

Transport Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into accessibility and inclusion in transport planning.

Calls for Evidence are open to anyone to respond to and in September 2024 the Committee published a number of questions it was particularly interested in responses to as part of its work, which can be found on page 3. The Call for Evidence was open from 17 September to 28 October 2024.

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

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Questions asked by the Committee

The Committee is particularly interested in hearing about the additional barriers people face using London's transport network, in particular understanding how these barriers impact different demographic groups e.g. those with protected characteristics (such as disability, age, gender, sexuality) and social class. The Committee would welcome responses to the following questions:

1. What do Londoners use transport for and how does this differ among demographic groups?
 - a. are most used and most appropriate for certain demographic groups?
 - b. How could the transport network better serve and connect London's communities with the places they travel to?
2. How does TfL use data and engagement to plan accessible and inclusive services?
 - a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?
 - b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?
 - c. How effective is TfL at involving all users in decision-making processes?
 - d. Are there any improvements that could be made to ensure that all voices are heard?
3. How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?
 - a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?
4. Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

Ability (GMB London Region) Ref No. AI001

Please see submission from Ability – the Disabled activists group of GMB London Region. The suggestions have come from disabled people who use TFL services to travel and have researched potential solutions to the issues and barriers.

Microphones for Drivers

Microphones for drivers on the bus (similar to those used in banks) and or that is currently used by London Black Taxis So that those (VI - Visually Impaired) and (HI - Hearing Impaired) passengers can hear what the driver is saying when boarding the bus.

This system could also be used to assist VI passengers when it comes to identifying buses.

Rather than getting on to a bus to ask what bus number the bus was at close quarters and then having to get off because it is the wrong bus and then having to get back off.

The mike system would reduce the need for close quarter contact between passenger and driver but still allow for passenger and driver interaction so that VI passengers no longer feel isolated and marginalised

Audio Announcements

When it comes to audio announcements on buses these should work seamlessly independently and in conjunction with the existing visual signage on buses however regrettably not all TfL buses are fitted with both visual and audio signage something we (ability) believe this should be standardised.

In addition to assist VI passengers and neurodiverse passengers the audio announcements should be heard on the outside of the bus when the bus reaches a bus stop.

As for the noise level of theses audio announcements theses would be marginally louder than the noise from the actual bus itself so would have very little impact on overall noise pollution already caused by standard non electric buses used on the TfL bus transportation network

Driver Training - Disability Awareness

All bus drivers and support staff across the TfL bus transportation system need to be fully trained in terms of disability awareness when it comes to disabled passengers in terms of both physical and hidden disabilities and must not be afraid of interacting with disabled passengers

Signage

Signage across the whole of the TfL network needs to be reassessed in terms of suitability across the whole TfL (underground and overground) when it comes to the needs of VI passengers.

The signage itself is either badly positioned overhead at bus stops or when it is positioned correctly at eye level in terms of accessibility it uses incorrect type styles or sizes. As for those neurodiverse passengers the constant movement and amount of the digital information provided by the overhead system used at bus stops can in some cases cause a sensory overload.

We would again ask for standardisation and a better understanding and observation and inclusion of those with lived experience in terms of VI and neurodiversity and suggest that these are the individuals that should and must be involved in reassessment and further development of the signage across the TfL network.

We would also suggest that some form of audio system such as a direct plug-in or mobile phone application is introduced at bus stops to allow for those who need to access the visual data on bus numbers and times of arrival using audio description similar to that already incorporated on some buses which again as previously outline we believe should be standard on all busses.

Disabled Freedom Pass

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In changing the status of the DFP to an Older Person's Freedom Pass (and that of other disabled passenger at the age of 60 years) restricts the ability to travel at certain times of day due to restrictions placed on the Older Person's Freedom Pass

Access Association Ref No. AI002

London Assembly Transport Committee

Call for Evidence: Accessibility and Inclusion in Transport Planning

Response from The Access Association

Please address any queries to president@accessassociation.co.uk

The Access Association aims to encourage the creation of a barrier-free inclusive environment that is accessible for everyone, including disabled people. The Association is about providing peer support, sharing knowledge and having an influential voice. The Association is an essential resource for everyone committed to improving access, working to:

- Support people working in access and disability fields
- Facilitate the exchange of knowledge and experience among members
- Promote the development and training of access professionals and volunteers
- Encourage consistency in practice and standards
- Monitor and advise on the effectiveness of current legislation
- Liaise with other organisations locally, regionally and nationally
- Advise on technical matters
- Represent the views of the membership

We are a not-for-profit membership organisation. The majority of members work in the private sector, but the rest are evenly spread across the public sector, third sector or non-waged roles.

All of our members were invited to contribute to a collective response on behalf of the Association.

Key questions

The Committee is particularly interested in hearing about the additional barriers people face using London's transport network, in particular understanding how these barriers impact different demographic groups e.g. those with protected characteristics (such as disability, age, gender, sexuality) and social class. The Committee would welcome responses to the following questions:

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1. What do Londoners use transport for and how does this differ among demographic groups?

a. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

One of the problems is lack of sound data on transport in London especially on walking and wheel travel. For example, no data is collected for walking as a journey chain yet this is a crucial aspect of the whole journey. Yet we know that problems with walking infrastructure and management is frequently an obstacle to access to the other modes. This leads to depressed demand, lower accessibility and inclusion.

b. How could the transport network better serve and connect London's communities with the places they travel to?

Clearly there are still too many stations on the underground and rail system without accessibility and we are aware of programmes to address this including making sure that all new facilities are accessible – inevitably we think progress is too slow. Meanwhile, there are four particular issues we would highlight.

- The first is a massive lack of accessible toilets and poor design of many of those that are available. Our Association has recently run a seminar on this subject and further information on this can be provided if required.
- The second issue we would raise is generally poor management of travel disruption. This has many facets ranging from poor enforcement of the Considerate Construction Scheme such as blocking off pavements and bus stops without consideration of accessibility needs through to lack of appropriate support for people with special needs when there are delays or replacement services – even when these arrive there is an assumption that disabled people have all the time in the world to wait for assistance or be forgotten even though they are also parents, carers and have jobs to get to.
- Thirdly, there is a need for better infrastructure design which does not disadvantage pedestrians. Thus, whilst shared between walking and cycling can be positive it is also threatening to others especially vulnerable pedestrians. Examples of this problem are floating bus stops and the concern raised by constant bus announcements to 'take care crossing the cycle lane' – not very comforting for people with visual disabilities or neurodiverse anxieties. One aspect of pedestrian design which would also be helpful is the inclusion of Colourful Crossings.
- Fourthly on behalf of deaf and hearing impaired travellers there is no optimum sound level for announcements which are often too quiet or hard to understand when delivered with non English first language speakers.

2. How does TfL use data and engagement to plan accessible and inclusive services?

a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data? b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services? c. How effective is TfL at involving all users in decision-making

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processes? d. Are there any improvements that could be made to ensure that all voices are heard?

TfL has a good record of engagement with transport users especially via Accessibility Champions and the Independent Disability Advisory Group, Travel Mentors, Equity in Motion and the Travel Go App. However, we would like to see more deep qualitative research and engagement with disabled and vulnerable travellers especially those digitally excluded who are unlikely to be picked up in regular online surveys. Such travellers are also likely to be more vulnerable when faced with security issues.

Another group deserving more attention are those who come into London from outside for work, hospitals and leisure many of whom don't understand the system well or aren't eligible for concessions. A good example is the equity impact of ULEZ on non-compliant lower income motorists who need to travel to work in London by car.

3. How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved? a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

If the aspirations and structure of the Equity in Motion are implemented there is no doubt of many aspects of travel would improve. We especially welcome the wider perspective of the role of transport in addressing health and security issues such as poor air quality which has a greater impact on many disabled and elderly people. In the past consultation has been lacking on intersectionality such as considering the needs of disabled parents with double buggies. Recent emphasis on disability, ethnicity and gender pay gaps are also positive in emphasising the need for lived experience within the TfL workforce. But we also need more robust evidence of the cost benefits of improved accessibility with much of previous TfL work in this area in need of updating.

4. Are there any best practices from other cities both in the UK or abroad that TfL could adopt

Evidence from other cities can be helpful in providing both positive and negative examples – the latter can be especially useful in learning from other's mistakes. For example, the marketing and design of Brighton bus services including guarantee of taxis when things go wrong has much to learn from. Another example is research demonstrating the value of concessionary fares to women in Refuges commissioned by TfGM. On the negative side reports on the poor value for money of community transport and DRT services could lead to similar re-assessments by TfL. It would be helpful for TfL to commission research on this theme including examples from other European Cities.

Active Travel Academy Ref No. AI003

Accessibility and Inclusion in Transport Planning in London

Dr. Rachel Aldred, Professor of Transport and Director of the Active Travel Academy,
Westminster University

I am writing this brief response to the GLA investigation into Accessibility and Inclusion in Transport Planning. The response covers Active Travel Academy (ATA) research into cycling accessibility and inclusion. This is obviously not the only area of interest nor the only one we have researched (e.g. we have also looked at School Streets); but I chose it because I felt research conducted by ATA members could make a substantial and coherent contribution, based on a series of projects and papers.

1. Much of my own early work looked at cycling in London/England/the UK and explored how cyclists were viewed and treated on the streets and in policy. This found, for instance, that cyclists are frequently marginalised by a dual stigma where not looking ‘like a cyclist’ (having ordinary clothing) led to perceptions of incompetence, but looking like ‘too much of a cyclist’ (with Lycra, hi-vis, helmet etc.) led to anti-cycling hostility¹. This is quite distinct from high-cycling countries where cycling is seen as an everyday activity carried out (like walking) by normal people. Recent research looking at media portrayals of cyclists involved in road traffic collisions has found the persistence of problematic portrayals linked to such stigma².
2. Relatedly, cycling investment is viewed as problematic by policy-makers³. Cycling infrastructure is lauded as cheap but is often then seen in practice as too expensive (when – as it should – it costs more than painting bicycle symbols on the footway or carriageway). The UK lives with the problematic legacy of ‘dual provision’ which provided unpleasant on-carriageway routes shared with HGVs for ‘fast commuters’ and muddy detours shared with pedestrians for everyone else. London has done more than most places to counteract this but like negative attitudes towards individual cyclists, it persists and needs constantly to be challenged by an inclusive approach (as in LTN 1/20, influenced by TfL’s earlier Cycle Design Standards⁴).
3. Our team were involved in a recent systematic review⁵ studying interventions to increase active travel. This found that social/behavioural interventions generally had little impact on their own, and that to achieve population-level change, such interventions must be accompanied by ‘environmental and infrastructure changes, including road space reallocation and access to e-bikes.’ The review highlighted the need for more work on

¹ <https://www.tandfonline.com/doi/full/10.1080/17450101.2012.696342>

² <https://www.tandfonline.com/doi/full/10.1080/17450101.2021.1981117>

³ <https://www.sciencedirect.com/science/article/pii/S0967070X12000820>

⁴ <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

⁵ <https://www.sciencedirect.com/science/article/pii/S2214140524001063>

demographic correlates of active travel uptake. Our previous exploratory study⁶ had found that the protected cycle route we monitored ‘had higher proportions of women, older people and children cycling than control sites.’ This is encouraging but more research is needed, especially as our other work found that although higher cycling levels are associated with more age and gender equity⁷, increasing cycling does not *automatically* lead to more equity – leading us to suggest that ‘creating a mass cycling culture may require deliberately targeting infrastructure and policies towards currently under-represented groups.’⁸

4. Many currently under-represented groups make trips that would in principle be highly suitable to cycling. For instance, our work on the Propensity to Cycle Tool revealed that ‘while cycle commuting in England and Wales is demographically skewed towards men and white people, women and people from ethnic minorities have greater cycling potential based on route distance and hilliness.’⁹ Although high-cycling contexts often see age and gender equity in cycling, some gaps persist, although they are smaller, indicating the potential to at least reduce these gaps and get much higher rates of cycling among other currently under-represented groups. For instance, our analysis of English Active People Survey data found that non-white English residents are only around half as likely to cycle as white English residents. In the Netherlands, people of non-Western ethnicity make 22.8% of their trips by cycle, compared to 27.9% for white Dutch people – an under-representation, but far lower proportionately than the English gap (and absolute cycling rates among ethnic minority Dutch residents are much higher than among white English people).¹⁰
5. How do we start reducing these gaps and increase access to cycling? An important starting point which London has already taken involves re-framing participation gaps as not about individual choice but about structural inequalities linked to a range of differences, many of which need not – but currently do – restrict cycling levels. For instance, our systematic review of age and gender preferences related to cycling infrastructure found that both men and women prefer cycling infrastructure separated from motor traffic, but that women’s preferences are stronger (we also found indications that the same is true for older people.)¹¹ Building cycling infrastructure to women’s (higher) standards benefits everyone. Similarly, we found that both men and women were willing to tolerate worse cycling conditions alone than they would where children were involved.¹² Given that women are more likely than men to make trips with children, this is not only an age equity but also a gender equity issue. However, it is one in principle easily solved by building the kind of cycle infrastructure/cycling conditions that are suitable for children.

⁶ <https://www.sciencedirect.com/science/article/pii/S2214140516303978>

⁷ <https://www.tandfonline.com/doi/full/10.1080/01441647.2021.1915898>

⁸ <https://www.tandfonline.com/doi/full/10.1080/01441647.2015.1014451>

⁹ <https://www.sciencedirect.com/science/article/pii/S2214140521000967>

¹⁰ <https://www.sciencedirect.com/science/article/pii/S1369847817302802>

¹¹ <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156> .

¹² <https://journals.open.tudelft.nl/ejtir/article/view/3064>

6. Sticking with gender and age, as well as good quality infrastructure our research has identified the importance of building for diverse types of trip, including trip chaining and diverse journey purposes. Building only for the A to B commute disadvantages those (like women) less likely to make commutes and more likely to combine them with other activities than men. Importantly, school escort trips (very predominantly made by women) imply a different distribution of infrastructure to commute trips¹³. Specifically, commute trips tend to involve radial routes to central business districts, but school trips are far more dispersed. Our PCT research also found that women and older people have sharper ‘distance decay functions’ for cycling than men and younger people (i.e., as distance increases, the likelihood that women or older people will still cycle a trip declines faster than for men and younger people). This implies that not only does poor infrastructure disproportionately disadvantage the former groups, but so does providing an alternative that is more circuitous.
7. Recent research exploring Black men’s¹⁴ and Women of Colour’s¹⁵ cycling experiences have highlighted the importance of further work on the under-researched ‘ethnicity gap’ – a gap of similar size to the gender gap but much less studied. For instance, Black men interviewed in the former study suggested that diverse areas of London have poorer provision of cycling infrastructure and services than whiter areas. This is in principle researchable using data on cycling infrastructure (and potentially also on e.g. bike shops and other facilities, to explore variation in access to these) but no such research in London has been conducted. Such research could, for instance, look at the distribution of infrastructure and services along similar lines to our research exploring how equitably Low Traffic Neighbourhoods were distributed in relation to deprivation and ethnic diversity¹⁶ (London-wide, LTNs were found more often in more deprived areas and were similarly likely to be found in more or less diverse areas; although the picture varied at borough-level). Groups such as Black men face a range of barriers that are often barely studied, let alone addressed, such as racism and harassment from the police and/or other members of the public. There are also indirect causes of barriers such as the higher likelihood in London for Black people of living in flats (compared to white or Asian people), meaning a lower likelihood of secure bike storage. A research project or programme focusing on the unmet cycling needs of London’s diverse communities could help create the data and political will needed to foreground the needs of the large number of potential cyclists of colour.
8. We have looked at the representation of people who cycle, which is important both in itself and as an indicator of other planning-related exclusions. In a paper looking at London borough transport and cycling strategies, we found that disabled people were rarely presented as cyclists or potential cyclists. This research is now some years old, and

¹³ <https://www.sciencedirect.com/science/article/pii/S2214140518301257>

¹⁴ <https://www.sciencedirect.com/science/article/pii/S0966692323000480>

¹⁵ <https://www.sciencedirect.com/science/article/pii/S2590198223000751>

¹⁶ <https://www.sciencedirect.com/science/article/pii/S0966692321002477>

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it would be good to repeat it to check whether things have changed¹⁷. A new report looking at representations of ‘family cycling’ in 100 images from a Google UK image search found a lack of any visibly disabled cyclists, alongside low representation of people of colour and those with larger body sizes. It found that families were implicitly represented as heterosexual where two adults were shown. More hearteningly, we did find more mixed gender representation where one adult was shown with children (and among children), suggesting that family cycling is portrayed exclusively in many regards but is at least shown as something that men and women, boys and girls can similarly participate in¹⁸.

9. Our research on cycle logistics has found many equity issues related to this workforce, often precariously employed and disproportionately male and ethnic minority¹⁹. There are many actions that national and local government and employers can take to improve the situation for these workers.²⁰ Cycle logistics has the potential to create multiple societal benefits²¹, and needs also to deliver ‘good work’ for those workers.
10. Finally, our research highlights how building more equitable and accessible cycling as well as wider transport systems requires equitable decision-making processes which give voice to communities that are often silenced or less visible.²² For instance, our research into the perspectives of disabled people on street reallocation measures revealed that the equitable implementation of such measures hinges upon establishing transparent and collaborative dialogue and co-production processes, designed to facilitate genuine participation of disabled individuals in planning and policy decisions.²³
11. In summary, there are multiple areas where action could be taken to improve cycling accessibility and inclusivity, and our research has highlighted some of these. Progress has been made particularly around gender but the ethnicity gap and other gaps and barriers need to be studied more and the issues brought into mainstream cycling policy. For instance, more research on representation and inclusivity in London borough and TfL cycling policies and plans, and more research on access to cycle infrastructure and facilities across London in relation to diversity.

¹⁷ <https://www.sciencedirect.com/science/article/pii/S2214140517301615>

¹⁸ <https://www.wearepossible.org/our-reports/breaking-the-cycle>

¹⁹ <https://blog.westminster.ac.uk/ata/delivering-good-work-labour-employment-and-wellbeing-in-londons-cargo-bike-sector/>

²⁰ <https://blog.westminster.ac.uk/ata/delivering-good-work-a-stakeholders-perspective/>

²¹

<https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/61091edc3acfd2f4af7d97f/1627987694676/The+Promise+of+Low-Carbon+Freight.pdf>

²² <https://www.tandfonline.com/doi/full/10.1080/14649357.2023.2273664>

²³ <https://blog.westminster.ac.uk/ata/projects/showcase/nobody-left-behind/>

Age UK London Ref No. AI004

Key questions

1. What do Londoners use transport for and how does this differ among demographic groups?

a. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

- Previous (pre-pandemic) research by Transport for London has found that older Londoners make only slightly fewer weekday journeys (2.1 journeys on average) compared with 2.4 for Londoners overall). This is especially the case among Londoners aged 70-79 (2.2 journeys).
- Buses and walking remain the most common forms of travel for older Londoners. Older Londoners are proportionally more likely to rely on car transport, particularly as passengers, than other Londoners. This is for accessibility reasons and based on higher proportions of older people living in outer London boroughs with fewer transport options and/or greater distances to cover.
- The types of journeys that older Londoners make are broadly similar to other age groups: Commuting, visiting friends and family, social activities. They are less likely to be for commuting (though it is important to note that Londoners work longer into their lives (often into their 70s) compared with the UK average. This is for a range of reasons including being unable to afford to retire.
- Journeys that older Londoners are proportionally more likely to make include travel for medical appointments, travel to community activities (as volunteers or people that use a service - or attending an activity), travel for caring responsibilities (e.g. someone in their early 60s travelling to support and older parent – picking grandchildren up from school etc.), and travelling to medical (including hospital) appointments.

b. How could the transport network better serve and connect London's communities with the places they travel to?

Greater **accessibility**. The prevalence of disability increases with age.

- Greater **information and communication** about accessible options where they exist.
- Steps to reduce the fear some older Londoners experience using the pavement (particularly **fear about being knocked over by a bike or scooter**).
- Steps to **reduce overcrowding**, which is a key concern (especially on buses)

2. How does TfL use data and engagement to plan accessible and inclusive services?

a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?

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b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?

- Levels of engagement with staff at Age UK London have been to a high standard and we particularly appreciate the hard work and proactivity from members of the engagement, accessibility and inclusion teams.
- Engagement is generally well planned in advance with good levels of inclusion.
- It can sometimes feel a little formal – or good, but ‘on their (TfL) terms’.
- Our experiences are positive. As a pan-London older Londoners organisation with name recognition, we recognise that we might be more prioritised than some other charities.
- More formal engagement with stakeholders is good, but it can be difficult to know the extent of meaningful outreach across communities.
- Experience of TfL staff members is almost always positive.
- Examples of good practice: Step-free consultation event with older Londoners – Quarterly meetings between TfL (Dial-a-Ride team) and local Age UKs to discuss concerns and improvements.

c. How effective is TfL at involving all users in decision-making processes?

- While most aspects of engagement are good, it can be hard to know the extent of influence. It can sometimes feel stakeholders are kept a few steps away from final decisions.
- It can feel that the findings captured in EQIAs rarely impact decision making.

d. Are there any improvements that could be made to ensure that all voices are heard?

- Greater transparency.
- Meaningful engagement at all stages, not after decisions have been made.

3. How effective is TfL’s Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

- We believe Equity in Motion is a reasonably age-inclusive plan (there is much in the document which we like) but don’t feel we know enough to assess its impact on decision-making processes.

4. Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

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Arup Ref No. AI005

Technical Note

Project title	Call for Evidence - Accessibility and Inclusion in Transport Planning
Job number	Call for Evidence Response
File reference	#1
Prepared by	Liani Baglietto Castelleras, Rob Goodall, Mei-Yee Man Oram
Date	28 October 2024
Subject	Arup Response

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This response assumes that the information covered across the various publications included in [TfL's Diversity & inclusion publications website](#) have been read and internalised by the Committee. We will refer to some of the headlines but noting that to properly plan and deliver for groups of protected characteristics, we must acknowledge and respect that rich diversity of experience from individual to individual. As such, granular explorations are highly encouraged across the different activities associated to the planning, operation and monitoring of the network.

Please note that the terminology used throughout this response has been selected to align with the language employed by TfL to refer to diverse groups.

Response Q.1 and Q.2: Travel in London and Data

The exploration conducted by TfL 2019 on how different groups travel in London was a commendable effort to create a baseline understanding of the experience of groups often overlooked in transport. A few highlights from the report included:

- Walking is the most common mode of transport, with 95% of Londoners walking weekly; however disabled Londoners walk less frequently (81%).
- Reliance of lower-income communities, women, and young Londoners on affordable public transport, highlighting the need for cost-effective options.
- Disparities in access for low-income, disabled and older Londoners, who making fewer trips.

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- Disparities in safety and perception of safety disproportionately impacting Black, Asian or ethnic minority, women, young and LGBTQ+ groups.

Though 2019 may seem recent, a lot has changed since then, considering the impact of COVID, technological change, social and economic change, amongst others, in lifestyles and travel patterns. The transport offer has also adapted accordingly, with a number of micromobility options appearing in the market, transforming the way we move around our streets. New mobility and user experience data has also become increasingly available. Similarly, more research on the experience of groups of protected characteristics using transport has also become available (see list of resources at the end of this response). TfL has also made considerable improvements to their transport network, as evidenced in pages 11-12 of the Equity in Motion Plan.

Considering all of the above, it is recommended that TfL updates its baseline exploration. A commitment towards updating the 'Understanding London's diverse communities evidence base' by 2026 included in the Equity in Motion Plan. However, it is also considered that various explorations might be needed to properly cover the multiple aspects that influence the experience of diverse communities travelling in London. The following could be interesting points to consider:

Evolving micromobility:

- **Progress towards enabling groups of protected characteristics feel more comfortable walking and cycling.** For example, the Cycling potential in London's diverse communities (2021) report recognised that women from Black, Asian and ethnic minority were one of the groups less likely to cycle but with highest cycle potential to start.
- **The role of e-scooters, e-bikes and cycle hire to cater for different travel needs.** For example, the DfT National Scooter Evaluation (2021) found that young users, users from ethnic minority groups, and users on low incomes, were more likely to frequently rent e-scooters.
- **Safety considerations for micromobility hire users, including recorded accident rates and the likelihood of incidents.** Additionally, examine how current business models, which charge users per minute, may incentivise reckless or unsafe road behaviour such as speeding, crossing at red lights, taking prohibited turns, going against the traffic flow, etc.
- **The impact of micromobility hire in the experience of diverse groups using London's streets.** For example, considering street clutter, safety and perception of safety to other groups, etc.

The Public Attitudes to the Use of E-scooters in the UK (2020) found that **safety concerns and negative connotations to the use of e-scooters were particularly strong in London** where survey participants were more likely to report first-hand experience of seeing e-scooters being ridden unsafely. Similarly, the National evaluation of e-scooter trials (2022) report found a significant proportion of e-scooters users riding on the pavement and wider associations of anti-social behaviour from e-scooter users.

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Similarly, it could be beneficial to build on the work developed by Streets for Diversity to consider in which ways **unpredictable driving behaviours and encroaching in footways** can affect the experience of people with certain forms of neurodivergence.

UCL's Person-Environment-Activity Research Laboratory (PEARL) has conducted research in collaboration with operators in London to **test inclusive sound alerts for e-scooters, aimed at enhancing awareness among other street users**. The support from TfL's Independent Disability Advisory Group for this initiative is commendable. Furthermore, it would be beneficial for TfL to publish information on the emerging findings and outline how these insights will be integrated into existing operational guidelines.

It would also be beneficial to build on the work developed by various organisations representing other disability groups to consider how blind and partially sighted people as well as those with a form of mobility impairment might be disproportionately affected by **micromobility-related street clutter**.

Impact of changes in the streetscape: In recent years, particularly following the COVID-19 pandemic, London's streetscape has undergone significant transformations. These changes include reallocating road space to prioritise pedestrians, increasing the number of cycleways, modifying bus stops, and improving junctions. Such developments have altered how different road users interact within specific spaces. To ensure that these changes effectively meet the needs of all users, it is essential to implement accompanying programmes that facilitate navigation for diverse groups. Additionally, gathering feedback from these communities will be crucial for assessing the suitability and effectiveness of the new designs.

Use of public transport: Evaluating progress towards known challenges, as well evaluating the extent to which changes in services have managed to respond to the changes in lifestyles, needs and expectations from diverse groups. For instance, considering the shifts in work-life balance and the changing dynamics of paid and unpaid labour within households which have translated into new demands on the transport system.

Impact of increased fares on different groups of protected characteristics: including, number of trips taken, purpose, mode of choice, and perceptions on value for money and the wider network. In addition to impact, it would be interesting to explore the processes by which changes were communicated and to which extent that might have disproportionately impacted certain groups (e.g. neurodivergent people, older people, etc.)

Communications associated with service disruptions and impact on diverse communities. Service disruptions are often communicated via TfL's online platforms (website, TfL Go app), but it would be beneficial to explore how more accessible and inclusive communication can be achieved. Proactively sharing information with target groups, such as by signalling upcoming disruptions at transport stops and stations, could be more effective. Additionally, offering clear advice on alternative transport options and providing access to helplines for support, particularly for neurodivergent individuals, older people, and tourists, would enhance accessibility and inclusivity.

[image redacted for publication] Figure 1 Disproportionate impact of unmanaged micromobility parking on groups of protected characteristics

Response Q.3: Equity in Motion Plan

We welcome the publication of the Equity in Motion Plan and are fully supportive of the potential value being realised for communities through its delivery. We also appreciate the reference to the 4 A's, as outlined in Arup's Equitable Future Mobility report, as a framework to help identify persistent barriers to travel in London.

Building on that, it is good to see that the short-term implementation of the plan sees ambitions to develop *'new research to better understand Londoners' needs and experiences'* and *'greater community engagement in the design process'*. The information provided above (response to Q.1 and Q.2) could serve as a valuable resource in shaping this research.

Additionally, we offer some general suggestions below on how the plan could incorporate further improvements per objective:

Objective 1: An equitable customer experience

- Consider conducting a comprehensive review of the quality and accessibility of audio systems on buses. This could be complemented through the collection of feedback from diverse groups on how changes in services are communicated whilst on board.
- An action included in the plan is: *"By 2026, make it easier for customers to report crime, antisocial behaviour and safety concerns, including adding reporting to our website and TfL Go app"*. We suggest prioritising accessible mechanisms for reporting on buses. For example, explore the possibility of including 'emergency' buttons or QR codes which can be accessed to automatically contact central support where additional help might be needed.
- We welcome the establishment of the Inclusive Design Centre of Excellence. In addition to its internal role at TfL, we recommend further engagement with external stakeholders involved in transport infrastructure and service design. This could include offering training and upskilling opportunities for transport planners and running outreach campaigns to promote new design principles. This can play a key role in ensuring the consistent application of inclusive design principles since early stages of scheme development rather than addressing it as an afterthought in response to feedback.
- We welcome the commitments taken towards improving toilet accessibility, availability and acceptability across the network. As part of the accessibility element, it will be important to consider how these facilities are signalled to the public.

Objective 2: Protecting and enhancing connectivity

- The plan includes a proposal for developing a 'range of connectivity assessment techniques to better consider equity in how we plan our network'. Within this, it would be interesting to see how Transport Related Social Exclusion could take a more prominent role in influencing the planning of the network.

We consider that the action: "raise awareness of our guidance on removing access barriers, encouraging its use with transport planners, designers and engineers to ensure barriers to using pavements, parks and paths are removed", is particularly valuable. It would be

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interesting to see how TfL could play a bigger role in the promotion of capacity building campaigns to ensure consistency of approach in the industry. Whilst ‘accessible’ on paper, many new developments can generate a confusing navigational experience to certain groups when accessibility features are not consistent with those of the surrounding areas. Thinking beyond the red line boundary is key to make sure that spaces and routes offer a continuous and consistent experience. This ease of navigation is also essential to support the feeling of safety (see Kaizen 2023 research on ‘Safety and Belonging for Women and Girls in Public Spaces’).

Objective 3: Keeping travel affordable

- All actions are highly welcomed. In particular, we appreciate the focus on collaboration with key stakeholders as we feel this will be crucial to ensure that the affordable travel options can be adequately communicated to key groups.
- Building on the previous point, providing clearer information about fares and promotions through communication material at stations or on services could help establish a more proactive approach to informing users. However, the placement of this information must be strategically considered to avoid overload, which may disproportionately affect certain groups.

Objective 4: Reducing health inequalities

- There is a mention on the support of micromobility options such as e-bikes and e-scooter rental. Whilst these options can certainly play a key role in enabling more sustainable trips from certain groups, it would also be important to assess the best mechanisms to ensure that the potential challenges explored above (in the response to Q.1 and Q.2) do not outweigh the benefits from these modes. To ensure that, it will be important to engage with diverse groups and operators to devise the best solutions to provide equitable outcomes for all.
- In the section on reducing road danger, we welcome the mention of collaborating with the grocery and meal delivery sector. We would like to underscore the importance of adapting the transport system to create a safer and more enjoyable environment for both the public and workers in these sectors. Key actions could include reviewing the availability of suitable parking spaces for delivery drivers, identifying dedicated areas where they can charge their vehicles (as they often rely on restaurant facilities), and providing spaces for them to rest. Additionally, the provision of accessible public toilets would be a highly beneficial measure for both the general public and delivery workers.
- Similarly, for reducing road danger, we welcome the recognition of the need to work with a diversity of stakeholders. We would like to emphasise the importance of working with schools, to promote and instil safe behaviours from an early age, which is essential for achieving long-term road safety outcomes
- We welcome the action of “by 2025, identify the impact of extreme weather events on different transport users and neighbouring communities and develop interventions to support those most severely affected”. A particular point of interest could be to explore the impact of flooding infrastructure and slippery pavements could have on those with mobility impairments. How could equity be best considered in preventive maintenance of infrastructure and timely response to disruptions? Similarly, heatwaves can have a disproportionate effect on certain users such as older people, women, and those with

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specific medical conditions. While striving for a heat-resilient network, it would be essential to assess which areas house the most vulnerable populations and, at the same time, have the poorest infrastructure, so that these areas can be prioritised for improvement.

Response Q.4: Good practice from other places

Listed below are a few examples of good practice globally and from other areas of the UK, but this should be considered a non-exhaustive list:

- **Targeted gender mainstreaming – Santiago de Chile, Chile:** A cross-sectoral collaboration between central and regional government, the Metropolitan Transportation Directorate (DTPM), transport operators, and civil society to implement a programme of initiatives as part of a wider ‘Policy of Gender Equality in Transport’. See more on the initiatives – <https://tglab.iadb.org/en/santiago>
- **App to support blind and low-vision bus riders:** App to support blind and low-vision bus riders: Pilot programme in New York to support visually impaired users access bus stops and now when the next bus is arriving, and how crowded it is. It works by translating visual signage into audio (reads QR codes) [https://new.mta.info/press-release/mta-pilots-smartphone-app-to-help-blind-and-low-vision-bus-riders#:~:text=The%20NaviLens%20app%2C%20which%20can,bus%20is%20\(if%20the%20necessary](https://new.mta.info/press-release/mta-pilots-smartphone-app-to-help-blind-and-low-vision-bus-riders#:~:text=The%20NaviLens%20app%2C%20which%20can,bus%20is%20(if%20the%20necessary)
- **Helping hand campaign Brighton & Hove, UK:** Helping passengers signal the need for additional support. Cards are customisable. See more – <https://everyonesjourney.campaign.gov.uk/helping-hand-assistance-scheme/>
- **Ciclodias/Ciclovia:** Whilst London already incorporates various forms of street experiments, the Ciclodía concept goes beyond this by closing strategic roads to motorized traffic. This presents a real opportunity accessible to users with different levels of confidence to engage in active travel. See more – Bogota: <https://www.idrd.gov.co/recreacion/ciclovia-bogotana> ; Lima: <https://nixonscan.com/2016/01/17/quiet-sunday-city-street-in-lima-peru-transformed-with-ciclodia/>

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Chartered Institution of Highways and Transportation Ref No. AI006

CIHT Response to

The London Assembly Transport Committee's Call for Evidence: 'Accessibility and Inclusion in Transport Planning in London'

October 2024

For any inquiries, please email technical@ciht.org.uk

The Chartered Institution of Highways and Transportation (CIHT) welcomes the opportunity to respond to the consultation on 'Accessibility and Inclusion in Transport Planning in London' and share knowledge in this area.

In the CIHT manifesto, *[A Transport Network Fit for All Our Futures](#)*, we are clear that a properly funded and managed highways, transportation and infrastructure network plays an important role in addressing social inequalities. Our streets, towns and neighbourhoods should be accessible and inclusive to everyone. Considerations of diversity and working towards inclusion of everyone should be central to how we design, build, and maintain our infrastructure.

CIHT's recent report, *[Creating a Public Realm for All](#)* outlines how designs should be created by a diverse design team, including as many individuals with protected characteristics as defined by the Equality Act 2010 as possible. When working with user groups, the aim should be co-cultivation, defined as meaningful engagement and representation from the outset and design through construction, operation, monitoring, and evaluation (rather than just consultation on a scheme). Early engagement is key to ensuring that feedback can be incorporated in a timely manner and avoid delays. This also allows stakeholders to work out acceptable solutions and agreements collaboratively, rather than having to react to decisions taken without their involvement.

Consultation questions

Q1: What do Londoners use transport for and how does this differ among demographic groups?

- a) Which journeys and types of transport are most used and most appropriate for certain demographic groups?**

No comment

- b) How could the transport network better serve and connect London's communities with the places they travel to?**

No comment

Q2: How does TfL use data and engagement to plan accessible and inclusive services?

- a) **Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?**

No comment

- b) **How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?**

No comment

- c) **How effective is TfL at involving all users in decision-making processes?**

No comment

- d) **Are there any improvements that could be made to ensure that all voices are heard?**

CIHT welcomes efforts by Transport for London (TfL) to work with user groups and stakeholders through their 'All Aboard' and Youth Panels. CIHT recommends TfL adopts the principle of co-cultivation to maximise the impact of this engagement and ensure that all voices are not only heard but actively listened to early in the design process. Co-cultivation is key to meaningful engagement as it encourages a shared understanding of the issues faced over the course of the design process and allows everyone with an interest in the project or that could be impacted from it, to work together towards an acceptable solution. For a visual explanation of co-cultivation, please see research by Professor Nick Tyler.²⁴

Q3: How effective is TfL's *Equity in Motion* plan, and how well does it influence decision-making across London? How could it be improved?

No comment

- a) **What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?**

As well as considering who should be consulted during the design process, it is also key to consider when and how user and stakeholders are consulted to maximise the impact of their feedback. As outlined in response to question 2d, CIHT recommends implementing the principle of co-cultivation to ensure that marginalised voices are included from the outset all the way to project evaluation and maintenance. Consideration should be given to the times, places, and formats that are used for engagement to avoid excluding any user group.

CIHT supports TfL's objective to address inequalities by centring inclusion in all that they do. *Equity in Motion* details how TfL uses equality impact assessments (EqIA) to assess the impact

²⁴ Tyler, N. and Guide Dogs (2024) *Designing for Inclusion*. Available at: [Technical Report 2024 \(gd-prod.azureedge.net\)](https://prod.azureedge.net/TechnicalReport2024/gd-prod.azureedge.net/)

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the impact of their work. CIHT welcomes the use of this tool and recommends that instead of being completed at the end of the design process, TfL should carry out an access and inclusive design review as early in the design process as reasonably possible. This review should be carried out by representatives of all potential users of the scheme and should provide the designer an opportunity to respond and change the design process to solve the issues identified.

CIHT supports TfL's aim to standardise staff training. To assist with this, CIHT offers a range of courses via the [CIHT Learn platform](#) to help those designing and planning transport and infrastructure to consider accessibility and inclusion in all that they do. Examples include: [Inclusion Essentials](#), [Designing highways and transportation for people with dementia](#), [EDI in the workplace](#), [Introduction to stakeholder and public engagement](#) and [Understanding Disability](#) as well as an upcoming course based on the [Creating a Public Realm for All](#) report. Courses are available free of charge for CIHT members, but we would welcome discussions with TfL about facilitating staff access to these resources. If interested, please contact admin@cihtlearn.org.uk to discuss options.

CIHT also welcomes TfL's recognition of the importance of 'enhancing protection from extreme weather events', whilst ensuring that climate change adaptation measures do not create additional barriers and inequalities. CIHT's most recent publication, [Delivering a Resilient Transport Network](#), illustrates how future weather events will impact the transport sector and calls for adaptation and resilience to be emphasised as a policy and investment priority. CIHT's recently published policy brief, [Ensuring a Just Transition to Net Zero](#) explores decarbonisation and highlights that efforts to decarbonise co-exist alongside existing inequalities, and policies must avoid exacerbating or creating new social disparities.

Q4: Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

As a membership organisation with international reach, CIHT appreciates opportunities to share knowledge and best practice with cities across the globe.

CIHT supports TfL's objective, expressed in *Equity in Motion*, to 'launch an innovation challenge aimed at improving travel for disabled people, making it easier for customers to contact staff during their journey and access information on crowding, accessibility and disruption'. Voiced in a [CIHT podcast](#), Nick Tyler, Director of the UCL Centre for Transport Studies and Chadwick Professor of Civil Engineering, has highlighted how members of the planning department in Medellin, Columbia spend approximately 4 days per week out and about in local communities, where community members can approach them and raise issues. This visibility facilitates an open and collaborative relationship, which has proved key in reforming a city now recognised globally for its innovative transport system, environmental policies and cultural offerings.

Ealing Community Transport Ref No. AI007

Call for evidence on Accessibility and Inclusion in Transport Planning – ECT Charity

Introduction

Ealing Community Transport (ECT) would like to thank the London Assembly Transport Committee for the opportunity to respond for its call for evidence on Accessibility and Inclusion in Transport Planning.

The main thrust of our response is that TfL and the Assembly have a strong focus on accessibility and inclusion, but suffer from two significant areas of strategic weakness that hamper their mission to provide safe and accessible transport for all Londoners:

- People who find public transport difficult to use for reasons of disability or old age (but are not eligible for Dial-a-Ride) remain structurally unseen in transport planning. This is because they are non-users of TfL services – and are invisible to TfL's strategic field-of-view.
- As this cohort of Londoners remains unseen, so do the organisations providing transport services for them (outside of their contracted delivery of Dial-a-Ride) – Community Transport.

Taken together, this lack of engagement is becoming increasingly consequential, both to Community Transport organisations and the Londoners they serve. We will explore these issues through the medium of the call for evidence.

About ECT Charity

ECT Charity is one of the UK's leading providers of Community Transport, safely providing almost 401,000 passenger trips for our communities each year. We operate a wide variety of services, each based on a particular local need: from minibuses for community groups to transport for children with Special Educational Needs or Disabilities, from door-to-door services for older and disabled people to buses tackling rural social isolation – and many more.

As a charity, our transport is designed to make a positive difference in the communities we serve – currently Cheshire, Dorset and Ealing, West London.

In matters relating to this call for evidence, ECT Charity's services and expertise are focussed on the needs of older and disabled people. As such, our response should be viewed as restricted to those areas of expertise specifically.

1) What do Londoners use transport for and how does this differ among demographic groups?

- a. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

Our response to part 'a' is best addressed together with part 'b' below

- b. How could the transport network better serve and connect London's communities with the places they travel to?

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The Accessibility Gap: TfL has worked tirelessly for a generation to make its mainstream public transport modes as accessible as possible. We think that this is an important point to recognise and celebrate. In addition, as a proud provider of TfL Dial-a-Ride services, we can recognise their contribution to providing a service for those who cannot use public transport – although we believe Dial-a-Ride does have potential for positive reform.

