

Equalities Impact Assessment

Directorate/Section	Chief Executive's Office	Date of Analysis	October 2018	Person Responsible for the analysis (include name of author if different)	Person Responsible: Harris Vallianatos (Sustainable Transport Projects Officer) Author: Victoria Heald (Graduate Transport Projects Officer)
Name of the proposal/policy to be assessed:	Development of the borough's third Local Implementation Plan for Transport (LIP III)				
1. Briefly describe the policy/proposal – its aim and expected outcomes		Section 145 of the GLA Act (1999) requires London Boroughs to produce a transport strategy (The 'Local Implementation Plan') illustrating how they are going to implement the objectives described in the Mayor's Transport Strategy (MTS), published in March 2018 - see <i>Attachment 1 for the MTS expected outcomes</i> .			
2. Who is the policy/decision going to impact/affect and in what way? Please use evidence to support your analysis		The policy will impact those who live, work or travel through the borough since the entire transport network is covered by the MTS.			
3. When will the decision be taken?		Following a minimum of 6 weeks of statutory consultation (commencing November 2018), the strategy must be approved by Cabinet by February 2019.			

<p>4. Are there concerns that the decision could have an impact on the following: -</p>		<p>Please explain/attach evidence of your answers to these questions</p> <p><i>Please see Attachment 2 for details.</i></p>
(i) Age	Y	
(ii) Disability	Y	
(iii) Gender Reassignment	Y	
(iv) Race	Y	
(v) Religion or Belief	Y	
(vi) Sex	Y	
(vii) Sexual Orientation	Y	
(viii) Pregnancy and Maternity	Y	
(ix) Fostering good relations and community cohesion	Y	
<p>(x) Human Rights</p> <p>Public Authorities have a duty under the Human Rights Act 1998 (HRA) not to act incompatibly with rights under the European Convention for the Protection of Fundamental Rights and Freedoms.</p> <p>Because of the close relationship between human rights and equality, it is good practice for those exercising public functions to consider equality and human rights together when analysing for effect on policies and proposals. (See list below for the Human Rights Articles)</p>	Y	
<p>5. Which equalities duties will be engaged by this proposal and will require due regard to be given before a decision is made?</p>	<p><i>All equalities</i></p>	

<p>6. Are there any relevant groups or stakeholders who you can approach to explore their views on the policy/proposal? You must consult/involve those who will be affected by the decision.</p> <p>YES</p> <p>Please list the relevant groups and how the views of these groups will be obtained. Or state the reason why you have not approached groups/users affected by your proposal</p>	<p>Two open forum sessions were conducted with the Disability Community Forum in Hounslow to inform the preparation of this EQIA. A summary of their views is included in attachments 4 and 5.</p> <p>In addition, LB Hounslow maintains lists of relevant representative groups for the purposes of consultation and these groups will be contacted as part of the full LIP consultation. A draft list of contacted groups is included as Attachment 3.</p>
<p>7. Please explain in detail the views of the relevant groups who have been consulted on the issues involved and the dates when this happened. (Please use a separate sheet if necessary).</p>	<p>See Attachments 4 and 5.</p>
<p>8. Considering the views of these groups, and the available evidence, please clearly state the risks associated with the decision, weighed against the benefits of the decision. Will the impact be high, medium or low?</p> <p>High – Impact is likely to be high if the savings proposal has significant relevance to the substance of the Equality duty. So consider size and scale of effect of policy/savings proposal or service restructure on staff, users/residents and other affected stakeholders. The effects can also be high if there is a potential for challenge of breach of equalities duties from affected stakeholders who have a protected equality characteristic (see overview of legal duties below).</p> <p>Medium – If your proposal is not assessed as high or low then it is likely to be medium risk. Due regard given to the equality duties must be commensurate with the impact of the policy/proposal or decision.</p> <p>Low – Impact is low if Equality is considered to have little or no effect on equality groups or if it is unlikely to engage Equality duty. Or if the proposal is relevant to the Equality duty but the effects are remote or peripheral to the substance of the Equality duty under section 149 and section 20, then impact is low. You do not need to complete this form, just write under the standard equalities text in your main report that you have considered Equalities duties. For the standard text see under Equalities Analysis on the intranet under Equality</p>	<p>Low</p>

