zone (ULEZ). In particular, public authorities **must not** create a supply shortage of zero emission vehicles via the premature introduction of Zero Emission Zones. Doing so will make the transition unaffordable for small businesses as zero emission vehicle prices rocket upwards unnecessarily. Instead, zero emission coaches must be phased in sustainably and affordably.

The need for Clean Air Zones must also be kept under review. When freight counterparts have reduced NOx pollution by 70% since 2013, Clean Air Zones should be abolished once legal air quality compliance targets are achieved.

■ Recommendations

- The government should work with industry and the market to develop a zero-emission coach travel roadmap up to 2050.
- Government investment in zero emission (EV) refuelling and recharging infrastructure suitable for coaches across the Strategic Road Network
- Coaches should feature in the Government's Zero Emission and Hydrogen Infrastructure Demonstrator (ZEHID) trial to develop vehicles with longer ranges to fulfil the functions needed and government must ensure a minimum participation from coach operators.
- An interim fuel duty incentive for low carbon fuels so that coach operators can run the cleanest fleet possible while waiting for zero emission operation to become viable.
- Government must publish its much-delayed Low Carbon Fuels Strategy as soon as possible to give industry the confidence it needs to invest in alternative fuels.
- Updated guidance on the implementation of clean air schemes to ensure coaches are not unfairly targeted in comparison with smaller, dirtier vehicles.

Addressing the skills shortage

The coach and bus industry has an estimated shortage of 5,000-10,000 drivers. As older drivers retire and others leave the industry, recruitment is not keeping up, and that shortage will only grow.

Despite record levels of recruitment and investment in training and apprenticeships, staff shortages remain persistent across the industry with almost 14% of driver roles currently vacant. Shortages of drivers and technicians are already a brake on growth and are holding the industry back from further growth.

The current apprenticeship for PSV drivers needs to be reviewed and made "fit for purpose". Currently, it does cover training towards acquiring a Category D licence and so effectively fails to include the most basic requirement for a coach driver.

We need a clear pathway from education into a career in coaches. Current age restrictions for bus and coach driving of 20 years limit the ability of companies to hire young people straight from school. We would like to see the removal of restrictions for 18-20 year old drivers – accompanied by adequate safety and insurance support.

The success of the Skills Bootcamp for HGV driving shows this type of flexible short course is effective in training drivers.

Skills shortages are not limited to driving, with members experiencing issues recruiting and accessing training for heavy vehicle technicians. Given that it takes 3 years to fully train a new technician, access to training must be improved with short course solutions offered to enable people to gain essential workshop skills such as tyre fitting and inspections.

The industry also needs to be more proactive about introducing attractive employee benefit packages to generate interest. We have been working with our members and the government to ensure that the issues associated with the skills shortage are addressed, considering both the short-term and long-term benefits.

Recommendations

- The Government should extend the Skills Bootcamp course to include Category D licence acquisition along with technical courses such as tyre fitting.
- Remove the current restrictions on 18-year-old drivers to allow them to undertake non-scheduled or occasional journeys, making coach driving a career choice for school and college leavers.
- The driver apprenticeship scheme as it applies to both bus and coach drivers needs urgent review.





/ A simpler regulatory environment

Coach services lead the way in accessibility, offering the only realistic longer-distance travel option for many older and disabled people.

Under the current Public Service Vehicle Accessibility Regulations (PSVAR), all applicable vehicles must be 100% accessible, which far exceeds the demand for such vehicles. The equipment and space required on a vehicle to ensure 100% accessibility are significant and means that in most cases accessible coaches are essentially running extra dead weight and space. This raises questions of efficiency and net zero compatibility.

Making all buses and coaches 100% accessible does not mean all journeys are 100% accessible. This is due to the lack of physical infrastructure being available at non-scheduled locations where a coach may be required to pick up a passenger (e.g. rural roads, remote locations).

There is also growing evidence that the lack of suitable coaches is driving a switch from use of coaches for home-to-school travel towards buses, solely to meet the requirement of PSVAR legislation. This is despite some concerns over the lack of comparative safety features on buses compared to coaches.

The Government has committed to review the Public Service Vehicle Accessibility Regulations 2000 (PSVAR), and we call on them to tackle this fundamental flaw in the current legislation by focussing on 100% accessible journeys rather than 100% accessible vehicles.

By shifting regulations to focus on the customer and their journey, where coach operators have a legal responsibility to provide the elements which allow a disabled person to complete a journey by coach, the industry can better service all its customers including the disabled. Operators would need to have access to coaches that meet a particular need of a disabled person; however, there would be no requirement for all coaches to be 100% accessible. This proposed reform would both ensure access for all whilst also allowing the industry to operate at full capacity.

We also seek clarity from Government on safety measures required of buses versus coaches to ensure that the former does not benefit from an unfair competitive advantage.

Finally, the UK Government should look at the potential for review and reform of PSV drivers' hours. PSV drivers typically spend a lower proportion of duty time driving than their freight counterparts, and we believe there is scope for appropriate reforms that maintain safety and allow for greater operational flexibility. With the EU actively considering changes, the UK must similarly keep abreast of the potential for reform.

/ Closing comment

Coaches occupy a unique position in the transport sector – it's the only mode that can transport large numbers of people point to point without significant additional infrastructure investments. The next Government should help our sector fulfil its full potential and connect more people to more destinations, boosting economies and minimising the environmental impact of travel.

For further information contact: policy@rha.uk.net

! The RHA is the leading trade association representing over 8,500 road haulage, coach and van companies across the UK, 85% of whom are small and medium-sized enterprises (SMEs). Our members are operators of vehicles who, between them, operate around 250,000 HGVs (half of the UK fleet) out of 10,000 operating centres and range from a single-truck company to those with thousands of vehicles.

! For more information, please connect with us:



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