There is, however, an essential difference between ‘people who cannot use public transport’ and ‘people who find public transport difficult to use’. Both groups do not use public transport (or use it very rarely), but only one would be likely to succeed in registering for Dia-a-Ride. *‘People who find public transport difficult to use’ are a cohort unserved and unseen by London’s transport planning.*

We are referring to the older or disabled person who can reach a bus stop and make a return journey, but finds it sufficiently arduous to avoid doing so; or those who have experienced an incident of harsh acceleration on a bus whilst still standing and decided that the risk of a fall was simply too high; or one who could get to a bus stop 50 metres away, but not 350 metres and so on.

We are referring to the person with a hidden disability who struggled with crowds; the wheelchair user who has simply had one too many confrontations with pushchair owners unaware of TfL’s enlightened policies in this regard; the person with a visual impairment on a multi-year waiting list for Orientation and Mobility training and so on.

We are even referring to those who find the process to apply for Dial-a-Ride simply too onerous. Almost by definition, a 15 page form, accompanied by a four page ‘how to fill in this form’ guide is not accessible for many people.

These are not edge cases; they are a significant proportion of the older and disabled people who do not use public transport. They are also the service users of Community Transport and we hear their stories every day. To give an idea of the scale of the issue, ECT Charity provides 10 vehicles a day to provide Dial-a-Ride services covering part of six London Boroughs, but at the same time, we are operating 3 ‘PlusBus’ services, often at higher occupancies, in Ealing alone – and we are aware of significant unmet local need.

This accessibility gap is not inconsequential. Each journey forgone is independence curtailed, social isolation compounded, health and well-being corroded – all at incalculable human and financial cost. We know the difference that providing services for this cohort of users makes – 91% of our users state that we have improved access to services, 76% state their independence has improved – and 78% say they are less lonely.

We believe that transport planning in the Capital needs to urgently understand and address the needs of this unseen cohort. This does not mean whole new fields of work, as partner organisations working across the capital – Community Transport in particular – stand ready to help. This is particularly true as most of the travel requirements for this group are intensely local – and Community Transport has excellent connections with local civil society that also provides services to this group. However, it does require the strategic attention of Government and its agencies, entirely absent at this moment.

2) How does TfL use data and engagement to plan accessible and inclusive services?

- a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?
- b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?

We believe that TfL collects a wide range of data on its service users, including those who face additional barriers. The important distinction here, however, is the term ‘service users’. We may be incorrect, but we are unaware of any recent, serious attempt to understand – through the use of data or any other measure – those who do not use TfL services as a result of age or disability. We suspect that any such research would be very enlightening.

- c. How effective is TfL at involving all users in decision-making processes?

Our response to question 1a/b has highlighted an unseen cohort of Londoners, structurally invisible to TfL. It should be no surprise that this cohort is not meaningfully represented in TfL’s decision making.

What is perhaps more surprising is that, outside TfL dialogue over Dial-a-Ride delivery, there is no meaningful dialogue between Community Transport and TfL/the Assembly at all. We are neither thought of nor considered. For example:

- The reason this submission is two-weeks past the deadline is that our existence was only remembered at the last minute.
- The page on TfL’s website that explores the Community Transport offer in London hasn’t been updated in at least 4 years, with information significantly out of date.

- d. Are there any improvements that could be made to ensure that all voices are heard?

Beyond the urgent need to consider the needs of the unseen cohort described above and include the organisations that provide services to them, we believe that the most significant change is one of philosophy. In transport, we tend to talk about passengers and meeting their needs, however diverse. We need to start talking about people – many of whom may not be passengers at the moment, but who have a real potential stake in our discourse.

3) How effective is TfL’s Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

We believe that TfL’s Equity in Motion plan is a thoughtful and effective articulation of TfL’s accessibility journey over many years. It is strong both in its ambition and in its record of delivery. From the perspective of Community Transport, it does have several challenges – outside the previously noted issues of ignoring Community Transport and its service users.

Functional accessibility: The model of accessibility set out is ‘functional’ in nature – can a user functionally get to the transport, safely ride it, afford it and so on. However, it does not consider any barrier not immediately addressable by functional design. For example, beyond the training and service standards already in place, there is little functional design can do about a harried bus driver (with their controller urging them to make time) from pulling away from a bus

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stop too quickly once in a while. What matters is what we do for the older person with the rational belief that public transport is too risky as a consequence.

Dial-Ride is not compatible: The aspirations of Equity in Motion are not reflected in the service design of Dial-a-Ride. Most TfL services start with the idea of transport as the engine of social and economic development in the Capital. Dial-a-Ride is recognisably a heavily rationed old-style public service thought of in a different way. It has intense barriers to participation (rationing by eligibility). Its destinations are arbitrarily limited from a user perspective, (rationing by scope of service) particularly around healthcare. It ignores local structures – often, attending regular local third sector provision of services is not permitted (rationing by relevance).

Consequently, we can consider Dial-a-Ride as an outlier in TfL's service portfolio. Most services start with the needs of Londoners – either as individuals or as a whole – as their first cause/strategic compass. Dial-a-Ride is the only service that does not start with a strategic assessment of the travel needs of its user group.

Social dimension of transport: The final missing piece in TfL's Equity in Motion strategy is the social dimension of transport. This is the potential impact of the journey itself on loneliness and social isolation; the opportunity to travel together for common purposes. Most Community Transport services recognise this dimension in their service design – ECT Charity's service users report a 75% improvement in their life satisfaction as a result of using our services.

- a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

We believe that, in relation to the transport needs of all older and disabled people, the best thing that TfL can do is to recognise the role of Community Transport and partner with it. Community Transport is currently the only non-statutory mode in which TfL has no strategic input at all, to everyone's detriment.

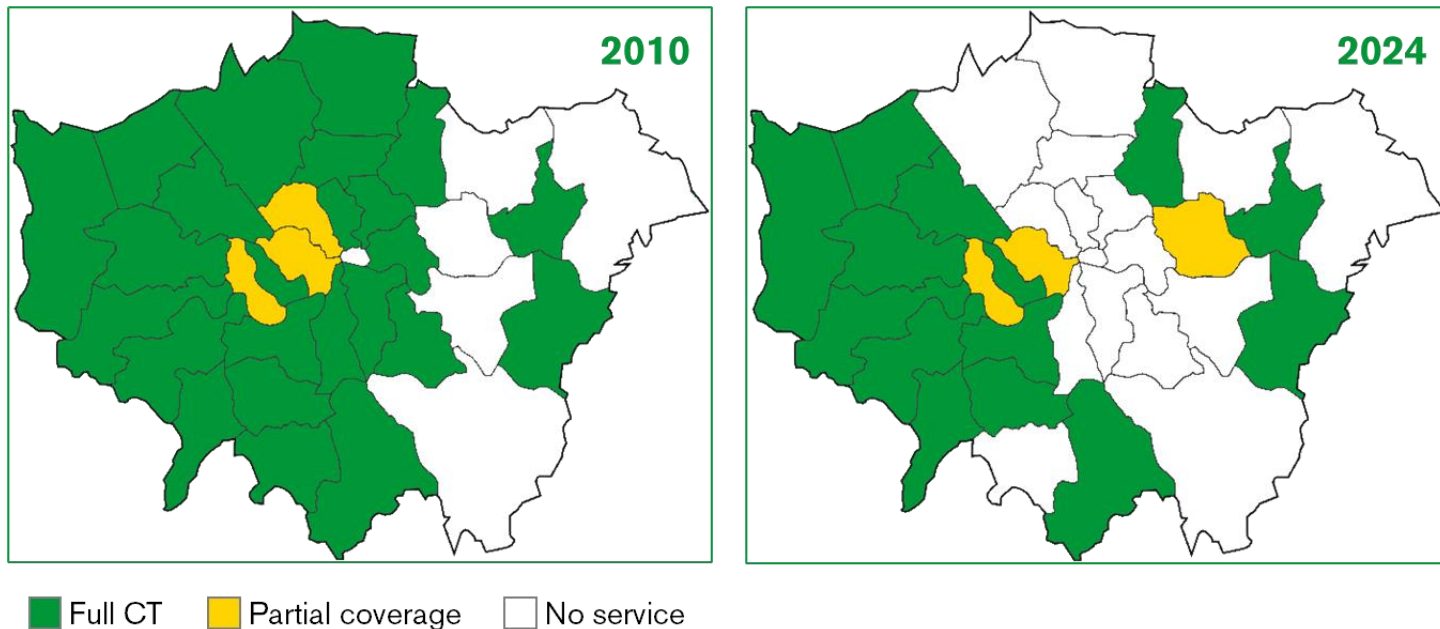
As a consequence, Community Transport faces a bleak set of challenges:

Locally vulnerable: Funding – through grants, contracts or social enterprise opportunities – is entirely at the discretion of hard-pressed local authorities. As this funding is normally for non-statutory services, each operator is a few decisions away from closure. This is not a theoretical threat, as data from London demonstrates.

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Community Transport coverage in London, by Borough, 2010-2024

Since 2010, due to the closure of a number of operators, full Community Transport provision has dropped from covering 75% of Londoners to just 43%: Over the past 14 years, almost 2.4 million Londoners have lost access to full Community Transport provision. The London coverage data demonstrates that, not only are services in the capital in structural decline, but that a postcode lottery has emerged.

Regulatory headwinds: Community Transport operates under regulations from a different era – one that did not envisage third sector delivery of public services. This creates regulatory challenges in everything from operating permits to the licences used by volunteers to drive vehicles.

Nationally and regionally ignored: Outside of the pressure we can bring to bear ourselves or through the Community Transport Association, there is no significant public policy discourse on Community Transport. National and regional government have been missing in action when it comes to creating a supportive environment for the sector.

Taken together, these threats set Community Transport on a glide-path to history – operators up and down the country are cutting services, at risk, or are closing their doors. When a Community Transport operation closes, odds are, its services are gone for good.

It is in the power of the Assembly and TfL to address these headwinds – and to meet the needs of the unseen cohort of our service users.

4. Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

We are unaware of international comparisons, as many European countries view the work of Community Transport as the job of the state.

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However, TfL has long been a national and international pioneer in making transport more accessible for vulnerable people. We strongly believe there is an opportunity for the Assembly/TfL to continue that tradition by supporting the development of the UK's first regional Community Transport strategy.

ECT Charity, The London CT operators, and the CTA stand ready to support TfL and the Assembly in the development of any such strategy.

Guide Dogs Ref No. AI008

The London Assembly Transport Committee

Accessibility and Inclusion in Transport Planning consultation

Guide Dogs response

October 2024

About Guide Dogs

Guide Dogs provides mobility services to increase the independence of people with sight loss in the UK. Alongside our mobility services we campaign nationally to break down physical and legal barriers to enable people with sight loss to get around on their own terms. Across London it is estimated that there are 217,000 people living with sight loss with 40,420 people registered as blind or partially sighted. Due to a variety of reasons, including an ageing population, the number of people with sight loss is predicted to increase to 264,000 by 2032²⁵. There is also a significant number of vision impaired people who travel into London for: work, leisure, medical appointments for example on a daily basis.

Guide Dogs expert local team work from our regional training centre in Redbridge and community team in Tavistock Square, providing services to clients across the capital. Although universally recognised for our iconic guide dogs, we also provide adult vision rehabilitation and children and young people habilitation and family support services which empower individuals of all ages with a vision impairment to get out and about in their local community and live the lives they choose.

The RNIB estimates that only one in four people of working age who are registered as blind or partially sighted are employed²⁶ and that blind and partially sighted people are twice as likely to be inactive than people without sight loss²⁷.

People with sight loss are unable to drive and therefore depend upon public transport for their independence and wellbeing.

For people with sight loss, a journey outside their front door is a holistic process; each aspect of that journey must integrate with the next seamlessly and safely for them to be confident to travel independently. However, the lived experience of people who are blind or partially sighted indicates that they frequently face numerous challenges when navigating within their local community and the wider urban environment; from identifying their location, traversing cluttered or confusing streetscapes, accessing public transport or simply being unable to cross the road in safety.

1. What do Londoners use transport for and how does this differ among demographic groups?

a. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

²⁵ RNIB, Statistics on Sight Loss, available at <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics/sight-loss-data-tool>

²⁶ RNIB, Key information and statistics on sight loss in the UK, available at [Learn more about sight loss statistics across the UK | RNIB](#)

²⁷ RNIB; See Sport Differently. <https://www.rnib.org.uk/about-us/see-sport-differently>

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Guide Dogs response: For blind and partially sighted people, local bus travel is the most common form of public transport used. The reason for this is that bus services are local (close to home) and affordable. From an accessibility perspective, London has had audible and visual announcements on all TfL bus services for nearly 20 years which our service users tell us has contributed to their confidence to travel independently by bus in London. Having accessible journey information makes a massive difference and is beneficial to all bus users.

We have heard from our service users that the frequency of bus services does depend on where you live, work etc. Living in the outer boroughs does seem to have a significant impact on the frequency and destination of bus services.

We know that London's Dial A Ride services are also popular with blind and partially sighted Londoners. Having a door-to-door service which is affordable, is greatly appreciated when travelling to unfamiliar destinations.

Guide dog owners travelling into London tend to use bus and taxi services. In the majority of cases, guide dog partnerships living outside of the capital will not be trained to use escalators, due to the dogs not becoming familiar with escalators due to infrequent use. In addition to visitors to London not being familiar with the transport network.

However, there are barriers in the built environment that are a significant challenge for vision impaired Londoners and visitors to the capital. Regardless of how accessible any form of public transport is, every journey starts with leaving your home and navigating the streetscape to access public transport.

b. How could the transport network better serve and connect London's communities with the places they travel to?

Guide Dogs response:

Local bus services

As previously mentioned, the frequency and lack of bus route choices can be a barrier to travel for vision impaired travelling from or to outer boroughs. Step free access on the underground network can also restrict which stations can be used. On a similar point, we hear from service users that overground and underground stations outside of the central London area tend to have less and sometimes no frontline staff to provide assistance. We know from listening to blind and partially sighted people that having staff available to provide information, advice and assistance is reassuring and gives more confidence in making independent, safe journeys.

Technology

The use of technology is developing at a pace for accessing information and purchasing tickets. For many people, this is convenient and makes planning a journey more straight forward. However, we would highlight the findings in the RNIB's "Sight loss and technology briefing: How blind and partially sighted people can bridge the digital divide". People with sight loss are twice as likely to be digitally excluded when compared to the general population. This is strongly linked to age. The numbers of people aged 18-49 who don't use the internet are extremely small, and people with sight loss in this age group appear to be just as likely to use the internet as people in the general population. Older people are much more likely to not use the internet, with 63 per cent of people with sight loss aged 75 plus not using or having access

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to the internet (compared to a UK average of 52 per cent for the same age group)²⁸. With this in mind, any aspiration to maximise digital technology must not be at the expense of those who are already digitally excluded; accessible and inclusive information and services should still be available for all.

Built Environment

For people who are blind or partially sighted, to be able to use and take benefit from any public transport system relies on an inclusive urban environment that allows an individual to walk to and from a desired destination in safety and with confidence; be it along a pavement, to a local bus stop or to their nearest transport hub.

In the past five years numerous initiatives have been announced in London aimed at revitalising and regenerating areas of London, improving local transport or walking, wheeling and cycling infrastructure. Funding for these initiatives operate in different ways and have different priorities however, they will all lead to major changes to the public realm.

Schemes facilitated by these funds have the potential to change the way our communities look, and have a significant impact on the residents, commuters and visitors that use them. People with a vision impairment will most likely benefit from the regeneration of communities where they live, work and visit. However, if aspects of these schemes are completed in a non-inclusive way, it will make everyday life harder for people with a vision impairment. Inaccessible designs may make maintaining a job, accessing recreational activities, or accessing public services, more difficult.

No one should feel unsafe when they walk or use public transport in the streets and spaces where they live or work. Yet we increasingly hear that street designs are creating barriers for disabled people. That is why Guide Dogs commissioned University College London (UCL) to explore the impact of four different types of design on disabled people, including blind people and people with a vision impairment. The research focused on Floating Island Bus Stops, Shared Bus Stop Boarders, Segregated Cycle-footways and Continuous Footways. These designs all incorporate cycle paths into their design. However, aspects of these designs are used in other settings.

The research recently published²⁹ included a literature review, focus groups with disabled people, workshops with professionals, site visits and controlled experiments at UCL's Person-Environment-Activity Research Laboratory (PEARL), identified significant problems with these designs. Using the findings from the UCL research, Guide Dogs identified 15 recommendations for improvements. Key recommendations include:

- Local communities (including disabled people) and professional specialists must be involved in the co-cultivation of pedestrian infrastructure to ensure that inclusion and accessibility are embedded into the planning and design process.
- Investigate different ways of enabling cycle lanes and bus stops to interact which do not raise safety concerns amongst passengers and pedestrians using the stop. This investigation should include consideration of alternative positions, alignments and routes for the cycle lane to ensure that both cyclists and pedestrians are safe around

²⁸ RNIB, [Sight loss and technology briefing – How blind and partially sighted people can bridge the digital divide \(rnib.org.uk\)](https://www.rnib.org.uk)

²⁹ [Streets Ahead Campaign | Guide Dogs](#)

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bus stops. Until findings from this research are available, stop the further installation of Floating Island Bus Stops and Shared Bus Stop Boarders.

- For Segregated Cycle-footways, a tactile paving delineator should be used at all times rather than a painted white line. Such routes should only be considered if the recommended space can accommodate the requirements for both users. Tactile paving should be installed at the beginning and end of each section, as well as at regular intervals within the Segregated Cycle-footway, in line with the guidance.
- Local authorities should install tactile paving and other signalling at all continuous pavement crossings so that there is a consistency of approach.

Notably... “research found that Shared Bus Stop Boarders pose a greater threat to disabled people and are considered less safe than Floating Island Bus Stops. Participants in our research were universally opposed to the use of Shared Bus Stop Boarders, and the experts consulted were equally sceptical of their safety. These problems are inherent in the design of Shared Bus Stop Boarders, and we do not think they should be used in their current form. Some of the main risks of this design include the higher travelling speeds of cyclists and risks boarding and leaving buses directly onto a cycle path. More research is needed to understand if these designs can be made to be safe and accessible, but until this is complete, the design should not be further implemented.”

Guide Dogs would urge decision makers to engage with this significant new research and seriously consider the recommendations contained within it in relation to current and future regeneration and infrastructure schemes across London.

“Designing for Inclusion; The accessibility challenges of some active travel infrastructure for people with vision impairment and other disabled people” the full research report, Guide Dogs summary and recommendations is available to download through the following link:

[Streets Ahead Campaign | Guide Dogs](#)

An accessible and inclusive environment is vital to allow blind and partially sighted people to live their lives independently. Proper infrastructure can make the difference between a person with sight loss travelling with confidence or forced to remain at home, with all that means for their health and wellbeing.

2. How does TfL use data and engagement to plan accessible and inclusive services?

a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?

Guide Dogs response: We are not sufficiently familiar regarding all the methods used by TfL to plan service and infrastructure to meet the needs of Londoners facing additional barriers. As an organisation we try to respond to as many consultations as possible via the ‘Have Your Say’ online portal. However, this is difficult due to lack of resources. We also promote consultations and public engagement opportunities to our service users, when possible.

b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?

Guide Dogs response: As an organisation Guide Dogs values the engagement we have with various teams within TfL. Having a named point of contact within the Stakeholder Engagement team does help to seek answers to questions and providing us with updates on a range of topics relating to the work of TfL and how we can be involved. We also value TfL’s regular Inclusive Transport Forum which is effectively Chaired by [personal information redacted for

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publication] . The forum receives updates and information regarding proposed TfL projects which is helpful. In some instances, project leads will return to update the ITF on projects including ‘you suggested and we listened’ updates. However, this is not always the case.

Feedback we have from service users in regard to engagement they have with TfL is mixed; from those who feel they are not listened to and those who are happy with the level of engagement in regard to specific schemes to those who feel they are overloaded with too much information or detail which is too technical to those who feel they are not provided with sufficient information or made aware of specific projects/schemes and opportunities to be involved. We do recognise that achieving a balance that will work for everyone is a challenge. Guide Dogs is always happy to support with engaging with our service users and other vision impaired people, where possible.

c. How effective is TfL at involving all users in decision-making processes?

Guide Dogs response: This has been covered in previous answers above.

d. Are there any improvements that could be made to ensure that all voices are heard?

Guide Dogs response: We would always recommend that TfL take every opportunity and channel to engage with a diverse group of users. Seeking advice from representative organisations on how to engage effectively. We would also encourage TfL to take a co-cultivation approach when consulting with diverse communities, ensuring that the voice of these groups are given opportunities to share their lived experience at every opportunity. Also to be transparent in their approach to engagement.

3. How effective is TfL’s Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

Guide Dogs response: Equity in Motion is still in its infancy and Guide Dogs welcomes this initiative and the four pillars that make up EM. We would hope that TfL will work with a wide range of stakeholder groups such as IDAG, ITF and others to set objectives (short, medium and long term) and work with the same groups to evaluate progress of set objectives.

Contact

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Guide Dogs

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Further information about Guide Dogs

www.guidedogs.org.uk

End of document

Harrow Community Transport AI009

Harrow Community Transport

Comments on TfL Equity in Motion consultation

Harrow Community Transport welcomes TfL's principles of Equity in Motion. We feel privileged to live in a city which is among the world's leaders in enabling its citizens to enjoy a relatively high degree of mobility compared to other places in the United Kingdom and elsewhere in the world. This applies to most of London's population, but there are certain groups who are less fortunate than the majority which benefits from historically unprecedented levels of personal health and fitness. These groups are those for whom Community Transport is a lifeline – the disabled, aged and others whose reduced mobility prevents them from accessing the mainstream TfL transport network – including Dial-a-Ride.

Our experience over forty five years of operating as a charity has shown that despite many improvements in London's transport infrastructure which have greatly improved accessibility for most people, there is still a latent demand for reliable, affordable and fully accessible transport services within our borough and reaching wider areas of London. Dial-a-Ride tends to be regarded as the default mode of travel in London for those who find barriers in using conventional buses, trams, tubes and surface rail, notwithstanding "fully accessible" interfaces ranging from bus stop boarders to tube and rail interchanges. Even if they can access the vehicle, the travelling conditions may not enable them to complete their journey: Uneven acceleration and potholes affect the comfort of bus services, whilst insufficient numbers of accessible stations (and at times overcrowded trains) often make train travel uncomfortable for the elderly, those with balance problems, and users of several types of wheelchair.

Community Transport's regular passengers include those who are reluctant or unable to use Dial-a-Ride because of ineligibility, unreliability of the service, or its inability to meet demand at key times: They suffer inequity of motion as a result, leading to social exclusion. We admire and applaud the accessibility which Dial-a-Ride does provide, often in severely congested traffic. In many boroughs the service works in co-operation with the larger Community Transport operators (though at present, sadly not Harrow Community Transport) but we believe that Dial-a-Ride alone does not deliver equity in motion as a complete answer to many people's mobility needs.

The role of Community Transport is vital to achieving this on a local basis (borough by borough, or small groups of boroughs) by providing sufficient granularity of detail to meet the needs of as many of the population as possible. In Harrow, the services we provide include individual accessible transport, accessible transport for groups of elderly/disabled/vulnerable people, and transport to doctor, medical centre and hospital appointments for those with no alternative means of transport or who cannot afford taxis.

We therefore urge more consideration of the impact (or lack) of equity in motion for Londoners who suffer from mobility problems, as we believe that Community Transport has a more prominent role to play in reaching those who miss out at present. There are undoubtedly cost implications, but the nature of the Community Transport model ensures that it has low overheads and a focus on maximum cost effectiveness, coupled with the highest standards of

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customer care, personalised where necessary. Equally, the local basis of most community transport operators in London will ensure maximum coverage, reducing exclusion for those who currently ‘slip through the net’ in their day-to-day mobility needs.

Harrow Community Transport

31 October 2024

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Inclusion London Ref No. AI010

Inclusion London wrote to the London Assembly Scrutiny Team to ask that its submission to the Transport Committee's meeting on "The Mayor's 2024 manifesto commitments and delivery of the Mayor's Transport Strategy" be resubmitted to this Call for Evidence.

Inclusion London Submission - The Mayor's 2024 manifesto commitments and delivery of the MTS

August 2024

For more information about this submission, please contact Laura Vicinanza, Policy and Stakeholder Engagement Manager at laura.vicinanza@inclusionlondon.org.uk

Inclusion London is a London-wide pan-impairment user-led organisation which promotes equality for London's Deaf and Disabled people and provides capacity-building support for over 70 Deaf and Disabled People's Organisations (DDPOs) in London. Through these organisations our reach extends to over 70,000 Disabled Londoners.

Inclusion London is run by and for Disabled people and our work is rooted in the Social Model of Disability, a radical approach to disability developed by Disabled people. It states that people have impairments but that the oppression, exclusion and discrimination people with impairments face is not an inevitable consequence of having an impairment but is caused instead by the way society is run and organised.

The Social Model of Disability holds that people with impairments are 'disabled' by the barriers operating in society that exclude and discriminate against them. Inclusion London's work spans across different areas and topics impacting the lives of Deaf and Disabled people, including housing, transport, welfare reform and social care.

In this submission we provide a general overview of the accessibility, financial and attitudinal barriers Disabled people face when navigating the street space, when using public transport and when making journeys via taxis, private hire vehicles and Assisted Transport Services (ATS), such as Taxicard. We also discuss the importance of using TfL's land to increase the supply of accessible social housing and the need of accessible parking in new developments. In addition, we analyse some of the key barriers that hinder the delivery of the MTS targets, and some lessons learnt since the publication of the MTS in 2018, including how they might impact the future delivery of the strategy.

We also explore what we think the Mayor's key priorities should be during this Mayoral term, making reference to the latest Mayoral manifesto commitments and our own Mayoral Elections Manifesto which sets out how to make London a truly inclusive and accessible city. This submission is structured based on the three main chapters of the MTS (Chapter Three: Healthy Streets and Healthy People, Chapter Four: A good public transport experience, Chapter Five: New homes and jobs). We conclude each chapter analysis with a series of recommendations about

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what can be done to remove disabling barriers we face in society and to ensure the successful delivery of the strategy.

Chapter Three: Healthy Streets and healthy people

Policy 2 - Active, inclusive and safe travel

An overview of accessibility barriers

We at Inclusion London fully support the MTS' objective of encouraging active travel and the need to improve the accessibility of streets for all to achieve this objective.

The MTS' healthy streets approach rightly recognises that London's streets should be welcoming places for all to walk, wheel and cycle, spend time and engage in community life. It also acknowledges that a wide range of people will choose to walk, wheel or cycle if our streets are easy to navigate, if there are places to stop and rest, if pavements and cycle paths are not overcrowded, dirty, cluttered or in disrepair and crucially, if people feel comfortable and safe on our streets at all times.

The strategy proposes to enable older and Disabled Londoners to travel safely and independently by implementing a series of measures, such as removing obstacles, widening pavements for wheelchair access, introducing tactile paving, raising sections of roadway to make crossing easier, providing seating, mitigating the impact of street works and, where possible, ensuring on-street cycling facilities cater for the wide range of cycles used by Disabled people.

However, while some progress has been made in achieving these outcomes, we believe there is much more to be done to improve Deaf and Disabled people's experience of navigating the street space, encouraging our community to switch to active travel and therefore ensuring the successful delivery of the MTS.

There are Disabled people who would like to walk/wheel or cycle more, but they are prevented from doing so by the way the built environment is designed in London. A significant barrier facing Disabled people is the inaccessibility of street space.

Pavements cluttered by obstacles (including bins, signs, car charging points, A-boards, etc.) are very difficult to navigate for those with mobility impairments and can pose a hazard to those with visual impairments. They are also confusing and overwhelming for those who are neurodivergent. Indeed, 68% of Disabled Londoners still feel that the condition of the pavements prevents them from being able to spend time on the city's streets, and 43% have reported that pavement obstacles/clutter are a barrier to being able to walk more.³⁰ Pavement clutter can prevent people from participating in active travel at any stage of the journey, and can mean that people are forced to take door-to-door transport options, i.e. private car usage (whether their own, as a passenger, or as a taxi customer).

30 Transport for London, Step-free access. Available at: <https://tfl.gov.uk/travel-information/improvements-and-projects/step-free-access#:~:text=See%20our%20page%20on%20wheelchair,tram%20stops%20are%20step%20free> Accessed 21.11.23

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Dockless bikes and e-scooters left in the middle of the pavement or strewn across crossings also present a hazard, and pavements that are steep, uneven, or bumpy (as a result of tree roots, cobblestones, poorly laid paving stones, etc.) are difficult to traverse in a wheelchair and can be trip-hazards. Furthermore, a lack of dropped kerbs render entire sections of pavement/walkways no-go zones for wheelchair users and pose a trip hazard to visually impaired people.

A lack of alcoves or benches mean that people are unable to stop and rest, which can exacerbate symptoms of certain impairments and health conditions, and confusing streetscape layout, with one-way systems, poor signage, shared space and excess bollards, can be distressing and anxiety-inducing. A lack of street lighting and prevalence of hate crime can put people off walking/wheeling.

Furthermore, a lack of accessible infrastructure across the transport network more widely means that Disabled people are often unable to undertake any sort of active travel at all. In London 79 train stations are missing tactile paving at the platform edge. If making multimodal journeys, such as walking and cycling to a bus stop or train station, the whole journey needs to be accessible. Otherwise, the only accessible option may be to drive or to take a taxi.

The design and state of the roads is also a barrier: the steep or uneven camber of roads is a bigger problem for those on three wheels as the cycle can easily tip over, and speed humps, potholes, and uneven surfaces of roads are uncomfortable or dangerous to traverse in a non-standard cycle.

It is not just the poor accessibility of the street space that deters Disabled people from walking and cycling. The wider lack of physical accessibility into businesses, workplaces, shops, venues means that it is often not practical to use a cycle or a wheeled mobility aid to get around, as it can't easily get into the buildings the person needs to access.

The MTS proposes a series of investments aimed at making cycling a more attractive option for all, including for Disabled people, by delivering a London-wide strategic cycle network, with new, high quality, safe routes and improved infrastructure to tackle barriers to cycling.

However, we know that those Disabled people who can cycle face significant barriers in doing so. According to Wheels for Wellbeing's Annual Survey of Disabled Cyclists³¹, inaccessible cycle infrastructure was cited as the biggest barrier to cycling. The majority of the UK's cycling infrastructure, including London cycling infrastructure, is designed with a standard two-wheel bike in mind, on the assumption that the rider is able to dismount and lift their bike where necessary. As an example, narrow cycle lanes cannot be used by trikes, handcycles and other nonstandard cycles, and the lack of continuous or joined up cycle routes force cyclists to dismount or perform tricky manoeuvres. It is also the case that a lack of storage facilities for non-standard cycles means it is not always practical to cycle for a commute as there is nowhere to store the cycle securely.

31 Wheels for Wellbeing (2020): Annual Survey of Disabled Cyclists. Available at: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf> Accessed 21.11.23

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Furthermore, steps into the cycle lane, or lanes segregated with large kerbs without regular dropped points, are inaccessible to those who cannot dismount, as are access control barriers that are designed to prevent access to motorbikes and mopeds (for example, kissing gates or bollards).

Also, while we support the objective of developing infrastructure to improve the cycling environment, we are concerned that transport infrastructure projects, such as bus stop bypasses/floating bus stops, designed with the aim of improving cyclists' safety and reducing road danger, pose a series of health and safety threats to many Deaf and Disabled Londoners, particularly people with visual impairments.

Many Disabled people do not find bus stop bypasses are safe to use because they have to cross a cycle track to get to the bus, making them fearful of and/or at risk of collisions with cyclists and preventing them to travel safely and independently. We know there is also a lack of design consistency of floating bus stops in London and Disabled people are concerned about routes without delineation, locations where the shelter is on the footway rather than the island, and where islands are narrow. The perceived and actual risk of being injured when using bus stop bypasses to get on and off a bus deters many Disabled people from using buses as a means of transport and incentivise them to rely on taxis and private hire vehicles.

An overview of financial barriers

Disabled people not only experience accessibility barriers when walking/wheeling and cycling, but also financial barriers as they often need expensive specialist equipment to be able to make Active Travel journeys and very few people can afford to pay for this equipment.

For example, the cost of adapted cycles is very high, and locks many Disabled people out of cycling: it can be as much as £500 for the most basic adult pedal trike, to £3500 for handcycles with e-assist (many hand cyclists will require e-assist as handcycling typically has a lower manual power output than pedal cycling). Some cargo bikes retail even at £6000 to £8000. The financial burden of these cycles means that often, driving is by far the cheaper and safer option.

When it comes to walking/wheeling, it needs to be considered that many Disabled people do not have mobility aids of a high enough quality - or that are adequately suited to their needs - to enable them to make active journeys on foot or using a wheelchair. Many Disabled people with physical and mobility impairments are not able to self-propel heavy, clunky manual wheelchairs. Therefore, they need lightweight, dynamic, sports wheelchairs, or chairs with power assisted driving (all of which can cost thousands of pounds and are not typically available on the NHS). Other Disabled people would benefit from other occupational equipment such as smart crutches or specialist shoes. As all of these aids are expensive, scarce, or difficult to get, many end up using a car as their main mode of transport rather than making active travel journeys.

An overview of societal barriers

The majority of Disabled people who would like to walk/wheel and cycle cannot afford to pay for expensive equipment because they are more likely than non-disabled people to be living in poverty and experiencing material deprivation. A recent study conducted by the Institute for Fiscal Studies, shows that close to half (44%) of those in the most deprived tenth of the

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population in the UK are Disabled, compared with 18% among the whole working-age population.³² In London specifically 1 in 3 families with a Disabled adult are living in poverty.³³

Disabled people are more likely to experience poverty and inequality than people who are not disabled for various reasons. Many are out of work as they face a significant number of barriers to paid work compared to non-disabled people. When they are in employment, they work fewer hours on average and are more likely to be low paid – they tend to be paid less than non-disabled people with the same qualification level, including a degree.³⁴

Barriers to the successful delivery of the MTS strategy and gaps in the strategy

Lack of co-production and Disability Equality Training (DET)

We believe that the disabling barriers to walking/wheeling and cycling Disabled people face could be eliminated if the Mayor, in collaboration with TfL and the local boroughs, meaningfully engaged with Deaf and Disabled people and the organisations that represent them (Deaf and Disabled People's organisations). This could be achieved by establishing a resourced co-production process, an effective mechanism where Deaf and Disabled people's experience is recognised and DDPOs play an active role in developing policies that affect their lives.

Meaningful engagement with Disabled people and DDPOs requires moving away from consultation mechanisms. It requires a shift towards embedding co-production engagement models in all designs and infrastructure projects to ensure Deaf and Disabled people's specific needs are addressed from the outset.

While we welcome the Mayor of London's 2024 manifesto commitment to create new forums for Disabled Londoners to engage with TfL to ensure our voices are heard in shaping London's future, we are concerned that setting up a new engagement forum would result in engagement that is just a tick-box exercise if only used to consult with our community rather than co-produce policies and projects.

By co-production we mean both an end-to-end and cyclical process by which Disabled people, through our organisations, and decision-makers within government, work collaboratively together to identify priority barriers and needs, develop strategic policy objectives and together design and develop solutions to address the inequality and injustice faced by Disabled people.

Co-production goes beyond information sharing, consultation and engagement as set out in ladder of participation models. Co-production must be about jointly working together, end to end from need to solution with equal access to all relevant information.

There should be clear and transparent information about the process and a clear record of everyone's contributions. There should also be an annual published review and analysis of the impact co-production work has had on the Mayor's and TfL's transport policies and practices.

³² Institute for Fiscal Studies. *Living standards of working-age disability benefits recipients in the UK*, July 2022. Available at: <https://ifs.org.uk/publications/living-standards-working-age-disability-benefits-recipients-uk>

³³ Trust for London, *London's Poverty Profile 2021*. Available at: <https://www.trustforlondon.org.uk/londons-poverty-profile-2021-covid-19-and-poverty-in-london/>

³⁴ Joseph Rowntree Foundation. *UK Poverty 2019/20*. Available at: <https://www.jrf.org.uk/report/uk-poverty-2019-20>

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We also believe that there is a generalised lack of understanding of disability equality and, particularly, of the social model of disability among designers and transport planners which compound the exclusion of Disabled people from the street space. We are of the view that all transport planners and designers should be required to co-design infrastructure projects with Deaf and Disabled people and should receive mandatory Disability Equality Training, based on the social model of disability. This training should be delivered by Deaf and Disabled people's organisations because Disabled people are experts by experience and know the solutions that are needed to tackle the challenges they face in society.

In addition, the MTS does not include specific proposals aimed at addressing the financial barriers Disabled people face when walking/wheeling and cycling which are a significant part of the problem. We believe that the Mayor should work with national Government, including the Department for Transport, Department for Work and Pensions and the Department of Health and Social Care, to review and streamline financial assistance for the direct and indirect costs of travel beyond fares, including the costs of appropriate mobility aids and financial support for the purchase of adapted cycles.

Policy 6 – Air quality

Lessons learnt since the publication of the MTS and impacts on the future delivery of the strategy

We at Inclusion London welcome the MTS' objective of reducing emissions from vehicles on London's streets to improve air quality, including by implementing measures such as road user charging. We fully support the fight for climate justice and understand the importance of introducing environmental initiatives that promote Active Travel and encourage the use of public transport. We value the commitments included in the MTS and the latest Mayor's manifesto commitments to tackle pollution, carbon emissions and congestion in London and welcome the efforts that have been made until now to reduce the circulation of polluting vehicles on the road in the city. The overarching aims of road user charging schemes of reducing pollution, reducing traffic, and reducing road danger are of critical importance to Disabled people, who we know are among the worst impacted by increased pollution levels and the effects of climate change.

However, while we welcome Policy 6 and initiatives aimed at reducing car dependency in London, we believe it must be acknowledged that there are Disabled people who rely on their cars as either drivers or passengers as their main mode of transport because they have limited travel options compared to non-disabled people and because some people cannot just switch to active travel due to their impairments.

It must be recognised in fact that there are some instances in which it is simply not possible for some Disabled people to walk/wheel or cycle. There are cases where, even if all the physical, societal and financial barriers were removed, many Disabled people would still rely upon their cars as the only form of transport available, for reasons pertaining to their impairment or access needs. This could be due to the fact that some people might require heavy equipment (for example breathing apparatus), to the fact that they are clinically vulnerable and therefore need to take particular caution to avoid contact with bacteria/viruses, or that they need to avoid cold weather as they have to maintain body temperature.

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We believe that any road user charging scheme should be designed taking into account these barriers and should incorporate targeted discounts for Disabled people to ensure schemes are truly fair to all and avoid putting Disabled Londoners at a substantial disadvantage compared to non-disabled people when travelling around London.

While we agree on the objectives of road user charging schemes, as proposed in the MTS, we believe it must be acknowledged that there are a myriad of barriers preventing Disabled people in London from participating in active travel and using public transport, which must be considered in any conversation about road user charging. When discussing these barriers, it is important to remember that no two Disabled people are the same. Many Disabled people have one or more impairment types, and the barriers they face will be different depending on these impairments.

Those Disabled people who rely on car use them either as drivers or passengers and there are more Disabled people in London using cars as passengers (42% of the population) than drivers (24% of the population).³⁵

Of those Disabled people with mobility impairments who have access to cars in England, the majority use them to do shopping for essentials and for other personal reasons, including attending medical appointments and picking up prescriptions and medicines.³⁶ People with mobility impairments also rely on cars to visit friends and family at their private homes and some use cars to take part in social activities due to various reasons, including barriers to active travel and to using public transport.

It is important to emphasise that the proportion of Disabled Londoners using cars as passengers is higher than the proportion of those using them as drivers because many Disabled people rely on the support of their informal carers to be able to make essential travel journeys in London. Many Disabled people receive significant support from their informal carers who often drive the cars of their loved ones for Disabled people's personal needs, such as picking up prescriptions and medicines and driving them to medical appointments. The importance of this support was acknowledged by TfL when the Congestion Charge was introduced and has been more recently recognised by the Mayor of London and TfL who have in fact incorporated exemptions from the ULEZ charge for Disabled people's nominated drivers.

We believe that any road user charging scheme should be designed taking into account the support Disabled people receive from their informal carers to make essential travel journeys. We therefore believe that exemptions from road user charges should be in place for unpaid carers and this could be achieved by giving each Disabled person the opportunity to nominate another person as his/her driver if they do not drive themselves.

In addition to this, we would like to highlight that a very large proportion of Disabled people also receive domiciliary care from paid carers who rely on their cars to provide care to various clients during the day. We are of the view that any road user charging scheme should carefully consider

³⁵ **Transport for London.** Travel in London: Understanding our diverse communities 2019. Available at: <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

³⁶ Department for Transport (2021), *National Travel Survey*. Available at: <https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-travel-by-disabled-people-and-people-with-mobility-difficulties>

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the impact that charging paid carers might have on their ability to provide care to Disabled and older clients and the consequences that this could have for Disabled people's health and wellbeing.

In conclusion, while significant progress has been made by the Mayor in meeting some of the air quality targets included in the MTS as a result of introducing road user charging schemes, we strongly encourage that any decisions made on these schemes in the future, including discounts and exemptions, are developed with DDPOs and Disabled people to ensure we are not structurally disadvantaged as a result of policies aimed at decreasing car ownership and use.

