

# York's Voice for Bus Users

## *Footstreets Shuttle Bus Consultation YBF Response*

15 February 2023

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## Background

City of York Council have launched a consultation on a proposal for a shuttle bus service serving the city-centre footstreets. The prime reason for this is as a mitigation for the closure of the footstreets to Blue Badge holders.

## Strategy

Commenting on this proposal is made difficult because, yet again, we are faced with a scheme drawn up in the strategic vacuum created by the absence of a local transport plan. The scheme appears to be designed solely to mitigate Blue Badge holders' loss of access to the footstreets.

There is no indication of anticipated costs or how the service would be funded.

There is little sign of consideration having been given to which other passengers might use it, and to what extent. This isn't just a question of whether they should be permitted to, which the website indicates they would be. It also has implications for the route, the capacity, the service frequency, and so on. A service designed purely for Blue Badge holders and then made available to others is likely to be less attractive to the larger ridership which could make the service more frequent and more viable. Visitors arriving at the railway station and wanting to go to the city centre are one obvious example: should the service be designed to accommodate these too?

Even if aims and objectives were better defined, we very much doubt whether anyone has an accurate idea of how large the ridership would be. It is therefore necessary to include in the plans a strategy for dealing with the actual numbers that arise. Plans should be prepared in advance to minimise the response time in case demand soon exceeds initial capacity.

There is no suggestion anything else might be changed. What implications, for example, do the existence of this new service have for other bus services? Should one-way restrictions be altered anywhere? Are there any road layout modifications that would open up options for a better service? We see no indication of any consideration having been given to wider questions like this.

To design the service without reference to any overall transport strategy is hardly the best way to maximise the likelihood of success. Minimal-cost *ad hoc* schemes such as this threaten to deliver benefits that are minimal too.

## Blue Badge Holders

This proposal is a mitigation for the closure of the foot streets to Blue Badge holders. It needs to be pointed out that the mitigation is only partial for a number of reasons, only some of which are related to the bus service itself. We leave it to other interest groups to comment on some of the other aspects.

## **Parking**

The three options presented provide figures for Blue Badge parking spaces, but these are of no use as a basis for comparison of the options because:-

- a) option 1 includes 18 bays in Coppergate car park, which would not be suitable for all Blue Badge holders;
- b) option 2 describes the number of bays in Monk Bar car park as '20+', presumably meaning the number might be greater, but with no indication as to how much greater;
- c) option 3 similarly unhelpfully describes the number of bays in Nunnery Lane car park as '12+';
- d) there is no indication how or where the 31 bays presently in Castle car park will be substituted for; and
- e) no provision at all is assumed at the railway station.

We are therefore unable to comment on which route might be best from this point of view, and would add that, given figures as unreliable as this, public comment is likely to be of little value too. We would have preferred something better.

Displacing Blue Badge parking to car parks outside the footstreet area will increase the number of disabled parking bays required at these locations.

## **Routes**

For those who can use peripheral parking, a shuttle bus could be of great benefit, particularly for blind & visually impaired people, those who are learning-disabled, neurodiverse, have dementia, or for whom wayfinding is difficult. It could greatly help in navigating to specific destinations.

Audio-visual passenger information is essential for many disabled passengers, and important for visitors too.

For maximum connectivity, a shuttle bus must connect with the maximum number of regular bus services, serve the station, and connect with the maximum number of Blue Badge spaces in car parks.

Unfortunately, Castle car park, scheduled for closure but not yet approved by Planning for closure, has the most Blue Badge spaces by far: 31 spaces where most of the other car parks have fewer than ten. Multi-storey car parks do not work for many disabled people (height restrictions, unreliability of lifts, poor lighting etc.) so for them Coppergate multi-storey car park is not a viable alternative.

In their legal challenge to withdrawal of Blue-Badge footstreet access, holders say they are now unable to get to, in particular, banks, building societies, the main post office, Browns, Betty's and City Screen cinema. Any route should therefore serve Blake Street, Davygate, Parliament Street, Coney Street, and Lendal.