9. What are the main conclusions and key actions to mitigate or minimise the disadvantage /concerns raised by equalities groups? Please identify recommendations to add to the main report from this equality analysis and explain how each action directly responds to the disadvantage raised. Set out fully the actions/recommendations you propose in the Action Plan below. (You can use the information in section 9 and 10 to inform the main report to members under the section on 'Equalities and Human Rights Implications'). By adding the conclusions and the key actions and recommendations to the main report you do not need to separately publish this form unless your report involves savings and affects the public. Then make sure it is added as an Appendix as well as completing the main report's Equality and Human Rights implications

It can be concluded that the proposed LIP III strategy does not disproportionately impact on any one population group and can help to mitigate barriers to certain groups using the transport network.

Signed (Completing Officer) **INSERT**

Signed (Manager) **INSERT**

Attachment 1 - Mayors Transport Strategy - Expected Outcomes

Mayor's Transport Strategy									
Strategic Drivers	Healthy Streets and Healthy People				A good public transport experience			New homes and jobs	
Policies	2	3,4	5	6,7,8,9	10,17,18,19	11,12,14,20	13,15,16	21a	21b
Outcomes	1) London's streets will be healthy and more Londoners will travel actively	2) London's streets will be safe and secure	3) London's streets will be used more efficiently and have less traffic on them	4) London's streets will be clean and green	5) The public transport network will meet the needs of a growing London	6) Public transport will be safe, affordable and accessible to all	7) Journeys by public transport will be pleasant, fast and reliable	8) Active, efficient and sustainable travel will be the best option in new developments	9) Transport investment will unlock the delivery of new homes and jobs
	Traffic reduction and changing mode share – policy 1 80% of all trips in London to be made on foot, by cycle or using public transport by 2041								
Outcome indicators	All Londoners to do at least 20 minutes' active travel a day by 2041	65% reduction in KSIs by 2022 compared to a 2005–09 baseline	10–15% reduction in volume of traffic by 2041	72% reduction in CO2 emissions from transport (excluding aviation) by 2041	Public transport network can accommodate 14–15 million trips daily by 2041	Reduce travel time difference between total and step-free network by 50% by 2041	5–15% improvement in bus speeds by 2041 London-wide		
	70% of Londoners live within 400m of London-wide strategic cycle network by 2041	70% reduction in KSIs by 2030 compared to a 2010–14 baseline	10% reduction in freight trips in central London by 2026 in morning peak	94% reduction in road transport NOx emissions by 2041					
		Zero deaths and zero serious injuries from road collisions by 2041	250,000 fewer cars owned by 2041	Reduction of 53% in PM2,5 and 45% in PM10 from road transport emissions by 2041					

Attachment 2 - The Impact of LIP III on Different Groups

Background

The LIP sets out the policy framework which will guide the investment the Council makes to improve the transport network. It must be developed in line with the Mayor of London's Transport Strategy (MTS). As noted in Attachment 1 the objectives of the Mayor's Transport Strategy stress the need to ensure that we improve the quality of life for all Londoners.

The objectives of Hounslow's LIP III are to develop a transport network that is:

- **Healthy, Clean and Green:** *this will be achieved by reducing transport related emissions; improving the quality and accessibility of the public realm and maximising the opportunity for the transport system to improve health outcomes by removing barriers to the uptake of active travel.*
- **Safe:** *this will be achieved by reducing the number of people killed and seriously injured on our roads, contributing to the Mayor's Vision Zero target.*
- **Efficient:** *this will be achieved by ensuring that the transport network facilitates economic growth in Hounslow and unlock space for new homes and jobs for all users, particularly through a shift from private to public transport.*

The impact of these objectives on the different groups has been assessed and is summarised below:

(i) Age

Elderly People

A person's ability to use the transport network can be reduced as a result of age-related health conditions. The elderly may have reduced walking ranges, limiting their ability to cover longer distances on foot, or using public transport. Walking, whether as a means of transport in its own right, or to get to bus stops and train stations, can be made easier for older people by the good design and maintenance of roads and footways. This, for instance, includes the use of dropped curbs, ramps and tactile paving, as well as the well-planned placement of street furniture in the public realm (in line with the Healthy Streets Approach), creating safe and pleasant places to stop and rest. Controlled

pedestrian crossings should be amply timed in order to allow slower walkers to use them safely; traffic calming measures and 20mph zones can also help create an increased feeling of safety whilst walking.