What the Mayor's priorities should be to deliver on the MTS targets during this Mayoral term

We believe that to successfully deliver the MTS strategy, the Mayor should prioritise:

- Making inclusive design and accessibility of the built environment key strategic priorities of the next London Plan.
- Making all bus stops safe and accessible, including by pausing the development of new bus stop bypasses until all safety concerns from Disabled people are addressed.
- Working with National Government to address the financial barriers Disabled people face to active travel by reviewing and streamlining financial assistance for the direct and indirect costs of travel beyond fares.
- Strategically engaging with Disabled Londoners through our Disabled and Deaf people-led organisations, by building on and further developing the London DDPO Stakeholder Forum, making it a focal point for engagement across the GLA Group. This engagement must be resourced, so our organisations have capacity to meaningfully engage with our community and collect evidence as well as co-produce problems and solutions with the GLA.
- Ensuring all staff within the GLA, particularly from the London Plan team, and organisations within the GLA Group receive mandatory Disability Equality Training based on the social model of disability and delivered by Deaf and Disabled People's Organisations.
- Recognising that not all Disabled people can use public transport or switch to active travel and ensuring that active travel schemes do not create additional barriers for those who have to rely on a car, by maintaining and improving mitigation measures for existing road user charging schemes, such as the Congestion Charge and ULEZ, helping everyone who needs an adapted car to get a non-polluting vehicle, and enabling Disabled people to easily access local authority exemptions from charges for driving in Low Traffic Neighbourhoods (LTNs).
- Ensuring any decisions made on future road user charging schemes, such as the pay per mile scheme, including mitigation measures are developed with Disabled people and our organisations.

Chapter Four: A good public transport experience

Policy 10, 11, 12, 13, 14

An overview of accessibility and attitudinal barriers – Underground Network

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We at Inclusion London fully support the MTS' objective of improving the overall accessibility of the transport system to ensure everyone, including older and Disabled Londoners, can travel safely and independently.

Public transport in London still comes with a variety of physical, infrastructural and attitudinal barriers which we explore in this submission. Removing these barriers should be a key Mayoral priority to ensure public transport is truly safe, affordable and accessible to all.

Just 92 out of 270 Tube stations in London are step free³⁷, although at around half of these there is no level boarding and so a manual boarding ramp is required. From a purely infrastructural point of view, taking the tube is not a viable option for many Disabled Londoners because it leads Disabled people to take longer and more convoluted routes, making journeys more time-consuming, stressful, and expensive.

We also welcome the MTS' target of halving the average additional time taken to make a public transport journey on the step-free network compared to the full network by 2041 and the latest Mayoral manifesto commitment to expand step-free access to cover half of the underground network by 2030.

However, while some progress has been made in achieving these outcomes, we believe there is much more to be done to improve Deaf and Disabled people's experience of using public transport, and therefore ensuring the successful delivery of the MTS. The MTS proposed to increase the number of step-free access tube stations to 126 by 2025 but it is clear from TfL's step-free access prioritisation model that this target will not be met.

Also, many Disabled people are often unable to travel on the Underground because they experience problems with lifts, including them being frequently out of service, too small, poorly signposted, or long distances apart. Sudden suspensions in lift services put us at serious risk of being stranded in stations, especially on underground metros with no phone signal or Wi-Fi. Lift outages are often recorded incorrectly, leaving Disabled people stranded mid-journey.

Disabled people also often experience problems with assistance at underground stations. Many are unable to find station staff to ask for assistance, and even when staff were available and visible, the assistance is poorly coordinated or inappropriate. Staff are sometimes unaware of how to provide the right assistance or use alternative forms of communication, leaving Disabled passengers having to advocate for themselves or defer to other passengers for support. Some people also encounter negative attitudes and behaviour from staff, sometimes being rude and dismissive, or making them feel like a nuisance for requesting assistance.

An overview of accessibility and attitudinal barriers – buses

While the MTS aim to ensure bus journeys are quick and reliable, that buses are not overcrowded and Disabled people can travel safely and independently, that is not often the case as a result of disabling barriers.

³⁷ Transport for London, *Step-free access*. Available at: <https://tfl.gov.uk/travel-information/improvements-and-projects/step-free-access#:~:text=See%20our%20page%20on%20wheelchair,tram%20stops%20are%20step%20free.>

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We know from members of our community that whilst the bus is often the most accessible mode of transport for disabled people, there are a variety of barriers associated with it. This can start from the beginning of the bus journey, with poor bus stop infrastructure that lacks shelter and seating stops people with energy limiting or mobility impairments from being able to safely wait at the stop. This includes people who may have expensive medical equipment that they cannot get wet. Further, bus stops often lack clear timetables and live departure times, which can be distressing and cause further difficulties on a journey- this is a particular issue for people who have multiple interchanges on their bus journeys due to a lack of other accessible modes.

Furthermore, for Disabled passengers, getting on and off the bus is the most critical part of the journey, and is fraught with barriers and opportunities for things to go wrong.

Issues getting on the bus include:

- Bus drivers refusing to pick up Disabled passengers
- Buses not stopping to inform a blind or visually impaired passenger of which service is at the stop
- Negative/discriminatory behaviour from bus drivers toward Disabled passenger while boarding
- Buses pulling up not close enough to kerb, or aligning the back door so it is blocked by bins, bollards, a pole etc and not accessible
- Issues deploying ramps: ramp will not come out, ramp faulty or broken or gets jammed, ramp deployed at steep gradient so inaccessible
- Priority space for wheelchairs is already occupied by another Disabled person, meaning passenger cannot board and has to wait for another bus
- Priority space for wheelchairs is already occupied illegitimately by passengers with luggage or buggies, putting Disabled passenger into conflict/uncomfortable position
- Priority seats are taken OR Disabled passenger experiences negative attitudes from other passengers while using priority seats (particularly an issue for those with non-visible impairments)
- Bus is tightly packed making it difficult for Disabled person to manoeuvre on and off
- Bus pulls away before Disabled passenger is securely seated, leading to falls

Issues getting off the bus:

- Audio and/or visual announcements are not working, so a passenger with visual impairment or a Deaf passenger is unaware their stop has passed
- A diversion is in place and not fully communicated to passengers, so a passenger disembarks away from their normal stop

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- Request stop buzzer is not working OR bus driver ignores request for stop, and does not deploy the ramp or pull up at the bus stop correctly meaning Disabled passenger cannot get off the bus
- Issues deploying ramp: ramp will not come out, ramp faulty or broken or gets jammed, ramp deployed at steep gradient so inaccessible.

All of these barriers to bus and tube usage means that private car or taxi journeys are often necessary.

An overview of financial barriers

On average, Disabled people are less likely to be in work (52.7% of Disabled people are employed, compared to 81% of non-disabled people³⁸), and more likely to live in social housing³⁹. Disabled people on average face £964 more in living costs per month than non-disabled people⁴⁰, a number which is extremely likely to have increased due to the cost-of-living crisis. Indeed, research shows that Disabled people are now making fewer essential journeys, such as to healthcare appointments, in order to save on transport costs⁴¹.

Whilst there are concessions available for Disabled Londoners to travel via public transport, most notably through the Disabled Person's Freedom Pass, transport costs are still a significant barrier to travel via public transport for many Disabled people. Due to barriers with the application process, and narrow eligibility criteria, many Disabled Londoners are not able to obtain a Freedom Pass, meaning that their travel costs are an additional expense.

Furthermore, the changes to the Older Person's Freedom Pass and 60+ Oyster card means that concessions are no longer available during peak hours for older people.

Barriers to the successful delivery of the MTS strategy and gaps in the strategy

Inconsistency of Disability Equality Training (DET) provision across the TfL network and no mention of toilet provision

We believe that a significant barrier hindering the delivery of the MTS is again the lack of understanding of disability equality and, particularly, of the social model of disability among bus drivers, tube and rail staff. There is a lack of consistency in the provision of trainings received by staff members across the TfL Network, including the content and the methods of delivery of

³⁸ Office of National Statistics (2021), *Labour Market Status of Disabled People*. Available at <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusofdisabledpeoplea08>

³⁹ Office of National Statistics (2019), *Disability and Housing*. Available at <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019>

⁴⁰ Scope (2019), *Disability Price Tag report*. Available at: <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag/>

⁴¹ Healthwatch (2023), *Cost of living: People are increasingly avoiding NHS appointments and prescriptions*. Available at: <https://www.healthwatch.co.uk/news/2023-01-09/cost-living-people-are-increasingly-avoiding-nhs-appointments-and-prescriptions>

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trainings, which cause major attitudinal barriers for Disabled people and worsen Disabled people's experience of using public transport.

Some TfL frontline staff members such as Underground staff receive disability equality training (DET), while bus drivers and staff working across Elizabeth Line, London Overground, DLR receive Equality, Diversity and Inclusion Training (EDI) which is not based on the social model of disability and is not delivered by Deaf and Disabled People's organisations. This needs to change.

In addition to this, the strategy does not mention toilets provision which is crucial to encourage older and Disabled Londoners to use public transport. While we welcome the latest Mayor's manifesto commitment to invest in public toilet provision across the TfL network, we are concerned that the amount proposed would fall short of the investment needed to ensure a sufficient level of toilet provision London-wide.

What the Mayor's priorities should be to deliver on the MTS targets during this Mayoral term

We believe that to successfully deliver the MTS strategy, the Mayor should prioritise:

- Investment in improved accessibility to tube and rail by ensuring at least 50% of all stations offer step-free access by 2030.
- Having staff at all stations to assist Disabled travellers and to ensure safety for all Disabled people.
- Replacing all buses with zero emission buses, featuring greater accessibility features.
- Ensuring senior leadership and frontline Transport for London (TfL) staff, including bus drivers, tube and rail staff receive Disability equality training that is based on the Social Model and delivered by Disabled people and our organisations.
- Reviewing concessionary travel schemes and their eligibility criteria, so they are coordinated, flexible and responsive and meet the needs of people who use them.
- Reinstating the right to free 24/7 travel for older people who are Freedom Pass holders.
- Using planning powers to increase provision of accessible public toilets and Changing Places facilities, including at underground stations, and working with TfL to improve signage.

Policy 20 – Taxis, private hire vehicles and Assisted Transport Services (ATS)

An overview of financial barriers

We fully support the MTS' objective of ensuring a taxi and private hire service that is safe, secure and accessible London-wide.

Given the extensive barriers to public transport and active travel, Taxis and Private Hire Vehicles (PHVs) fill a vital gap in Disabled people's mobility options.

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Compared to other areas in England, all taxis in London are fully wheelchair accessible and therefore have wheelchair ramps. However, there does not seem to be any consistency in terms of ramp designs standards and gradients, meaning that it is sometimes difficult for wheelchair users to get onto a taxi. Also, while taxis are often one of the most physically accessible modes for many Disabled people, they are one of the least financially accessible. Many Disabled people cannot afford to use taxis as much as they want or need and are often forced to miss vital hospital appointments, which are not covered by the Taxicard scheme operated by London Councils.

While Taxicard offers subsidised travel in licensed taxis and private hire vehicles to Disabled people, it cannot be in fact used for hospital appointments. In addition, Taxicard's journeys are often unreliable, especially in the evening, further restricting Disabled people's independent travel. There is a limited availability of wheelchair accessible vehicles operated by the Taxicard scheme and a shortage of drivers, especially in the evening, meaning that Disabled people are forced to wait hours for a taxi to arrive. People tell us this creates a constant sense of anxiety and uncertainty when booking a taxi via Taxicard; people are not sure how long the wait is until a taxi becomes available.

[An overview of accessibility and attitudinal barriers](#)

Many blind and partially sighted people relying on guide dogs experience access refusals when trying to use a taxi. Some taxi drivers refuse to pick up Disabled people with guide dogs or drive off upon seeing them. In addition, there are drivers who do not provide adequate assistance to Disabled customers wanting to get on a taxi. Some drivers struggle to safely deploy ramps which cause a significant health and safety hazard for wheelchair users.

[Barriers to the successful delivery of the MTS strategy, lessons learnt and gaps in the strategy](#)

We are concerned that the MTS does not address the financial, accessibility and attitudinal barriers Disabled people experience when making taxi journeys. Delivering accessible taxi ranks without tackling these barriers does not enable Disabled people to travel independently.

We believe that there is a generalised lack of understanding of disability equality and particularly, of the social model of disability among taxi drivers which are major drivers of attitudinal barriers. The lack of mandatory disability equality training among taxi and private hire vehicles drivers is a gap in the strategy that should be addressed.

In addition, it is often difficult for Disabled people to report access refusals and drivers are not meaningfully held to account for access refusals and other discriminatory behaviour. We also believe that not enough is being done to enforce provisions under the Equality Act which would prevent access refusals from taxi drivers in the first place.

We are also concerned that while the MTS proposes to improve Assisted Transport Services, such as Taxicard, by delivering a Roadmap centred on the principles of safe and reliable journeys, convenience, flexibility and choice, journeys are still unreliable and inconvenient. We believe that the unreliability of Taxicard journeys is likely to be driven by low remuneration of drivers and lower incentives for drivers to join the ComCab's fleet.

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What the Mayor's priorities should be to deliver on the MTS targets during this Mayoral term

We believe that to successfully deliver the MTS strategy, the Mayor should prioritise:

- Ensuring all London taxi drivers receive mandatory Disability Equality Training as a condition of licensing. This training should be based on the social model of disability and should be delivered by Deaf and Disabled people's organisations.
- Working with national government to evaluate the effectiveness of existing legislation and policies in prohibiting discrimination and access refusals, and take action to address gaps.
- Undertaking a full review of Taxicard services, with the objective of addressing the shortage of drivers of WAVs and establishing accessible and streamlined complaints processes with swift response times, prompt resolution and impact on future practice.

Chapter Five: New homes and jobs

Policy 21 – The transport principles of good growth

Lessons learnt since the publication of the strategy and impact on the future delivery of the strategy

The importance of using TfL's land to increase the supply of accessible social housing

We fully support the MTS's objectives of improving transport investments in London to unlock new homes and jobs and using, where possible, TfL's land to deliver more housing.

However, we are concerned that the development opportunities around stations the MTS seem to prioritise are for 'Build to Rent' properties which are unaffordable and insecure for the majority of Disabled people. Disabled people are more likely to be living in poverty, be on lower-incomes or be out of work and are more likely to rent social housing because of the affordability and security of this tenure.

We welcome the latest Mayoral's manifesto commitment to prioritise building 40,000 new council homes and we believe this should be reflected in the delivery of the strategy to ensure we do not just build more homes in the future but the right kind of homes for all.

In addition, we are concerned that the MTS does not specifically mention using land around step-free access stations, often owned by TfL, Network Rail and other public sector landowners, to increase the supply of wheelchair accessible housing of which we are in great need of.

While London has higher accessibility standards and have housing accessibility targets in place compared to other areas in England, as set in the London Plan, there is still a shortage of accessible homes, especially of wheelchair accessible homes, across all tenures, and particularly in social housing developments.

Inclusion London interviewed 22 Deaf and Disabled individuals with varied impairment types, who lived in boroughs all across London in a variety of tenure types. We asked them about the current housing situations. We are currently in the process of analysing these case studies.

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During the case studies, the importance of good transport links in Deaf and Disabled People's local areas emerged as a common theme. 14 of the 22 people we interviewed told us that local transport options were inaccessible to them.

We are disappointed that the latest Mayoral Manifesto did not include any commitment to increase accessible housing delivery despite evidence suggesting that local planning authorities in London are consistently failing to meet the London Plan's targets.

Our analysis underscores the critical need for housing developments to be situated near accessible transport options, particularly tube stations. Residents living far from accessible tube stations face significant physical and emotional challenges due to extended travel times and unreliable transportation alternatives.

Those not near accessible tube stations often experience considerable delays as they must rely on buses, which frequently lack reliability and accessibility. Our case studies revealed that bus services can be particularly problematic, with reports of ableism being common. For instance, many residents noted that bus drivers did not consistently enforce the legal requirement for prams to be folded, forcing Disabled passengers to address this issue themselves. Such confrontations not only create conflict but can also prevent individuals from boarding the bus altogether, adding to barriers to travelling by public transport.

Moreover, the difficulties extend beyond public transport to the street environment. Residents further away from accessible transport options encounter additional barriers such as uneven pavements, poorly marked drop-curbs, and obstructed pathways. These issues can significantly lengthen travel times as individuals are forced to navigate longer, more burdensome routes to avoid physical obstacles. The added strain of negotiating these environmental challenges compounds the physical and emotional toll of daily travel for Disabled people. The people we spoke to reported they would travel less due to these issues – as a result transport acted as a barrier to Disabled people accessing work & socialising.

Overall, longer travel times, unreliable and inaccessible public transport, and hazardous street conditions—contributes to a stressful and often degrading experience for Disabled Londoners. Thus, ensuring accessible tube stations are taken into account for the planning of new housing developments is not just a matter of convenience but a necessity for reducing physical strain and improving overall quality of life for Disabled people. Strategically locating housing near well-serviced and accessible transport options can alleviate many of these issues, enhancing accessibility and ensuring a more equal and supportive transport environment for Disabled people.

If TfL land around step-free access stations as well as surplus and underused land identified for development is not used to increase the supply of accessible social rent homes, the MTS's targets of delivering new homes and jobs for all will not be met because they will exclude Disabled people.

[The importance of accessible parking in new developments](#)

We support the transport principles of good growth, including the MTS' expectation for car-free development in London's more accessible areas, and car-lite development elsewhere.

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Whilst promoting car-free and car-lite developments is important for reducing carbon emissions, it is crucial to recognise that there are Disabled people who rely on their cars as their primary mode of transportation. Our analysis found that cars are essential for many Disabled people due to significant barriers posed by public transport and inadequate infrastructure.

For some, using public transport is burdened with stress and anxiety. Experiences of ableism, such as bus drivers not enforcing the legal requirement for prams to be folded to make space for wheelchair users, are common. Inconsistent accessibility features, like broken lifts at supposedly accessible tube stations, add to the frustration. The emotional toll of navigating these systems, from facing hostility from other passengers to the unpredictability of assistance services on trains, often makes public transport an unviable option.

In contrast, cars offer a sense of control and security. They allow individuals to avoid the physical and emotional strain associated with public transport, providing a reliable means of getting to essential places like medical appointments.

Therefore, reducing car reliance needs to account for those who currently have no viable alternatives, ensuring that any reduction in car usage does not come at the expense of their mobility and independence.

What the Mayor's priorities should be to deliver on the MTS targets during this Mayoral term

We believe that to successfully deliver the MTS strategy, the Mayor should prioritise:

- Using TfL's land around step-free access stations, surplus land and underused land to increase the supply of wheelchair accessible social housing.
- Using TfL's land around stations, surplus land and underused land to increase the supply of accessible and adaptable social housing.
- Ensuring the provision of accessible parking places for new development proposals that include wheelchair user units.

END

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Accessibility and Inclusion in Transport Planning – written evidence

July 2025

Joy Riders Ref No. AI011

Headline: Accessibility and Inclusion in Transport Planning

Authority: London Assembly Transport Committee

Deadline: 28th October 2024

Link: <https://www.london.gov.uk/accessibility-and-inclusion-transport-planning>

1. What do Londoners use transport for and how does this differ among demographic groups?

a. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

b. How could the transport network better serve and connect London's communities with the places they travel to?

It is well observed in the literature, including in TfL's Equity in Motion (2024) and Cycling action plan 2 (2023), that women tend to make different types and lengths of journeys than men. Women are more likely to be running local errands such as the school run and the shopping. We know that a greater proportion of women's travel can be switched from car to cycling.

JoyRiders works with women and families in areas of multiple deprivations to remove the skill barrier to cycling by offering learn to ride sessions and delivering Bikeability to families, and providing social rides for women and people recovering from heart events.

The What Stops Women Cycling in London? (2024) (WSWCiL) report from the London Cycling Campaign with JoyRiders and London Cycling Club (Londra Bisiklet Kulubu) highlighted three barriers to women, non-binary and gender non-conforming people starting cycling or increasing the amount they cycle: physical safety; social safety and lack of local networks. The Cycling action plan 2 (2023) addresses the need for physically safe cycling routes and local route planning.

Large parts of London's higher quality cycling infrastructure, such as the Cycle Superhighways, disproportionately benefit men, whose cycling journeys are more commute based (often into Central and Inner London). We believe that this is the reason why cycling uptake by men has been greater than by women. By delivering more cycleways that support local, encumbered and trip-chaining journeys, we would expect to see a rise in the number and proportion of women cycling and as well as a greater diversity in the type of journeys that they make by bike. The aim should be for 50% of cycle journeys to be made by women.

The WSWCiL report recommends that '[b]orough councils identify and prioritise neighbourhoods within 3km of their town centres to deliver high-quality cycle routes, low traffic neighbourhoods and high levels of secure and convenient cycle parking.' This would

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complement TfL's aim of increasing the proportion of Londoners who live within 400m of the Cycleway as in the Cycling action plan 2 (2023).

In order to support women's journeys by bike, secure cycle parking for different types of cycles (including cargo bikes and adapted bikes) must be made more readily available in places of interest, such as shops, places of worship, children's play areas, town centres and at public transport hubs. TfL should develop a standard for cycle parking, with too much parking being confusing (designed for aesthetics over function), impractical (e.g. too close to a wall) or inaccessible for non-standard cycles.

With dockless cycle hire being increasingly normalised across London's boroughs, TfL should consider working with boroughs to make dockless cargo bikes more accessible to families. Dockless cargo bikes should be allowed to be dropped off in places other than their starting location and across borough lines. This would increase the proportion of swappable journeys and greatly benefit women and business owners.

The Cycling action plan 2 (2023) acknowledges women's 'fear of harassment'. The WSWCiL (2024) report goes further to describe the abuse that women face when cycling and how change is needed to ensure that all women can be socially safe when cycling. This means free from verbal abuse and physical and sexual assault from car and van drivers, taxi and bus drivers as well as male cyclists and pedestrians. Women often face a difficult choice between routes that are either poorly lit and present socially unsafe scenarios or hazardous and busy main roads. This is most prescient during the darker months. It must be made safe for women to cycle all year round, at any time of day or night.

The WSWCiL (2024) report recommends that the Mayor of London, TfL and the Metropolitan Police work together to address gendered abuse and violence towards women cycling. This means:

- The Metropolitan Police to swiftly follow up and act on reports of gendered abuse or violence while cycling.
- The Metropolitan Police to record and report on crimes against women cycling, identifying crime 'hotspots' and targeting criminal behaviour in these areas.
- The Mayor of London to run a targeted public information campaign to raise awareness of aggression and abuse towards women cycling in London.
- Transport for London to include 'social safety' as a key priority in its Cycle Route Quality Criteria, to ensure London's signed cycleways are socially safe, well-lit cycle routes available to all, year and day round.

TfL's Equity in Motion (2024) and Cycling action plan 2 (2023) plans rightly recognise that engagement with service users through the lens of ethnicity is key to understanding the needs of the London community. We do not have a detailed understanding of the experiences of

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abuse of people of colour and minority ethnic communities who cycle or who would consider starting to cycle and how this may be a barrier to starting or increasing cycling. Engagement should also consider differences in the journeys that people make. This should be done through the lenses of cycling for leisure alone and in groups, and what can be done to encourage more leisure cycling and support leisure cyclists to use their bike for other purposes.

2. How does TfL use data and engagement to plan accessible and inclusive services?

a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?

b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?

c. How effective is TfL at involving all users in decision-making processes?

d. Are there any improvements that could be made to ensure that all voices are heard?

In order to better design cycling services for women, Black, Asian and people from minority ethnic groups, TfL and the boroughs must gather better data on current cycling trends in Outer London. This should look at motivations and barriers to cycling in these groups specifically. They should hear stories about abuse people from these groups face and their suggestions on how to create progressive change and make their communities safer.

3. How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

TfL's Equity in Motion (2023) plan is useful for JoyRiders in that it is a good summary of the make-up of London and the transport realities for the groups that we work with (generally women and families living in areas of multiple deprivations). Our organisation is working towards the same goals as the Equity in Motion (2023) plan.

The Equity in Motion (2023) plan acknowledges the limitations of its data and TfL acknowledges the need for better data collection and collaboration with customers, communities, partners and other stakeholders. JoyRiders work with women and families living in areas of multiple deprivations and have a high proportion of Black and Asian service users and although we do not currently have data on the transport habits of our service users, we can support TfL to engage with these groups.

4. Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

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Accessibility and Inclusion in Transport Planning – written evidence

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London TravelWatch Ref No. AI012

Alongside its submission below, London TravelWatch also submitted its report [Making Buses Better](#) to this Call for Evidence.

GLA Transport Committee call for evidence: Accessibility and Inclusion in Transport Planning

Written evidence from London TravelWatch

About London TravelWatch

London TravelWatch is the official independent transport watchdog set up to advocate for all people travelling in and around capital. We are sponsored and funded by the London Assembly, which is part of the Greater London Authority, and is independent from transport operators.

London TravelWatch promotes integrated transport policies and presses for better journeys for everyone, with higher standards of quality, performance and accessibility. We work directly with users, other transport user groups as well as transport operators, providers, regulators and local authorities. In turn, transport operators consult us on proposed changes to services or closures of lines or stations.

We cover all forms of Transport for London (TfL) services, National Rail services in and around London, and those who walk, wheel or cycle in the capital.

Context

Public transport is an essential service that many Londoners rely on, from commuting to work and education, to going to social activities and essential errands. But it is more than getting a person from A to B. It is needed to supporting people's livelihoods and connects people to friends and family. It is vital that everyone should have access to the street and transport network. However, London's transport network, while good in many ways, is not accessible to everyone who needs it, most notably Disabled passengers.

People experience the transport network in different ways, and it does not always meet the differing requirements that people may have. There are significant barriers that disproportionately affect certain demographics, such Disabled people, older people, women and girls, people of colour and the LGBTQ+ community. This can impact the journeys people make in various ways, for example they experience longer journeys due to barriers related to accessibility or travel at a different time due to concerns about personal security. Indeed, our past research indicates that travel patterns vary across demographics, with specific groups favouring different modes of transport.

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Effective and meaningful engagement with various passenger groups is crucial for developing an accessible and inclusive network. TfL's commitment to fostering an inclusive design culture is central to its ongoing efforts highlighted in Equity in Motion.

Key questions

1. What do Londoners use transport for and how does this differ among demographic groups?

a) Which journeys and types of transport are most used and most appropriate for certain demographic groups?

Most people use public transport; however, they do not experience the network the same way, and so different groups will also use transport in different ways. For example, some will choose to use one mode of transport as it is cheaper, while another may prioritise one that has step-free access. Often, characteristics intersect to compound barriers that certain groups face to travel. For example, someone who is both Disabled and has a low income may face compounded barriers associated with affordability and accessibility that affect how they use transport.

While London TravelWatch does not have in depth research across all demographics, insight from our previous work highlights some of these different transport uses and priorities. Some of the key drivers include:

1. **Affordability.** Many people with lower incomes more heavily rely on public transport. Buses are particularly important for this demographic, as it is the most affordable form of public transport, compared to other modes in London.⁴² At times there is no alternative, and affordability and accessibility are dual priorities consideration for passengers in this group.
2. **Accessibility and ease of use.** The design of the transport network is integral to if and how people can use it. Step-free access and level boarding are some of the more high-profile examples of this, but it can also include things like hearing loops, quiet spaces and noise reduction measures, and access to toilets. Having staff members present is also an important part of making transport accessible, as they can provide further information and support to help people travel, for example delivering Passenger Assist.

The bus is often considered to be the most affordable and accessible form of public transport, though there may be other drawbacks such as longer journey times. Things such as level boarding and step-free access are crucial for wheelchair users and those with mobility impairments, which is generally available across the bus network. It is also important to people travelling with pushchairs, buggies and heavy luggage.

Lack of accessibility can negatively impact Disabled people's use of transport. It can impact the time people travel, with peak times when overcrowding is more likely making

⁴² <https://www.londontravelwatch.org.uk/publication/free-the-bus-briefing/>

the barriers worse (such as limited priority spaces and seating). It also means Disabled people travel less, with government statistics finding that Disabled adults in England made 25% fewer trips than non-Disabled adults in 2022 (686 trips compared with 916 trips).⁴³

3. **Digitally exclusion and disadvantage.** While technology has benefited many people travelling around London, for those who are digitally excluded or disadvantaged (people who either are unable to, or choose not to, go online rarely or at all) it presents more barriers to travel. London TravelWatch's 2023 report [Left behind Londoners](#)⁴⁴ found that digitally excluded and disadvantaged people are more likely to be older, Disabled people and have a low income. It also found that being digitally excluded or disadvantaged can have a big impact on if and how people travel:

- Digitally excluded and disadvantaged people (83%) are less likely to use public transport than digitally included people (96%) and are more likely to not use any transport at all (4% vs 1%)
- 37% of digitally excluded and disadvantaged people agreed that the increased use of technology has made it harder to get around London
- They can experience challenges with planning journeys, finding timetables, booking travel, and paying for tickets offline.
- As people who are digitally excluded and disadvantaged are also likely to have other accessibility needs, these barriers together make travel around London harder than it is for digitally included people.
- Consequently, the digitally excluded and disadvantaged people we spoke to mostly make short and local journeys within their borough or local area, preferring to travel to familiar locations using accessible and familiar modes of transport, or walk / wheel.
- It can impact the mode people use to travel and their feelings about using them:

⁴³ [UK disability statistics: Prevalence and life experiences](#), House of Commons Library, October 2024

⁴⁴ <https://www.londontravelwatch.org.uk/campaigns/digital-exclusion/>

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	% of digitally excluded and disadvantaged people using this mode in London	How digitally excluded and disadvantaged people feel about this mode of transport
 Walking	60%	Whenever possible, this is a preferred method of travel.
 Bus	69%	The bus is the most popular mode of transport, as it is the most accessible, and having a driver you can talk to is reassuring. On the other hand, the bus is slow, and route planning is challenging to do with only offline information.
 Underground	58%	There is a general feeling that the Underground goes wrong more often than other modes of transport, and finding information is challenging. Underground maps are often overwhelming, staff are not always nearby, and being underground with no signal most of the time means it is harder to contact people for support. Many stations are not step-free and having to use stairs or rely on lifts (which may be broken) puts many people off using the Underground without being able to research their journey first.
 Overground	33%	Being above ground means it is easier to contact people and visualise a journey. However, the Overground shares many barriers with the Underground around staff availability and clarity of information.
 Rail	21%	Rail is more likely to be used for unfamiliar journeys. Ticketing and pricing is more complicated and daunting for many, so the option to buy tickets in person is essential for digitally excluded and disadvantaged people.
 Taxis	29%	Taxis are generally accessible and being able to make a direct journey is a real positive, but the expense and the impossibility to book parking permits offline means they are rarely used by the people we spoke to.
 Personal Vehicles	13%	The cost of buying, maintaining and parking a personal vehicle is prohibitive.

Red font = used significantly less often by digitally excluded and disadvantaged people compared to those who are digitally included
Green font = used significantly more often by digitally excluded and disadvantaged people compared to those who are digitally included

Q5. Which of the following methods of transport, if any, do you use to get around London? Base: All digitally disadvantaged or excluded respondents (153), All digitally included respondents (956)

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- Personal security.** For many people safety is a key consideration when traveling. London TravelWatch research⁴⁶ found that:

⁴⁵ <https://www.londontravelwatch.org.uk/campaigns/digital-exclusion/> page 15

⁴⁶ [Personal Security on London's Transport Network: Recommendations for safer travel](#), London TravelWatch, 2022
[Out in London: LGBTQ+ people's safety on the London transport network](#), London TravelWatch, 2023

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- Women, young people, Disabled people, People of Colour and people from an ethnic minority background and the LGBTQ+ community were all at greater risk of victimisation.
 - Among those who told us they felt unsafe when travelling in London, over 70% stopped travelling at certain times of the day, and many chose to take personal precautions like carrying alarms or switching their journeys to other modes of transport.
 - For Disabled people, the decision to stop travelling on certain modes or even at all is far too common. Negative experiences, previous victimisation and repeated failure to be able to travel due to an inaccessible transport network results in the exclusion and marginalisation of Disabled transport users.
 - While a good proportion of people felt fairly safe on most modes, the Tube, the bus and cycling ranked highest for people feeling fairly unsafe or very unsafe. For users of the Tube and train, a number of people cited the feeling of being trapped and unable to leave a developing situation easily. In contrast, on the bus people felt they could get away from a situation, but it was easier for perpetrators to get on and cause harm.
5. **Outer Londoners.** As shown through analysis of Public Transport Access Levels (PTALs), in general outer London has a lower level of public transport provision when compared to inner London. Even within outer London there are considerable difference in availability of transport. For example, boroughs such as Barking and Dagenham and Enfield have access to the bus, Underground, Overground and National Rail. Bexley and Kingston upon Thames in contrast are only served by buses and National Rail.⁴⁷

This will clearly have an impact on the types of transport people in outer London are using. Poor public transport and cycling provision can force people to be car-dependent, depriving them of choice in how they travel. Indeed, the Centre for London found that people in outer London own and use cars more often than people in inner London, with twice as many journeys in outer London made by car than in inner London (18% vs 19%)⁴⁸. While people may still choose to drive, by improving public transport options (and widening focus from radial journeys into London to more local connections), it can give people more freedom in how they travel, as well as helping to reduce air pollution and congestion.

b) How could the transport network better serve and connect London's communities with the places they travel to?

There are many things the transport network can do to better serve Londoners, including improving accessibility, making it safer and increasing affordability. More generally working to

⁴⁷ [Submission to London Assembly Transport Committee: A Review of Public Transport Provision in outer London](#), London TravelWatch, July 2023

⁴⁸ [Moving with the Times: Supporting sustainable travel in outer London](#), Centre for London, June 2023

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make it reliable, easy to use and inclusive will contribute to a better system that serves to connect London's communities together.

Increasing accessibility

The current transport infrastructure often excludes people with access requirements, including Disabled people, older people and others. This leads to significant challenges and barriers in their everyday experiences with London's Transport network. Building infrastructure around Disabled peoples lived experiences will create a more equitable environment. Key areas for improvement include (but are not limited to) ensuring level boarding and step-free access is included at new stations, as well as providing adequate public toilet provisions, signage, hearing loops, accessible information, water fountains and seating areas. Disabled people and accessibility organisations should be meaningfully involved throughout any work.

Steps to reduce digital exclusion and disadvantage are also important. These include:

- Equal fares whether purchased online or in person
- Staff visibility and assistance
- Providing support and mentoring services
- Engagement and consultation on accessibility
- Providing more accessible services and resources
- Maintaining non-digital options before and during travel⁴⁹

More widely, there is a need to shift the focus from a medical model of disability, which places the onus of accessibility on individuals, to the social model, which is a more inclusive framework that addresses systemic barriers. The social model emphasises that people are not disabled by medical conditions or impairments, but rather by the physical, social, and environmental barriers that society puts in place. It is these barriers which need to be dismantled and improved. While we acknowledge more organisations moving in this direction, more need to be done to shift the narrative around Disabled people.

As part of this the transport industry needs to focus on building awareness to tackle societal issues around discrimination. It is essential to implement robust and in-depth staff training and education on these topics and TfL policies. These training should also be reviewed regularly to ensure it remains fit for purpose. When staff do not consistently follow the appropriate policies and guidance it can create stress for the people they are assisting, undermining confidence in the system and potentially deterring them from future travel.

Improving personal security

As noted previously, London TravelWatch's research on personal security highlighted significant safety concerns, especially among women and girls, the LGBTQ+ community, Disabled people,

⁴⁹ [Left Behind Londoners: Digital Exclusion and Disadvantage in London Transport](#), London TravelWatch, 2023

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and people of colour. To address these issues around personal security London TravelWatch has recommended several key actions for the transport industry:

- Commit to cross-industry awareness campaigns to end hate crime and harassment on transport, and build understanding of how people can be active bystanders
- Have visible staff at stations and on services to support people who need it. These staff should have all completed relevant training, co-designed with community groups and refreshed periodically
- Implement a robust cross-industry strategy to address anti-social behaviour
- Maintain the frequency of services and ensure they are reliable
- Put infrastructure in place to improve security concerns and perceptions of safety, including improving Wi-Fi and connectivity, lighting and CCTV
- Build trust and faith in policing authorities and making it easier for people to report incidents. This could include working with trusted third-party organisations such as CATCH and Zoteria.
- Further research data-driven solutions, especially from groups where data is limited

Engagement and co-design with community groups should be factored into all aspects of this work to ensure the solutions truly address their needs.

Strengthening transport links

The transport network can better serve all Londoners when its reach is expanded and strengthened, particularly in the outer boroughs. This could include:

1. Increasing and expanding bus routes to cover more areas, especially those with less access to Tube or train stations. This would provide better connectivity for people living in outer boroughs and should include more orbital routes that go around London rather than into London, making it easier to travel between neighbouring boroughs. This would help reduce car dependency and address transport inequalities of outer London. Superloop has been a positive example of this, better connecting parts of outer London with express orbital bus routes. London TravelWatch would like to see TfL implement the second phase of the Superloop network and continue to expand it where possible.
2. Improving connections between buses, trains, and the Tube to make travel more efficient. Making sure that bus routes are well-connected with train and Tube stations, and that interchange times between different modes are minimised, would enhance overall network efficiency and the transport experience for many Londoners.
3. Improving the quality of interchange to improve inclusivity. For example, making sure there is step-free access between bus stops and their closest Underground Station, and that paving between them is level, uncluttered and has tactile paving where needed.

Affordability

Many Londoners, especially those with low incomes, are the most impacted by fare increases. Analysis of government data by Trust for London finds that 24% of Londoners are in poverty, with the highest poverty rates experienced by workless families (50%) and single people with

children (47%). People of colour and those with an ethnic minority background are also more likely to be in poverty (34%) than white people (17%).⁵⁰ Maintaining low fares, particularly on buses, and expanding the use of fare capping and discounts, such as the Hopper fare, would make sure that transport remains affordable for all passengers.

2. How does TfL use data and engagement to plan accessible and inclusive services?

a) Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?

While TfL hold a wealth of data, which is used to help inform the planning of services, we believe there are some gaps in this. One such area is Public Transport Access Levels (PTAL). PTALs are a way of calculating access to public transport, developed in London and used by TfL. They are determined using the walking distance from the site to the nearest transport stop or station and the service levels at those stops. Routes are also reflected to indicate the attractiveness and reliability of a route. In London it has generally been used as a planning tool and is a good indicator of public transport provision across London.

However, there are several shortcomings to the way PTALs are measured. It uses arbitrary cut-off distances that may exclude useful transport links just outside these areas, and the accessibility of the services is not considered. For example, take an area that contains a high number of stations, but none of these are step-free. According to this calculation it would receive a high PTAL. In reality though, the access to public transport for those who need step-free access is actually much lower than this number would suggest.

This in turn means planning decisions might not be sufficiently informed by current PTALs, with the result that services do not meet the needs of Londoners facing additional barriers. By incorporating more data to better reflect the accessibility of transport, or creating another measure to supplement current PTALs, this could be improved. Additional factors which could be considered include (but are not limited to) access to toilets, step-free access and quality of interchange.

Additionally, it's important that TfL have data across different demographics to properly inform their work, planning services and infrastructure according to the needs of the people who use them. Again, some of this is already available to TfL, but there is room for improvements.

For example, TfL use STATS19 (a database holding information on all road traffic collisions that result in a person being injured, collected by the Metropolitan Police Service and the City of London Police) in parts of their work, for example to track progress against Vision Zero goals and in their [bus stop bypass safety review](#). While STATS19 is a useful source of data, it generally doesn't allow people to report personal information like disability and ethnicity. In turn, TfL have a reduced ability to see data specific to these demographics, and if they are being disproportionately impacted by for example a policy or infrastructure change.

⁵⁰ [London's Poverty Profile](#), Trust for London, 2024

Other examples of gaps include:

- Carers' travel patterns. Travel for care-related purposes is generally not captured, and it is mostly women who perform both paid and unpaid care-related work (including travel). By not capturing data on travel for care-related purposes, TfL are missing an opportunity to better understand how caring responsibilities impact travel and how to improve the transport network to support care-related journeys.
- Delivery workers' road injuries and collisions, which neither TfL nor the Met collect data on. There is evidence on how gig economy delivery platforms' business models incentivise dangerous driving, motorcycle-riding and cycling; most gig economy delivery workers are men of colour. This is a data gap that, if filled, could help improve road safety for all road users, not just delivery workers.

We would also note that while quantitative data is valuable, it should also be supplemented with qualitative data to provide more insight into the reasons behind differences and how to address them.

b) How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?

It is important that there is meaningful engagement with a diverse group of users when planning and designing infrastructure and services to make sure that it meets their needs – across protected characteristics, from Disabled people to women, to people of different faiths and ages, and more. People can provide feedback on what they need the services to do and how they use them and identify issues that might make transport less accessible and inclusive.

Indeed, policy and decision making that does not involve people who use it from the start, particularly those who face additional barriers, can ultimately create more issues and financial impacts when looking at current and future infrastructure provisions.

We appreciate that TfL do engage with a variety of groups when planning and designing infrastructure and services. For example, there is the TfL Youth Panel and Independent Disability Advisory Group, both of which can feed into TfL plans and help shape them. These have the benefit of being able to delve more deeply into issues, which presents the opportunity for more in-depth understanding and learning from these groups. However, it is also important to engage with a wider group of stakeholders who may be able to provide alternative perspectives. While groups like the Inclusive Transport Forum can help with this, with breadth there can be the trade-off of less in-depth and meaningful engagement. We would ask if more can be done to have more in depth engagement with an even wider group of users and stakeholders.

An example of where this would be beneficial is engagement with Disabled people. Inadequate infrastructure design can create more barriers for Disabled passengers, so it is important they are properly engaged with when planning and designing infrastructure and services. While we

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acknowledge that TfL do engage with Disabled passenger groups, we believe more can be done to make the process better and more beneficial for stakeholders involved.

For example, the new Piccadilly line fleet will in many ways be more accessible to disabled people, including more priority seating and space for wheelchair users. However, the gap between the platform edge and the new stock will be wider in some places, actually making the trains more inaccessible to people who cannot traverse the gap and increasing requirements for assistance. Wider and more in-depth consultation with Disabled people could have helped identify this design issue in an early enough stage to properly address. As it stands, it now instead presents a missed opportunity and an additional barrier to travel.