## **Type of Vehicle**

Whatever vehicles are chosen, an essential criterion is that wheelchair users board using the same entrance as other passengers to avoid stigma.

Also, whereas insurance requires that wheelchair users boarding the current Dial-a-Ride vehicles must be strapped to the floor in their chairs, this is to be avoided because it will significantly delay the running of vehicles and again create stigma. Other bus services operate without this imposition, so we assume a solution to this problem can be found, as it must be.

## **Priority**

If this service is to be a mitigation for loss of Blue Badge footstreet access, it would seem to suggest Blue Badge holders should be given priority when demand exceeds capacity. Presentation of the Blue Badge itself isn't an option because that often needs to be left at the car park. We do not pretend to offer a solution to this potentially thorny issue.

## **Hierarchy of Need**

Making the shuttle readily available to those with somewhat limited mobility would largely if not entirely be met automatically if senior citizens' bus passes are valid on this service too, which consultation representations say they would be.

## **Other Users**

We question the wisdom of providing a service designed with such a limited target ridership in mind, when there will clearly be non-disabled users who could benefit, as well as those with less severely limited mobility. Targeting a larger potential customer base would require greater capacity, but would usefully raise service frequency and attract additional fare revenue.

A service designed solely for Blue Badge holders also fails to address another deserving group: those who are not 'officially' disabled, but who nevertheless have somewhat limited mobility, many of whom are elderly. This group would be usefully served by allowing holders of senior citizens' bus passes to use the service free. But because many of this group are able to walk further, their travel needs are different. Service design should take this into account too.

It seems a lot of consultees have commented that visitors shouldn't be allowed to use the service, as that would prevent local people using it. Arguments of this nature rest on the implicit assumption that capacity would be independent of demand. We very much doubt whether that would be the case. Visitors arriving at the railway station are an obvious example of a ridership which would, in effect, subsidise the service for Blue Badge holders.

In any case, a blanket ban on visitors using the service would discriminate against disabled visitors and be unlawful. Bearing also in mind the implications for service frequency and revenue of allowing visitors to use the service, we cannot support such a view.

## Route

Little thought seems to have been given to whether a shuttle service should be solely designed to mitigate for Blue Badge holders' loss of footstreet access, or whether it should serve more passengers, even though that has the potential to pay for a better, more frequent service and benefit others too.

If the core principle of a central loop is retained, a reasonably comprehensive service would need a number of spurs off it, which would entail either:-

- a) a single but complex route, taking passengers along detours out to extremities and back again, and therefore requiring more seats per passenger – in necessarily short buses! – or
- b) more than one route sharing the central loop, but each serving different spurs.

An argument against option (b) is that it would be confusing for some disabled passengers, but a single complex route would likely be as bad or worse, so the only way to keep the route as simple and unconfusing as possible would be to abandon the idea that the service should be of maximum benefit to other users too. Is that the right thing to do? That decision ought to be made not by default, but within the strategic transport planning framework York lacks.

## Severely Limited Option Set

We were struck by the very limited set of route options presented at the Hilton Hotel. We understand there was initially a far greater number, which was whittled down to six, then by the time of the presentation in the Hilton, just four to consult on. Between then and putting the options up on the CYC website, the number was further reduced to just three.

Michael Howard informs us this doesn't mean CYC would not look at alternatives if the consultation response points in that direction. We therefore assume that the very limited set of options presented is not exhaustive. We are not persuaded, however, given what seems to us an unnecessarily narrow option set, that CYC is genuinely as open-minded as we are being led to believe.

## Limitations of Proposals in the City Centre

A common theme of many options was a loop running along Coney Street and Lendal, then back along Blake Street, Davygate, and Parliament Street. Whether or not this is the best option depends on the target ridership. For the more severely disabled this does appear to be the better option of those consulted upon. But there will be those with less limited mobility who are able to walk the short distance between these two routes, so for them a loop including Low Petergate and Colliergate would be more suitable, and connect better with the Stonebow interchange. If, after the upcoming local elections in May, the decision to bar Blue Badge holders from the footstreets is reversed, and the shuttle bus proposal is not abandoned as a result, a wider loop deserves serious consideration.