The physical challenges of boarding and alighting trains, the underground, and buses may be a barrier to older people walking to, and using public transport. The design of bus stops can be improved to allow older people to board and alight more easily. One of LIP III's objectives outlines that public transport should serve the needs of all users by making public realm improvements at transport hubs using the Healthy Streets principles.

Information about transport needs to be communicated to older people effectively; large print leaflets and timetables, audio visual announcements on buses, and real-time passenger information may all be beneficial.

As a result of mobility issues, elderly people may ultimately rely more heavily on private motor vehicles for their transport needs. Proposals which limit or reduce provision for cars without improvements to public transport could have a negative impact on this group. However, affordability of public transport has been addressed in recent years by the provision of free 60+ London Oyster Cards, providing free travel on buses, tubes and off-peak trains across the Greater London network.

There is a rising need for public health facilities, such as hospitals and GP surgeries, to be served by good public and private transport facilities and this has been considered in the LIP as part of the accessibility planning process.

How will the LIP address these issues?

- The Better Streets programme will deliver on street accessibility improvements such as dropped kerbs and tactile paving where appropriate.
- Ensuring that 95 percent of all bus stops in Hounslow continue to meet accessibility guidelines and that other improvements such as seating and real-time information for passengers is provided where the need is greatest.
- Working directly with South Western Railway to deliver step free access on the Hounslow Loop and with Transport for London (TfL) to improve accessibility at Hounslow West and other tube stations.
- Engineering measures designed to improve bus reliability and journey times will benefit all bus users.
- A continued policy of supporting disabled parking at destinations such as public services and shopping areas.
- Expanding 20mph coverage or consider other speed reduction strategies in all residential and high street areas or where there are reports of high speeds or hostile driving.

Young People

Transport choice for younger people is often constrained by cost and parental perceptions of safety, both in terms of the risk of being involved in an accident, and in terms of personal safety when travelling unsupervised.

Recent research¹ reveals that young people are driving less and are less likely to hold a licence than at any time in the last 20 years. This trend has a number of causes such as the increasing costs of motoring and the increasing use of social media for communication, but the effect will be to increase the need for an affordable, reliable public transport system. In common with the over 60s, all children who are aged under sixteen can benefit from free travel on the London bus network through using a Zip Oyster Card, which ensures that cost is not a barrier to accessing public transport.

Children also require additional amounts of physical activity to ensure healthy development. Schemes to promote sustainable travel, such as Transport for London's STARS (school travel planning) Programme, can help to support physical activity as part of a young person's daily routine, as well as cycling training that is offered to young people residing in the borough.

How will the LIP address these issues?

- Engineering measures designed to improve bus reliability and journey times will benefit all bus users.
- Supporting the TfL STARS² programme will increase the number of pupils taking part in regular physical activity through walking and cycling.
- Ensuring that everyone cycling to school, the high street, leisure centre or library can park their bike securely and that those without space inside their home have an option for on-street storage.
- Challenging misconceptions about active travel and overcome perceived barriers, including lack of cycle training and growing a cycling culture in the next generation.

(ii) Disability

A person's ability to use the transport network can be reduced as a result of having an impairment or hidden disability. Walking, whether as a means of transport in its own right, or as a walk to bus stops and train stations, can be made easier for those who are impaired by following good design practice and also through the continued maintenance of roads and footways. This, includes clutter-free and sufficiently broad and flat footways, an intelligent use of colour contrast signage, ramps, lifts, handrails, and suitable tactile paving. The Council understands the

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/673176/young-peoples-travel-whats-changed.pdf

² Sustainable Travel: Active, Responsible, Safe – TfL school travel programme

concerns that some impaired people have around 'shared space' schemes, which deliberately blur the distinction between road and footway (flushed rather than dropped curbs and indistinguishable paving). Scheme's employing this technique would be subject to their own EQIA report as required and will also be guided by the government's upcoming accessibility review to be published in 2019.

The design of bus stops should meet accessibility guidelines in order for people to alight more easily. This includes careful design of seating and waiting areas to allow for manoeuvring, good lighting, railings, and kerbs/pavements designed as standard to facilitate boarding and alighting to and from buses. Working ramps and lifts, which allow step-free access, should also be installed across all rail and underground stations within the borough, to enable travel into central London and surrounding boroughs - it would be beneficial for all station staff to be trained to know how to use such equipment in order to help facilitate with boarding, if required.