This example highlights the importance of involving Disabled people in the policy-making processes and design stages of potential changes, to avoid financial waste and improve overall accessibility of transport. This will not only make it better for those who use transport, but also welcome back Disabled passengers who have stopped using it, as it is unreliable and inaccessible by design.

c) How effective is TfL at involving all users in decision-making processes?

Alongside the topics already discussed, a key part of the decision-making process is consultation. Organisations should aspire to build a robust and meaningful process, with the results strengthening outcomes by providing more insight and views that can benefit their work.

To be effective consultation and engagement must be done in a timely manner, so responses can genuinely feed into the work. They shouldn't be a tick box exercise.

While TfL do at times make changes to schemes in response to feedback provided in for example consultations, it is important that this is done openly and clearly. If people do not believe there is genuine consultation this can damage trust and confidence in TfL, undermining their work and reducing the quality of future consultations. While TfL do often provide explanations for why they have or haven't done something, it is not always as clear or accessible as it could be.

While consultation and engagement are important, the communications around it can be just as vital – a consultation isn't very effective if no one responds. A range of communication channels should be used – digital methods such as social media, emails, banners on websites, but also non-digital channels so the significant minority of Londoners who are digitally excluded can still be involved. This could include things like posters, news stories, adverts, and even pop-up stands. TfL do use many of these channels, but it is important they maintain the variety, in particular non-digital options so people are not digitally excluded. This extends to responding to consultations, which people can generally do on their website or via email, telephone and freepost. All channels should remain free to the respondent.

It's particularly important to make sure that in cases where certain groups are more likely to be impacted, for example Disabled people or digitally disadvantaged people, extra efforts are made to reach them so their views can be properly considered should they choose to respond. We welcome the availability of accessible information available during consultations, including easy

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read materials, audio versions and BSL conversation services. Further opportunities to expand accessibility are always appreciated.

d) Are there any improvements that could be made to ensure that all voices are heard?

To make sure that all voices are represented and considered when discussing improvements to London's transport network, it's essential for TfL to adopt a genuinely intersectional approach. This means not only recognising the diversity of characteristics and identities, but also understanding how these overlap in ways that shape unique transport needs and challenges. By focusing on intersectionality and lived experiences, TfL can design solutions that reflect the diverse needs of Londoners and the barriers they may come across.

Incorporating an intersectional approach: Everyone has diverse journey patterns and needs. But by looking deeper into how marginalised groups travel TfL will be able to build a greater understanding of transport barriers, and what solutions will make substantial change. Traditional transport systems often prioritise, point-to-point journey patterns typically associated with men when commuting to their jobs. However, women and other marginalised groups are more likely to make shorter, local, and multi-stop journeys, often for domestic, care-related, or community purposes. Taking these travel patterns into account would help understand the need to broaden service coverage and focus on the reliability across non-central routes and off-peak times to support these essential but often overlooked trips. With an intersectional focus, TfL can also more accurately address safety and accessibility barriers by recognising how different identities intersect to impact a person's sense of security. For example, initiatives such as visible staff presence, improved lighting, and reporting apps can be prioritised in specific concerns.

Centred on lived experiences: Bringing passengers into the decision-making process from the start, especially those with varied intersectional identities, will help TfL in addressing varied travel experiences. By focusing on lived experience TfL would consider passengers needs before, during, and after journeys, making sure that transport improvements are grounded in the real-life experiences of London's diverse communities.

Inclusive scheduling for low-paid and shift work: Public transport and its frequency often aligns with white collar office jobs. However, those who work in shift-based work such as cleaners, hospitality staff, and healthcare workers often travel during non-peak hours when services may be less frequent. These roles can often be low paid and such employees more likely to need to use affordable public transport. Increasing service frequency, especially late at night and early in the morning, would better support this essential workforce and address safety and accessibility concerns that are heightened during these times.

Data Collection and Analysis: Data collection should go beyond basic demographics to capture the intersections of identity, journey types, and unique barriers faced by different groups. This includes gathering insights from people whose transport needs may otherwise be

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overlooked, such as single parents, older passengers, and Disabled people. Data that dives deep into specific demographics will better inform targeted interventions and campaigns making sure improvements and progress are relevant and effective everyone, especially groups that are often added into the conversation as an afterthought.

By embedding an intersectional perspective throughout planning and policy, TfL can create a more inclusive and equitable transport network that genuinely reflects and responds to London's diverse population. This approach not only improves accessibility and safety but also builds a transport system that respects and reflects the lived experiences of all Londoners, supporting them in journeys

3. How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

a) What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

As mentioned before, it is important that when making decisions those who would be the most affected should be a priority for TfL to engage with. Co-designing transport services with underrepresented groups would make transport more accessible and inclusive, and there is hope that the work TfL are doing on Equity in Motion (EiM) will make progress in improving this. But it must be genuine, and it must involve impacted groups and people with lived experience throughout the process.

While the creation of TfL's EiM strategy is welcome, it is also important it is delivered to a high standard. While the ambition is positive, it needs to be realistic and properly funded to make a real impact. We are glad to see that even with such a long list of actions planned since its launch in February 2024, the EiM programme has made significant progress according to the Customer, Sustainability and Operations Panel, with 58% of the planned actions for 2024 either completed or in progress.⁵¹

To ensure ongoing accountability and transparency it is important TfL openly publish their work on EiM, including regular updates on the programme. We would also be interested to hear more about the oversight structures in place for the strategy. For example, is TfL self-reporting progress or is there an external evaluator monitoring progress? And what community input is there into this?

We understand that TfL have engaged with various community groups and stakeholders in the creation of EiM. This is positive and needs to continue throughout the implementation and the strategy (and beyond). Even deeper consultation and involvement of lived experiences from various groups, especially varying opinions within demographic groups, would bring further benefits.

This ties into the importance of EiM having a more intentional approach to intersectionality. Plans to improve safety, affordability, and connectivity should be more reflective of the unique

⁵¹ [Customer, Sustainability and Operations Panel Agenda and Papers 2 October 2024 \(tfl.gov.uk\)](#)

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needs of Londoners who experience multiple forms of exclusion. Rolling out more comprehensive training for staff on intersectional inequalities, and embedding this awareness in the decision-making process can ensure that policies address the full variety of passenger needs. More intersectional data collection, paired with long-term community involvement in policy development, will enable TfL to better tailor and build on existing services to meet the needs of lived experiences of all Londoners. This approach would strengthen TfL's planning, ensuring that the voices of those with the most varied and marginalised transport experiences are amplified in shaping London's transport future.

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Lord Blunkett Ref No. AI013

Dear Elly,

Thank you for being in touch just before Christmas and for letting me have the questions that the panel have been addressing.

I'm very sorry that, because of timings, I missed the opportunity to be able to give full evidence before the deadline and I'm therefore just following up, as requested by you, with a brief note in writing.

I'm slightly mystified at the description "deaf and disabled". As someone without sight, I've always accepted (but rarely acknowledged) that I have a disability. It's a different sensory loss to those who are profoundly deaf, but it falls into the same category. I would be really interested to know why this description is being used, as it is entirely new to me and, therefore, it would be genuinely enlightening.

I put 16 questions to Transport for London arising out of the accident I had at Westminster Underground Station on the 29th of October last year.

I am very happy to supply the questions and the answers separately, but as far as the conclusion and follow-through on your enquiry is concerned, one of the main ones was as follows.

Namely, how those in need of support when travelling can make contact and therefore pre-book that help?

On overground services (including at stations relevant to TfL), it's possible to book service in advance when booking a ticket.

Clearly this is not feasible for the underground services as there is not an established support system in place. However, for those without sight or with little sight, it must be possible, using new technology, to notify before arrival, and therefore alert a member of staff that some form of assistance might be required?

No good saying "ask when you arrive", because if you can't see who to ask, you can't get the support! It might sound blindingly obvious, but the response I had in conversation with leading members of TfL indicated that this has simply not been thought about, and there is an assumption that everyone will be able to see a particular member of staff and therefore ask for the necessary assistance.

I have looked at the questions that you laid out for your consultation. Your first question about barriers is touched on above. Obviously others with different forms of disability will have major challenges in relation to the configuration of services (the physical environment), but support on overground trains has improved markedly in the last decade.

I'm not at all clear how TfL engages with groups of "users". Different individuals face different challenges and, as far as I'm aware, there is no easy mechanism for consultation which could

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deal with such a variety of different barriers to travel. Therefore, a pluralistic approach is absolutely vital – including understanding that travellers are individuals and not part of some amorphous “community”.

It would be interesting to know just what lessons have been learnt, and therefore good practice put in place, in respect of the consultation process for the design of the Elizabeth Line. Learning from what has worked is a prerequisite to getting it right in the future – and, of course, what has gone wrong despite consultation?

I notice that your meeting on the 24th October looked at demographic trends. The use of enabling technology in creative ways is something that younger people are much more likely to use and able to exploit. I think the possibilities here are considerable for the future.

I have no further comments on your roundtable on 27th of November, other than the query I raised the beginning of this note (in relation to forms of disability) as to the description you're using.

Finally, I note that there has not been an emphasis on safety. This is obviously something that is very close to my heart, given the reason for your approach to me was due to the publicity given to the substantial accident I had at Westminster underground station. I have received a very large number of emails since that publicity, many from those with disability, or frailty and ageing, who have experienced the most horrendous accidents.

Some of the questions I have raised with TfL will be directed in such a way as to interrogate this matter and, as I said at the beginning of this note, I will pass those answers on when I receive them.

Thank you for the opportunity of responding and I look forward to hearing from you with answers to my own queries in this communication.

With very best wishes,

David Blunkett

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The following documents were provided to the London Assembly Transport Committee as part of Lord Blunkett's submission to this call for evidence. They are:

- 29.10.24 Lord Blunkett IRF Westminster incident ref IRF001424363
- 2024 12 11 Lord Blunkett questions and requests for TfL
- TfL response to Lord Blunkett queries from 11 December meeting

Incident Reporting Form

Reference Number IRF001424363

Incident Details	Date: 29-Oct-2024	Time: 17:46	Day: Tuesday
Station or site name: Westminster		Line or Department: District	
Specific Location - Platform / Train Interface		Stairs/Platform/Escalator/Lift No: One	
SID Plate Id:3/261		1Within the Station Boundary	
• There were people physically injured in this incident • This was not a Slip/Trip/Fall, or a PTI incident with no physical injury • No Workplace Violence or Aggression involved in this incident • No Psychological Trauma involved in this incident • No one was taken ill as a result of Heat or Congestion related issues • There was no damage to any Assets in this incident		No Alarms or Emergency Stop activated	
Initial delay	No initial delay		
Train Specific Information There is no train specific information for this report			
No station specific information reported for this IRF			
Staff involved in incident: None			
Other people involved in incident			
Surname: Blunkett		First name: David	Involvement: Injured/Taken Ill
Association: Member of Public			
Address: - No address supplied			
There were no related Traction current arrangements			
No consequential cancellation or reformation			
No crime committed			
No fire or smoke			
No assets involved			
No SPAD was reported as part of this IRF			
Incident Description :- 1746.28 DB and male companion arrive on the platform 1746.59 Train doors open 1747.05 Male companion gets on the train first and with one hand pulls DB on the train but he seems to fall between the train and platform. 1747.09 Other passengers help DB to his feet. 1747 12 All are now on the train. 1747.36 Train departs.			
Findings of immediate investigation (basic cause) :- Male companion got on the train first, pulling DB behind him onto the train. Other customers bend down to help DB who appeared to have slipped thorough the gap between train and platform when boarding the train.			
This was a near miss of a Person by a Train		This was not a Suicide Intervention	
Person responsible for filing this IRF: - Maria Pinan Puertas			

11. What steps, if any, have been taken consequent on those accidents to improve safety at Westminster Underground Station?
12. What steps are in train, or new policy initiatives approved, to increase passenger safety at Westminster Underground station?
 - a. What are the timescales for implementation of those policies, including:
 - i. tactile markings at the edge of the platform;
 - ii. increased messaging for those waiting on the platform in relation to the known "risk";
 - iii. ensuring there is sufficient manpower to intervene where apparent assistance is required?
13. What steps are being taken to increase audio warnings at peak times when noise levels are likely to drown out "normal" audio presentation?
14. How has my injury been categorised? Minor or serious? On what basis has that decision been made?
15. What changes have taken place in the categorisation of injury (and therefore the balance between minor and serious) over the last five years? Is there now a clear and established methodology and criteria for such assessment?
16. Are there any plans to improve the mechanism for communicating (in the way that exists for overground trains) with specific manned and busy underground stations where additional support would be of benefit to travellers requiring special assistance?

Dates of hospital visits:

Wednesday 30th October 2024: Treatment at Accident and Emergency at St Thomas' Hospital, London.

Tuesday, 5th November 2024: Dressing change at Victoria Health Clinic, London.

Thursday, 7th November 2024: Appointment with tissue viability specialist at the Royal Hallamshire Hospital, Sheffield.

Monday, 11th November: Appointment with tissue viability specialist at the Royal Hallamshire Hospital, Sheffield.

Monday, 18th November 2024: Appointment with tissue viability specialist at the Royal Hallamshire Hospital, Sheffield.

Friday, 29th November 2024: Appointment with tissue viability specialist at the Royal Hallamshire Hospital, Sheffield.

Monday, 9th December 2024: Appointment with tissue viability specialist at the Royal Hallamshire Hospital, Sheffield.

Further appointments have been scheduled for the 16th and 27th of December 2024.

Lord Blunkett
House of Lords
London
SW1A 0AA

28 January 2025

Dear Lord Blunkett

Thank you for meeting with us on 11 December 2024 to discuss the incident at Westminster station on 29 October 2024. We were very sorry to hear about the impact of the incident, and we hope that you continue to recover from your injuries.

We valued the opportunity to discuss the incident with you in person, as well as what we are doing to ensure that customers are safe when boarding or alighting our trains and across our network. We have shared the insights and feedback you provided from your experience across TfL and asked the relevant teams to consider what additional action we may need to take in response.

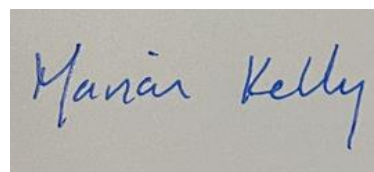
At the meeting you provided us with a list of questions and we promised to come back to you with answers. Thank you for your patience while we have collated this information. We have set out our responses to the points you raised below. We hope our responses address your queries, but please let us know if you would like to discuss these further.

We will continue to do all we can to ensure our services are safe and that anyone affected by an incident on the network is provided support.

Kind regards

A handwritten signature in black ink, appearing to read 'Nick Dent', with a long horizontal stroke extending to the right.

Nick Dent
Director of Customer Operations
London Underground

A handwritten signature in blue ink, appearing to read 'Marian Kelly', on a light grey rectangular background.

Marian Kelly
Director of SHE TfL operations

Transport for London responses to questions and requests provided by Lord Blunkett

- 1) I request the CCTV coverage from the time and day of the accident (29th October 2024), but not in MP4 format.**

We have sent the CCTV footage of the incident to your office today.

- 2) Consequent on this accident becoming known to TfL, when was the appropriate reporting form completed and what steps were subsequently taken?**

An Electronic Incident Report Form was completed by staff at the station on the 30 October 2024 once we became aware of the incident. A check of the area was undertaken by the station team including to ensure that the area was free from slip or trip hazards. The station CCTV was further reviewed by our Safety, Health & Environment team for further fact finding to understand what happened.

- 3) What footage is available (on train) at the time of the accident?**

The on-train CCTV was not requested following the incident as the station CCTV provided the information needed to understand the sequence of events which led to the incident. The on-train CCTV is no longer available as the retention time for this has passed.

- 4) I would be grateful if you would supply me with the accident investigation report.**

We have sent the Electronic Incident Report Form to your office today.

- 5) How many staff were on duty at Westminster Underground Station on the early evening of the 29th October 2024?**

There were seven station staff on duty at Westminster during the early evening of the 29 October 2024.

- 6) How many staff scheduled to be on duty were not available, and for what reason?**

There were eight station staff scheduled to work at the time of the incident. Seven members of staff on the station at the time of the incident as one was unwell and not at work at the time. Westminster station requires six members of staff to be on duty to respond and deal with incidents and to safely evacuate the station if necessary so staffing levels still remained above the level required.

At the time of your incident there was no member of staff on the platform undertaking platform train interface duties as another member of staff at the station had been subject to a physical assault and the member of staff at the platform had left to assist with the response to that incident. Since your incident, all Customer Service Supervisors working at Westminster station have been reminded that platform train interface duties should be prioritised and where the duties cannot be undertaken that this is recorded in the station log along with the supporting rationale.

7) Has the accident been notified to the Office of Road and Rail and/or the Health and Safety Executive?

This incident has not been notified to the Office of Rail and Road (ORR) or the Health and Safety Executive. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations do not require incidents of this nature to be reported. However, we work closely with both the ORR and the Health and Safety Executive on measures to improve safety. We also regularly provide data to ORR for its annual rail safety reporting.

8) What was the measurement at the point of boarding, by myself, on the 29th October at the time of the accident?

The horizontal gap measurement between the train and platform at the point you boarded was 195mm.

9) Would you supply me with the measurements of the gap (the platform train interface) on the District Line at Westminster Underground Station at different points between the platform and the train?

This is provided at **Appendix One**.

10) Is it correct that in the last five years (which, of course, includes an enormous drop in passenger usage during Covid), there have been over 160 accidents at Westminster Underground Station?

From 1 January 2020 to 31 December 2024 there were a total of 137 injuries recorded by TfL at Westminster Station.

Over the same period 31 incidents were recorded related to boarding and alighting trains on the District/Circle Line platforms 1 and 2 at Westminster. An incident may or may not involve an injury.

21 of these incidents were recorded as falls in the gap between the train and the platform.

Of these 21 incidents from falls in the gap between the train and the platform, seven were recorded as causing injuries, including the injury you suffered on 29 October 2024. All seven of these injuries were classified as minor customer injuries in accordance with the injury definitions we use which are discussed at point 14 below.

Consistent with TfL's reporting practices the data on injuries set out above excludes an injury which results from a pre-existing medical incident (such as a passenger fainting or suffering a seizure and being injured as a result); intentional self-harm resulting in physical injury and criminal activity perpetrated by members of the public against other members of the public (such as customer-on-customer assault).

11) What steps, if any, have been taken consequent on those accidents to improve safety at Westminster Underground Station?

There are a number of mitigations in place across London Underground platforms to help manage the risk of a customer being hurt when boarding or alighting a train. These are also in place at Westminster Platform 1 and include:

- Platform layout and construction that takes account of:

- Surfaces and markings including tactiles and yellow / white lines to warn customers to stand clear of the platform edge
- Lighting
- Alarm systems including customer help points on station platforms to summon staff assistance where necessary
- Train design and maintenance that takes account of:
 - Doors
 - Alarm systems
 - Audio/visual aids
 - Intercar barriers

These controls are complemented by operational standards and procedures to manage train arrival and departure, customers, interaction between train and station staff and procedures for degraded operations and emergency plans. Specifically they include:

- LU Rule Book – Managing the platform train interface details the role of station, service control and trains colleagues which they are trained on
- Station colleagues are trained and briefed on assisting vulnerable customers
- Station colleagues are trained and briefed to provide ‘turn up and go’ assistance to mobility and visually impaired customers
- Congestion control and emergency plans in place for managing congestion on platforms to avoid customers standing too close to the platform edge
- Emergency procedures for stopping a train
- Station colleague security checks in line with the Station Security Plan
- Platform announcements are made to customers on status of the train service, safety messages to warn customers to stand clear of the platform edge / mind the gap / take care boarding alighting
- Platform indicator boards detail train frequency information to deter customers rushing for trains
- Customer communications e.g. posters to warn customers of the risks associated with the PTI

At a number of locations, we have put location-specific mitigation measures in place to address specific risks that have been identified, as part of the customer risk assessment, for that platform. These include specific controls for those stations which have the greatest number of safety incidents at the interface between the train and the platform and at locations where changes to our trains/platforms have been made which have changed the risk of a safety incident for our customers.

At Westminster Platform 1, the platform is staffed at certain times of the day to undertake specific platform train interface duties including making safety related announcements and to respond in the event of a platform train incident occurring. At Westminster Platform 1, we have also identified the need for infrastructure changes to reduce the risk of platform train incidents occurring and to reduce the potential consequences of incidents in the event that they occur.

We are developing plans to trial a range of technological and innovative solutions including smart technology and video data analytics technology which will alert staff when customers are at risk of an incident.

12) What steps are in train, or new policy initiatives approved, to increase passenger safety at Westminster Underground Station?

What are the timescales for implementation of those policies, including:

- a. Tactile markings at the edge of the platform**
- b. Increased messaging for those waiting on the platform in relation to the known “risk”**
- c. Ensuring there is sufficient manpower to intervene where apparent assistance is required?**

As detailed in our response to question 11 above we are developing plans to trial a range of innovative technology which will alert staff when customers are at risk of an incident. We are in the final stages of developing these plans and will look to implement them in the near future. This will include a series of trials to ensure that we fully test the effectiveness of the technologies. Locations and timescales for further trials will be identified as part of this work with a view to wider rollout across the TfL rail network.

In response to your other questions:

- there are already tactile markings at the end of Platform 1 at Westminster;
- There are regular automated PAs on the platform warning customers of the GAP. These are played every 2 and 3 minutes (further detail in response to question 13 below)
- Platform 1 has a member of staff present from 13:00-23:00 Mon to Friday. These staff are on the platform to undertake specific platform train interface duties including making verbal PA announcements and to respond to incidents in the event that they occur.

At the time of your incident there was no member of staff on the platform undertaking platform train interface duties as another member of staff at the station had been subject to a physical assault and the member of staff at the platform had left to assist with the response to that incident. Since your incident, all Customer Service Supervisors working at Westminster station have been reminded that platform train interface duties should be prioritised and where the duties cannot be undertaken that this is recorded in the station log along with the supporting rationale.

In addition to the above, we offer a turn up and go service on the Tube, London Overground and Elizabeth line. This service does not need to be booked and station staff provide additional assistance to these customers including:

- Contacting the destination station to confirm availability if staff to assist
- Assisting the customer onto the train
- Ensuring that the train operator is aware of the details, including the location within the train and the destination of the customer
- Confirm the details with the destination station to arrange for staff to assist the customer off the train.

13) What steps are being taken to increase audio warnings at peak times when noise levels are likely to drown out “normal” audio presentation?

There are a number of different safety related announcements on the platforms at Westminster including:

- ‘Mind The Gap’ announcements are played on the station public address system every 2 minutes.

- “Platform safety information. When waiting for the train please use the full length of the platform. When the train arrives, please use all available doors on the train and please mind the gap between the train and the platform.” announcements are played on the station public address system every 3 minutes.
- “The train now approaching is (for destination) please stand back from the platform edge.” is announced with the arrival of every train entering the platform.
- Station colleagues undertaking platform train interface duties on the platform Monday to Friday 1300 – 2300 make regular platform train interface announcements to customers.

The platform was checked by our Safety, Health & Environment Business team for the line, during the morning peak, and the public address system was clearly audible.

14) How has my injury been categorised? Minor or serious? On what basis has that decision been made?

Your injury has been categorised as a minor injury. Our injury definitions have been based on the specific type of injury and body part affected in line with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) guidelines provided by the Health and Safety Executive.

Types of injury that are classified as serious under RIDDOR include:

- Any bone fracture or suspected bone fracture, other than to a finger, thumb or toe
- Amputation of an arm, hand, finger, thumb, leg, foot or toe
- Any injury likely to cause permanent loss of sight or reduction in sight in one or both eyes
- Any crush injury to the head or torso causing damage to the brain or internal organs in the chest or abdomen
- Any degree of scalping (separation of skin from the head) requiring hospital treatment
- Any loss of consciousness caused by head injury or asphyxia.

15) What changes have taken place in the categorisation of injury (and therefore the balance between minor and serious) over the last five years? Is there now a clear and established methodology and criteria for such assessment?

Pre 2020/2021, the difference between a non-fatal minor and major injury was defined as whether that injury resulted in a trip to the hospital for the person. However, since the beginning of the financial year 2020/21, Our injury definitions have been based on the specific type of injury and the body part affected, in line with the RIDDOR guidelines provided by the Health and Safety Executive.

16) Are there any plans to improve the mechanism for communicating (in the way that exists for overground trains) with specific manned and busy underground stations where additional support would be of benefit to travellers requiring special assistance?

There are a number of existing mechanisms in place for customers that require additional assistance. These include:

Journey planning

Our [Journey Planner](#) tool or [TfL Go app](#) – can both be used to plan step-free, accessible journeys using live travel information. We also have a telephone line which is available 24 hours a day, 7 days a week that can be used to assist customers plan their journeys.

Turn up and go service

As detailed in question 12 above, across London Underground, London Overground and the Elizabeth line we offer a customer assistance service called [turn up and go](#) on the London Underground, London Overground and Elizabeth line. Staff in the station ticket hall will help you plan a step-free journey, and will also assist you through the station and onto the train, and arrange for staff at your destination station to meet you off the train and accompany you back to the ticket hall. Staff are trained and ready to assist customers that require it.

Travel support card

We offer a free travel support card to help customers communicate any assistance or information requirements they have with staff on all our services. A travel support card helps our staff know what assistance customers need. Customers can write on the card what assistance or information they need, including adding their name and an emergency contact number. Everyone is welcome to use a travel support card - they can be helpful for customers with non-visible disabilities, or that don't often travel on their own. Our staff also recognise the [hidden disabilities sunflower scheme](#) alongside other support cards and schemes.

Travel mentoring service

Our free travel mentoring service supports people using public transport in and around London so customers can become more confident and independent travellers. This includes:

- Offering advice by telephone to help customers plan accessible routes
- Providing customers with a mentor to accompany customers on their first few practice journeys to help them learn how to travel the network independently
- Assisting customers virtually, using the Apps available on most smartphones.

Our travel mentors can help anyone who lives or travels in London. This covers all types of journey on our transport including bus, Tube, Elizabeth line, DLR, London Overground, tram, Thames Clipper river boats and the IFS Cloud Cable Car.

Improvements/Developments:

In addition to the above we are undertaking the following:

- We are conducting a pan-TfL review of the effectiveness of the travel assistance we provide for customers with additional access requirements, including disabled customers, parents and people travelling with children, and older Londoners.
- We are also exploring how customers might want to connect with staff for help anywhere during their journey, whether in stations, on-board TfL services, or at bus stops. We are exploring the types of support needed, how customers currently access assistance (e.g., help points, staff, call centres), and the potential impact of technological advances.

When you met with us on 11 December you noted that you had not often been provided additional assistance from our staff through our 'turn up and go' service. You raised that this

service could be hard to access for those who were blind or partially sighted as they may not be able to easily find staff and request assistance in a busy station.

The insights you shared from your experience are extremely valuable to us. Our staff are trained to proactively offer assistance to customers who may require it and we want to ensure that any customer is able to make use of this service. We have asked the TfL Customer Insight Strategy and Experience team to take your feedback into account and consider any action that we might need to take to address it as they undertake the reviews noted above into the effectiveness of our travel assistance and how customers connect with staff.

Appendix One: Westminster Platform1 – Platform to Train step and gaps

Carriage	1			2			3			4			5			5			7		
Doorway	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3
Gap (mm)	166	190	146	155	195	154	144	200	165	162	212	165	162	206	157	160	200	156	140	197	165
Step (mm)	0	0	-5	0	0	10	10	10	5	5	5	10	10	10	0	0	5	10	10	5	0

The gap is the horizontal distance between the platform edge and the train step.

The step is the vertical difference between the platform height and the train floor height.

The highlighted column is the train carriage and door at which Lord Blunkett was boarded.

Municipality of Umeå Ref No. AI014

Examples from Umeå related to mobility, transport and gender equality

General information on Umeå and gender equality work

[Gender, power and politics! - Thirty years of equality work in Umeå municipality](#)

[In English: Gender equality work in Umeå - Umeå kommun](#)

Travel habit survey

See the [travel habit survey report in Swedish here](#), with gender segregated data.

See attached ppt for a summary and examples in English.

See attached machine translation of gender segregated travel habit survey

Lev! Station tunnel

See a [description in English here](#)

Station of being

The Station of Being is a new, experimental bus station for the Arctic Region. The station transforms the uncomfortable experience of waiting into a transitional experience: a moment to 'just be' and 'change your state of being' – before heading for a new place and new activities. The first prototype of the bus stop was inaugurated on 2 October 2019 during the EU Arctic Forum in Umeå, Sweden.

[Read more about the bus stop in English here](#)

Sustainable and equal commuting to work project

[Read more about this project in English here](#)

This project stems from the analysis that it is very easy to take public transport if you work at a very female-dominated workplace such as the university hospital, with one of two hubs for public transport being placed right outside. What does it look like outside of the larger industries in the city? How might creating conditions for sustainable modes of transport or the

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

preservation of conditions for unsustainable modes of transport might be related to the gender segregated labour market and the unequal division of unpaid care and domestic work?

Around 40% of the carbon emissions produced in Umeå comes from transport and travel. It is by far the largest source of emissions, and thus the primary focus of many of the municipality's efforts in the sustainable transition. In relation to personal travel, the goal adopted by the municipal council is that at least 65% of personal travel in the urban area should be made by sustainable means of transport (meaning bus, bike and walking) by the year 2025. The latest travel habit survey from 2022 showed that of the travels in the municipality, women's travels are 66% car-free whereas men's travels are only 55% car free, making it evident that if the men in Umeå travelled like women, the sustainable transport goal would already be reached.

The policy implication of that data is a discussion on that men need to travel like women – and why they don't. The travel habit survey specifically shows that women use public transport to a higher extent than men. It is therefore interesting to ask questions about what possible investments are most efficient if the goal is to reduce climate emissions? One action can be to electrify the bus fleet, but another, that would increase use of public transport as well as reduce the number of cars would be to focus on behavioural change and getting more men to take the bus. This insight calls for a challenging of norms and behaviours and a commitment to targeting specific groups and underlining through action what the data is telling us, that men as a group need to change the way they transport themselves. It also calls for an understanding of sustainable development and reduction of climate emissions as a process that goes beyond mere infrastructural investments and technological innovations, it is about understanding life conditions, challenging norms, behaviours, and power structures, not only on a theoretical level, but also when working with actions and projects on local level.

Västerslätt is a small industrial area once located in the outskirts of the city, but with the continuous population growth now a stone's throw away from the city centre. With predominantly small and medium size companies in the building and logistics sectors, the area is one of the most gender segregated workplace areas in the municipality. In 2019, the percentage of men employed at the businesses in the area was 79%. In this area, an initiative was carried out, working together with companies and the municipality, and with the support from the RISE Research Institutes of Sweden trying to find successful actions for changing travel behaviours. One of the aims was to increase knowledge of how norms, identity and underlying context shape our choice of mobility.

One of the ambitions was to deepen the knowledge on the car as an expression of gender identity, such as when manufacturers use an ideal of masculinity when alluding to the lost dreams of potential owners to become fighter pilots or racing car drivers, while smaller cars are perceived as feminine or "unmanly". Women as a group are more interested in more fuel-efficient cars than men, but early adopters of electric cars like Tesla have mainly been men, while women are more interested in the second-hand market for these vehicles. Based on this theoretical framework, it seems likely that both electric and self-driving vehicles have the potential to reproduce prevailing norms to a similar extent as petrol cars, while carpools can

challenge these norms more because individuals do not own a car themselves but share it with others.

It is pivotal to understand what behaviour drives the car norm and what conditions need to be in place in order to make sustainable commuting and work travel possible, for female as well as male dominated workplaces. This understanding needs to have the holistic perspective of physical infrastructure, labour markets, domestic division of responsibilities, social norms and perceptions on femininity and masculinity, and power, because transport policy is never only about means of transportation.

Safety in public transportation

See attached answer (machine translated) to question by politicians in Umeå city council 2023 on what measures taken by the municipal corporation responsible for the bus traffic in Umeå (bus being the public transportation in the city of Umeå).

E12 highway – gender equality in relation to mobility infrastructure

See information in Swedish [about the project here](#) and information in Swedish [about the strategy and project here](#)

A work package within the project with focus on how infrastructure investments contribute to social sustainability. Examples of measures:

- Measures are analysed in terms of social sustainability
- Gender-disaggregated statistics in planning and decision-making documents
- Gender-disaggregated indicators

Adopted vision: *The E12 region will serve as a model for how gender equality and social sustainability are integrated into the development of transport systems*

Actions:

- Develop methods for implementing social sustainability in the E12 region.
- Conduct mapping of the region's gendered landscape

Answer to Interpellation - Safe transport in local traffic?

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

Umeå's local traffic - Ultra - is a collaboration between: Länstrafiken i Västerbotten, Transdev and Umeå municipality. Umeå municipality - via Umeå Kommunföretag AB - plans and finances the traffic, Länstrafiken procures and Transdev carries out the traffic, which means, among other things, that drivers are employed there and most of the buses are owned by the company.

The parties work closely together in a number of areas, of which security is a prioritized and specifically designated area.

this cooperation has resulted in the country's highest customer satisfaction - according to the national public transport barometer - in 2022. In the national public transport barometer, we can also deduce that Umeå's public transport travelers this year gave the highest safety rating since 2016. At the same time, we have not had so few travelers who feel insecure with to use public transport in Umeå since 2016.

An impressively high rating in terms of safety is related to :

- A group of representatives who meet regularly to increase safety in Umeå, it includes, among other things Transdev , Transdev's protection organization, Länstrafiken, the Police, the Fältgruppen and the company that carries out controls in public transport.
- We support and collaborate with the police volunteers and the Field Team.
- We have bus hosts at larger events.
- There are security cameras in all vehicles.
- A special driver certification is carried out by the drivers.
- A dedicated working group with Länstrafiken, Transdev and Umeå Municipal Corporation whose task is to develop and increase safety in public transport.
- There is no cash on board the bus.
- Arranged a test day to ensure the calls in the buses, stop buttons and interior signs together with representatives from different organizations for functional variations.
- Carried out an on-board survey in the buses where travelers via QR codes were able to provide opinions about safety in public transport.
- Through answers in the public transport barometer, knowledge was gained about which factors create insecurity. Based on these analyses, a number of activities/measures have been carried out.
- Transdev as an employer has carried out a risk and impact analysis regarding threats and violence in relation to drivers. This generated a number of action plan points.
- The drivers have also undergone safety training in order to better handle situations that may arise in traffic.
- Transdev also follows up on all reported incidents involving threats and violence against staff.

In summary, public transport has a high rating in terms of safety, and yes, passengers on public transport can feel safe that safety work is a priority. The focus on safety for several years is also an important reason why travel in Umeå's public transport has never been higher than in the summer/autumn of 2023.

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

The following documents were provided to the London Assembly Transport Committee as part of the Municipality of Umeå's submission to this call for evidence. They are:

- Analysis RVU Travel habit of different groups
- Travel habit survey

Analysis RVU

Travel habits of different groups



Analysis RVU, Travel habits for different groups

[2023-08-16]

Version 1.0

Analysis:

Linnea Persson, Strategic development

linnea.persson@umea.se

Other actors:

Hanna Ahnlund, Streets and parks

Fredrik Forslund, Physical planning

Anna Gemzell, Strategic Development

Linda Gustafsson, Strategic development

Ebba Sundström, Physical planning

Summary Umeå

Municipality strives to increase the share of sustainable travel and works actively with various types of measures to promote this. As part of the work, this analysis has been produced. The document describes residents' travel habits and conditions for traveling in Umeå municipality. The aim is to investigate and highlight differences in travel habits between different groups.

The results show differences in travel patterns for different age groups. Younger people today travel more sustainably than older people. It also appears that women generally travel more sustainably than men.

Women make a greater proportion of their journeys on foot, by bicycle or by bus. Regarding the distribution of matters, women make a higher proportion of shopping and leisure trips, while men make more business trips. Almost all residents between the ages of 18 and 84 have a driver's license, but a larger proportion of men have access to a car.

The presence of children in the household does not seem to affect sustainable travel. However, there are differences in the choice of means of transport for groups with different levels of education. Women with low education travel most sustainably, while men with low education make a high proportion of car journeys. Based on the type of accommodation, it was also found that people in rental properties travel more sustainably compared to those in ownership. Probable factors that can affect this are finances, the location of the home and age differences for these groups.

A breakdown of fuel for passenger cars is presented in the report as well as an overview of the opportunities for remote working for different groups. It is mainly residents with higher education who have the opportunity to work remotely.

Regarding changed travel habits in the last three years, it is a smaller percentage of municipal residents who now choose to travel more sustainably. It is above all the youngest age category with residents aged 16-24 who state that they have changed their main mode of travel.

Finally, residents' wishes about which types of traffic should be prioritized are highlighted. There is broad support for prioritizing sustainable modes of transport. However, different groups of municipal residents tend to prioritize different types of traffic. About the same number of women and men believe that bicycle traffic should have the highest priority. However, among those who believe that the municipality should invest primarily in car traffic, there are significantly more men than women. Among those who want to prioritize bus traffic, there are above all many in the youngest and oldest age groups.

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1. Background and purpose

Umeå municipality aims to increase the share of sustainable travel and therefore works with a number of different initiatives. In order to increase the share of sustainable travel, changes are implemented in the infrastructure as well as efforts linked to behavioral influence.

The purpose of the analysis is to investigate and describe the travel habits of the municipality's residents and the conditions for travel. Comparisons are made, among other things, between women and men, different age groups, forms of housing and family constellations. The background highlights sustainable travel as well as traveling by car. Sustainable journeys in this case consist of journeys by bus, bicycle and on foot.

The analysis can contribute with an in-depth insight into the travel habits of municipal residents. The result can be used as guidance for decision-making as well as discussion material in the strategic work for increased sustainable travel.

2. Men travel more by car

Figure 2-1 shows the distribution of means of transport as an average over the entire week for women and men respectively. Women make a smaller proportion of their journeys by car, and a greater proportion of their journeys on foot, by bicycle and by bus. The category "Other" includes, among other things, travel by train, electric scooter, flight or things that the participant himself has chosen to classify as "other".

Figure 2-1 Distribution of means of transport in total and divided by women and men, shares

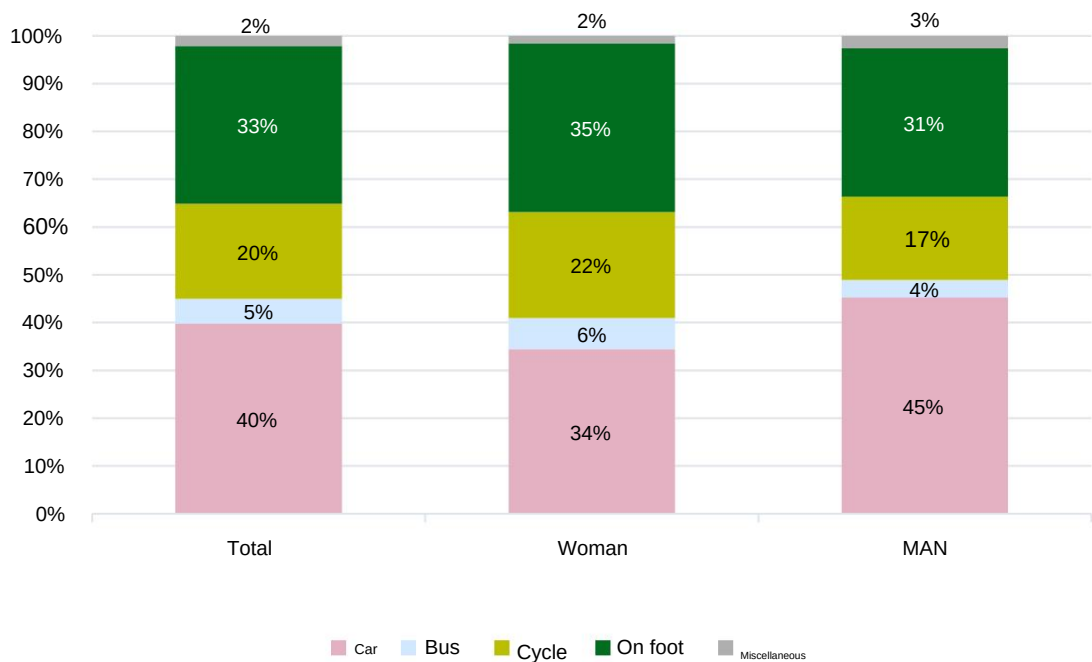
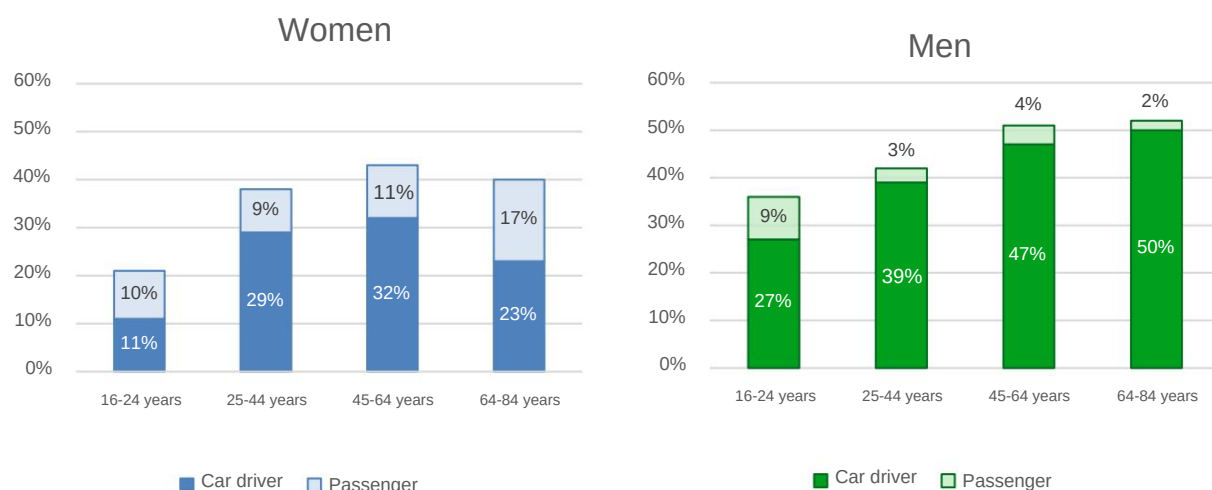


Figure 2.2 shows the proportion of car journeys divided between women and men and in different age groups. The car journeys in each bar are divided between the proportion of journeys as driver and passenger. Women travel more as passengers in all age groups. As previously mentioned, however, women have a lower proportion of car journeys overall than men.