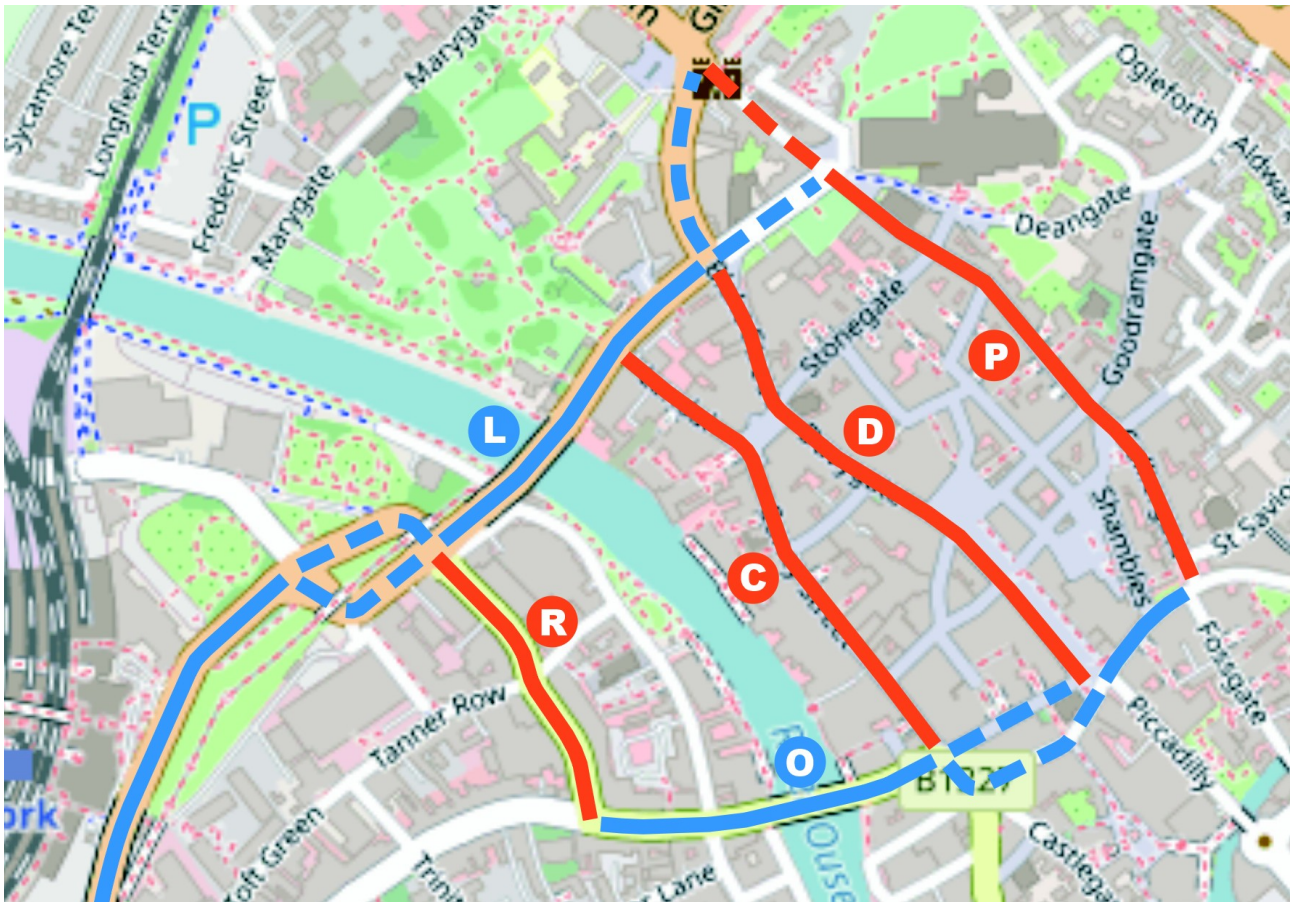
If the shuttle is to give the disabled access to city-centre streets, the CYC proposals fall short by only serving two north-west to south-east street alignments.