It is important that those with impairments have access to suitable bathroom facilities when using the transport network; it would be advantageous to have WC accessible, ideally Changing Places facilities, installed at all major transport hubs across the borough.

Information about transport services needs to be communicated effectively to those that are impaired; large-print leaflets, timetables and signs, the use of Unified English Braille (UEB), audio-visual announcements, staff with a knowledge of British Sign Language (BSL), sound enhancement systems, and real-time passenger information may all be of particular benefit. It may also be beneficial for those working within the transport sector (especially those in front-line services) to receive mandatory, in-depth training to highlight different requirements and accessibility issues, such waiting for wheelchair users to park before pulling away from a stop.

There is a significant need for public health facilities, such as hospitals and GP surgeries, to be served by good public and private transport facilities. Those that are impaired, and/or have learning disabilities are able to benefit from community transport services (for those that cannot access mainstream services), and also door-to-door transport services such as Dial-a-Ride (free) and Taxicard or Capital Call (subsidised for members). An increase in the number of these services would allow more people to benefit from them.

How will the LIP address these issues?

- Using the planning system to ensure new developments incorporate the healthy streets principles into their designs, in line with policy T2 of the new London Plan.
- Working directly with South Western Railway to deliver step free access on the Hounslow Loop and with TfL to improve accessibility at Hounslow West and other tube stations.
- Working with TfL to improve bus driver's awareness of accessibility issues through accessibility forum training.
- Ensure 95 percent of all bus stops in Hounslow continue to meet accessibility guidelines and that other improvements such as seating and real-time information for passengers is provided where the need is greatest.

- A continued policy of supporting disabled parking at destinations such as public services and shopping areas.

(iii) Gender Reassignment

In general, it was not considered that persons that had undergone or were undergoing gender reassignment would be disproportionately impacted by changes to the transport network, however, people may experience harassment as well as other aggressive and threatening behaviour whilst using public transport or navigating the public realm.

These fears can be reduced by the reassurance given by staff presence, CCTV, police presence and emergency help points.

How will the LIP address these issues?

- The LIP will not directly address the above issues, however, TfL are implementing a number of measures to make the network safe, such as funding over 2,000 officers across the Metropolitan Police Service (MPS) and the British Transport Police (BTP).

(iv) Race

In general, it was not considered that people from different racial backgrounds were disproportionately impacted by the projects and programmes proposed by the LIP. However, people from all ethnic communities may be concerned about the possibility of racist attacks and personal safety on the transport network, including when walking through the public realm or waiting at bus stops or in stations.

This fear can act as a barrier to using the transport network to access key facilities and employment opportunities. Some of these issues may be alleviated, for instance, by ensuring better lighting, improved sightlines (the removal of blind spots), better signage, the installation of CCTV, increased staffing and a visible police presence. Similar issues can relate to people walking generally through public spaces, particularly at night.

In some areas there can also be cultural barriers to the uptake of cycling which can be addressed through targeted cycle training initiatives and promotions.

How will the LIP address these issues?

- The LIP will not directly address the above issues; however, TfL's London wide public transport network safety improvements are expected to benefit all users who may feel unsafe.

(v) Religion or Belief

In general, it was not considered that people from different faiths were disproportionately impacted by the projects and programmes proposed by the LIP. However, it is possible there may be localised problems of accessing places of worship which could be addressed by local safety schemes; safer public transport or public realm (for example by ensuring line of sight is maximised at design stage).

Members of different faith groups may experience feelings of insecurity while using certain routes, or at night time when travelling to and from faith-related activities. In some situations, these fears may be exacerbated by the wearing of faith-related or cultural dress. Some of these issues may be addressed, for instance, by better lighting, the removal of blind spots, better signage and the installation of CCTV.

How will the LIP address these issues?

- Feeling safe is one of the design principles of the Healthy Streets approach and by embedding this in public realm design processes, safety on a location specific scale will be improved.

(vi) Sex

In general, it was not considered that people of different sexes were disproportionately impacted by the projects and programmes proposed by the LIP. Personal safety and security on the transport network remains a major concern; people of all sexes can experience harassment as well as other aggressive and threatening behaviour whilst using public transport or walking.