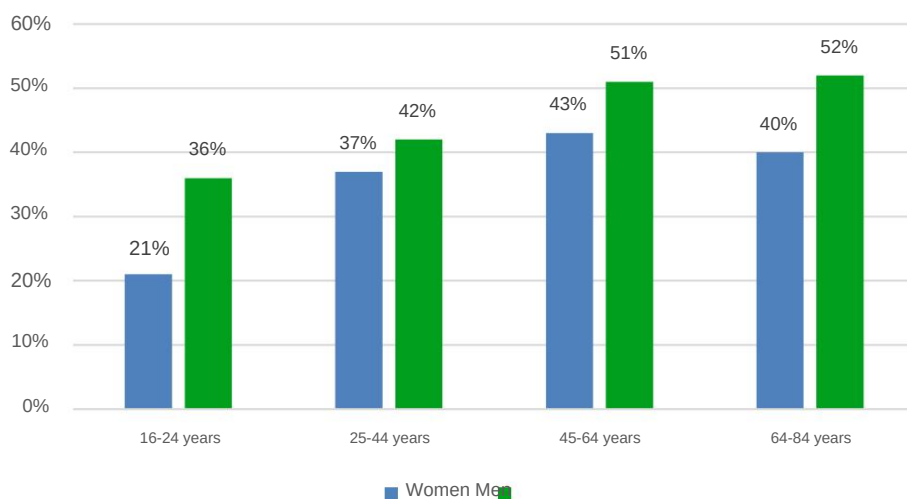
Figure 2-2 Car journeys divided by women and men and between car drivers and passengers, shares



3. Young people travel more

sustainably The proportion of car journeys differs greatly between different age groups. The youngest age group travels the most sustainably. Figure 3.1 shows the percentage of car journeys divided between women and men in each age group. The smallest difference is found between women and men in the 25-44 age group and the largest difference in the 16-24 age group.

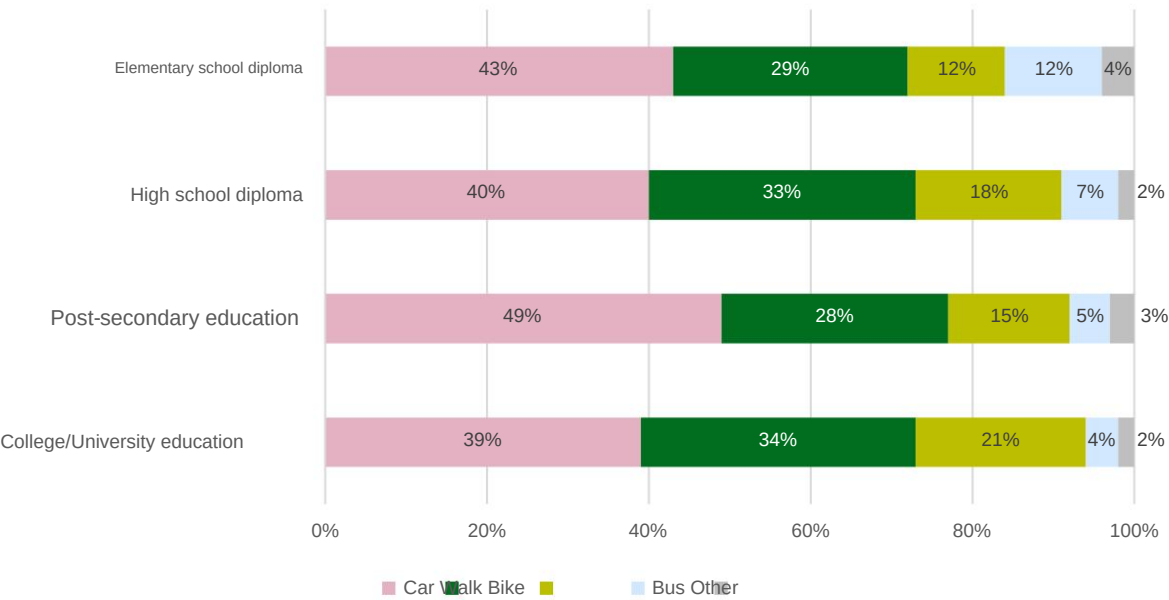
Figure 3-1 Car journeys divided by women and men and different age groups, shares



4. Educational background affects travel patterns

There are some differences in travel patterns linked to the educational background of municipal residents. The highest percentage of car journeys are made by those who have a post-secondary education that is not at a college or university. This group makes almost half of all their journeys by car. Municipal residents with a high school diploma and residents with education at a college or university travel the most sustainably. Residents with a primary school diploma are the group that travels the most by bus, while those with college and university education have the highest proportion of bicycle trips and walking trips.

Figure 4-1 Distribution of means of transport for municipal residents with different levels of education, shares



After further examination of travel data for residents with different educational backgrounds, clear differences also emerge in terms of travel between women and men within the respective groups.

Differences in the choice of means of transport between women and men with college or university education differ less than for women and men with lower education.

Women with low education, on the other hand, travel more sustainably than women with high education do. Among men, however, we see the opposite. Men with low education are the group that makes the highest proportion of car journeys. The differences in travel patterns between different groups of residents are partly influenced by income differences.

Figure 4-2 Distribution of means of transport for municipal residents with university/university education divided into women and men, shares

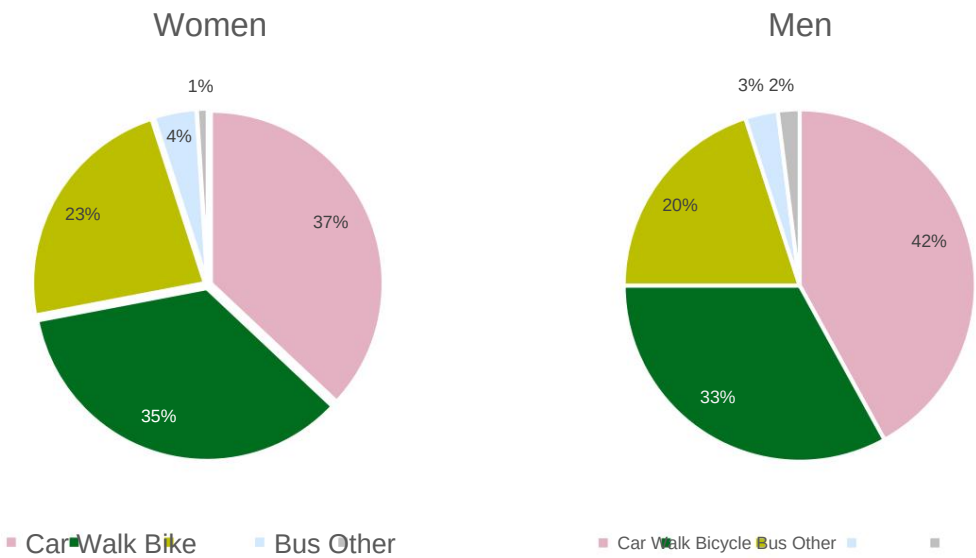
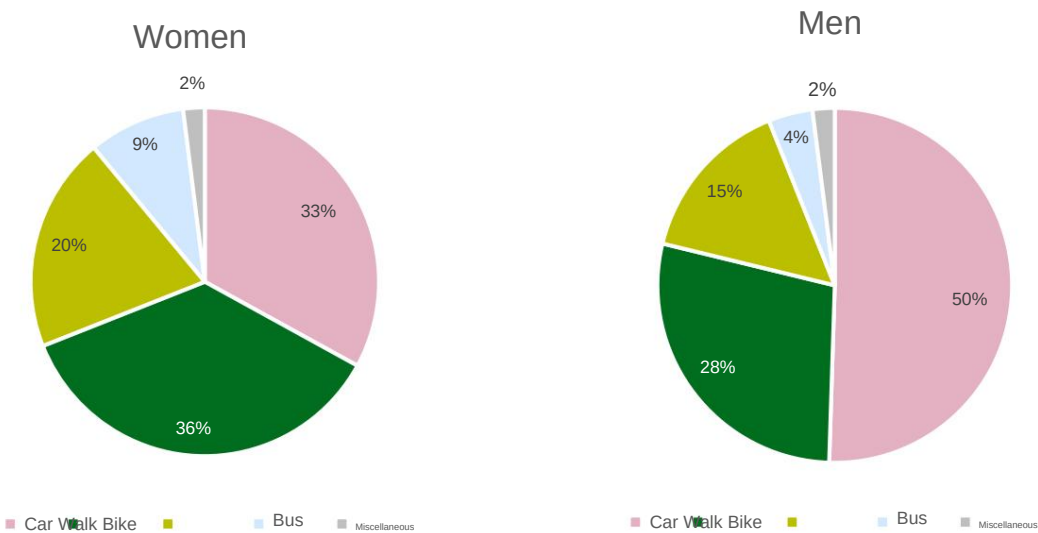


Figure 4-3 Distribution of means of transport for municipal residents with a lower level of education divided by women and men, shares



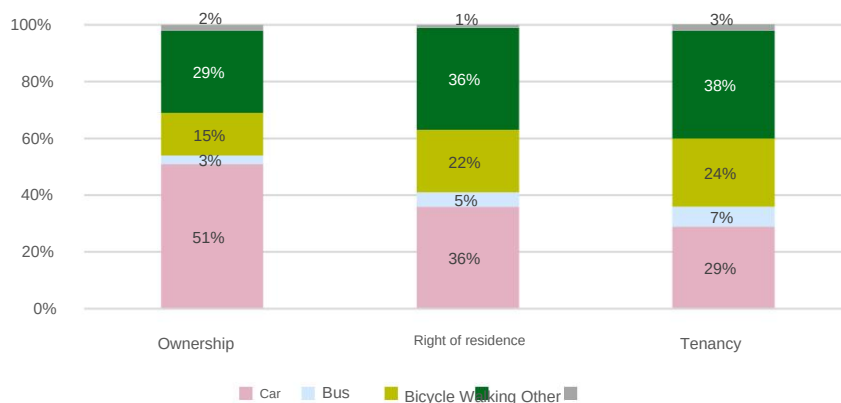
* This includes municipal students with a primary school diploma, upper secondary school diploma and post-secondary education that are not studies at a university or university.

5. Residents living in rental properties travel more

sustainably There is a clear difference in travel patterns between people living in different types of households.

The distribution of means of transport differs most between owner-occupied and rented accommodation. People living in tenements travel most sustainably. The differences in travel patterns are influenced by the fact that individuals' financial situation and age tend to differ greatly between different types of households. Rental properties also tend to be more centrally located than, for example, ownership rights in general, which leads to an increased opportunity to choose sustainable means of transport.

Figure 5-1 Distribution of means of transport for residents in different forms of housing, shares

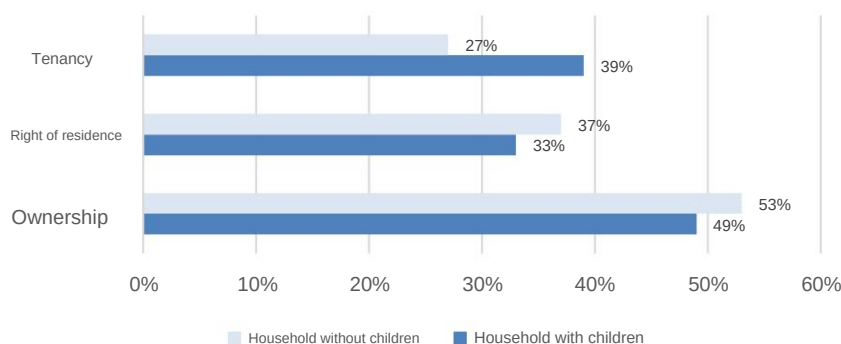


6. No clear connection between family composition and sustainable travel

There are no clear general patterns for sustainable travel in households with or without children.

Residents in tenements with children travel more by car than residents in tenements without children. This can to some extent be explained by the fact that many younger people travel more sustainably and do not have children. For individuals living in condominiums and ownership, as well as in households with children, it appears that these groups have a slightly lower proportion of car journeys than those without children. The number of trips per day does not seem to be affected to any great extent either. Households with children travel on average 4.6 trips per day and households without children 4.1 trips (all means of transport).

Figure 6-1 Car journeys broken down by housing type and households with and without children, shares



7. Women make more shopping trips. The

distribution of tasks is partly different for full-time working women and men. Women make a higher proportion of shopping trips and leisure trips as well as trips to pick up/drop off. Men, in turn, make a higher proportion of work trips.

Figure 7-1 Case distribution full-time workers divided by men and women, shares

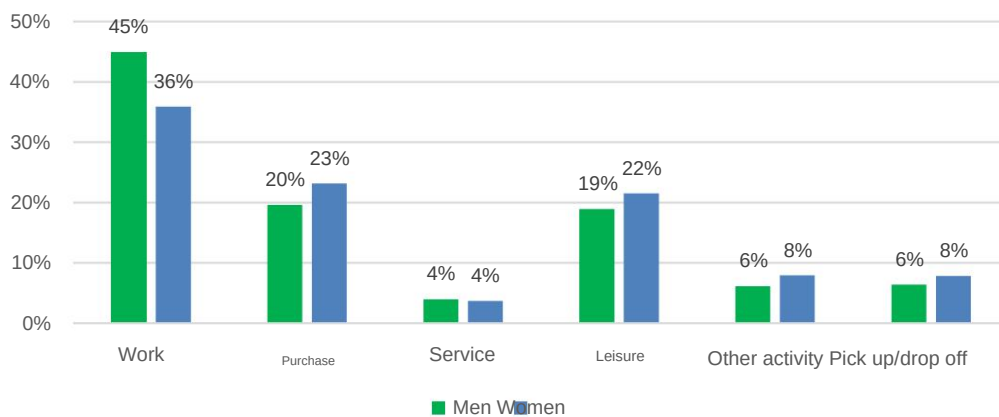
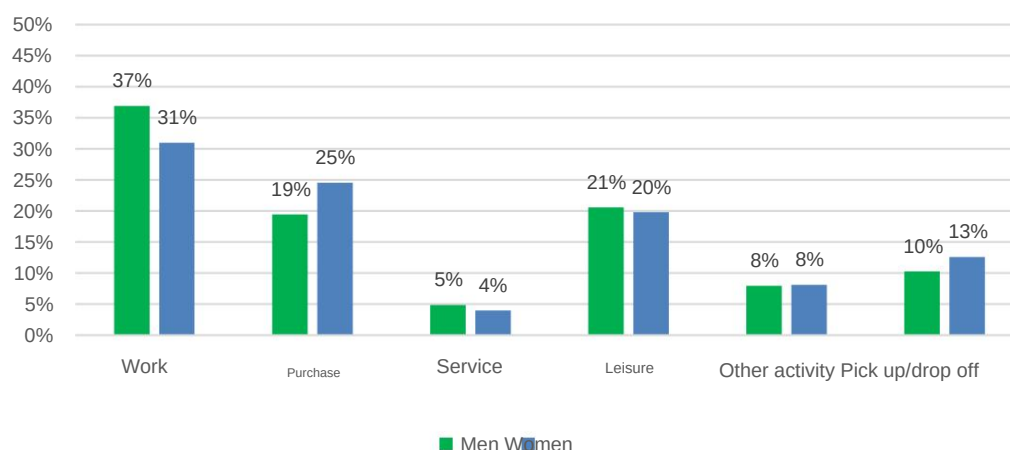


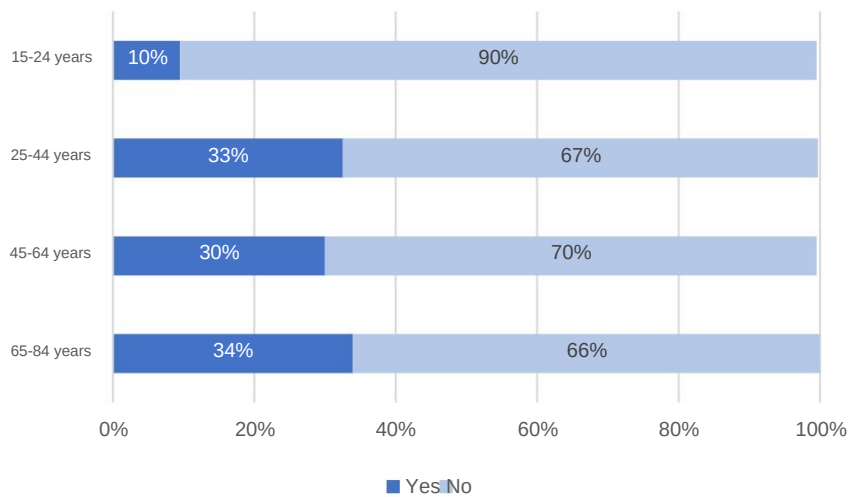
Figure 7.2 shows the distribution of cases for men and women who live together with children in the household. The share of work trips is a slightly smaller part of the total travel compared to full-time workers as presented in figure 7.1. Men make a higher proportion of work trips than women among full-time workers as well as among those living together with children. Women generally make a higher proportion of shopping trips. The difference between the percentage of shopping trips made is also greater between women and men who live together with children than for the group of full-time working women and men. Women's trips to pick up and drop off also make up a larger share of total travel compared to men.

Figure 7-2 Distribution of cases for adults who live together and with children in the household, divided between men and women, shares



8. Individuals with high education work from home to a greater extent Of those who are gainfully employed, 30 percent usually telecommute from home for all or part of the working week. The corresponding proportion for those studying is 24 percent. Those who are gainfully employed and indicate that they telecommute do so on average 2.8 days a week. Those who study and indicate that they study from home remotely do so on average 3.3 days a week. Among those who are gainfully employed, there is no difference between women and men in terms of the percentage who work from home. When comparing different age groups, however, it becomes clear that the proportion in the age group 15-24 year olds who work or study from home is low.

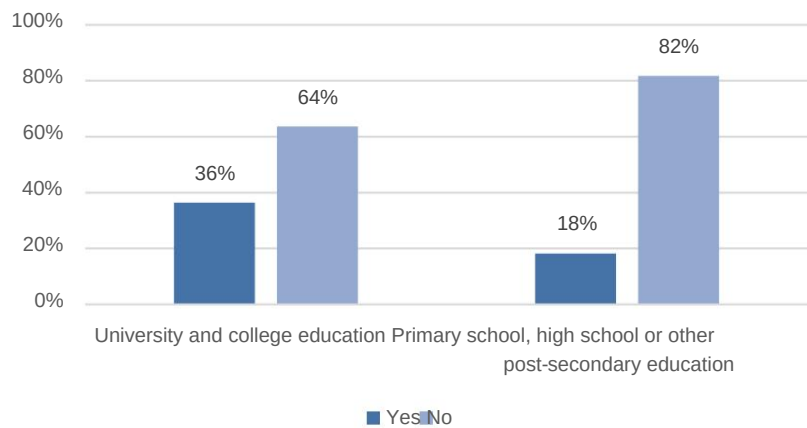
Figure 8-1 Proportion who telecommute full-time or part-time, paid workers divided between different ages



**The number of gainfully employed full-time or part-time is relatively low within 15-24 years and 65-84 years. The estimates are based on a smaller number of individuals for these groups, which means that the result thus has a greater uncertainty.*

The proportion who work from home differs greatly between different industries, workplaces and not least depending on the job role and the tasks performed. Individuals with higher education work from home to a greater extent.

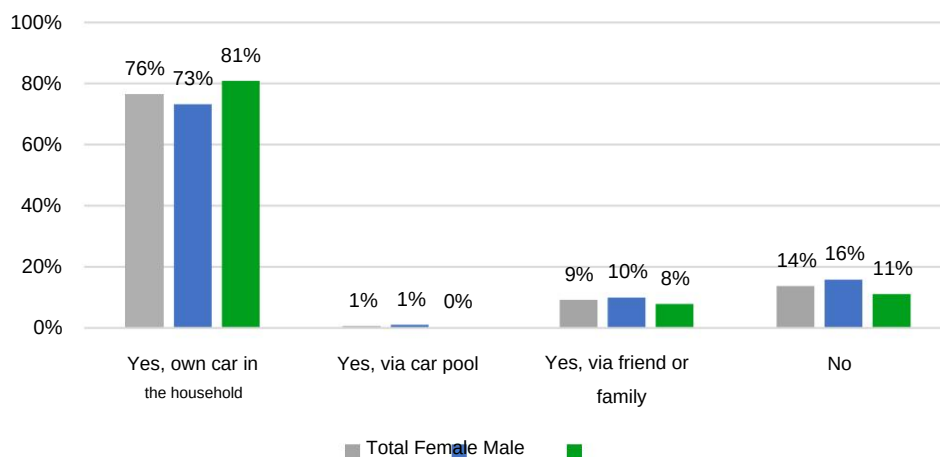
Figure 8-2 Share of telecommuting among gainful workers with different educational backgrounds



9. Driver's license and access to

a car 91 percent of the municipality's residents aged 18-84 have a driver's license for a passenger car. Among women, the proportion is 88 percent and among men 95 percent. There are 14 percent of the municipality's residents aged 16–84 who do not have access to a car. A larger percentage of women lack access to a car compared to men. There is also a larger proportion of men who have access to a car in their own household compared to women.

Figure 9-1 Access to a car divided by women and men, shares



Those who have access to their own car in the household generally make more car journeys than those who do not have a car. Other things that are distinctive for those who have access to a car within the household are:

- There is a greater proportion of men
- On average, they have higher education
- They live to a large extent in ownership (eg a villa) compared to condominiums or rental properties
- Those who live in rural areas tend to own a car to a greater extent. There are few residents in rural areas that lack access to their own car.

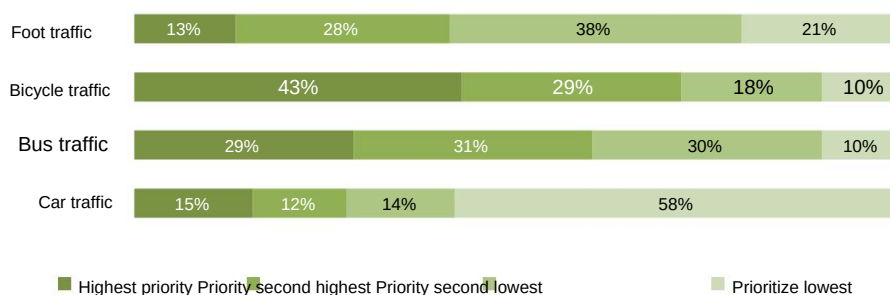
There are no clear general differences for households with or without children in terms of access to a car in the own household. However, there is a clear trend that cohabiting adults with children in the household often have access to their own car, while single people without children in the household often lack it.

With regard to age and access to a car in the own household, it appears that among the two younger age groups, 16-24 years and 25-34 years, there are fewer who have access to a car compared to the older age groups. For the age groups 45-54 years and 55-64 years, it is the other way around. In these age groups, it is common to have access to a car in one's own household. The fact that it differs greatly for different age groups in terms of car ownership is certainly connected to some extent with both differences in income and the location of the residence. To what extent young people choose not to have a car in their own household due to sustainability aspects is a question that the data cannot answer.

10. Municipal residents want to prioritize bicycle traffic Below

is presented which means of transport that municipal residents want to be given the highest priority in planning. The travel behavior survey 2022 shows that there are many residents in Umeå municipality who want to prioritize the sustainable modes of transport. According to the results of the survey, it is the largest percentage that states that bicycle traffic should be given the highest priority, followed by bus traffic.

Figure 10-1 Priority modes of travel for municipal residents, shares



**Respondents had to indicate the order in which they wanted the municipality to prioritize the different types of traffic in the planning.*

There are many municipal residents who place car traffic last when they rank how the municipality must prioritize the different types of traffic.

Who then wants car traffic to have the highest priority?

- ÿ There is a greater proportion of men
- ÿ They have, on average, lower education
- ÿ To a greater extent living in rural areas
- ÿ Car owners want to prioritize car traffic to a greater extent compared to those who do not have access to a car in their own household. However, there is a significantly larger proportion of car owners who would rather prioritize other modes of transport instead of car traffic.

Who wants bus traffic to be prioritized?

- ÿ There is a greater proportion of women
- ÿ To a greater extent living in rural areas
- ÿ They are mainly the youngest and the oldest target groups who want to give the bus the highest priority

Who wants bicycle traffic to be prioritized?

- ÿ To a greater extent living in urban areas
- ÿ Individuals with higher education
- ÿ Those who do not have access to a car in their own household

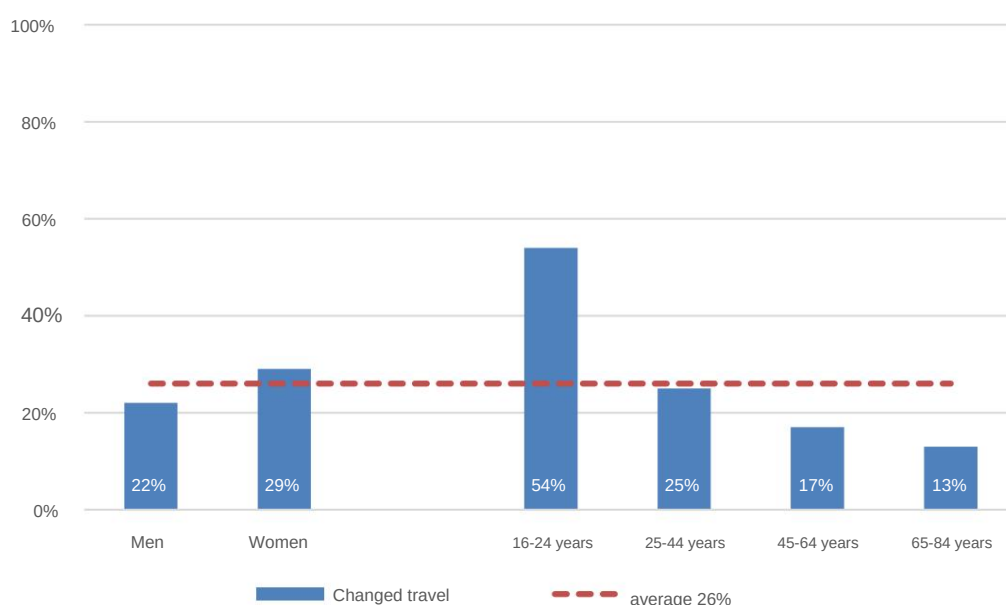
Generally speaking, all age categories want bicycle traffic to be a relatively high priority. Between 40-50 percent of all those aged 16-64 want the bicycle as a means of transport to be given the highest priority. In the two oldest age groups, 65-74 years and 75-84 years, however, the percentage who want bicycle traffic to have the highest priority is somewhat smaller, 35 and 20 percent respectively.

11. Changed travel behaviour

It is approximately 26 percent of the municipality's residents aged 16-84 who have changed their main method of travel in the last three years. The most common change that has taken place is that cycling trips take place more often.

In figure 11.1, it appears that the difference is large between different age groups. Among young people aged 16–24 years, more than half stated that they have changed their main mode of travel in the last three years. These data are also based on individuals' own experience of changing travel habits and not on one actual change.

Figure 11-1 Proportion who stated that they changed their main mode of travel, divided into women and men and divided into different age groups



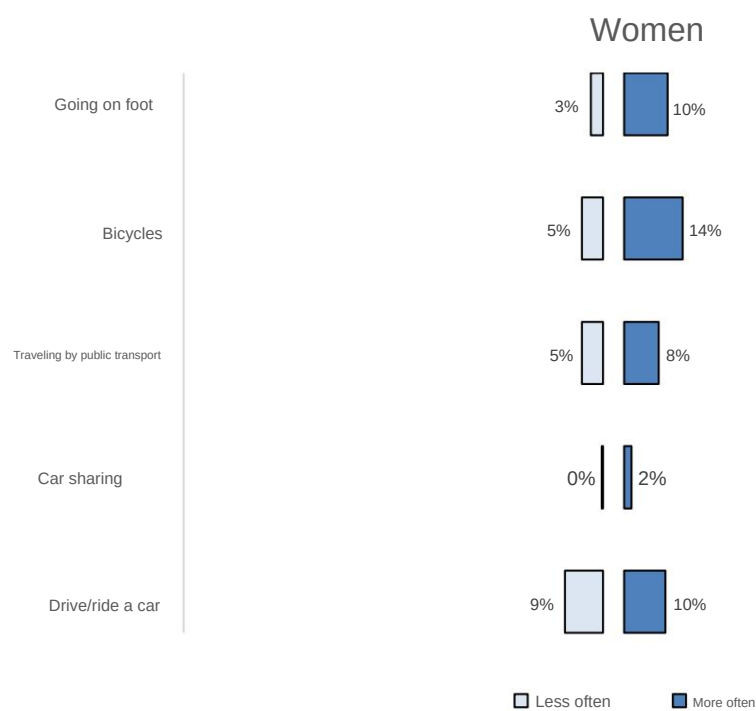
* N=148 people have answered for the age group 16-24 years. The estimate for this age group contains the greatest uncertainty.

To a greater extent than men, women have stated that they have changed their main mode of travel in the last three years. The percentage of women who now travel more often by car is actually about as large as that percentage of women who reduced their car journeys. For men, on the other hand, it is a larger proportion than in recent years over the years reduced their traveling by car.

The vast majority of respondents answered that they had not changed their traveling habits in the last three years.

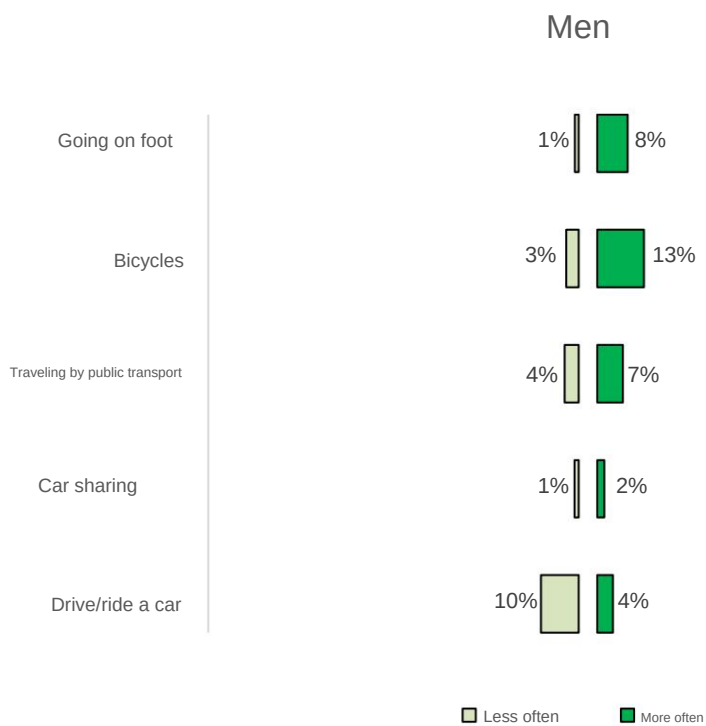
The result in figures 11.2 and 11.3 thus has a relatively low number of respondents. The results should be interpreted with caution.

Figure 11-2 Change in main mode of travel for women, shares



* Number of respondents, men N=132. Several answer options were possible.

Figure 11-3 Change in main mode of travel for men, shares

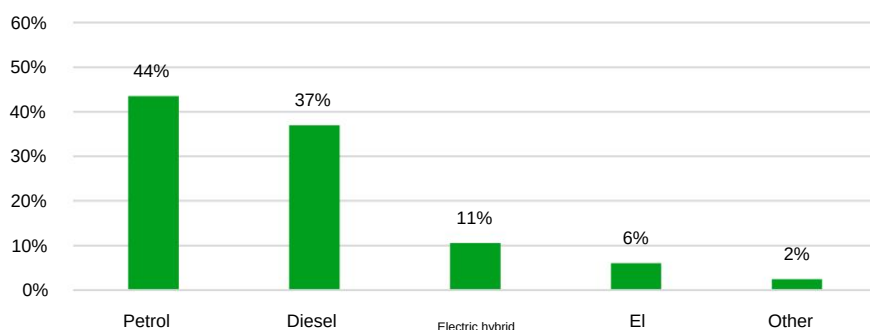


* Number of respondents N=284. Several answer options were possible.

12. Fuel

Figure 12.1 shows the distribution of different fuels in the car that municipal residents drive or ride in the most. "Other" includes, among other things, ethanol and gas. Most people indicate that they usually drive/ride in a petrol-powered car, but an almost equal percentage indicate that they use a diesel car. In total, 17 percent state that the car they most often drive/ride in is an electric car or electric hybrid.

Figure 12-1 Distribution of cars with different fuels that municipal residents drive, shares

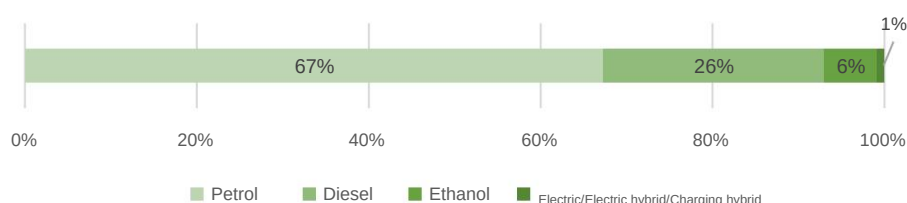


Among those who mostly use electric cars or electric hybrids, 48% are men and 52% are women. Regarding the use of electric cars and electric hybrids, no clear pattern emerges linked to educational background or the location of the home (urban/rural).

It is 10% of all passenger cars in Sweden that are rechargeable in May 2023. The county of Västerbotten is well placed in terms of the number of electric cars compared to many other parts of Norrland, but in a national comparison it is difficult to compete with more densely populated regions in Sweden.¹

The previous travel habits survey was done in 2014 in Umeå municipality. In the previous survey, the question of fuel was not asked as in 2022, and below is therefore presented data produced by 2 Since 2014, Traffic there has been a major change regarding the proportion of electric cars and electric hybrids. analysis. In 2014, these accounted for only 1 percent of Umeå's registered passenger cars, while the share of electric cars and electric hybrids is a total of 17 percent in the travel habits survey 2022. However, the 2022 survey did not show fuel for all registered cars, but the fuel that residents use in the car they drive or ride in the most. According to statistics from Trafikanalys, electric cars, plug-in hybrids and electric hybrids made up approximately 11 percent of all passenger cars in 2022.³

Figure 12-2 Distribution of cars with different fuels in 2014, shares



*Data taken from Trafikanalys which is not directly comparable to figure 12.1

¹ Power Circle. 2023. *Electric car statistics*. <https://www.elbilsstatistik.se> (Retrieved 2023-06-21)

² Traffic analysis. 2014. [Vehicles on the road \(trafa.se\)](https://Vehicles on the road (trafa.se)) (Retrieved 2023-06-29)

³ Traffic analysis 2022. [Vehicles on the road \(trafa.se\)](https://Vehicles on the road (trafa.se)) (Retrieved 2023-06-29)

13. About the Travel Habits Survey 2022

13.1 Method

In the past, travel habits have been mapped using the traditional method of paper surveys in Umeå municipality, at the latest in 2014. However, the travel habits survey in 2022 has been carried out using a mobile application. There are advantages and disadvantages to different method choices. The biggest disadvantage of the mobile application is that there has been a low response rate. There were 2,049 participants in the survey who approved at least one measurement day, which corresponds to a response rate of 6.8 percent. The advantage of collecting with a mobile application is that significantly more details about the trips can be collected, for example travel routes. More travel data is collected and journey lengths become more accurate. It is difficult to compare the results of the travel habits surveys conducted in 2014 and 2022 because the method is not the same.

13.2 Selection

An invitation letter to participate in the travel habits survey was sent home to 30,000 residents of Umeå municipality. The selection was made from the Municipal Resident Register (KIR). Selected people were aged 16-84 years. In order to draw conclusions from the sample, it is important to obtain a good representativeness of the population. A stratified random sample was used with stratum for sex, age and geographical area. After the data collection, weighting of the data has also been done so that the estimates produced can represent the population as a whole.

13.3 Dispatch and measurement week

Travel during the year varies, above all cycling travel varies. During April and October, cycling is like an average over the year. The survey ran from 29 September to 23 October 2022.

13.4 More about the travel habits survey

For more information about the results, method and approach for the travel habits survey, see the report in its entirety. [Travel habits in Umeå, how we traveled in the municipality in autumn 2022.pdf \(umea.se\)](#)

Appendix 1 Case categories

In order to create an easier overview of the cases that are carried out, several case categories have been merged into a larger overall category. The merged categories have been aggregated as below.

