



# Department for Transport

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HM Coroner's Court  
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18 Nov 2014

Dear Mr Nelson

Thank you for your letter dated 11 November, which referred to your inquest into the death of Mrs Muriel Naylor. On conclusion of the inquest you made a finding that the design and location of the seat on which Mrs Naylor was sitting on the bus contributed to her fall and ultimately to her death. I am replying as head of the Crash Injury Mitigation branch within International Vehicle Standards division, which has policy responsibility for road vehicle safety standards.

I was grateful for the information provided in your Regulation 28 Report and I have made further enquiries with the Driver and Vehicle Licensing Agency, which is an Executive Agency of the Department for Transport with responsibility for bus certification and roadworthiness in Great Britain. The subject vehicle (Registration number MX09 AUK) was first registered in May 2009 and is certified to carry a maximum of 33 seated passengers, 14 standees and 1 wheelchair user on the lower deck, although these capacities would not apply simultaneously.

In common with most buses operating in the UK, the vehicle on which Mrs Naylor was travelling when she received her fatal injuries was approved to national regulations. These regulations specify general safety items of the vehicles, and include for example, emergency exits, lighting, and additional features to make it easier for disabled people, including wheelchair users, to gain access. Amongst other provisions, they set requirements for additional handholds, a minimum of 1 wheelchair space, together with a minimum of 4 priority seats for disabled and elderly passengers. These priority seats have extra legroom and can be easily reached from the entrance of the vehicle.

It is also important to recognise that incidents involving buses and coaches are rare. Travel by bus and coach is one of the safest modes of road transport in Great Britain, with the rate of killed and seriously injured passengers per mile travelled being approximately one third that of passenger cars.

The Department is committed to improving safety for all bus passengers through the use of appropriate vehicle construction standards and ensuring the safe operation of vehicles. Vehicle manufacturers have some flexibility to install additional design features that benefit passengers providing they do not compromise the existing construction requirements.

Our national regulations setting the minimum standards for new vehicles utilise a number of specifications that are harmonised with the European Union and wider international requirements. These standards are reviewed regularly by an international group of experts under the United Nations Economic Commission for Europe. The Department for Transport is an active participant in this group.

I have already brought this issue to the attention of the bus manufacturers through the Society of Motor Manufacturers and Traders (SMMT), and the Confederation of Passenger Transport (CPT) who represent the bus & coach operating industry. We have a tripartite meeting scheduled this month, at which we will be encouraging them to adopt additional safety features for these seating positions where it is possible.

I also intend to raise this issue within the International technical group responsible for the pan-European construction requirements to explore whether it is appropriate to amend the minimum specification for new vehicles to reduce the risk of similar incidents in future, and to determine whether there is international support for such a move.

I hope you find this information helpful and are assured that the Department is taking appropriate action to respond to your concerns.

Yours sincerely



Head of Crash Injury Mitigation  
International Vehicle Standards Division