## Brief Analysis of Options

We question whether enough possibilities have been looked at. An obvious issue is whether or not Petergate can be served in addition to the other two cross-centre routes, rather than instead of one of them.

What follows is a brief analysis showing why designing this service is not as easy as might be hoped.

The map below shows in red the three north-west to south-east alignments considered in the three consultation routes, P (Petergate), D (Davygate) C (Coney Street), plus an additional alignment R (Rougier Street). It also shows in blue two south-west to north-east alignments, L (Lendal Bridge) and O (Ouse Bridge).



The routes proposed by CYC only traverse two of the red alignments, C and either D or P, missing out P or D respectively. Rougier Street, despite its importance as an interchange, is not served by any of the consultation proposals.

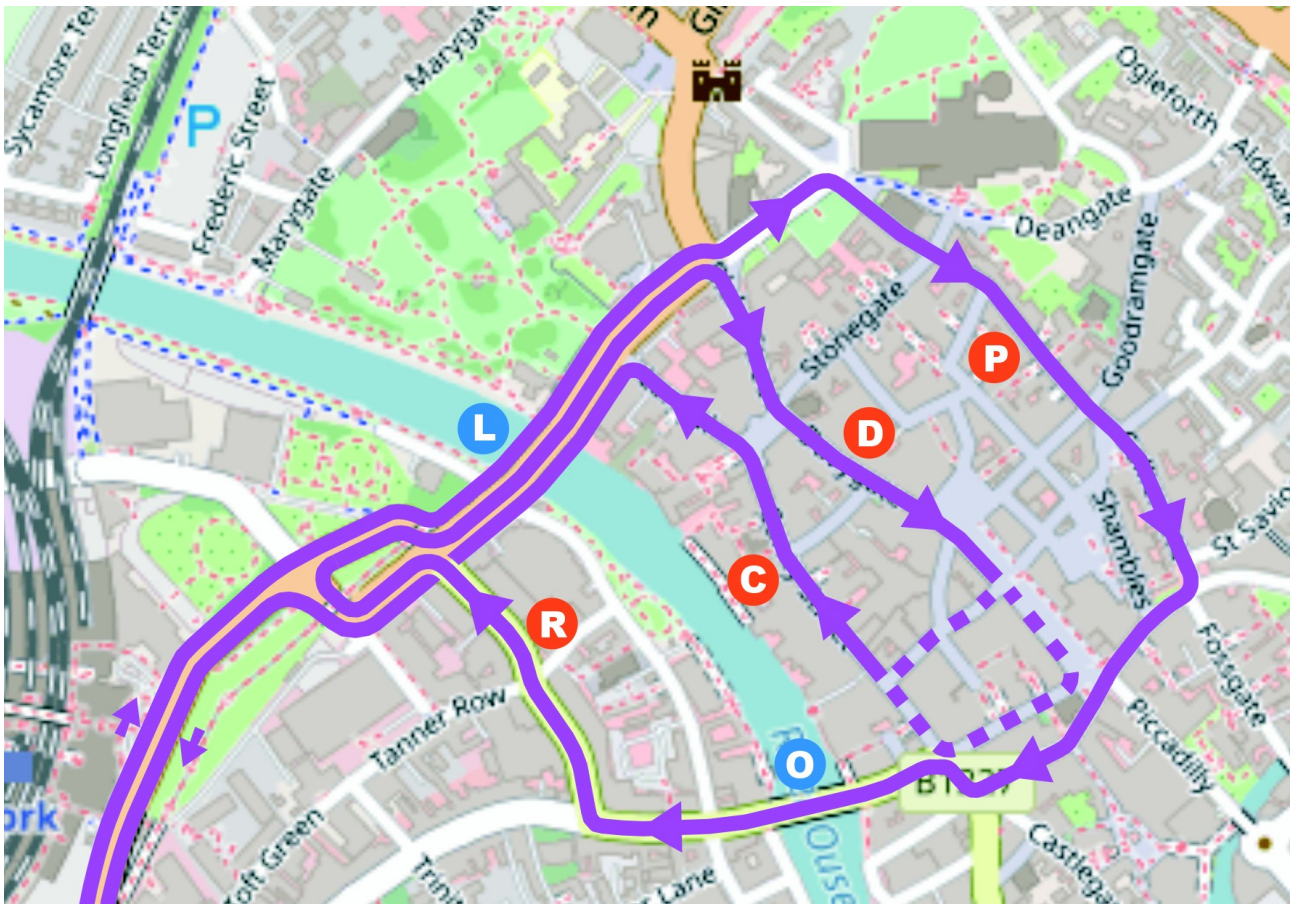
To make a complete round trip, the route must traverse the red alignments an even number of times divided equally between the two directions. The CYC routes achieve this by traversing only two, one in each direction. A better geographical coverage would be achieved by four traverses, two in each direction. But with only three red alignments on the east side of the Ouse, that would require one of them be traversed twice, which is inefficient and also potentially confusing to passengers (and even drivers too?).