🍷 **Work:** Work, Service matters, School/education

🍷 **Pick up/drop off:** Pick up/drop off child, Pick up/drop off other

🍷 **Purchase:** Purchase of daily goods, Purchase of other goods, Pick up/drop off goods

🍷 **Leisure time:** Health of family/friends, Exercise and outdoor life, Restaurant/café, Entertainment and culture

🍷 **Service:** Healthcare, Other service matter

🍷 **Other:** Other activity, Don't want to state

Appendix 2 Areas that count as rural areas in the 2022 travel habits survey, NYKO

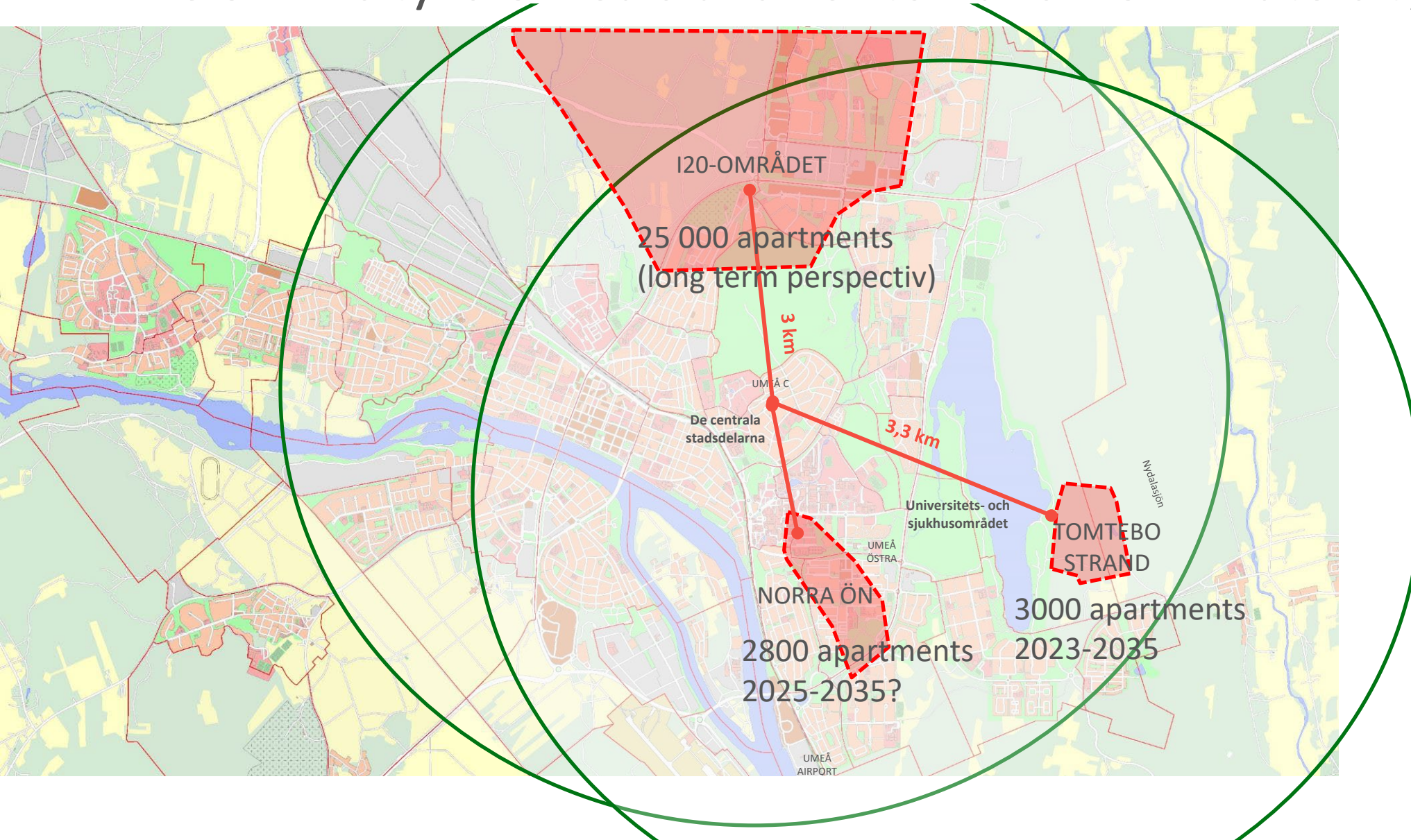
Nyko6 Area	71407 The countryside south of Umeå
92307 Böleäng, Röbbäck	71519 The countryside south of Umeå
92320 Böleäng, Röbbäck	71520 The countryside south of Umeå
92322 Böleäng, Röbbäck	102401 The countryside south of Umeå
164402 Hörnefors and the surrounding area of Hörnefors	102402 The countryside south of Umeå
164403 Hörnefors and the surrounding area of Hörnefors	102403 The countryside south of Umeå
164506 Hörnefors and surrounding area of Hörnefors	102404 The countryside south of Umeå
164607 Hörnefors and the surrounding area of Hörnefors	102405 The countryside south of Umeå
164608 Hörnefors and the surrounding area of Hörnefors	102406 The countryside south of Umeå
50809 The countryside north of Umeå	102407 The countryside south of Umeå
71401 The countryside north of Umeå	102408 The countryside south of Umeå
71402 The countryside north of Umeå	102411 The countryside south of Umeå
71403 The countryside north of Umeå	102412 The countryside south of Umeå
71404 The countryside north of Umeå	102413 The countryside south of Umeå
71405 The countryside north of Umeå	102414 The countryside south of Umeå
71408 The countryside north of Umeå	102609 The countryside south of Umeå
71412 The countryside north of Umeå	102610 The countryside south of Umeå
71413 The countryside north of Umeå	102615 The countryside south of Umeå
71514 The countryside north of Umeå	102616 The countryside south of Umeå
71515 The countryside north of Umeå	102617 The countryside south of Umeå
71516 The countryside north of Umeå	102618 The countryside south of Umeå
71517 The countryside north of Umeå	102619 The countryside south of Umeå
71518 The countryside north of Umeå	102620 The countryside south of Umeå
71521 The countryside north of Umeå	154109 The countryside south of Umeå
81701 The countryside north of Umeå	164404 The countryside south of Umeå
81702 The countryside north of Umeå	164605 The countryside south of Umeå
81703 The countryside north of Umeå	174911 Sävar and Sävar's surroundings
81704 The countryside north of Umeå	174914 Sävar and Sävar's surroundings
81708 The countryside north of Umeå	154010 Täfteå/Inner board/Outer board with surrounding area
81806 The countryside north of Umeå	154013 Täfteå/Inner board/Outer board with surrounding area
81807 The countryside north of Umeå	174606 Täfteå/Inner panel/Outer panel with surrounds
81809 The countryside north of Umeå	174912 Täfteå/Inner board/Outer board with surrounds
81810 The countryside north of Umeå	193505 Täfteå/Inner board/Outer board with surrounding area
81811 The countryside north of Umeå	193506 Täfteå/Inner board/Outer board with surrounding area
81812 The countryside north of Umeå	193507 Täfteå/Inner plate/Outer plate with surrounding area
174601 The countryside north of Umeå	193610 Täfteå/Inner plate/Outer plate with surrounding area
174602 The countryside north of Umeå	193611 Täfteå/Inner plate/Outer plate with surrounding area
174603 The countryside north of Umeå	193612 Täfteå/Inner plate/Outer plate with surrounding area
174604 The countryside north of Umeå	193613 Täfteå/Inner plate/Outer plate with surrounding area
174907 The countryside north of Umeå	92110 Västteg, Östteg
174908 The countryside north of Umeå	
174909 The countryside north of Umeå	
174910 The countryside north of Umeå	
174915 The countryside north of Umeå	
184901 The countryside north of Umeå	
71406 The countryside south of Umeå	

Gender equality and mobility

Gender equality and mobility

Umeå plans for population growth in sustainable locations

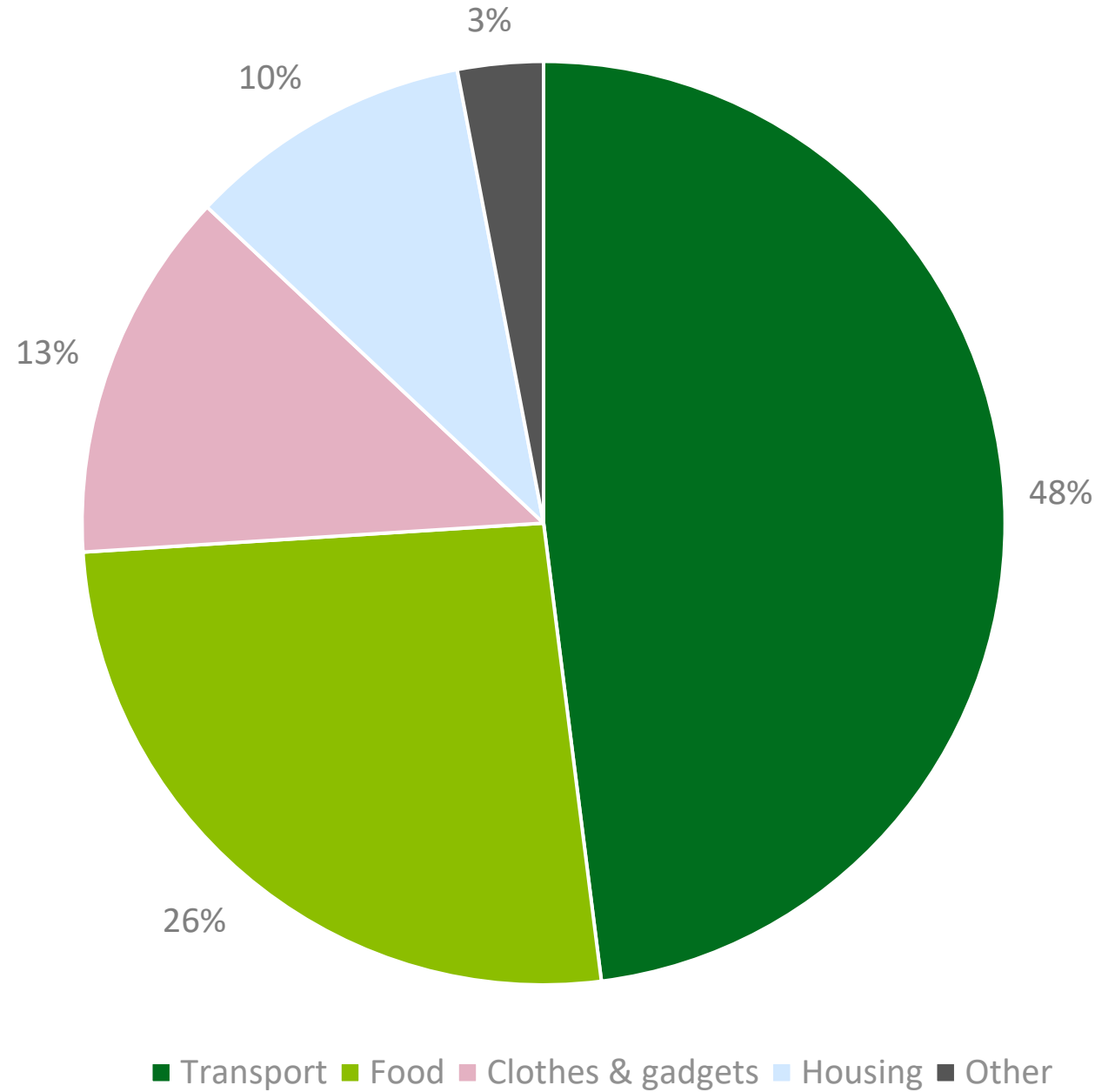
The 5 km city is Umeå's answer to Paris' 15 minute city



Half of the local carbon foot print come from transports

Consumer habit survey

www.umea.se/konsumtionsvanor



Not respond to specific needs but *contribute to a more gender equal society*

Who do we
talk to?

Who is
made
visible?

How do we
travel?

Who is
responsible
for unpaid
care work?

Who
commutes?
Today?
Tomorrow?

For whom
do we plan?

The working methods, the implementation and the
results of the transport politics

Security in
physical
places

Expectations,
attitudes,
experiences

Whose labour
market?

Travel habit survey and gender equality - planning mobility and infrastructure

Our most recent data from October 2022 shows that the share of car travel for men in the municipality is 45%, whereas it is only 34% for women. Given that mobility generates almost half of the total emissions from private households in Umeå, this is a key area to work on. What this data tells us is that if men would travel like women, the car travel would go down six points from 40% (overall average) to 34%.

66% women's travels sustainable (bus, bike, walking)

55% men's travels sustainable (bus, bike, walking)

(2022)

Ignites the question: Is it (from a sustainability standpoint – reducing emissions) more effective to electrify the buses *or* to get more men to take the bus?



Travel habit survey via TravelVu app

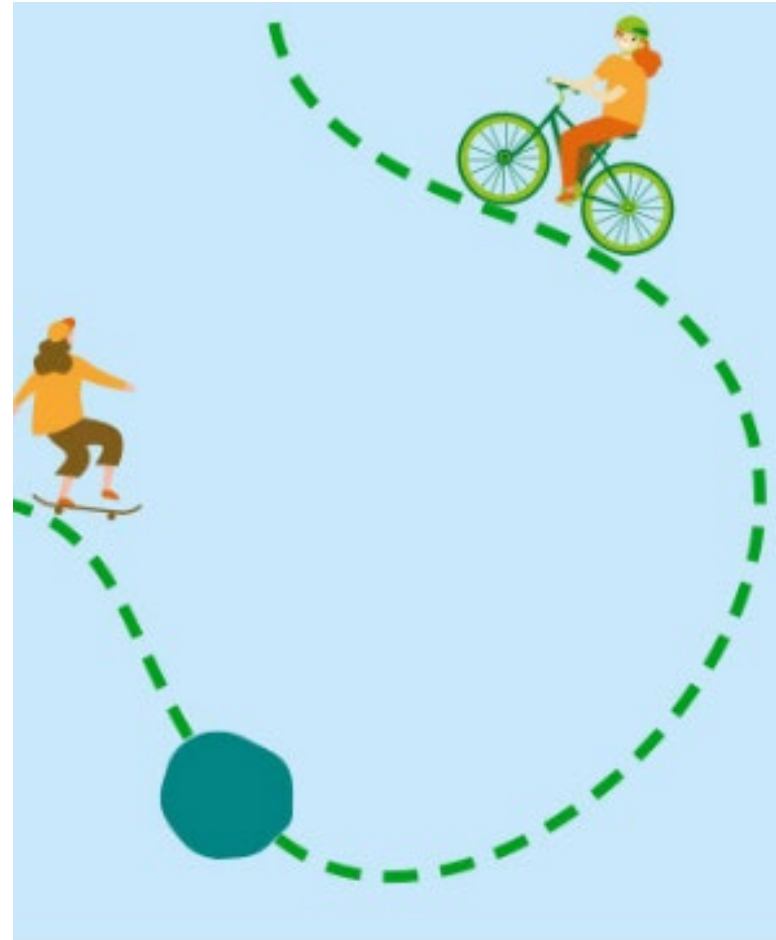
➤ 32 000 days measured - 141 200 trips (all respondents)

Definition of trip:

- Moving from one place to another to make an errand (work, study, shop etc.)
- Multiple modes of transportation can be included in one trip
- Exercise/ walking the dog not included
- All trips the inhabitants make

Number of travels — weekly average

- **4,3** travels per person per day
- Women do **4,1** travels
- Men do **4,5** travels



Travel time weekdays/weekends

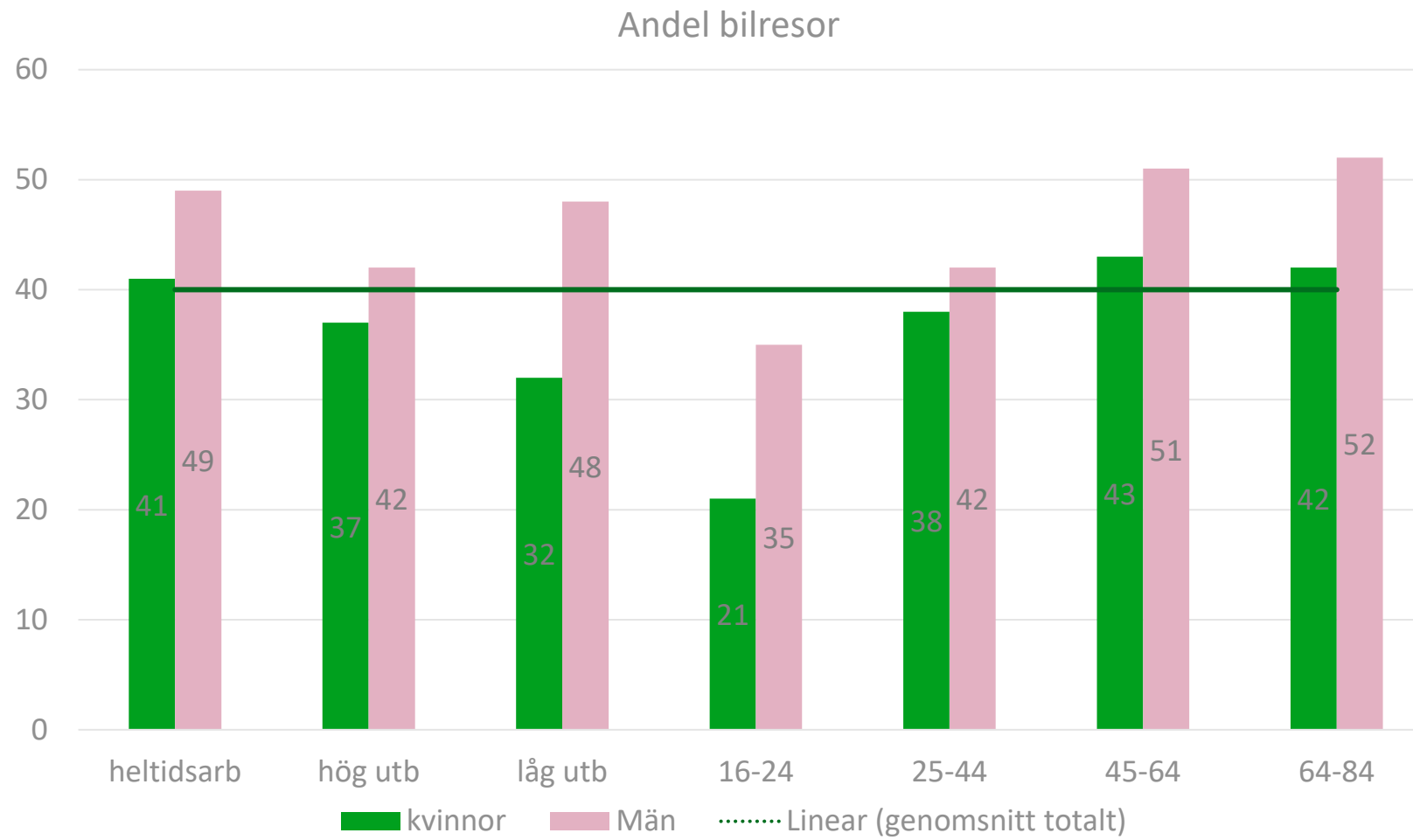
Weekday

- **83 minutes** per person/day
- Women **77 minutes**, men **90 minutes**
- Urban areas **80 minutes**
- Rural areas **101 minutes**

Weekend

- **72 minuter** per person/day
- Women **71 minuter** men **75 minuter**.
- Urban areas **72 minutes**
- Rural areas **73 minutes**

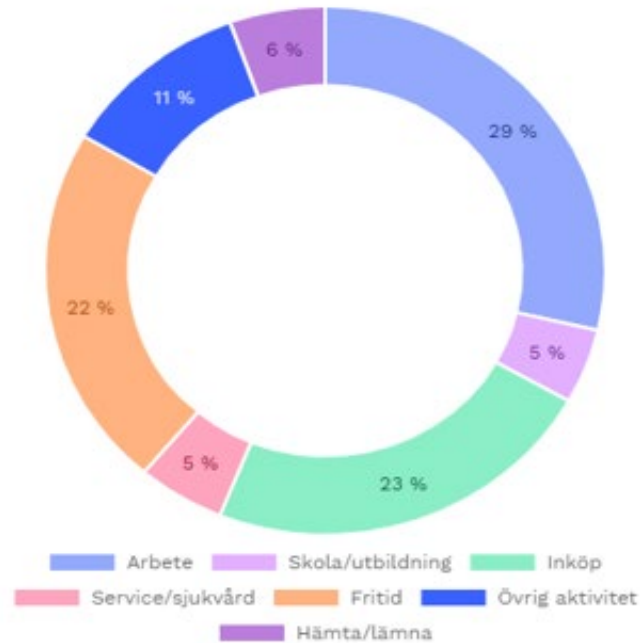
Trips by car – women and men/age/level of education



Reason for trips – men and women

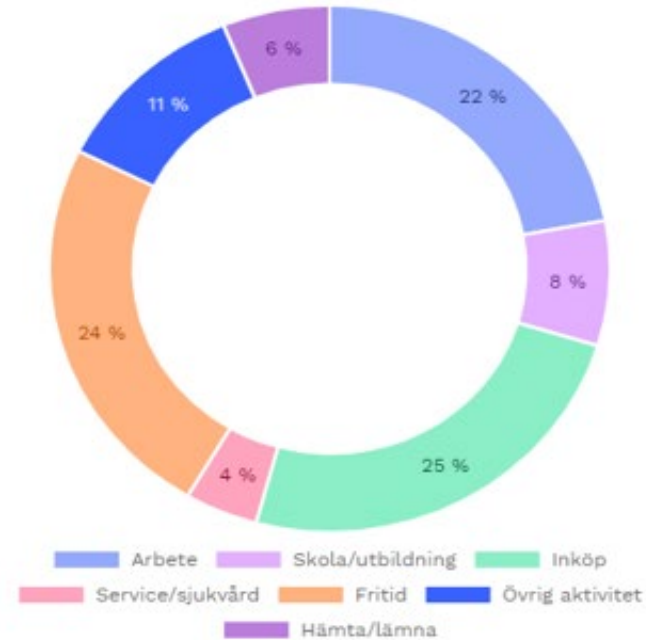
Men

Fördelning av aktiviteter (baserat på antal resor)



Women

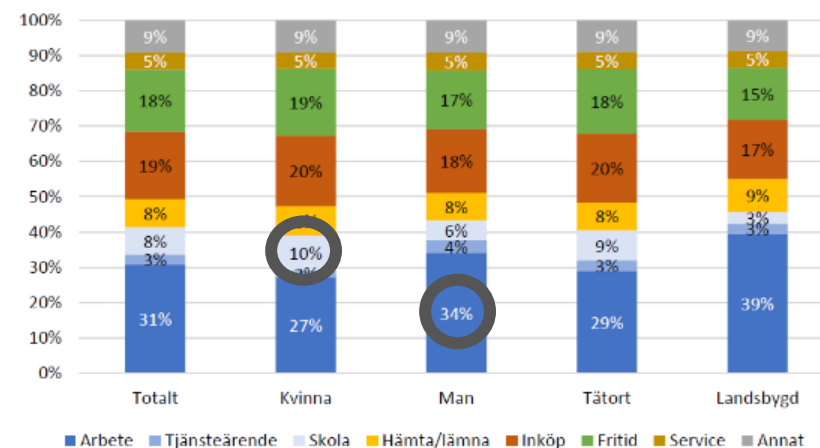
Fördelning av aktiviteter (baserat på antal resor)



Ärendefördelning vardag och helgdag

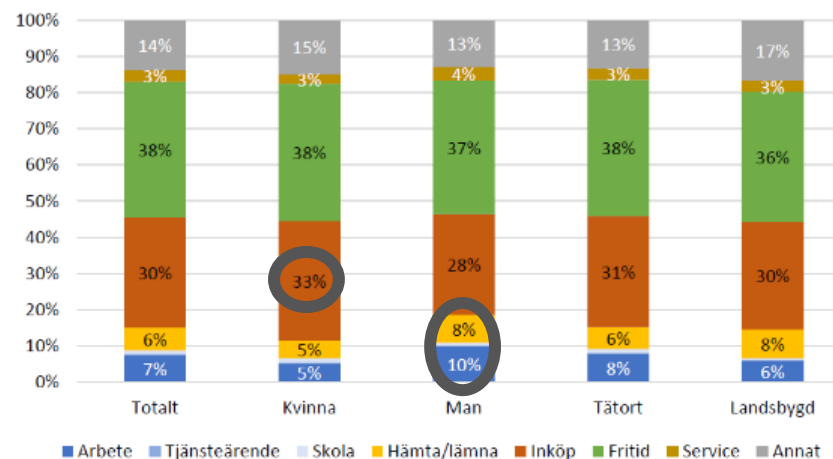
Vardagar

- Männen har större andel resor till arbete än kvinnorna som i stället har större andel resor till skola/utbildning och också något större andel inköpsresor.
- De som bor på landsbygden har betydligt större andel resor till arbete. De som bor i tätort har i stället större andel resor till skola, inköp och fritid.



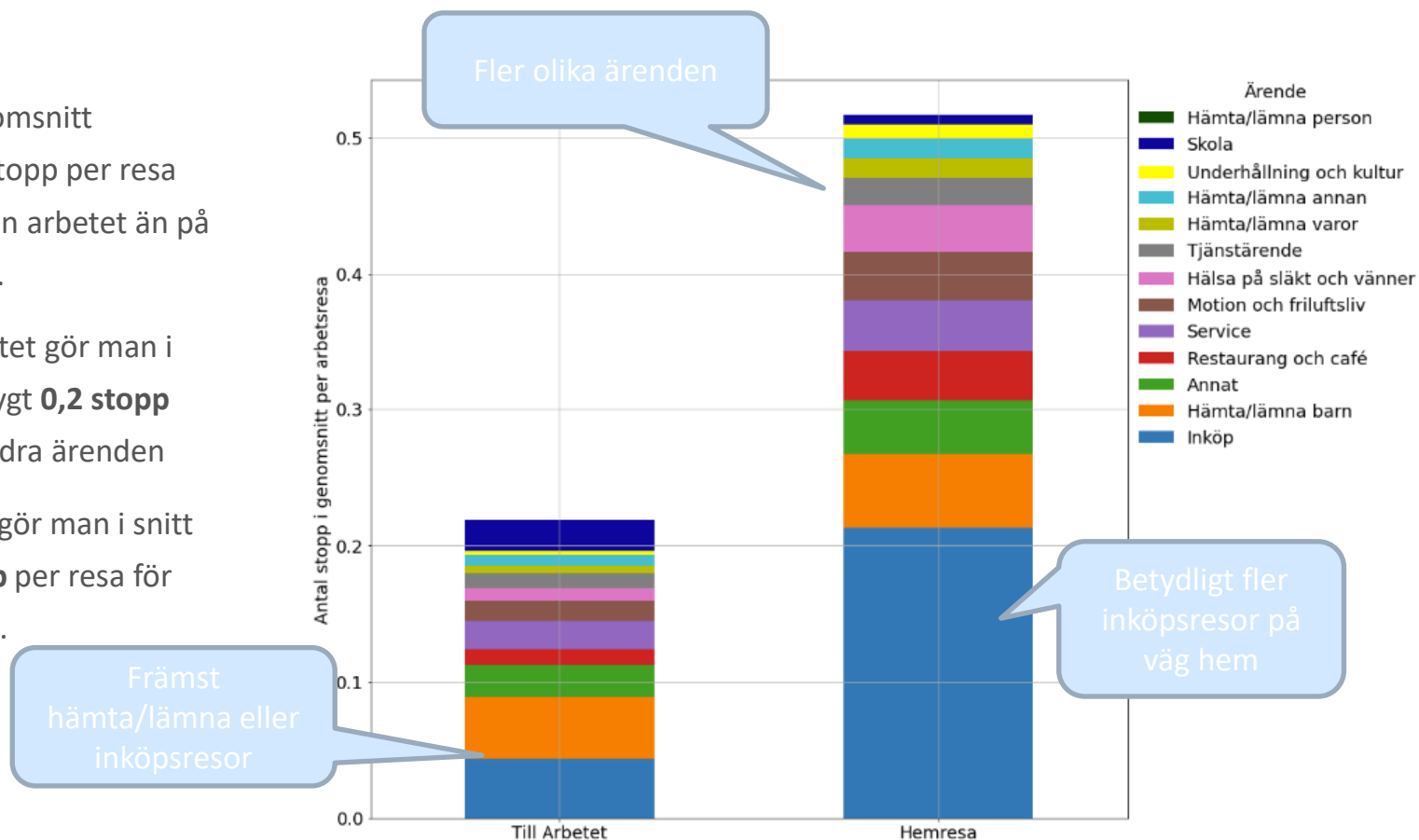
Helgdagar

- ▶ Även på helgen har kvinnorna större andel inköpsresor och männen en större andel resor till arbete. På helgen har dock männen också en större andel resor för att hämta/lämna.
- ▶ På helgen är ärendefördelningen relativt lika för de som bor i tätort och de som bor på landsbygd

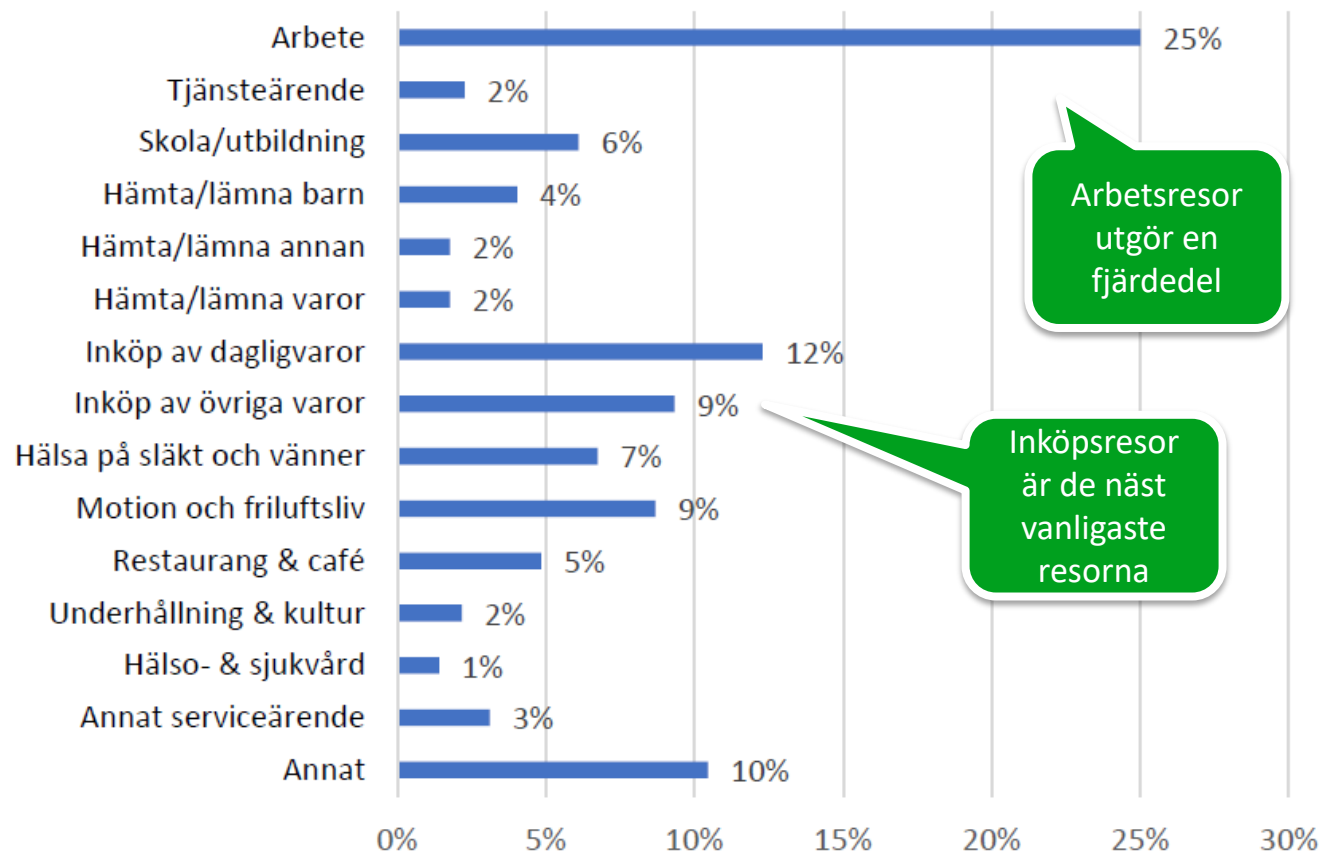


Antal stopp på vägen till/från arbete

- Man gör i genomsnitt betydligt fler stopp per resa på väg hem från arbetet än på väg till arbetet.
- På väg till arbetet gör man i genomsnitt drygt **0,2 stopp** per resa för andra ärenden
- På vägen hem gör man i snitt drygt **0,5 stopp** per resa för andra ärenden.



Reasons for travel/trips



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July 2025

National Federation of the Blind Ref No. AI015

Submission to the London Transport Assembly Scrutiny Investigating Accessibility and Inclusion in Transport Planning

on behalf of the

National Federation of the Blind of the UK

[image redacted for publication] The photo shows [personal information redacted for publication] waiting at a shared use bus boarder bus stop, standing on the pavement with his white cane. A cargo bike is being ridden on the pavement behind him and the shop frontages. Another cyclist is on the pavement riding towards him a wheelchair user boarding the bus using the ramp who is in the cycle lane. The pavement and cycle are all level surface.

Sarah Gayton, BSc (Hons), MSc, PG Cert.
Street Access Campaign Coordinator
National Federation of the Blind of the UK
Reg. Charity No. 236629 (England & Wales) SC 040134 (Scotland)
Sir John Wilson House
215 Kirkgate
WAKEFIELD
West Yorkshire
WF1 1JG
30 October 2024

About us

The National Federation of the Blind of the UK is a national membership organisation of blind, deaf blind and partially sighted people working and campaigning on behalf of others in the UK with similar difficulties.

Question 1

How is TfL's Equity in Motion plan being implemented, and what will it achieve if it is successful? Is there anything that Equity in Motion does not adequately cover, and if so, what steps should TfL take to rectify this?

With regards to the Equity in Motion concept, the NFBUK were not invited to its launch which is disappointing given other Disabled Peoples Organisations were invited. We feel we were not invited because the organisers of the event did not want feedback or engagement that would not align with some of TfL's key transport policies, including the continued roll out of floating bus stops and funding of shared use bus boarders in cycle lanes as well as allowing dockless e-bikes to operate in the city. The plan fails at the first hurdle and demonstrates that it will not

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deliver on the words in its title when it excludes those very organisations with valid concerns over its work.

Using words without understanding what they mean and doing the opposite, clearly exposes the weaknesses in this policy. It ignores key issues which are inherently discriminatory against the access needs of blind, deaf-blind and visually impaired people, whose motion is being inhibited due to TfL's own design standards at bus stops. A further example is the lack of urgent action to insist that dockless e-bikes are docked off the pavement like the Santander bikes.

Question 2

What are the main barriers to accessible and inclusive travel on London's transport network, including public transport, walking and cycling, and what is TfL doing to overcome these?

Pre-amble

The people we represent cannot drive or cycle independently, they walk in their local area to services, shops, visiting friends and for recreation using mobility aids which include long white canes and Guide Dogs. They are able to walk to local stations and their bus stops to travel beyond their local area independently. Many older people may well have become blind later in life or have deteriorating eyesight.

Getting around for blind people is not a trivial matter. They must have extensive training to be able to have guide dog assistance or use a white cane. To travel independently, as many want to continue to do, takes a lot of concentration and effort to keep themselves safe and their Guide Dogs safe.

At present [personal information redacted for publication] can travel on his own to Stamford Brook station, be assisted by Underground and now DLR staff to the train and on to City Hall, where he can be met at Royal Victoria station to attend a meeting with London Assembly members. However, since the introduction of the floating bus stops on Chiswick High Road [personal information redacted for publication] can no longer travel to his local M&S without overriding his old bus stop, travelling to Turnham Green, a conventional stop and walking back. Others are replacing independent journeys with taxi trips they can't afford, paid for assistance, interminable hospital transport, having to appeal to random strangers or simply not travelling. One of our colleagues moved out of London. This is unacceptable!

NFBUK recognises that TfL has been a leader in access for disabled people for decades.

Blind, deafblind and partially sighted people have benefitted enormously from the help they receive from well trained staff of both London Underground and London Overground. They are provided with an almost seamless assistance from any station in London to any other station on a turn up and go basis. They are treated with politeness and dignity with only a few exceptions. There is, however, a need to review the training of staff in respect to the access needs of blind, deafblind and partially sighted people as issues are starting to emerge on some journeys, which need to be investigated.

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London's bus services are used by blind people. Blind people are trained to stand at the bus stop flag and the bus driver will pull up next to it to allow the blind person to communicate with the driver and board the bus.

Our overriding concern, is we want to see a reversal of the policy of routing cycle lanes through and around bus stops. The so-called 'floating bus stops' (photo 1) and 'bus stop boarders' (photo 2). Blind, deafblind and partially sighted people cannot see or hear cycles at these stops, they are fearful that cycles will not stop for them and the designs take them away from the safety of the pavement. Buses are a lifeline for them and they are being increasingly excluded from using London's bus services. The loss of amenity at these bus stops for blind people means that they cannot now independently access the bus from stops which were once accessible. We present our evidence below.

[image redacted for publication] Photo 1: Floating bus stop at Westminster Bridge showing cyclist riding past blind lady holding her white cane and a lady giving sighted assistance at zebra crossing opposite St Thomas' Hospital.

[image redacted for publication] Photo 2: A shared use bus boarder in Walthamstow, with the bus doors open and a passenger waiting to cross the cycle lane as a person rides past on an electric skateboard, with two bikes riding ahead of the skateboarder.

Whilst we focus on floating bus stops in this submission, as this is the most egregious problem, it should be noted that the general introduction of cycle lanes and tracks onto and through the pavement, particularly at junctions has made getting around for blind people terrifying, confusing and at times near impossible. The same chaos and fear of crossing cycle lanes used by fast moving cycles that cannot be heard nor seen now prevails where pavements were generally free of cycles. For example on Lea Bridge Road in Hackney, the entire pavement has been removed for a so-called 'backless floating bus stop', and all pedestrians must now navigate via the crossing and bus stop island, as shown on this [NFBUK video](#). The same has happened close to Kew Bridge, where the pavement has been removed and a cycle lane built behind the bus stop, shown in this [NFBUK video](#). At Lea Bridge Roundabout cycle lanes have been routed through the pavement and have caused the area to become unsafe and unusable for blind and visually impaired people as explained in this [short video](#).

[image redacted for publication] Photo 3 shows a backless / pavementless bus stop bypass. [personal information redacted for publication] is standing next to the bus stop pole holding his white cane & a sign which reads 'This is a bus stop not a cycle lane'. There is a red double decker bus pulled up to the kerb. The cycle lane has replaced the pavement at the back of the bus stop, which is separated by a low up stand.

We are supported in our concerns by over 290 other groups across the UK, representing many blind, deaf-blind, partially sighted people, older and disabled people. Those groups and our petition are attached. The petition has been submitted twice to the Mayor of London, the first on the 2nd November 2022 and the second time on the 15th March 2024 it reads:

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- Direct access to and from the pavement to board and alight from the bus is protected for all bus passengers.
- No more floating bus stop or Copenhagen style bus stop / cycle track at bus border to be constructed in London.
- For all active travel schemes / street redesigns in planning process to be redesigned to ensure direct access from the pavement to the bus is protected.
- References to using floating bus stops (bus stop bypasses) and Copenhagen style bus stops / cycle track at bus borders be removed from all Guidance produced by Transport for London (a similar request has been made to the Prime Minister to do the same for the Department for Transport, and by devolved parliaments in Scotland, Wales and Northern Ireland).
- For all temporary floating bus stops and Copenhagen style bus stops / cycle track at bus borders added during COVID to be immediately removed to ensure direct access to and from the pavement for all bus passengers is restored.
- For all bus stops that have been changed to accommodate cycle lanes to be changed back to ensure direct access to and from the bus stop for all bus passengers.

TfL and other local highway authorities are now citing ‘national guidance’, [Local Transport Note 1/20](#) in support of their designs. However, this note was published during the Covid pandemic without any consultation. We have met the DfT together with Active Travel England. Both accept this is a serious issue and they have known about it for a long time but seemingly will do nothing to address it.

TfL buses have introduced messages on their buses warning people of these stops and that it is passengers who must take care! Blind people cannot see nor hear cycles! This also does not help navigate the confusion and disorientation of the bus island, which blind people find themselves stepping onto from wherever the bus drops them on the island or behind it onto the road in the case of multiple queuing buses. This [short film](#) illustrates a warning being given when bus passengers are expected to get off a bus directly into a bike lane. These messages do nothing to ensure the safety or accessibility of floating bus stops or [shared use bus borders for blind people](#).

We are aware of a technical trial for this problem, which supposedly will warn of gaps in the flow of cyclists. It was explained early on in this work to Transport for Greater Manchester that this was not a universal design and was not a solution for blind people but these concerns were ignored. Adding another button and crossing phase at bus stops is not acceptable and adds to the regular confusion and chaos that happens at bus stops for bus passengers. It is inconceivable that a system could be made to work in all circumstances to give blind people the confidence a cyclist or riders of e-micro-mobility travelling at high speeds won't appear as they cross a cycle track. This system gives priority to cyclists and is totally opposite to the road hierarchy now in place in the Highway Code.

TfL regularly quote their work with groups of blind and older persons at workshops and stakeholders meetings, often associated with the TRL commissioned work in 2016. They don't say that most of the groups representing blind and older people objected and continue to object to these bus stops and feel ignored.

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We have met with Seb Dance recently. We got into a circular discussion. Our blind members described how they could not use these stops and he accepted what they were saying, but somehow wanted them to help him design a useable bus stop with a bike lane running through it. This caused a significant amount of distress to our colleagues. We asked him how does a blind person use these stops and then he asked the very blind people who told him they could not use them, to tell him how they could use them. He referred to their concerns raised to these questions as passion, which infuriated them and appeared to show a total lack of understanding of this issue on his part and a unwillingness to accept these designs simply do not work for blind people. We again told him and his colleagues of the principles of 'universal design' and our need to alight and board directly to and from the pavement. This ensures a blind person can get on and off a bus direct from and to the pavement, without having to worry about people riding bikes and e-micro-mobility getting in their way and the confusion of trying to navigate getting off the island.

We have asked TfL in meetings how many accessibility officers they employ, and they could not answer us, as we fear it is none. Which we understand was not the case in the past. It is unthinkable that such an organisation like TfL does not employ fully qualified access officers as part of their work.

It is widely known that there are differing degrees of people who are partially sighted and those who are blind. This can lead to disbelief in what is being said by blind people. We believe this is the case here and refer you to an academic paper* discussing '[Professionals' Implicit Attitudes about the Competence of People Who are Blind](#)'. We would respectfully ask Assembly members to meet with our members and take a little time to understand them, how they get around and their concerns.

Rental e-bikes and e-scooters

There is also a serious issue of the pavements in London been overrun with dockless rental e-bikes and e-scooters. These have created pavements which are like minefields and have led to blind and visually impaired people being injured due to falling over them on the pavements. This [short video](#) explains the dangers of the rental e-bikes.

Many of the accessible features that blind, deafblind and partially sighted people use to independently navigate London, like kerbs, the building line, the pavement, tactile paving, bus stops etc have been disrupted due to the presence of the rented e-bikes and e-scooters.

We are aware of blind people who have tripped and been injured while out walking the streets, and close to where they live, with one who had to have stitches in his head and another who has tripped 5 to 6 times.

We could provide pages and pages of evidence of these problems, but we believe that the London Assembly already know of this problem and the dangers associated with them. We can however supply further evidence on the request of the assembly if needed.

There is an urgent need to remove the e-bikes and to ensure lockable docking stations off the pavement are installed before they are returned so the bikes cannot be moved or fall over therefore removing the trip hazards associated with them.

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The rental e-scooter trial should be halted with immediate effect as recommended in our follow up evidence to the Transport Select Committee submitted 13th March 2023 given in this [link on the Committees website](#). Evidence

In September 2013 TfL installed the first cycle superhighway style floating bus stop at Bow Roundabout. In parallel to this they undertook [an off-road trial of a floating bus stop](#). That trial reported in December 2014 and stated:

“There was a general feeling of being wary of using the bus stop bypass facility. Also, the majority of blind and partially sighted participants stated that they would be deterred from using buses on routes where there were bus stops with a cycle bypass track.”

There is evidence from [TfL commissioned research](#) that the majority of cycles do not slow down, let alone stop for bus passengers at floating bus stops with or without a Zebra crossing, with or without a Belisha beacon.

The same research found that cycles travel through these floating bus stops at an average of 14mph without slowing. Some travel at 20mph.

There is evidence from [TfL commissioned research](#) that blind people would be deterred by the introduction of floating bus stops:

Whilst some of the issues faced were reported with all groups, the most impacted group were those people who are blind or partially sighted who reported difficulties in understanding the layout or not being able to instruct their assistance dog.

There is evidence from the [consultation undertaken by TfL prior to publishing their Accessible Bus Stop Design Guidance](#) of objection and concern from Transport for All, AgeUK London and London TravelWatch, London’s statutory transport watchdog.

The published version of [TfL’s Accessible Bus Stop Design Guidance](#) describes the importance of consistency in design of bus stops. As anyone can see there is no consistency, with dozens of variants already on the network. This means that even if one were to risk crossing a cycle lane as a blind person, one would not know what to expect at the destination. The whole networks would become a no-go area for blind, deaf-blind and partially sighted people. It should be noted that ‘bus stop boarders’ never appeared in TfL guidance, nor on their roads, although they are funded by them! Also the concept of consistency in the context of floating bus stops and bus stop bypasses will not resolve the inherent design flaws these designs exhibit.

There is evidence from our members and others own experience that they can no longer catch their bus or travel to their destination because of the introduction of floating bus stops. The introduction of floating bus stops has been life changing for these blind people who can no longer travel independently as they used to.

Firstly a longer note from [personal information redacted for publication] and shorter précis from some others.