As with other characteristics, these fears can be reduced by the reassurance given by staff presence, CCTV, emergency help points and well-lit and prominent bus shelters which are strategically located. Replacement of subways with surface-level crossings, wherever possible, could benefit all in terms of both personal safety and avoiding the need to make detours that some subways require.

How will the LIP address these issues?

- The LIP will not directly address the above issues; however, TfL's London wide public transport network safety improvements are expected to benefit all users who may feel unsafe.

(vii) Sexual Orientation

In general, it was not considered that people with different sexual orientations were disproportionately impacted by the projects and programmes proposed by the LIP, however, public transport may be avoided at certain places and times because of fear of harassment or attacks. Increased staffing on public transport services and a visible police presence generally, alongside investment in CCTV and enforcement, can help to reassure all people.

How will the LIP address these issues?

- The LIP will not directly address the above issues; however, TfL's London wide public transport network safety improvements are expected to benefit all users who may feel unsafe.

(viii) Pregnancy or Maternity

Pregnant women and parents with children may find it more difficult to travel across the transport network with buggies, therefore this group could benefit from improved accessibility and connectivity across the borough's transport network.

How will the LIP address these issues?

- Improving public transport accessibility by making public realm improvements at transport hubs and bus stops
- Working with Hounslow Highways to ensure public realm assets such as pavements are maintained to the standards set in the PFI contract.

(ix) Fostering Good Relations and Community Cohesion

LIP III prioritises initiatives that encourage active/sustainable travel, promotes road safety and improves air quality; all of which reflect the needs and requirements of different groups, helping to create a borough that is more accessible and pleasant for all, building upon community spirit, good relations, and cohesion.

Public transport services often form the main space in which people from different community backgrounds mix. As such, the promotion of a safe and welcoming public transport system and public realm could be seen to be an important tool in promoting community cohesion.

Overcrowding and severe delays on the public transport network can increase levels of stress, which may lead to a temporary breakdown in

good relations and cohesion between different communities.

How will the LIP address these issues?

- It is one of the primary aims of the LIP to reduce congestion and the additional stress that accompanies it. The majority of programmes will make a contribution in this area either directly or indirectly by encouraging active travel.
- Application of the Healthy Streets approach in public realm design is expected to create community spaces that will promote community cohesion by creating facilities that all community members want to use.

(x) Human Rights

It is not evident that the improvements set out above would have an impact on human rights as LIP III objectives promotes the rights and equality for all groups and communities.

Attachment 3 - Consultation of Umbrella Groups

Local groups consulted include, but is not limited to:

(i) Age
Hounslow Action for Youth Association
Hounslow Pensioners Forum
Age UK Hounslow

(ii) Disability
Disability Network Hounslow
Autism Hounslow
The Middlesex Association for the Blind
Speak Out Hounslow

(iii) Gender Reassignment
TBC

(iv) Race
Bangladesh Welfare Association
Mutli-Cultral Centre Hounslow
Hounslow Chinese Community Centre
Hounslow Racial Equality Council
Hounslow Asian Community Advice Service
United Somali Community
The Arab Group in Hounslow and the Suburbs

(v) Religion or Belief
Hounslow Friends of Faith
London Buddhist Vihara
Gurdwara Sri Guru Singh Sabha Southall (SGSS)
Hounslow Jamia Masjid & Islamic Centre
Staines and District Affiliated Synagogue
Ahmadiyya Muslim Association UK
Hindu Temple & Cultural Trust Centre
Parish of Brentford (St Pauls & St Faiths)

(vi) Sex
Norwood Green Afternoon WI
Women and Girls Network Advice Service

(vii) Sexual Orientation
West London LGBT Forum

(viii) Pregnancy or Maternity
Twickenham, Hounslow and District NCT

(ix) Fostering Good Relations and Community Cohesion
London Borough of Hounslow Neighbourhood Watch Association

(x) Human Rights
Amber Training, Advisory & Support Services

Attachment 4 - EQIA Summary from Meeting with E Plus - 22nd August 2018

Participants were asked to identify mobility challenges within the transport network that they would like the Council to try and address. The most common statements have been listed below:

	Challenge	Response
4a	Health Centre and hospital accessibility by bus is very poor and services are not frequent enough or direct from many parts of the borough.	The borough is aware that some health facilities, particularly West Middlesex hospital, are not easily accessible from all parts of the borough. An objective has been included in the LIP to work with TfL to enhance orbital and cross-borough bus services that provide residents access to employment and local services.
4b	Routes are not always direct across the borough or north to south.	The paucity of public transport routes across the borough has been named as one of the four major transport challenges for Hounslow. The LIP commits to working with TfL, who control bus route allocations, to improve this situation.
4c	Poor pavements can make bus access very difficult for wheelchairs e.g. if tree roots are in way, also street furniture especially bins can block access if near a bus stop (even if not directly outside door).	This feedback has been noted and included as a challenge in the LIP, section 3. Several objectives have been set to address this issue including working with Hounslow Highways to ensure a high level of maintenance for public realm assets.
4d	Buses only have space for one wheelchair and bars and poles often in the way when manoeuvring.	This feedback has been noted and will be passed to TfL since bus design falls within their remit.
4e	Ramps on buses do not always work.	This feedback has been noted and will be passed to TfL.
4f	Not all buses have audible announcements.	This feedback has been noted and will be passed to TfL.
4g	More time is needed to park a wheelchair before buses pull	This feedback has been noted and will be passed to TfL. The LIP contains an objective to improve bus driver's awareness of accessibility

	away.	issues through accessibility training.
4h	Dial a ride services are good but are limited in scope.	Agreed. Dial a ride will not be able to replace an accessible public transport network and so it is important that the network serves all users.
4i	There is poor step free provision on the Piccadilly line which prevents access to central London.	Agreed that Piccadilly line stations generally do not provide step free access. Osterley is due to be upgraded in 2019 and the LIP includes an objective to request that TfL upgrade remaining Hounslow stations.
4j	Night buses are less direct and impaired users feel vulnerable when changing buses.	This feedback has been noted in the preparation of the LIP and will be passed to TfL. Agreed that direct routes are not only more convenient but have a role in improving safety particularly at night.

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Attachment 5 - EQIA Summary from Disability Community Forum - 4th September 2018

Participants were asked to identify mobility challenges within the transport network that they would like the Council to try and address. The most common statements have been listed below:

	Challenge	Response
5a	Irregular pavements make boarding buses difficult as well as general passage.	Agreed. The LIP contains a commitment to improving public transport accessibility at transport hubs through public realm improvements and working with Hounslow Highways to ensure a high level of maintenance for public realm assets such as pavements.
5b	There is a lack of lifts at underground stations and they can be dirty.	See response in Attachment 4-4i. The feedback on cleanliness will be passed on to TfL as part of our improving station accessibility discussions.
5c	There is an uneven distribution of step free access cross London.	This feedback has been noted and will be passed to TfL. LB Hounslow will continue to lobby for improvements at all stations in the borough.
5d	A lift is needed at Feltham Station (new footbridge) as slopes are difficult for some.	This feedback has been noted and has been shared with the project team for Feltham station improvements. Whilst there are no plans for a lift, the design of the bridge, including slope and flat stopping areas, complies fully with DDA regulations. A full consultation was carried out but if there are further concerns they can be addressed to traffic@hounslow.gov.uk
5e	There is no warning for the visually impaired where pavements flush into the road.	Following government guidance in 2018, all shared space schemes involving a level surface that are in design stage have been paused until a government accessibility review is complete. There are currently no schemes of this nature planned.
5f	Bus stop benches are too slippery to sit on.	The LIP now includes a statement concerning benches at bus stops not being suitable for all. This will form part of the bus stop accessibility programme for the next three years.
5g	Ramps are needed at Hounslow West station - it is difficult to access for impaired of all types.	This feedback has been noted and will be passed to TfL.

5h	Ramp malfunctions on buses appear to be caused by kerbs being too high.	See response to 5a. Kerb height will be included in any review of public realm.
5i	There are no accessible toilets at stations.	This feedback has been noted and will be passed to TfL.
5j	Central Hounslow has no seating.	This feedback has been noted and will be passed to TfL. Seating is a vital part of the accessibility improvements that the LIP
5k	When multiple buses arrive, bus stops are no longer accessible because not at the right section.	This is an issue that needs to be addressed both by LB Hounslow and TfL. Drivers need to be aware that they may need to wait and move forward to pick up passengers and the accessible public realm must extend a suitable distance beyond the bus stop itself. The LIP contains objectives around improved driver training and public realm improvements where multiple buses could stop.

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