The added red alignment through Rougier Street avoids the need to traverse any one twice, improves geographical coverage, and provides better interchange with other routes.

But there are no straightforward routes compatible with existing restrictions, namely (a) one-way streets, (b) no right turn from Lendal into Museum Street, and (c) barriers between Low Ousegate/Nessgate and High Ousegate/Spurriergate.

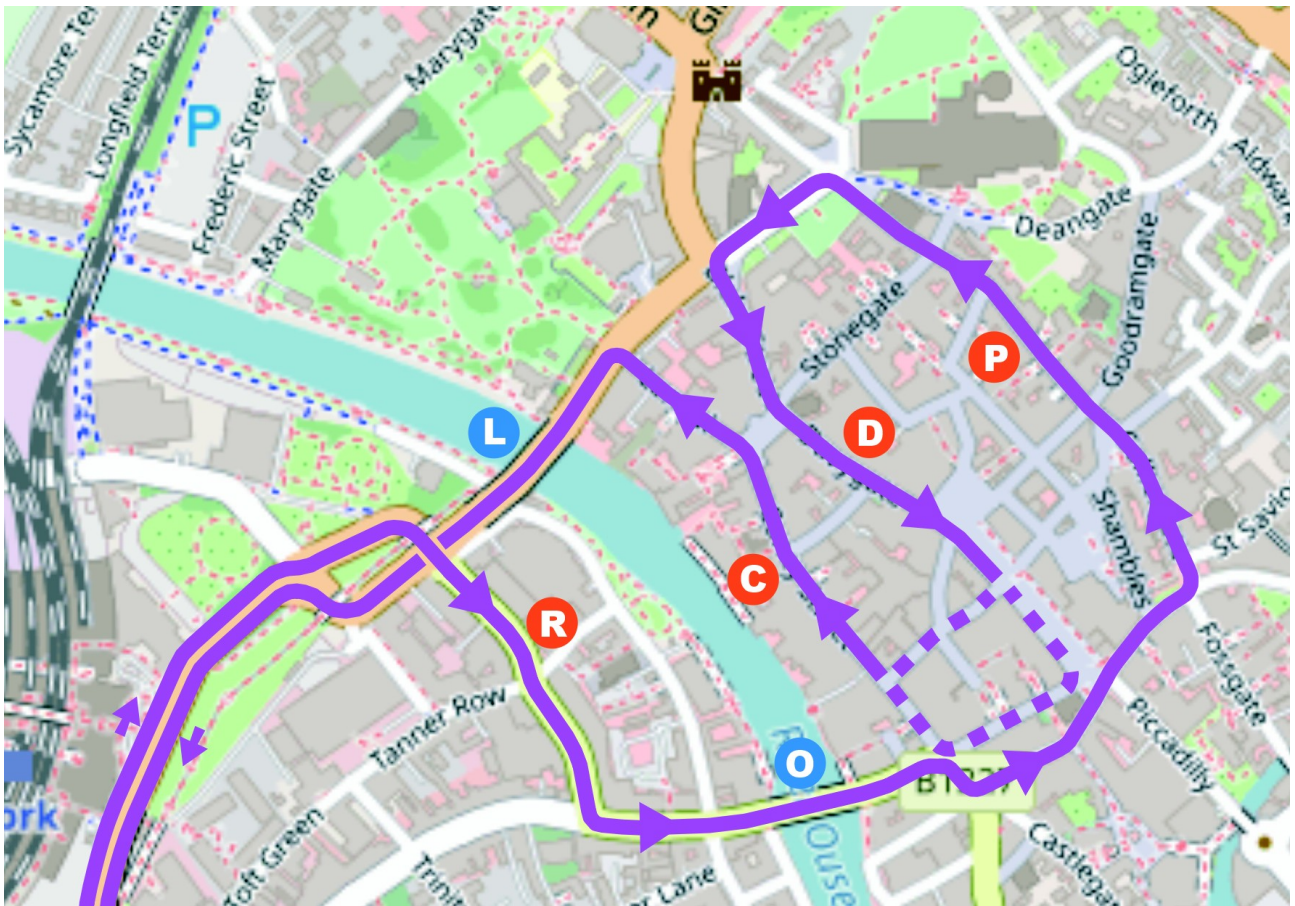
One route which can do so is the convoluted one in the next map. Others are variants on the same theme, possibly going along St Leonards Place and High Petergate instead, and possibly with legs D and P of the circuit interposed, though the one shown does work a little better at the junction of Parliament Street and High Ousegate. No route exists which avoids crossing Lendal Bridge three times.