“I have been living in Hammersmith, on the borders with Shepherds Bush and Chiswick since 1987. I am totally blind and use a long cane as a mobility aid. As I prefer doing my shopping away from closed in shopping centres I have been doing my food shopping

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in Chiswick throughout this period. In recent years I have favoured the Marks & Spencer food store because of their good customer service for vision impaired people. To get there I would travel to a bus-stop near Dukes Road. This was until just over three years ago when a bus-stop bypass was installed. On my first journey to that bus-stop I was warned against it by an elderly passenger. Realising the unpredictability of these features, due to having to listen for the movement of cyclists, which is largely impossible due to their silent nature. I quickly realised that in order to visit M & S I would have to go on one stop further to the Turnham Green Church stop, which is of the traditional design, giving direct access to and from the pavement, alight there and walk back. This can be inconvenient, especially if it is raining. More important, however, is the fact that my freedom of movement and human rights have been affected by this installation. On one occasion I did try to use the stop at Dukes Road and crossed at what I thought was the zebra crossing leading me on to the pavement. It wasn't, however, and I ended up going down a nearby side road and could have been hit by a cyclist. This was an alarming situation. There must have been more than one bus at the stop and so when I turned left I was already some yards away from the crossing and therefore in a dangerous situation. I don't wish to repeat this experience!"

[personal information redacted for publication] is a retired NHS ward assistant. She has been blind for 34 years and uses a long white cane. She was a regular bus passenger living in Tooting.

Before the bus stop bypass was installed, she would be able to travel independently from her home to Guy's and St Thomas' hospital for the glaucoma clinic. She would also enjoy catching the bus to the knitting shop on Balham High Road. She can now no longer do these journeys independently.

Now [personal information redacted for publication] must get hospital transport. The outward journey is OK, but to return means very long waits to get a trip home. Sometimes taking a whole day. She can no longer visit the knitting shop at her own convenience, but must now be accompanied.

[personal information redacted for publication] has tried to get her concerns heard by the Mayor of London, questioning him at the Mayors question time on the 2 November 2022 and the Mayor promised to meet with her after being asked if he would in a BBC Radio London interview which he agreed to but failed to set any date. This follow up [interview with Eddie Nester](#) on BBC London replays the moment the Major agreed to meet with [personal information redacted for publication] and NFBUK.

[personal information redacted for publication] is totally blind, but a very experienced long cane user, and has travelled by bus in London for more than half her life. However, it is too dangerous to cross a one or two-way cycle lane between the pavement and an island bus-stop, as the traffic noise is directly ahead, masking the quieter bikes. Therefore, if crossing to the bus-stop, she must ask for assistance from the public.

[personal information redacted for publication] can't use any of the bus-stops along the Blackfriars Road going north including Blackfriars Bridge as the 2-way bike

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superhighway is located here. She used to interchange from Southwark Tube to travel by bus to Blackfriars Bridge which is no longer possible.

“All the bike-lanes that I know about on main streets are under-used in off peak times, but a visually impaired traveller, is never completely sure about this, so has to still enlist help”.

[personal information redacted for publication] is 44 and Lives in Hammersmith. She has been blind for 15 years. In that time she has had two guide dogs, Fred, just for the past 3 months. [personal information redacted for publication] has also used a long white cane when a dog was unavailable.

At present [personal information redacted for publication] is studying in Richmond to be a counsellor and will normally travel alone on the Underground from Stamford Brook station. However, sometimes the Underground fails and she must find another way home. Once this happened and she was directed to use the bus. She was terrified at the prospect of crossing the cycle lane and so sought help from a passerby at 10:30.

[personal information redacted for publication] , says this is too stressful and won't do this again? She knows she would have to pay for a taxi in the future.

[personal information redacted for publication] cannot independently access Chiswick High Road any longer due to the introduction of the floating bus stops. She has to plan her journeys and pay for her Personal Assistant to go with her every time she wants to access the shops and services on this street, which is something she should not have to do. [personal information redacted for publication] should be able to access the shops independently by bus like she did before the floating bus stops were introduced.

[personal information redacted for publication] is 54 . He worked until he was 49 as a carer for a local authority in London. He experienced two heart attacks and a TIA which led to a worsening of already poor eyesight. He is a long cane user and after an initial assessment by Guide Dogs he is now awaiting final approval to get his dog. He is a cat lover and owner but is confident they will get along.

[personal information redacted for publication] was able to travel independently and typically would travel to North Greenwich by bus where the London Underground Limited staff would assist him to the Underground train and then travel onto London. He would meet friends for a beer and browse the record shops. One of his passions.

With the installation of the bike lanes and bus stops, on Woolwich Road, that appeared without notice during the pandemic buses are impossible for [personal information redacted for publication] to use, though retaining some sight, he cannot see nor hear the cycles because of the traffic noise? Following an incident where a cyclist broke his cane, which shattered his confidence, he became a bit of a recluse. He gained weight and would only go out with sighted assistance. He was terrified of the floating bus stops and stopped using them. His ability to independently travel by bus was taken away from him and he moved away from London as the earliest possible time. [personal

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information redacted for publication] life has turned around, he is now walking everyday, lost weight and has a much more positive outlook on life.

[personal information redacted for publication] lives in Colliers Wood. She is 35 and runs her own business. She is registered disabled and holds a freedom pass. She has difficulty walking and uses a mobility aid for balance.

Previously she was a regular bus user catching the 57,131 and 152 from Colliers Wood Underground station to visit friends, shop and generally get around London. Because of her disability she can no longer use the bus stop because of the cycle lane that she regards as too dangerous. This means that despite having a Freedom Pass she cannot use these bus services and now travels by taxi, though the cost of this is high.

[personal information redacted for publication] took part in the consultation that was held in Lockdown, though she believes there would have been very little input from disabled people at that time and TfL are missing out the people who now actively avoid using these stops. [personal information redacted for publication] explained these concerns to TfL at the time.

[personal information redacted for publication] is an 82 year old man who lives in Kennington. He is an albino. Those with this condition often have poor eyesight, said to affect up to 95% of albinos. In 2000 [personal information redacted for publication] was diagnosed with glaucoma and he can now no longer see at all in one eye. His eyesight continues to deteriorate.

Until 2010 [personal information redacted for publication] continued to work as an Independent Financial Advisor able to get around London and beyond to visit clients and to attend seminars, travelling by bus and rail, for example to Maidenhead.

He used the bus to travel to Guy's and St Thomas', but with the installation of the bus stop bypass he can no longer do this. [personal information redacted for publication] must now travel by taxi or use sighted assistance.

The photo below shows [personal information redacted for publication] contributing to TfL's Lea Bridge Roundabout consultation. Subsequently bus stop bypasses were nevertheless installed. The NFBUK were also disgusted and lost for words that this consultation exercise was [written up for publication](#) on 'The Consultation Institute' website to promote how to engage with blind people but none of the concerns raised were acted upon.

[image redacted for publication] Photo 4 shows [personal information redacted for publication] contributing to TfL's Lea Bridge Roundabout consultation. He is using his phone to look at a tactile plan of the proposed Lea Bridge Roundabout scheme in London.

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We are aware of other blind and visually impaired people who have been impacted by these designs who are not using them independently in London. Including visually impaired women not being able to access the gym due to floating bus stops or take their child swimming independently by bus any longer.

There is evidence from our work filming at bus stops from Waltham Forest ([film of the shared use bus boarder](#)); Westminster Bridge (warning shows a collision) ([film of the floating bus stop](#)); Elephant and Castle; Lea Bridge (Hackney) ([film of backless bus stop boarder](#)); Farringdon ([film 2 way cycle lane](#)) and others of the chaos created at floating bus stops. There are all manner of micro-mobility, some legal and some illegal, alongside conventional cycles travelling in two directions, sometimes on one-way tracks, sometimes swerving onto the pavement. With riders going through them at speed, looking at mobile phone screens, shouting at pedestrians or ringing their bells to get out of the way as they ride through.

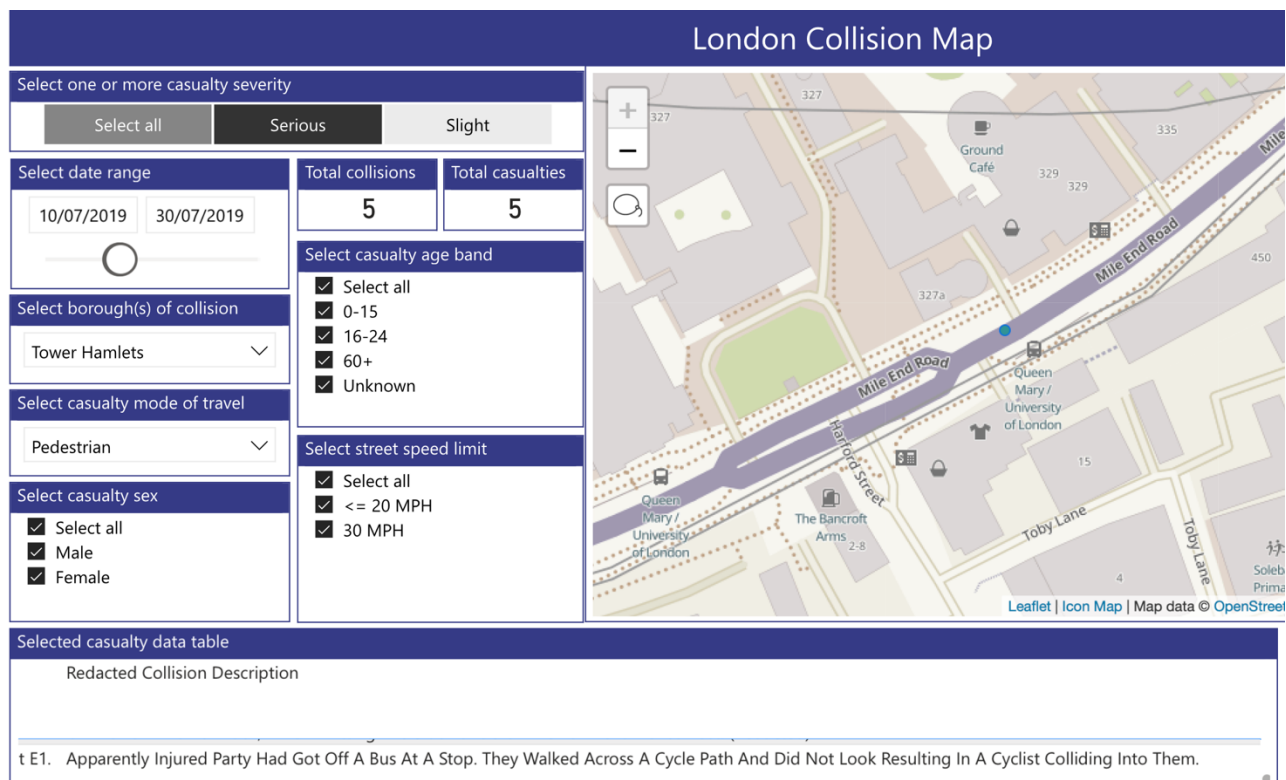
There is TfL evidence of injuries to passengers at floating bus stops reported in the recent [review of bus stop bypass safety](#). TfL initially identified four injuries. That was corrected to six following our intervention with the [Telegraph Newspaper](#). There are also outstanding queries on other potential injuries occurring during this time period which are still to be answered by TfL submitted by NFBUK. TfL have suggested this is a small number compared to the totality of the London road network. However, this is a disingenuous and nonsensical comparison as floating bus stops constitute only a very tiny minority of London's bus stops and road network. It is clear that floating bus stops may well now be a hot spot for pedestrian injuries with cyclists / e-micro-mobility devices. At Balham High Street, bus stop H, the stop [personal information redacted for publication] used to use independently, but no longer can, two pedestrians have been injured. One an 87 year old, the other a 6 year old child.

This study has multiple failings. It must be noted that it is widely accepted and there is under reporting of such injuries where no motor vehicle is involved, particularly where the injuries are less severe. TfL failed to acknowledge this in their report. It should also be noted that they looked at 2020, 2021 and 2022. These were years impacted by Covid with shielding and so times of very low bus patronage, especially of vulnerable people. The NFBUK have submitted queries on a number of potential injuries occurring at floating bus stops that occurred in 2018 and 2019, and we are still awaiting a response from TfL on this. We are however aware that on the 19th July 2019 a serious injury to 65 year old female pedestrian by cyclist which is documented on the from TfL [London Collision Website](#) - 'Apparently Injured Party Had Got Off A Bus At A Stop. They Walked Across A Cycle Path And Did Not Look Resulting In A Cyclist Colliding Into Them' as shown in the screen grab given below from the TfL Collision Website.

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The TfL study was in effect a study of the reported road safety collisions at floating bus stops used by sighted cyclists and sighted passengers. It was not a study of the accessibility of these stops to older, blind and disabled people. Bizarrely the study excluded bus stop boarder designs.

We ourselves have evidence of 4 pedestrian cyclist collisions in 2024, with two of these injuries happening on a single day and another happening within 4 days of those two. We have reported the incidents however we believe if we had not done this they would have gone unreported.

One was on 29th April 2024, where a [speeding cyclist knocked into a pensioner who fell](#) and was bleeding from her chin and was very shaken. This happened at the Westminster Bridge Stop opposite St Thomas' Hospital.

[images redacted for publication] Photos 5 and 6: Photo 5 Shows a male cyclist trying to ride around pedestrian at speed and knocking into her and photo 6 then shows the female pensioner fallen over in the cycle lane with people going to try and help her.

The second was on the 30th September 2024 at Elephant and Castle floating bus stops, where a young school child was run over by a rental e-bike rider, [as shown in this short film](#). The rider rang his bell however there were sirens going off in the background and it is a noisy area mainly with traffic. He asked if the child was deaf as he said he had rung his bell and if the child was

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wearing headphones. The e-bike rider took priority and had zero hazard perception. He did offer his number but the adult with the child to take it. The child limped off. Photos 7 to 9 below show the cyclist and pedestrian colliding.

[image redacted for publication] Photo 7 shows the child running over the cycle lane just before the e-bike rider knocks him over.

[image redacted for publication] Photo 8 shows the child knocked over lying in the cycle lane and the e-bike with its back wheel in the air and the rider now slid forward to the where the handle bars are. The child's umbrella is just about to fly out of his hands.

[image redacted for publication] Photo 9 shows the child lying in the cycle lane and the e-bike rider with his hands stretched out in front of him, just missing the child. The bucket of the bike is pressing down on the child's leg and the bikes wheel is still in the air.

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The third was also on the 30th September 2024 at the Westminster Bridge Stop opposite St Thomas' Hospital. The cyclist was riding a Santander bike and was riding too fast through the bypass to stop in time when a person stepped off the bus platform onto the cycle track. The person was not knocked over, but the cyclist fell off their bike as shown in photos 10 and 11 below.

[images redacted for publication] Photos 10 & 11 show a cyclist just before and just after she collides with a pedestrian, resulting in her falling off her bike.

The fourth was also on the 3rd October 2024 at the Westminster Bridge Stop opposite St Thomas' Hospital. The cyclist was riding a Santander bike and was riding too fast through the bypass to stop in time. A male was standing in the cycle lane taking photos of the sunset (shown in photo 12) and then walked over the cycle way when the cyclist crashed into him at speed, the person was not knocked over but the cyclist fell off his bike with force (shown in photo 13). The cyclist would have seen the person in the cycle lane (as shown in photo 12) and should have slowed down. He was very abusive to the pedestrian and shouted at him.

[image redacted for publication] Photo 12: The cyclist can be seen riding towards the person taking a photo standing in the cycle lane. The person was very visible to the person riding a bike who was travelling at speed through the floating bus stop.

[image redacted for publication] Photo 13: The speeding cyclist has come to an abrupt stop after hitting the pedestrian. The back wheel of the cyclist is up in the air and the cyclist's two legs are up in the air. There is another cyclist cycling down the floating bus stop and there are bus passengers waiting on the floating island.

We have filmed pedestrians being clipped by cycles, near misses, swerving cyclists leaving the cycle track and verbal abuse being hurled at bus passengers. It is very disturbing. It is clear that these incidents are happening on a daily basis and are going unreported.

As part of the Public Sector Equality Duty (PSED) local highway authorities are required to consider the needs of disabled people. Particularly S149 of the Equality Act states:

"1. b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

4. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities."

There are no adjustments that have been made by TfL to account for blind people's needs such that they can use these stops. Indeed the introduction of these stops has been in the full knowledge that, for many years, they discriminate against blind people who can no longer use them. Far from advancing equality of opportunity TfL and other highway authorities are systematically denying opportunity for blind people.

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The PSED has led to the publication of some equality impact assessments (EqIAs) by highway authorities. These describe, occasionally, the disproportionate impact on blind, disabled and older people and in one case the ‘fear’ of using floating bus stops. However, these real access needs of blind, disabled and older people are ‘balanced-off’ against the abstract needs of other equality groups, women, ethnic minorities etc. to cycle. Often the potential need to cycle is derived from ‘stated preference’ surveys of non-cyclists, i.e. asking non-cyclists what they might do!

As an example here an extract from an EqIA: Newham made the following judgement:

“The proposals are expected to, overall, advance equality for disabled people by providing an environment that is more enabling for active travel.”

From TfL EqIAs:

“Pedestrians who have cognitive, mobility and sensory impairments are more likely to suffer from the negative effects of the increased degree of cyclist / pedestrian interaction.”

“We know that blind pedestrians, and those who are visually or mobility impaired, can be **fearful** of crossing a cycle track to reach a floating bus stop and will ensure that designs are developed to take account of the recommendations from the review of bus stop bypasses, which is in progress.”

From a recent Camden EqIA following a meeting NFBUK held with its officers:

“Officers appreciate the concern around danger at bus stop bypasses. The risk [or] potential risk of conflicts between bus users and cyclists has been carefully considered within this specific context, in balance with the potential benefits to reducing risks for cyclists and thereby creating a safer and more comfortable environment for those statistically less likely to cycle, including disabled people. The designs are in line with TfL’s Bus Stop Accessibility guidance, LTN 1/20 cycle guidance and TfL’s Bus Stop Bypass Safety Review 2024.”

Living streets were commissioned by the UK and Scottish government to investigate these issues. [They reported](#):

Many, disabled people have issues using bus stop bypasses (of all types), particularly if the cycle lane is bidirectional or is heavily used. Cyclists do not always give way to those wishing to cross, and visually impaired people may have difficulty knowing when there is a safe time to cross, as cycles do not make significant noise on approach.

Our work backs up the idea that busier cycle tracks can be difficult or impossible for blind or partially sighted pedestrians to cross, at least as these are currently designed in Britain.

However, we believe some of their conclusions are implausible. Flashing lights will not stop cycles travelling through bus stops at speed. Their notion that this problem only occurs at busier or

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complex stops is absurd for blind people who cannot see and may well be travelling to and from any stop on the network.

[Guide Dogs for the blind have reported:](#)

From the focus groups it is clear, that this anxiety causes disabled people to stop using some bus stops, and this would reduce their ability to get out and about independently.

The fundamental problem for blind and vision-impaired people that is generated by bus stops that incorporate cycle lanes, is a fear of the unknown. This is manifested in the sense that they do not know if there is a bicycle in the vicinity and so they have to assume that there is. The experiments show that this fear is real.

The NFBUK do not believe any further research is needed on this issue, as it is clear blind people are not using these designs. Bus stops should be brought back to the kerb to allow passengers to get on and off the bus direct from the pavement as a matter of urgency. This is the only universal design which will be acceptable.

[The Chartered Institute for Highways and Transport has reported:](#)

Bus stop bypasses can deter many disabled people from using buses, often the only accessible mode of transport available to them.

The Disability Policy Centre recommended in their report [How To Make London An Accessible City For All](#):

‘Floating bus stops should be reviewed, for the potential danger, and threat to independence that they pose to disabled people- in particular those who are blind and are visually impaired. The implementation of these designs should be halted, and in consultation with disabled people, new designs should be implemented that are fully accessible.’

[Extract from a member of TfL’s](#) ‘Independent Disability Advisory Group’ in a statement to TfL’s Bus stop Bypass Safety Review:

‘I am [Name redacted], I have been visually impaired all my life. As a pedestrian I have never been involved in an accident with a motor vehicle, but I have had 4 collisions with bicycles. The first was when I was age 7. The other three all took place in London, all on zebra or pelican crossings. All involved the cyclist going too fast through stationery traffic at the crossing that I had right of way over (the cyclists went through red lights or could clearly see that vehicles had stopped for me and others to cross the zebra.)

On all occasions I was injured. I attempted to report the last incident in 2014 to the council, TfL, and police but no one would take my report because it involved a cyclist and pedestrian.

It is the psychological effect that has had the greatest impact on my life. From the age of 7 I suffered from extreme anxiety when crossing roads. I would feel sick every time I had to cross a road no matter how small the road. A mobility officer helped me gain my confidence, but the anxiety never left me. I recently had EMDR trauma therapy and the first aspect of trauma I focussed on was my fear of crossing roads. As a result of this

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expensive and difficult therapy my confidence at crossing roads has increased and I now ride a mountain bike (always off road.) Something which seemed impossible just a few years ago. I tell you this to demonstrate the psychological impact these collisions have on people's lives. It affected me daily and still often does.

But even after all that therapy and years of just sucking up my fear I am still terrified at crossing certain roads and using bus stop bypasses in London on certain days. It means that I visit London less often than I used to. I change the routes I take to avoid having to use bus stop bypasses or to cross cycle lanes in general. Not every day is a good day.

I am conscious that this may seem like an over reaction to what must seem like something trivial to someone with average vision. In the past I would never have shared something as personal as this with anyone in a professional setting. I would be too self-conscious and fear that you wouldn't take my evidence as credible or worth listening to because it's personal. Because it's about the psychological effect of a piece of road infrastructure.

But I've spent the last 25 years trying to improve the accessibility and inclusion of our built environment and public transport, sharing all the research I did for the RNIB and Disability Rights Commission with decision makers. I've drafted examples used in the codes of practice for the DDA and Equality Act. And it's made a difference some things have improved. But BSB's are an example of a design feature which is supposed to benefit one group, cyclists but has had a huge psychological impact on another group, visually impaired, disabled and older people'.

Evidence from other countries

There is evidence from other countries that cyclists don't stop for pedestrians crossing even at the request of flashing lights in Canada which were installed after the Canadian Federation of the Blind won a human rights tribunal against them in the City of Victoria in British Columbia. The flashing lights solution was not discussed or agreed with the blind people who took the case and blind people are still not using the floating bus stops. The NFBUK met representatives of the Canadian Federation of the Blind and visited the floating bus stops. This [short film](#) from the study tour clearly shows the same dangers of cyclists not stopping for pedestrians crossing the zebra crossing when the lights were and when they were not flashing.

In Denmark a [substantial study](#) of their cycle network found the implementation of bus stop boarders had led to a huge increase at bus stops. 5 injuries being recorded before, 73 afterwards. Also in Denmark [bus drivers were asked by their company, Arriva](#), if they had witnessed any 'real collisions. The study found it was clear they had. Further published research '[How does the public transportation of Copenhagen consider the rights for disabled persons and the declaration of Barcelona?](#)' clearly highlighted the problems for blind and visually impaired people with the bus stops and cycle tracks, with the report recommending that bus stops and cycle tracks should not clash and highlights the problems for blind people who cannot hear cyclists.

Dutch TV has highlighted the problems for blind people getting around, with one distressing scene where a blind women, who had raised her cane (a signal recognised in the Netherlands to

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stop traffic to allow them to cross), had it dragged off of her by a passing cycle that had ignored her at a Zebra type crossing. Which can be viewed via this link <https://wnl.tv/2019/10/15/dit-gebeurt-er-als-een-blinde-wil-oversteken-het-is-absurd/>.

Professor Anna Lawson, Professor of Law and a guide dog user, gave the following oral evidence on the 15th October 2023 to the [Transport Select Committee - Accessible Transport: Legal Obligations Inquiry](#) with reference to floating bus stops - Q291:

"Professor Lawson: Thank you; it is a great question. I would just add a couple of things to what others have said. I think disability does get overlooked, disregarded or regarded as less important than it should be. That is really evident when it comes into potential conflict with other agendas like the green agenda or increasing cyclist travel. Floating bus stops are a massive concern for a lot of disabled people, but they are going in all over the place. These bus stops—there is another word for them—or bus stop bypasses are where you have to cross over a cycle lane to get to the bus stop. You cannot often stop the bikes, so you have to take your life into your hands to get to the bus".

Lord Holmes of Richmond, a blind peer and a guide dog user, clearly articulated the dangers of floating bus stops and made a recommendation in the debate on Transport in the House of Lords on the 25th April 2024 for a moratorium on floating bus stops, as recorded in [Hansard](#) at 12.51pm and can be watched on this [short film](#).

"So-called floating bus stops are those where there is a cycle lane between the pavement, the bus stop and the carriage-way where the bus pulls up. How are disabled people supposed to board and alight from those bus services safely and effectively? What equality impact assessment has been done around floating bus stops? It must be clear that buses have to be able to pull up, pick up and drop off at the kerbside, rather than the passenger getting on and off the bus in the middle of nowhere, which is what a floating bus stop feels like. Does my noble friend the Minister agree that it is time for a moratorium on floating bus stops so that a full impact assessment can be undertaken? Will he convene a meeting with the Secretary of State and interested parties to come up with accessible, inclusive solutions—which floating bus stops certainly are not?"

Marsha da Cordova MP has [written to the TfL Commissioner](#) to say 25 January 2023:

"Given the clear risk of injury posed by this design, I would like to see the bus-stop changed so that it provides direct access from the bus to the pavement." The letter also highlights that 'there have already been numerous incidents where elderly passengers have been injured as they attempt to cross the busy cycle-lane'.

However, from investigating crash map it is clear these injuries were not reported to the police to be officially collected in the STATS19 data. Which further illustrates the underreporting of injuries at these bus stops.

[Meg Hillier MP said in a Commons debate:](#)

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“I want to touch briefly on the Mayor of London’s (Mayor Johnson) transport policy, particularly the cycle super-highway along the very busy Whitechapel road neighbouring my constituency. One proposal is to carve through the pavement in order to narrow it to 2.5 metres, which is about the same size as an average side street, and require pedestrians to cross the cycle super-highway to get to the bus stop. That is bonkers. We have to make sure that, in the attempt to improve cycling, cyclists are not pitted against pedestrians.”

London Assembly agreed further independent review was need on floating bus stops 5th September 2024 as reported by [Disability News Service](#):

‘Commit to establishing a fully independent review on the impact of floating bus stops on blind, visually impaired and disabled people and, if that review determines that floating bus stops are unsafe, further commit to removing floating bus stops from London's streets’.

The NFBUK welcomes this commitment, however, we firmly believe that these bus stops are not working for blind people, and no further research will change this and no further design changes will make them accessible.

Elly Baker wrote to Mayor of London on 23rd October 2024 in the letter given below:

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Elly Baker AM

Londonwide Assembly Member

Sadiq Khan
Mayor of London
City Hall
Kamal Chunchie Way
London E16 1ZE



City Hall
Kamal Chunchie Way
London E16 1ZE

23rd October 2024

Dear Sadiq,

I am writing regarding Bus Stop Bypasses. This follows the publication of the "Designing for Inclusion" by Guide Dogs in early September 2024 and a meeting between London Assembly Labour Members and National Federation of the Blind on 18 September 2024.

I previously wrote on 17 July 2023 and 24 June 2024 letters about this issue where I raised concerns on the level of engagement with stakeholders and called for a pause to the rollout programme until a safety review could be completed.

I am still concerned about the safety of Bus Stop Bypasses in London. This would also include Shared Use Bus Boarders and any other design that involves pedestrians having to cross cycleways to access their bus service.

I have raised privately my concerns that any approach that relied heavily on collision data was likely not to be adequate given the evidence Assembly Members were hearing on perception of danger and avoidance of public transport completely or for particular journeys. The replies I have received have not allayed my concerns.

I now note the publication of the "Designing for Inclusion" by Guide Dogs in early September 2024 which includes extensive research on perception of danger and bears out many of the concerns raised by campaigning organisations. I support the call from Guide Dogs to pause any new bus stop bypasses until the guidance is clearer.

Our buses remain by far our most accessible form of transport, and we must remain committed to the network both in word and deed and expand, not reduce, access to an affordable, accessible and effective bus network.

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I would be grateful to understand your response to this new research and reiterate my ask for a pause of the rollout of any new Bus Stop Bypasses or Shared Use Bus Boarders.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Elly Baker'.

Elly Baker AM
Londonwide Assembly Member

The text version of the letter is given below:

From LONDON ASSEMBLY LABOUR, Elly Baker AM, Londonwide Assembly Member

To Sadiq Khan, Mayor of London, City Hall, Kamal Chunchie Way, London E16 1ZE

23rd October 2024

Dear Sadiq,

I am writing regarding Bus Stop Bypasses. This follows the publication of the "Designing for Inclusion" by Guide Dogs in early September 2024 and a meeting between London Assembly Labour Members and National Federation of the Blind on 18 September 2024.

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I would be grateful to understand your response to this new research and reiterate my ask for a pause of the rollout of any new Bus Stop Bypasses or Shared Use Bus Boarders.

Yours sincerely,

Elly Baker AM

Londonwide Assembly Member

The NFBUK welcomes this intervention by Elly Baker, however, we firmly believe that these bus stops are not working for blind people, and no further research will change this and no further design changes will make them accessible. We sincerely hope the Mayor will act and call a halt to any more floating bus stops and shared use bus boarders.

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In 2016 a shared use bus boarder was removed in Islington:

A shared use bus boarder in Islington, was removed after blind and visually impaired representatives explained how dangerous they were for them to use as explained in the article given below.

The Independent London Newspaper

Islington Tribune

[Camden](#) [Islington](#) [West End](#) [Arts & Entertainment](#) [Jobs](#) [Archive](#) [Competitions](#) [Shop](#)



Cycle lane that pedestrians branded dangerous is axed



Olav Ernstzen and Elizabeth Jones at the cycle lane that's to be removed

Published: 4 March, 2016

by JOE COOPER

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Published: 4 March, 2016
by JOE COOPER

THE Town Hall has agreed to remove a raised cycle lane between the pavement and the road which has been branded “terrifying” by visually impaired people.

The lane has been raised to the level of the pavement so cyclists are not impeded by buses stopping.

But Tufnell Park barrister Olav Ernstzen points out that it puts vulnerable pedestrians in danger by forcing them to step into the cycle lane.

Cyclists racing home along New North Road pass inches from people stepping off buses at the stop at Elizabeth Avenue, Canonbury.

“It’s wrong in so many ways,” said Mr Ernstzen, who is chairman of Healthwatch Islington.

“On a common-sense level or from an equality impact assessment perspective this fails.”

Mr Ernstzen said bus travel was vital for the independence of disabled people in the borough.

“It’s also a worry for parents with a baby in a buggy, wheelchair or mobility scooter users and people just coming home with shopping,” he added. “Cyclists have the choice of putting pedestrians at risk or, if they choose to go outside the bus where they now have less room, putting themselves at risk.”

The cycle lane is on the way to Moorfields Eye Hospital.

Elizabeth Jones, who set up Talking News Islington, said: “When I step off the bus I put my stick first. If that got caught in a cyclist’s wheel there could be a pile-up.”

The council has agreed to remove the raised lane after admitting to Mr Ernstzen that it had not followed its own equalities policy.

Transport chief Councillor Claudia Webbe said: “Our designs here could have been better as it is clear that Mr Ernstzen’s needs were not considered.

“The council has listened to the concerns and I have requested the removal of this ‘shared space’ and a better solution for cycle safety that does not disadvantage bus passengers, particularly those who are disabled.”

Mr Ernstzen and Ms Jones are working with the Thomas Pocklington Trust to try to establish a support and advocacy group for people with sight loss in Islington. Most other London boroughs have their own dedicated groups.

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Text from the article is given below:

Islington Tribune Cycle lane that pedestrians branded dangerous is axed.

The Independent London Newspaper Islington Tribune Picture of Olav Ernstzen and Elizabeth Jones at the cycle lane that’s to be removed (given in the screen grab of the article below)

THE Town Hall has agreed to remove a raised cycle lane between the pavement and the road which has been branded “terrifying” by visually impaired people.

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But Tufnell Park barrister Olav Ernstzen points out that it puts vulnerable pedestrians in danger by forcing them to step into the cycle lane. Cyclists racing home along New North Road pass inches from people stepping off buses at the stop at Elizabeth Avenue, Canonbury.

“It’s wrong in so many ways,” said Mr Ernstzen, who is chairman of Healthwatch Islington. “On a common-sense level or from an equality impact assessment perspective this fails.” Mr Ernstzen said bus travel was vital for the independence of disabled people in the borough. “It’s also a worry for parents with a baby in a buggy, wheelchair or mobility scooter users and people just coming home with shopping,” he added. “Cyclists have the choice of putting pedestrians at risk or, if they choose to go outside the bus where they now have less room, putting themselves at risk.”

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Four other bus stops have been removed so far:

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The NFBUK are also aware of a floating bus stop on Euston Road which was removed, and three shared use bus boarders, one in Colliers Wood at two in Edmonton have also been removed. Others may have already been removed that we are not aware of in London.

[NFBUK Evidence To The UK Governments Transport Select Committee:](#)

NFBUK submitted evidence to the Transport Select Committee dated May 2023 which has been included as it provides detailed evidence to support this submission to the London Assembly. The report is called '[Evidence of the systematic failure to protect the safety and accessibility of bus stops in the UK](#)' for Transport Select Committee Inquiry on Accessible Transport – Legal Obligations Inquiry.

Our position on cycling

NFBUK is not against people cycling, however we do not accept that routing cycles through the pavement and thereby depriving blind people of access to bus services is an acceptable intervention. It certainly discriminates against those who cannot use the bus stops, as they cannot hear or see the cycles and is life changing for them. The bus has to be allowed to be able to pull up to the kerb so bus passengers can board and alight direct from the pavement with out having to cross or step into a live cycle lane first.

We are an organisation representing blind people, not cycle track designers. But we do think sighted people wishing to cycle or being encouraged to cycle could wait on the carriageway behind a bus at a stop in a protected cycle lane and move off when it is clear, with signage provided to the cyclist to stop to allow the bus to pull in. The carriage way could also be made wider if space allows to allow those cyclists who choose to ride past the bus in the carriage way with more room to do so. If cycle lanes cannot be diverted away from bus routes, only one-way cycle lanes should be installed to allow cyclists the opportunity to wait behind the bus or pass the bus in the carriage way.

We also do not accept that cycle tracks should be routed through the pavement to bypass green man pedestrian crossings as has happened in Lea Bridge Roundabout, creating an unsafe and totally confusing environment for all blind and visually impaired people, not just bus passengers. This short video explains these concerns at the recently changed [Lea Bridge Roundabout](#). Cycle lanes need to be part of the green man phase of all pedestrian crossings and cannot be separated, giving cyclists the ability to ignore the needs of pedestrians to cross these roads.

We tried to get our voices heard at numerous events we attended. We had a meeting with Will Norman which took place on the 1st May 2019 as shown in photo 14 below and provided him with evidence we had collected at that time, including the dangers of the Danish bus stops in cycle lanes and showed him a film of the problems being encountered. Nothing has made any difference what so ever, and the designs have continued being rolled out.

[image redacted for publication] Photo 14 shows Will Norman standing up with [personal information redacted for publication] sitting down at the table. [personal information redacted for publication] has tinted large glasses on with his magnifier and mobile phone on the table

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and [personal information redacted for publication] has his braille note taker on the table in front of them. They are all wearing visitor badges.

When our concerns are raised over floating bus stops TfL respond without citation, a figure of “40 to 65%” reduction in risk of injuries to cyclists associated with segregated cycle schemes, without providing further evidence of where these injuries are taking place across the network. Our understanding the junctions are where the majority of these are taking place.

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Summary of our response to question two

Blind people cannot cycle, nor drive. Buses are often the only way they can travel independently beyond their own local area. Buses are their lifeline and these changes to bus stops mean blind people can no longer travel by bus as they used to. They have changed blind people's lives for the worse.

In September 2013 floating bus stops were introduced as part of the Cycle Superhighways project without any external consultation. In December 2014, TfL were told by blind people participating in an off-road trial they would be deterred from using bus services, served by floating bus stops. In 2017 TfL consulted, on the design of floating bus stops as part of their Accessible Bus Stop Design Guidance. In response London TravelWatch, Transport for All and AgeUK London all expressed objections and concern. A substantive piece of research was undertaken by TRL on behalf of TfL and reported in 2018 (though undertaken in 2016). This highlighted the fears and concerns of blind participants. More evidence since has further demonstrated the problem.

In 2020, during the Covid pandemic, DfT issued 'Local Transport Note 1/20, Cycling Infrastructure Design, without consultation. This is now being used as cover by London highway authorities, despite it reminding authorities of their Public Sector Equality Duty responsibilities.

[Ten years on](#) and real people are being impacted by the introduction of floating bus stops and other novel active travel interventions. Blind people are on the frontline of this and can no longer travel independently as they used to. Many more will be impacted, such as [personal information redacted for publication] who has a mobility impairment. We believe many other older and disabled people will be deterred from using these stops.

It is not known how many injuries are happening at these stops. Underreporting of such collisions not involving a motor vehicle is widely recognised. However, our evidence highlights that injury collisions are occurring and much more often than once thought, three being caught on camera within 4 days of each other and two of these being on the same day. These designs are inherently unsafe for bus passengers. As the number of floating bus stops increases, so will the injuries and so will the number of blind people unable to use them.

Cyclists can see, they can stop and they can wait behind the bus until safe to continue.

There is plenty of evidence from TfL commissioned research to evidence from other countries; blind people's own testimonies; research from independent organisations; calls from charities representing blind people beyond our petition list of 290 organisations and the issue has been raised in parliament by its members.

We implore Assembly members to stand with the blind community and call for both a halt to new schemes and the removal of existing schemes that have already impacted on blind people.

Appendix A NFBUK Petition To Request The Immediate Halt To The Construction And Funding Of Any More Floating or Shared Use Bus Stop Boarders in Active Travel Schemes in London.