Dotted lines suggest a possible slight shortening of the route by going via Market Street instead of High Ousegate, but this would require a change to one-way restrictions in Market Street.

Although this map has been drawn on the assumption that the shuttle serves the station and Nunnery Lane car park – our preferred route – the general principles apply whatever car park terminal sites are chosen. The route is inevitably convoluted, with a total of four river crossings unless existing restrictions are modified.

This third map shows a much simpler route which might be achieved by reversing the one-way restriction in Petergate, and the direction of travel in Rougier Street to maintain the balance of directions along the red lines.

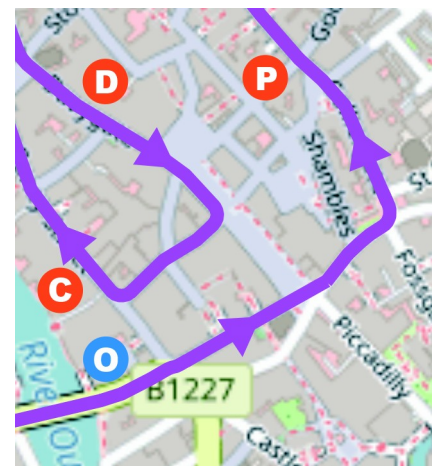


While we feel something more along these lines would be better, we cannot endorse this specific route because we are not in a position to say whether it is practicable, since there would presumably be knock-on effects from reversing the Petergate one-way restriction, which needs to be analysed.

A scheme like this would also require the Coppergate one-way restriction be re-examined. This would have other merits in any case: the detour via Castle Mills that eastbound buses now take is most unsatisfactory. Permitting buses and perhaps taxis to run in both directions did help tilt the balance of advantage away from private vehicles and towards public transport, and the detour via Castle Mills has its own safety issues for bus users. There are no easy solutions here!

If that solution is not acceptable, an alternative would be to allow shuttle buses to pass through the barriers and run along High Ousegate instead, but in the opposite direction to the one in CYC's consultation proposals, as shown on the right. In this case, the case for shortening the Davygate to Coney Street loop via Market Street is stronger.

Again, changes to existing restrictions would be required. It is not our intention to become bogged down in detailed discussion of alternative routes. There are far too many options. The important point here is to illustrate how designing the shuttle service simply to fit in with existing





restrictions leads to a suboptimal outcome with either poor geographical coverage or a convoluted route. If a shuttle service is to be introduced, a wider review of city-centre infrastructure is needed to create an environment in which the shuttle can deliver better value for money. We would support a major review of all bus services and their infrastructure needs at the same time. Strategic planning is needed.

## **Serving the West Side**

Although we are of the view that something along the lines outlined above would be preferable, the following observations relate to the specific options presented in the consultation, in which only two traversals along red street alignments are made. The arguments present a general case for the Nunnery Lane car park option, which the maps above assume.

Most (i.e. just two out of just three!) consultation routes run north-westwards along Spurriergate, Coney Street, and Lendal (red line C), and return south-eastwards along Blake Street, Davygate, and Parliament Street (red line D). Some proposals link Lendal and Blake Street directly via Museum Street.

One concern is the practicability and safety of turning right out of Lendal into Museum Street, which is presently prohibited. Two obvious alternatives would avoid this: the first is to traverse the loop anticlockwise instead, but this is incompatible with existing one-way restrictions. The second would be to turn left out of Lendal, cross Lendal Bridge, turn on the west side, and return across Lendal Bridge.

## **Lendal Gyratory**

One suggestion, purely as a way to avoid the inconvenient right turn, would be to turn via Lendal Gyratory, which would add interconnections to the route, but only to a limited extent: not all services via the railway station and Rougier Street stop here.

Another disadvantage to an interchange here is that pavements are steeply-sloped, making them unsuitable for many wheelchair users. The only merit we can see in turning here is as a temporary expedient, should Station Gateway road works make this necessary.

We therefore do not support this possibility, partly because ...

## **Railway Station**

... we strongly believe it should serve the station in any case, on integrated transport grounds. 25% of York's visitors arrive by train.

From the narrow perspective of providing mitigation for local Blue Badge holders, serving the station is less important, but if a wider potential ridership is taken into account, as we believe it should be, its availability to visitors – including disabled ones arriving by train – would have obvious benefits, including the potential to support the service through additional fare revenue.

## **Nunnery Lane Car Park**

There are contradictory indications concerning when the service might start. Michael Howard tells us that it would not begin before the Station Gateway project is complete. But Option 3 turns round in Nunnery Lane, apparently on the assumption that turning at the station is not possible. This lack of clarity makes practical comment more difficult.

Nunnery Lane car park is the principal car park for the entire west side of the city, so is a very important destination for Blue Badge holders. Turning here has an additional practical advantage over turning at the station: railway passenger numbers are very peaky, depending on when trains arrive. Inbound Blue Badge holders using Nunnery Lane car park would automatically have priority simply by being first to board.

With the caveat that we are yet to be convinced that the limited set of three options offered includes the best possible, YBF believes the third option serving Nunnery Lane car park is the best of the three, largely because it serves the railway station too.

## **Frequency**

We believe the service frequency should be high, preferably every 15 minutes, or even more frequent. Our biggest fear is that with small buses, passenger numbers could be so high that there may be times when the disabled ridership will be prevented from using the service due to overcrowding.

## **Buses**

Of the bus options offered, we were least impressed by the microbus, simply because it looks too small, so fare revenue is less able to defray fixed costs. Apart only from the question of strapping wheelchairs to the floor (see above) we suspect a Dial-a-Ride type, with the highest capacity, would be most suitable.

None of these comments, however, is based on any analysis. We do not know how many passengers would use the service, and very much doubt whether anyone else does either. Passenger numbers are very dependent on the target ridership, which is poorly defined. Choice of bus and choice of route are not necessarily independent of one another.

## **Street Seating**

People with limited mobility, whether Blue Badge holders or not, need seating in the streets. Joined-up thinking is needed here, so the seating and the shuttle service stops are co-located.