- Direct access to and from the pavement to board and alight from the bus is protected for all bus passengers.
- No more floating bus stop or Copenhagen style bus stop / cycle track at bus border to be constructed in London.
- For all active travel schemes / street redesigns in planning process to be redesigned to ensure direct access from the pavement to the bus is protected.
- References to using floating bus stops (bus stop bypasses) and Copenhagen style bus stops / cycle track at bus borders be removed from all Guidance produced by Transport for London (a similar request has been made to the Prime Minister to do the same for the Department for Transport, and by devolved parliaments in Scotland, Wales and Northern Ireland).
- For all temporary floating bus stops and Copenhagen style bus stops / cycle track at bus borders added during COVID to be immediately removed to ensure direct access to and from the pavement for all bus passengers is restored
- For all bus stops that have been changed to accommodate cycle lanes to be changed back to ensure direct access to and from the bus stop for all bus passengers

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Updated supporting organisations for petition so far:

- 1 Phoenix Talking Post, trading name of Lewes & District Talking Newspapers
- 2 4 Sight Vision Sight, West Sussex
- 3 Action Disability Kensington and Chelsea (ADKC)
- 4 Action on Disability London
- 5 AGE CONCERN BANSTEAD
- 6 Age Concern Eastleigh
- 7 Age UK Barnet
- 8 Age UK Bexley
- 9 Age UK Bristol
- 10 Age UK Coventry & Warwickshire
- 11 Age UK Gateshead
- 12 Age UK Gloucestershire
- 13 Age UK Hammersmith and Fulham, London
- 14 Age UK Leicester Shire & Rutland
- 15 Age UK London
- 16 Age UK Manchester
- 17 Age UK Sunderland
- 18 Age UK Westminster
- 19 Angus Talking Newspaper Association
- 20 Antrim Lions
- 21 Association of British Commuters
- 22 Association of Talking Newspapers in Northern Ireland
- 23 Bardet-Biedl Syndrome UK
- 24 Barking and Dagenham Talking Newspaper.
- 25 Barnsley Blind and Partially Sighted Association
- 26 Bedfordshire NARPO Branch National Association of Retired Police Officers
- 27 Bexhill Talking Newspaper.
- 28 Beyond Sight Loss, London
- 29 Blackburn and District Blind Society
- 30 Blind Aid, London
- 31 Blind and Sight Impaired Society (BASIS)
- 32 Blind in Business
- 33 Blind in Greenwich
- 34 Blind Veterans UK
- 35 Bolton Newstalk.
- 36 Borders Older People's Forum, Scotland
- 37 Borders Talking Newspaper
- 38 Boston & South Holland Talking Newspaper
- 39 Bournemouth & Wessex Talking Newspaper
- 40 Bournemouth Blind Society
- 41 Bradbury Fields - A division of Catholic Blind Institute, Liverpool
- 42 Braille Chess Association
- 43 Brentwood and District Talking Newspaper
- 44 Bridgend Visually Impaired Society
- 45 Bristol and District Blind Bowls Club
- 46 British Blind Sport
- 47 British Wireless For The Blind

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48	Bristol Older people's Forum
49	Bromley Experts by Experience
50	Buckinghamshire Disability Service
51	Bucks Vision
52	Burnley and District Talking News
53	Cam Sight
54	Centre for Disability Studies, University of Leeds
55	Charnwood Talking News
56	Chatterbox, Norwich Talking Newspaper
57	Chelmsford Talking Newspaper
58	Chesham Visually Impaired Bowling Club
59	Children Living with Autism Parent Advocacy Network
60	Chippenham & District Talking Newspapers
61	Choice in Hackney
62	Chronic Illness Inclusion
63	Community Broadcasting Services (Coventry)
64	Cornwall Branch NARPO National Association of Retired Police Officers
65	Coventry Resource Centre for the Blind
66	Craigavon Area Talking Newspaper Association
67	Crawley Audio News
68	Crediton Talking Newspaper
69	Crewe and Nantwich Talking Newspaper
70	Croydon Vision
71	CVI The Cerebral Visual Impairment Society
72	Dacorum Talking Newspaper
73	Darlington & District Talking Newspaper
74	Deafblind Enablement
75	Deafblind Scotland
76	Deafblind UK
77	Defiant Sports CIC, Defiant Sports Inclusion Hub, Eastbourne
78	Devon in Sight
79	Disability Action in Islington
80	Disability Advice Service Lambeth (DASL)
81	Disability Equality Scotland
82	Disability Rights UK
83	Disability Watford
84	Disabled Staff Network DSN University of Nottingham
85	Doncaster Talking Newspapers
86	Dorking & District Talking Newspaper
87	Dorset Blind Association
88	Dundee Blind & Partially Sighted Society
89	East Cheshire Eye Society
90	East Dunbartonshire Visually Impaired Peoples Forum, Scotland
91	East Shropshire Talking Newspaper
92	East Sussex Vision Support
93	Eastbourne Access Group
94	Eastbourne Blind Society
95	Ellesmere Port and Neston Talking Newspaper

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96	Enfield Talking Newspaper
97	Enfield Vision, London
98	Epsom and Ewell Talking Newspaper
99	Esme's Umbrella
100	Essex Blind Charity
101	European Guide Dogs Federation
102	Eye Matter Empowering People With Visual Impairment
103	FATN Talking News Covering the Surrey and Hampshire borders
104	FENPROBE TALKING NEWS (ELY, CAMBRIDGESHIRE)
105	Fight for Sight
106	Five Valley Sounds - Stroud's Talking Newspaper
107	Focus Birmingham
108	FOREST TALK
109	Forth Valley Sensory Centre, Scotland
110	Galloways Society for the Blind
111	Glasgow Disability Alliance
112	Gloucester Talking Newspaper.
113	Gloucestershire Deaf Association
114	Goalball UK
115	Greenwich Talking Newspaper Association.
116	Grenestede Talking Newspaper (East Grinstead)
117	Hackney Disability BackUp, London
118	Halifax Society for the Blind
119	Harrow Association of Disabled People
120	Hastings and St Leonards Seniors' Forum
121	Hearing Loss Cornwall
122	Henshaws, Manchester
123	Hereford Vision Links
124	Hornsey Pensioners Action Group
125	Illuminate Freedom Health and Well-Being CIC
126	Inclusion London
127	Independent Disability Council Leeds
128	Insight Gloucestershire
129	Keighley and District Talking Newspaper
130	Kent Association for the Blind
131	Keynsham Talking Newspaper
132	Kings Lynn Talking Newspaper association
133	Kingston Association for the Blind, London
134	Knutsford & District Talking News
135	Lambeth Pensioners Action Group (LAMPAG), London
136	Langbaugh Talking Newspaper (Redcar and Cleveland)
137	Leeds Society for Deaf and Blind People
138	Lincoln & Lindsey Blind Society
139	Liverpool Talking Newspaper for the Blind.
140	London Sports Club for the Blind
141	Macular Society
142	Manchester & District Branch of National Association Retired Police Officers
143	Maidenhead & District Talking Newspaper Association

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144	Marlow - Maidenhead Passengers' Association
145	Merlin MS Centre, Nr St. Austell
146	Merton Centre for Independent Living, London
147	Merton Vision, London
148	Mid Essex Talking News
149	Middlesex Association for the Blind
150	Moorvision Devon and Cornwall
151	My Sight Nottinghamshire
152	MyVision Oxfordshire
153	N-Vision, Blackpool, Flyde & Wyre Society for the Blind
154	National Association of Disabled Staff Networks (NADSN)
155	National Federation of the Blind of the UK Leeds Branch
156	National Pensioners Convention
157	New Milton Talking Newspaper
158	Newcastle Vision Support
159	North Down Talking News
160	North East Sensory Services, Scotland
161	Nuneaton & Bedworth Talking Newspaper
162	Nystagmus Network
163	Older Peoples' Network in Croydon
164	OneChiswick, London
165	Open Sight, Eastleigh, Hampshire
166	Open Wings Adult Learning, Nottingham
167	Otley & District Talking Newspaper
168	Outlookers - The Local Sight Loss Charity
169	Oxtalk, the Oxford & District Talking Newspaper for the Blind
170	Pershore Talking Newspaper
171	PHAB
172	Pocklington Lodge Tenants' Association, London
173	Pontefract and Castleford Talking Newspaper.
174	PrioritEyes Ltd
175	Radlett Elstree Borehamwood And Shenley Talking Newspaper
176	Reading's Talking News.
177	Redbridge Talking Newspaper
178	Redditch and Bromsgrove Talking Newspaper
179	Redditch Association for the blind
180	Redditch Older Peoples Forum
181	Retina UK
182	Richmond Talking News
183	Rochdale Talking Newspaper
184	Rockvale rebound talking newspaper
185	ROUNABOUT TALKING NEWS
186	Rugby Talking Newspaper
187	Ruils-Independent Living, London
188	Sandwell Talking News
189	Sandwell Visually Impaired
190	Selby District Talking News
191	Sense

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192	Sheffield Royal Society for the Blind
193	Sheffield Talking News
194	Sight Action Havering
195	Sight Action, Inverness, Scotland
196	Sight Concern Worcestershire
197	Sight for Surrey
198	Sight Loss Councils
199	Sight Loss Shropshire
200	Sight Scotland and Sight Scotland Veterans
201	Sight Support Derbyshire
202	Sight Support Hull & East Yorkshire
203	Sight Support Worthing
204	Sightloss Councils
205	Sightseekers, Chorley
206	Solihull Borough Talking Newspaper
207	Solway Sound, Talking Newspaper for Dumfries and Galloway
208	South London Resource Centre. For Visually Impaired People
209	Southampton Area Talking Echo
210	Southampton Sight
211	Southend in Sight
212	Southwark Irish Pensioners Project
213	Spinal Injuries Scotland
214	St Albans & District Talking Newspaper
215	St Edmundsbury Newstalk - West Suffolk Talking Newspaper
216	Staffordshire Sight Loss Association
217	Stonehaven & District Talking Newspaper
218	Sudbury Newstalk, Sudbury Suffolk
219	Sutton Seniors Forum
220	Sutton Vision
221	Swindon Bats Sports & Social Club
222	Swindon Blind Association
223	Talk Lochaber TNF member
224	Talking Newspaper for Todmorden
225	Talking Newspaper Islington
226	Tamworth and Lichfield Brain Injury Support Group
227	Tandridge Lions Talking Newspaper
228	The Access Committee for Leeds
229	The Cotswold Listener
230	The North Norfolk Talking Newspaper - The Mardler
231	The Partially Sighted Society
232	The Ringwood & Fordingbridge Talking News
233	The Scottish Centre for Personal Safety
234	The Stevenage & North Herts Talking News
235	The Talking News Federation
236	The Tandridge Club for the Visually Impaired
237	Thomas Pocklington Trust
238	Three Rivers Talking Newspaper
239	Tonbridge & Malling Seniors Forum

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240	Torch Trust
241	Trowbridge Talking News
242	UK Keratoconus Self-Help and Support Association
243	Uttoxeter & Burton Talking News
244	Vale Royal Talking News
245	VI Talk
246	VICTA
247	Visibility Scotland
248	Vision Norfolk
249	Vision North Somerset
250	Vision PK, Scotland
251	Vision Support Barrow & District
252	Vision Support Harrogate District
253	Vision Support, Chester
254	Visionary
255	Visual Impairment Merthyr Tydfil, Wales
256	Visually Impaired in Camden, London
257	Visually Impaired Society of Richmond (VISOR) London
258	Wakefield District Sight Aid
259	Wakefield Talking Newspaper
260	Wales Council for Deaf People
261	Wales Council of the Blind
262	Wallingford & District Talking Newspaper
263	Walsall Society for the Blind
264	Walsall Talking News
265	Waltham Forest Blind Association
266	Waltham Forest Disability Resource Centre
267	Warminster and Westbury Talking Newspaper, Wiltshire.
268	Warrington Talking Newspaper
269	Warwickshire Vision Support
270	Watford Talking Newspaper
271	Waveney Words
272	Wealden Talking News
273	Welwyn Hatfield Talking Newspaper Association
274	West London Residents Association
275	West Suffolk Talking Newspaper
276	Western Enfield Residents Association, London
277	Whitefield Blind Aid Committee
278	Wilberforce Trust, York
279	Wilmslow Talking Newspaper
280	Windsor Talking Newspaper
281	Winter Hill Insight, Bolton
282	Wirral Society of the Blind and Partially Sighted
283	Woking Talking Newspaper (1988) Association
284	Worcester Talking News
285	Yews Talking News of Mid-Sussex (Talking Newspaper)
286	York Talking News
287	Yorkshire Coast Sight Support

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- 288 London Blind Ramblers
- 289 Dunfermline Sound (Talking Newspaper)
- 290 British Wireless for the Blind Fund
- 291 Leicester Disabled People's Access Group
- 292 Civil Service Pensioners' Alliance (CSPA)
- 293 Mysight York
- 294 York Disability Rights Forum

Social and Environmental Justice AI016

Call for Evidence: Accessibility and Inclusion in Transport Planning

Response from Social and Environmental Justice (SEJ)

<https://www.socialenvironmentaljustice.co.uk/>

Thank you for the opportunity to respond.

Social and Environmental Justice (SEJ) is an apolitical not-for-profit organisation founded by individuals adversely impacted by and/or concerned about Low Traffic Neighbourhoods (LTNs) implemented during and since 2020 which have had the broad support of TfL and the Mayor.

Our response focuses on Low Traffic Neighbourhoods. It is divided into 3 sections:

1. Accessibility – Disability
2. Buses
3. A case study from Hackney

We would be happy to discuss in more detail if this would be helpful.

1. Accessibility – Disability and Low Traffic Neighbourhoods

During the pandemic, the government urged local authorities to implement LTNs ‘at speed’ to facilitate social distancing and encourage active travel whilst public transport was operating at reduced capacity, Experimental/temporary traffic orders that circumvented the need for the usual pre- scheme checks and balances (such as thorough consultation, baseline traffic counts and Equality Impact Assessments).

Most if not all LTNs implemented during and since 2020 have resulted in (albeit perhaps unintended) negative consequences for many people, including those living working, using buses, attending schools on the busier/more congested roads (who tend to be the poorest in their communities, and in cities like London, People of Colour) as well as those who drive for their livelihoods and individuals with limited mobility who rely on cars (either their own or other people’s) to get about.

SEJ has received many testimonies from people with long term health conditions and/or disabilities (who are unable to walk or cycle) stating their longer car journeys (caused by detours around LTNs and traffic congestion on surrounding roads), exacerbate symptoms such as pain/fatigue resulting in extra distress for themselves and their carers. However, when disabled Covid Coma survivor Sofia Sheakh took legal action against Lambeth Council in 2021, due to their lack of LTN EQIAs the judge ruled in favour of the council due to a Covid technicality (i)

We are not aware of any areas where public transport has been enhanced in and around LTNs, but we have received many reports of bus journeys being delayed in traffic displaced from LTN streets.

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The Transport for All report ‘Pave the Way’ (2021) **(ii)** detailed the lived experiences of people with limited mobility, adversely impacted by LTNs and a survey carried out by the Petitions committee prior to the HoC debate on LTNs (May 2024) stated that *‘78% of those who said they had physical or mental health issues that meant they were affected by LTN, said that they had a negative; or very negative effect on them’* **(iii)** At the debate (opened by Labour MP Marsha de Cordova) politicians from all sides of the house appeared to agree that there should be universal access through LTN barriers for disabled Blue Badge holders (which is not currently the case). **(iv)**

There is no evidence that LTNs have any positive impact on tackling climate change or improving overall public health, two of the key reasons often given by councils for implementing and retaining them and many councils appear to have pushed through traffic management schemes that prioritise the *wants* of fit, wealthier people over the *needs* of more vulnerable members of their communities. Draft guidance issued by the last government that stated that local authorities must obtain buy-in and support from residents, businesses, emergency services and other relevant stakeholders across LTNs areas, went some way to redress this issue. SEJ have written to the current government asking about the status of this guidance.

SEJ have previously called for the implementation of a regulatory framework for new and existing LTNs, so that groups with protected characteristics are not unfairly disadvantaged by traffic management schemes **(v)**

We also feel that it is necessary for there to be a national traffic reduction strategy (rather than the current piecemeal approach of relocating it) to include affordable, accessible public transport, high quality well-maintained pavements & roads, good freight management, as well as well-planned inclusive cycleways. We fear that without these measures, many local authorities will continue to implement LTN traffic schemes in such a way that not only divides communities, but may also significantly contribute to maintaining or exacerbating existing social inequalities **(vi)**

i <https://www.landmarkchambers.co.uk/wp-content/uploads/2021/06/sheakh-v.-lambeth-approved-judgment1.pdf>

ii <https://www.transportforall.org.uk/news/pave-the-way/>

iii https://ukparliament.shorthandstories.com/pet-ltns-survey/index.html?utm_source=petitioners&utm_medium=email&utm_campaign=%5Bpet-ltns-survey%5D

iv <https://hansard.parliament.uk/Commons/2024-05-20/debates/676B0381-AC1E-4852-B5F3-C76F72CB1CFC/LowTrafficNeighbourhoods>

v <https://irp.cdn-website.com/630197fe/files/uploaded/SEJ%20response%20to%20LTN%20Review%20April%2024.pdf>

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vi <https://www.instituteofhealthequity.org/resources-reports/structural-racism-ethnicity-and-health-inequalities>

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2. Low Traffic Neighbourhoods impact bus passengers

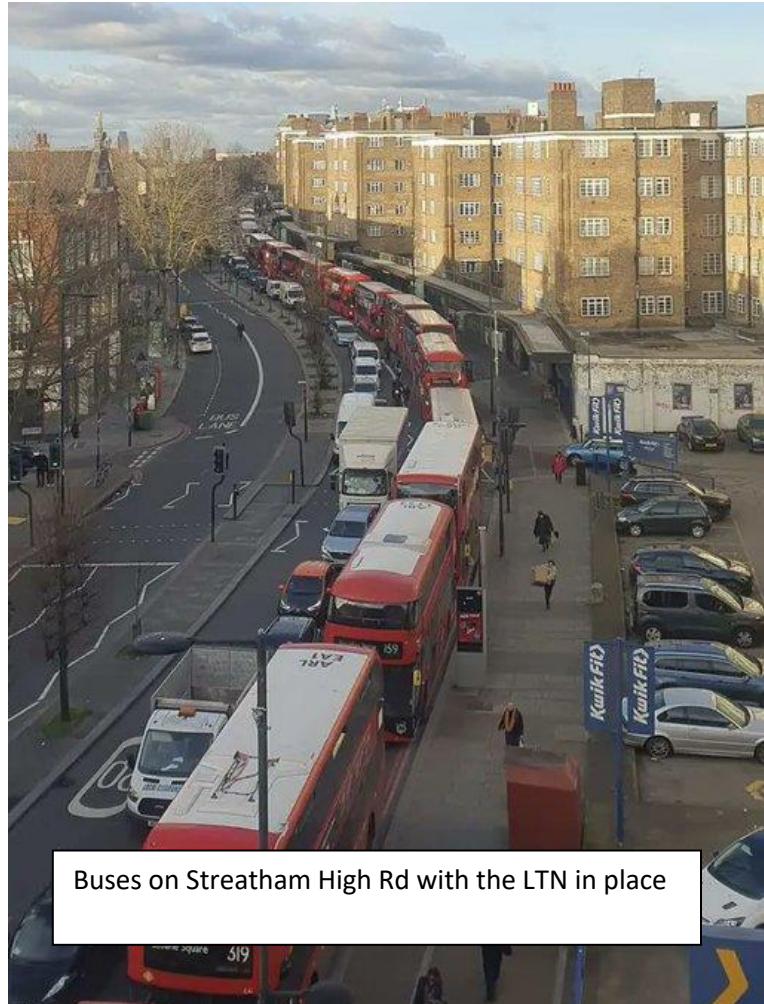
Low Traffic Neighbourhoods can have an adverse impact on bus routes on surrounding roads. Streatham Wells LTN may be the best-known example but it is not an isolated case. However, surprisingly little research has been done into this. It means we have largely to rely on the anecdotal evidence that reveals slower trips and more erratic services.

The people most impacted by this are those who most rely on buses: poorer, older and disabled people; women, children; and those from black and ethnic minority communities.

Black and ethnic minority communities

The bus is the most common mode of public transport used amongst ethnic minority communities (in particular amongst black communities; less so amongst Asian communities). Sixty nine per cent of BAME Londoners use the bus at least once a week compared to 56% of white Londoners.

<https://content.tfl.gov.uk/BAME-summary.pdf>



Buses on Streatham High Rd with the LTN in place

Lower income households



Disabled People



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Women and Children



Source: <https://www.londontravelwatch.org.uk/blog/who-uses-the-busand-why/>

3. The negative impact of Low Traffic Neighbourhoods (LTNs) on certain roads and specific schools: Hackney as a case study.

Post-Implementation

Shortly after the implementation of the Covid LTNs many residents noticed many of the streets closed to through traffic were already quieter, more affluent streets, often closer to parks. Since no additional steps were taken to reduce the total amount of traffic, that traffic was diverted onto other roads. Those “sacrificial” roads immediately saw a rise in traffic, congestion, noise and pollution. Many of the streets onto which the traffic was rerouted also generally have a higher proportion of social housing, fewer expensive owned homes (often flats rather than single doorbell houses), with a smattering of cheaper private rented accommodation. Many of these are historic residential roads which had been given an A or B designation were narrower but housed more residents than many of the roads within the LTNs. They are often pedestrian corridors having bus routes and other transport hubs on them. But most alarming in Hackney (and certain other boroughs) is the fact that these are the streets where many of our large (often Victorian) primary schools and some secondary schools and nurseries are located.

Raising Concerns

Despite being told by various councillors that the traffic would evaporate, concerned residents decided to compile lists of residential roads⁵² where there had been significant increases in traffic and of schools⁵³ that were now facing an increase in congestion (within 50 metres) as a result of the creation of these Low Traffic neighbourhoods.

⁵² (Albion Rd)*, Amhurst Rd, Ballance Rd, Balls Pond Rd, Cazenove Rd, Chatsworth Rd/Brooksby Rd, Cricketfield Rd, Dalston Lane, Downham Rd, Graham Rd, Hackney Rd, Homerton High St, Kingsland Rd, Laburnum Rd, Lea Bridge Rd, Lower Clapton Rd, Mare St, New North Rd, Northwold Rd, Pembury Rd, Southgate Rd, Queensbridge Rd, Upper Clapton Rd, Urswick Rd, Whitson Rd, Wick Rd, Manor Rd **

*Change due to take place

** Manor Rd was not on the original list but with the daytime closure of Church St it has been predicted that this will become the newest sacrificial road.

⁵³ Schools

Primary (inc nursery class)

Mossbourne Parkside Academy, Queensbridge, Northwold, Hackney New, St Dominic's, St John & St James, St Paul's with St Michael, Lauriston, Kingsmead (high levels of pollution from Homerton High St congestion), Rushmore, Morningside, Princess May, (Grasmere)*

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Some residents were aware that Hackney's Air Quality Action Plan (2015-2019) had highlighted the need for action, and a small group of streets had been highlighted as being of particular concern and a focus for action.

As part of the LTN plan in 2020, we were told that traffic "belonged" on certain roads, despite the fact that these were residential roads usually more densely inhabited than the roads being closed to "through traffic" and disturbingly, these were many of the roads highlighted for pollution reduction by the Council's own *Air Quality Action Plan 2015-2019*.

Orchard, The Olive School, Simon Mark, Beis Rochel; D'Satmar School & Nursery Dept
Tawhid Boys School, Holy Trinity CE

*Changes in Stoke Newington will change the situation for this school

Special School *Ickburgh*

Secondary

The City Academy, Clapton Girls Academy, Hackney New School (Kingsland Rd), Cardinal Pole, Our Lady's, Mossbourne Victoria Park Academy, The Urswick School, Haggerston School, Clapton Girls' Academy (off Lower Clapton Rd), Lubavitch Senior Girls School, Stoke Newington School

Group Pre-school/Nursery Provision

RoofTop Nursery (Dalston Ln), Bright Kids (Kenworthy Rd), Monkey Puzzle Day Nursery, Sebright Children's Centre (Queensbridge Rd), Linden Children's Centre (Rectory Rd), Little Pioneers Nursery & Pre-school, Mapledene & Queensbridge Children's Centre, Minik Kardes Children's Centre (Balls Pond Rd), Bloomers Day Nursery, Wentworth Nursery School & Children's Centre (Cassland Rd), Pembury Nursery, Pembury Pre-school (Dalston Lane), Sunrise Nursery (Cazenove Rd), Co-op Nursery (Morning Ln), N Family Club (Mare St), Zeeba Daycare Centre, Amazing Days Nursery

Local actions

The Greater London Authority has identified strategic nitrogen dioxide focus areas across London where further action is needed to reduce air pollution levels. Eight areas

identified in Hackney are set out within Table 2 and shown in Figure 3.

Table 2: Greater London Authority nitrogen dioxide action areas

Focus area	Name	Description of location
1	South	Old Street, City Road, Greater Eastern Street and Shoreditch High Street
2	Clapton	Junction between Clapton Road and Lea Bridge Road
3	Hackney Centre	Area including Amhurst Road, Dalston Lane and Mare Street
4	Dalston	Junction between Balls Pond Road and Kingsland Road
5	Stoke Newington	Area including Stoke Newington High Street, Stamford Hill and Rectory Road
6	Stamford Hill	Area including Amhurst Park Road and Stamford Hill Road
7	Manor House	Junction between Green Lane and Seven Sisters Road
8	Hackney Wick	Area including Hommertons High Street, Wick Road, Cassland Road and Victoria Park Road

When clean air equality activists raised these concerns, highlighting that hundreds of young children were being exposed to even higher levels of the ill effects of traffic, we were told that the traffic would evaporate and that residents would be given a chance to raise concerns via a consultation.

A list of roads receiving increased traffic and schools about which there was concern was submitted to the council and personally to Mete Coban (Hackney Council's Cabinet Member for Climate Change, Environment and Transport). A meeting with Councillor Anntionette Bramble was requested, and she was handed a petition signed by local residents, most of whom had children at Mossbourne Parkside Academy and/or RoofTop Nursery on Dalston Lane. The petition was not even acknowledged in writing.

Clean air equality activists also raised concerns about the fact that these roads that were now experiencing even greater volumes of traffic tended to be those with high levels of disadvantaged residents with worse health outcomes, something that Hackney had previously acknowledged but now seemed to be denying. Central Government emergency funding was being used to improve the areas that already had cleaner air. This improvement was made to the direct detriment of the residents and school children who had previously been stated as being the priority. Groups such as the Hackney Branch of the London Cycling Campaign (a number of who were councillors) claimed that the creation of LTNs would bring about a modal shift that would benefit everyone. Evidence proves that this has not been the case.

⁵⁴ https://hackney.moderngov.co.uk/documents/s46724/CE%20H51%20APPENDIX%201%20CDM-16561963-v1-Hackney_Air_Quality_Action_Plan_2015-19_v4.pdf

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We will target nitrogen dioxide levels within these, and other, areas through Green Action Zones and business engagement initiatives.

Green Action Zones

We believe that there is a better chance of improving air quality, in the worst affected areas of the borough, if we identify all that may be done to reduce air pollution locally and then take concerted joined up actions to deliver the agreed improvements. We will achieve this by identifying three local 'Green Action Zones' (see Figure 4).

Each zone will be developed as a locally targeted air quality action plan for the borough and will:

- Consider all available measures to further reduce air quality ranging from the strategic to street level and including innovative schemes.
- Promote and seek to fund grass roots actions by residents and the public.
- Ensure that the Council's own efforts are appropriately targeted to ensure value for money.

While a whole range of measures will be considered for each area, examples of the types of questions we will need to tackle include whether:

- The use of healthy travel options, such as cycling and walking, and public transport may be promoted and coordinated better?
- Any parts of the road network could be developed, changed or controlled better to reduce emissions or promote cycling or walking?
- Local Low Emissions Neighbourhoods should be introduced to control the types of vehicles that may enter certain areas?
- Further Development Control requirements need to be introduced?
- Parking controls could be changed to influence choices and behaviour?
- No idling and residents only zones need to be created?
- The times that freight is delivered need to be reconsidered?
- Any innovative technologies or approaches could be trialled?

The Council claimed that there had been decreases in traffic on LTN "boundary roads" yet as concerned residents pointed out, traffic was not necessarily displaced to the streets bordering the LTNs; instead, other residential roads have borne this burden. Eventually, the Council published figures showing increases in traffic resulting from implementation of the London Fields LTN.

This chart shows average increases meaning that the daytime/peak time increases are much higher. Traffic was measured using Automatic Traffic Counters that according to their manufacturers should not be used in congested circumstances since the counters will not count vehicles that are stationary or slow moving (i.e. travelling at less than 10kph). It has also been shown that the timing of the traffic counts on some occasions was against what is considered good practice. Caution must be taken in analysing the November traffic counting since the United Kingdom was in lockdown from 5 November – 2 December 2020.

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Changes in daily average traffic flows on main and boundary roads for London Fields LTN that were negatively affected by traffic filters compared to baseline figures					
Location	Pre Implementation (baseline traffic counts 2019)	Post Implementation traffic counts (Nov 2020)		Post Implementation traffic counts (July 2021)	
		Total	Difference (against base figures)	Total	Difference (against base figures)
Whiston Road west of Queensbridge Road	7428	6106	1322 18%↓	11525	4097 55%↑
Dalston Lane (west of Queensbridge Road)	16743	13264	3479 -21%↓	20409	3666 22%↑
Dalston Lane (east of Kingsland Road)	16743	13264	3479 -21%↓	20583	3840 23%↑
Graham Road west of Mare Street	11426	unusable data due to damaged tubes		14316	2890 25%↑
Graham Road east of Queensbridge Road	11847	unusable data due to damaged tubes		14140	2293 19%↑
Kingsland Road north of Richmond Road to south of Dalston Lane	15078	13524	1554 10%↓	15387	309 2%↑
Mare Street North of Richmond Road	13681	13810	129 1%↑	15112	1431 10%↑

https://drive.google.com/file/d/1nk_ly6NIACv5-Ng-MI7IqFVCGxT67k2_/view Pg 29, Table 5

Post Implementation Consultation

Whenever concerns about the negative impact of LTNs on certain were raised, Council representatives replied that the traffic would evaporate and that residents would be given a chance to raise concerns via a consultation. This “consultation” was an online form which had issues such as (1) it was not limited to persons resident or working in Hackney; (2) it was online only, which precluded many residents who are not technically adept; (3) the wording could be seen as “leading” in favour of the LTNs.

After the consultation on the London Fields and Hackney Downs LTN opened, a survey of parents of children at Mossbourne found that none had completed the survey, and many knew nothing about it. Residents (two of whom were retired teachers) realised that there was a high

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level of digital exclusion among the parents and in this respect, decided to follow the lead of pro-LTN activists in London Fields. They raised money to print response cards that parents at 3 of the worst impacted schools could send freepost to Hackney Council. Again and again, parents said “they won’t care what we think” but they were still encouraged to complete and post back the cards (responses included comments such as “Very stressful for school kids and too much traffic! Not fair!” and “Children that are asthmatic are at high risk as the pollution levels on the main roads have increased greatly and has an impact on their health.”). The schools chosen were Mossbourne Parkside, Northwold and Princess May. Concerned residents who spoke a range of community languages took part to aid communication and translate when necessary. Hundreds of response cards were returned to the Council.

The majority of residents did not support the creation of Low Traffic Neighbourhoods⁵⁵, with many citing the differential impacts on residents and school children. Indeed, most of the areas protected by the LTNs have higher than average car ownership and some have had increases in parking permits post-LTN implementation⁵⁶ while areas that had already had greater volumes of traffic became more polluted and dangerous “sacrifice zones”.⁵⁷

Cleaner Air for ALL?

Those behind the creation of LTNs and their supporters have consistently claimed that LTNs benefit children. Those who believe in cleaner air equity point out that poorer children and those from Black and minority ethnic communities are much more likely to bear the brunt of the negative impacts of traffic displacement. Despite countless studies showing that poorer people are more likely to be exposed to higher levels of air pollution and Hackney Council previously acknowledging just this, since the advent of LTNs the Council has refused to concede that the impact of its policies is indeed classist and in effect racist by rerouting traffic on to roads with higher levels of disadvantage and alongside schools whose intake tend to be more disadvantaged.

So, let’s examine these claims by looking at the available data for the three schools mentioned above where clean air equality activists encouraged parents to get involved in the consultation and schools a short distance away. Note: William Patten was a school listed and is located on a road contained in the list above, but a successful campaign by its parents has seen the council protect these children by installing a bus gate on Stoke Newington Church Street, despite the fact that there are relatively few homes.

Free School Meals (FSM) is considered a reliable indicator of disadvantage. At William Patten (protected by a school bus gate), the percentage of children eligible for FSM is only 18%. At Gayhurst School within the London Fields LTN the figure is 29.7%. In contrast, on the roads where rerouted traffic increased following implementation of the LTNs, the percentage of children eligible for FSM in 2020 was 45.5% at Princess May (Mare St), 43.3% at Northwold (Northwold Rd), and 52.7% at Mossbourne Parkside Academy (Dalston Ln).

⁵⁵ <https://hackney.gov.uk/london-fields-ltn>

⁵⁶ “As of the 1st of May 2020, there were 2,703 resident permits registered to properties within the London Fields low traffic neighbourhood, including both on-street and estate permits. As of the 19th of December 2021, there were 2,994 permits registered to these addresses...” (Information provided in response to an FOI request.)

⁵⁷ Additional information may be found here https://irp.cdn-website.com/630197fe/files/uploaded/21.06.23_C-A_Expert_Report_JW_copy.pdf

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There is no readily available information concerning the ethnic heritage of students at these schools. Percentages of children having English as an additional language (EAL) tell only part of the story as middle-class bilingual French or Italian speakers are counted together with the children of recently arrived refugees from Syria or Somalia. However, it is still important to note that in 2020 at Princess May, 71.7% of children had EAL, at Northwold the figure was 69.3% and at Mossbourne, it was 58.4%. The figures for that year at William Patten and Gayhurst are 42% and 31.8% respectively. However, anecdotal evidence has shown that schools on our larger busier roads, most notably those mentioned above, have a much higher percentage of children of what are sometimes called Black and Minority Ethnic Communities or People of Colour.

If we believe that exhaust fumes have a harmful effect on health and children are even more vulnerable to that harm, as a society, how can we accept and support policies that reroute traffic onto roads where our most disadvantaged children are much more likely to live and attend school?

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Southwark Torch Fellowship Group Ref No. AI017

CALL FOR EVIDENCE: ACCESSIBILITY AND INCLUSION

IN TRANSPORT PLANNING

Response from SOUTHWARK TORCH FELLOWSHIP GROUP

[personal information redacted for publication] **Meeting monthly on the 2nd Saturday of each month since February 2007. In addition to the regular meeting, Southwark Torch provide advocacy and support.**

The demographic nature of our members:

Our members' primary disability is blind, but they may have additional sensory or mobility needs.

Many of them have lost their sight in older age, the implications of that are:

- **They do not have the coping strategies of those who have been blind throughout their lives**
- **They may not have access or expertise in using online facilities**
 - **Smartphones and Apps may well be foreign to them**
- **They will be relying on relatives, carers, and volunteers for support in everyday living.**
- **The environment is hostile towards this group**
 - **Pavements are increasingly strewn with random obstacles: bins, bicycles, scooters etc.**
 - **Cyclists and Scooters rarely take account of traffic lights and crossings.**
 - **Bus stops have been placed across cycles lanes; these are impossible to negotiate safely.**
- **Many of our blind members are wholly dependent on the Dial -a- Ride service and this response relates solely to that service.**

1. What do OUR MEMBERS USE TRANSPORT FOR and how does this differ among demographic groups?

- **Shopping**
- **Social groups**
- **Church**
- **Visiting family**

The very nature of blindness plus mobility issues severely restricts the extent to which members of this demographic get out and about easily.

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What other transport could you go out NOW and use unaided?

Answer: The overwhelming response to this question is NONE

a. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

Answer: The beauty of the Dial a Ride service is that it is the only means of transport that will collect our members from their front door and return them to it. The drivers are all so helpful and caring, having received the appropriate training for escorting members of this demographic.

b. How could the transport network better serve and connect London's communities with the places they travel to?

Answer: The service delivered by Dial a Ride has plummeted since November 2023. The committee will need to investigate the reasons for this and implement serious restorative strategies.

2. How does TfL use data and engagement to plan accessible and inclusive services?

a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? **NO Not at all**

The Dial a Ride application form already includes a section on the person's ability to use other means of transport.

Where applicants specify that they do not access other means of transport, that is a fair indication that they are wholly dependent on the Dial a ride service.

- **The implications of this are:**
 - **Applicants need to be offered ride(s) for both 'outward' and 'return' journeys.**
 - **The offer of a single ride in either direction is no offer at all.**

Do they need to collect different and additional data? **YES**

- **Dial A Ride**
 - **IF you are offered a ride in one direction, are you able to manage the return or outward journey unaided???**
 - **In which case a single journey would not be offered**
 - **How much notice do you need to give carers of your availability for care session(s) surrounding your journey(s) (This may be as much as 48 hours)**

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- In which case, a ride would need to be confirmed before that deadline.
- In response to a **GROUP BOOKING**, Dial A Ride should confirm the outcome to the originator of the group booking as well as the user.
 - As we serve an afternoon tea as part of our meeting, to only hear how many people will be able to come at 19:30 on the day prior to the event is inadequate.

b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services? **NOT AT ALL**

c. How effective is TfL at involving all users in decision-making processes? **TOTALLY INEFFECTIVE**

d. Are there any improvements that could be made to ensure that all voices are heard? **YES**

Answer: Our group has been submitting group bookings to Dial a Ride each month since 2009. There has not been any attempt on their part to gain input from members of our demographic group whose needs are very specific

3. How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services? **PRIMARY ENGAGEMENT WITH USERS/GROUPS BEFORE PUTTING PEN TO PAPER.**

It is very obvious to us that changes put in place around November 2023 have had a devastating impact on the functionality of the service.

- Prior to this we would submit a group booking request at the beginning of the week for a meeting on Saturday afternoon.
 - For several years this group booking would be for 12-14 people.
 - Usually most people would receive a ride in both directions. On the rare occasions that a bus wasn't available for a return journey, a taxi would be provided.
 - In addition to that one or two members might cancel their booking due to unforeseen circumstances.
 - One of our members who has been using the service to attend the meetings since 2009, said that the recent failures are "not fair to us disabled people"!

Please see additional data in the accompanying Excel file: **Deterioration of DAR service.xlsx**

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The following table was provided by Southwark Torch Fellowship Group as part of its submission to this call for evidence:

DATE of meeting	RIDES OFFERED	TOTAL REQUESTED	PERCENTAGE
12/10/2024	13	28	46
13/07/2024	14	26	54
08/06/2024	20	30	67
11/05/2024	13	28	46
13/04/2024	13	26	50
09/03/2024	26	26	100
13/01/2024	3	22	14
09/12/2023	11	20	55
09/11/2023	18	26	69
14/10/2023	20	22	91
09/09/2023	22	26	85
08/07/2023	22	24	92
10/06/2023	16	18	89
13/05/2023	18	18	100
11/03/2023	22	22	100
11/02/2023	12	20	60
14/01/2023	20	20	100
10/12/2022	22	24	92
12/11/2022	14	20	70
08/10/2022	16	18	89
10/09/2022	16	16	100
09/07/2022	18	18	100
11/06/2022	18	18	100
07/03/2022	18	18	100

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Transport for All Ref No. AI018

Alongside its submission below, Transport for All also submitted its report [Accessibility Review of the PTAL Index](#) to this Call for Evidence.

Call for Evidence: Accessibility and Inclusion in Transport Planning

Transport for All's response
October 2024

About Transport for All

[Transport for All](#) is the only disabled-led group striving to increase access to all modes of transport and streetspace across the UK. We are a pan-impairment organisation, guided by the passionate belief that all disabled and older people have the right to travel with freedom and independence.

How the views of our community are obtained

Transport for All is the leading voice on accessible transport. We have 40 years of specialist knowledge of transport access, and a unique understanding of the needs and views of disabled travellers. As a membership organisation, we facilitate a network of over 1000 disabled people, gathering the perceptions and insights of those with lived experience of access to transport. Through our information and advice line we provide advice, support and education for over 250 disabled and older people each month.

What do Londoners use transport for and how does this differ among demographic groups?

Londoners rely on transport to access essential services such as healthcare, education, and employment, as well as for leisure and social activities. While these needs are shared across demographic groups, access to transport varies significantly, particularly for disabled Londoners who face significant barriers to travel.

For disabled people, accessible transport is vital for maintaining independence and participating fully in society. When transport is inaccessible, it can lead to social isolation and limit access to essential services and opportunities. For example, while commuting is a vital use of transport for everyone, disabled people often face additional barriers. TfL's Freedom Pass has made a positive impact in this regard, allowing disabled Londoners to travel without time restrictions—an enhancement not available in much of the UK, where the Disabled Person's Bus Pass has limitations.

Which journeys and types of transport are most used and most appropriate for certain demographic groups?

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The types of transport used by disabled Londoners are heavily influenced by factors such as accessibility, affordability, and convenience. For example, buses are one of the most vital modes of transport for disabled people with [data from the Department for Transport](#) highlighting that we make a higher proportion of our journeys by bus compared to non-disabled people (5% vs 3%). This is because buses are often the only step-free option available and are more affordable compared to alternatives like the Underground or taxis. Our latest [state-of-the-nation report on accessible transport](#) found that London participants rated their bus experience higher than those in other regions, reflecting the relative accessibility of London bus services and the benefits of the Freedom Pass. However, issues such as limited priority seating and insufficient space remain significant barriers, with 20% of respondents citing this as their biggest barrier to using buses.

The London Underground is another essential mode of transport, particularly due to its speed, frequency, and capacity. However, many disabled people are effectively excluded from these benefits due to a lack of step-free access and overcrowding. Only [92 out of 272 Underground stations have step-free access](#), and nearly half of those stations still require a manual boarding ramp. Unsurprisingly, 31% of our London respondents reported that the lack of step-free access was their most significant barrier to using the Underground. Expanding step-free access would unlock this vital transport mode for many more disabled people, allowing for faster and more convenient journeys.

For some disabled people, the persistent inaccessibility of public transport means private transport options like cars and taxis are more appropriate. However, financial barriers, including the costs of vehicle adaptations, taxes, and fuel, limit car use. Similarly, 64% of our research participants said they could not afford taxis or private hire vehicles as much as they needed, with many experiencing cancelled journeys or disrupted plans due to cost constraints. While schemes like Motability and the London Taxicard exist to mitigate financial barriers, restrictive eligibility criteria and availability issues often limit their effectiveness. For example, one respondent from Zone 5 reported that they were often unable to book a wheelchair accessible taxi through the Taxicard scheme, forcing them to use standard cabs that could not accommodate their wheelchair, resulting in pain and health issues.

It's important to recognise that disabled people's transport choices are often driven more by accessibility barriers than by personal preferences. Many would prefer to use more sustainable travel options like trains or the Underground but are instead forced into cars or taxis because public transport isn't accessible. In fact, 71% of respondents to our survey said they would prefer to use more sustainable transport modes but were prevented from doing so by a lack of accessibility and availability.

Ultimately, no single form of transport can be considered most appropriate for all disabled people in London. Accessibility barriers and financial constraints disproportionately affect disabled people's travel choices, which can vary even further depending on individual impairments. Addressing all access barriers to transport is critical to ensuring that all Londoners, especially disabled people, have equal access to transport.

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How could the transport network better serve and connect London's communities with the places they travel to?

To better serve and connect London's communities, the transport network must prioritise accessibility, particularly step-free access. Currently, a significant portion of London's transport infrastructure remains inaccessible, with progress on step-free stations slow and inconsistent. In addition to upgrading existing stations, all new infrastructure must include step-free access from the outset. For example, despite Old Oak Common being a major transport hub under construction, there has been [no commitment to provide level boarding](#) – something that should have been a basic requirement for all new builds. It is unacceptable that, in 2024, we are still witnessing such fundamental accessibility features being overlooked. Ensuring comprehensive accessibility from the outset is not only more cost-effective than retrofitting, but is also essential to enabling disabled Londoners to travel independently and access the wider city.

Accessibility barriers extend beyond stations themselves. The journey to and from transport hubs is often obstructed by uneven pavement conditions, narrow paths, and street clutter. [Our research](#) found that London ranks among the worst regions for pavement quality, with 38% of respondents identifying poor pavements as their primary barrier to walking or wheeling. Considering active travel is highlighted as a key priority in the [Mayor's Transport Strategy](#), improving pavement quality, widening paths, adding dropped kerbs, and removing street clutter like e-scooters must be addressed to ensure walking or wheeling is a viable option for all.

Interchanges are another area that needs improvement, being one of the most stressful parts of a journey for disabled passengers. Only 12% of our respondents said they could make interchanges easily, with each transfer presenting new challenges like assistance failures, overcrowding, and inaccessible platforms. Bus interchanges are especially problematic, with priority seating often limited, forcing disabled passengers to wait for buses with available space.

One example of poor interchange management is the change to the 211-bus route which previously connected major transport hubs to hospitals, including those offering specialist care. Many disabled patients, including those with medical equipment like ventilators or feeding tubes, relied on this route. Despite an [Equality Impact Assessment](#) (EIA) showing that the changes would negatively affect eight out of nine protected characteristics, TfL rejected proposed alternatives. The diversion now forces passengers to make interchanges, disproportionately affecting disabled people by increasing physical strain and posing serious risks to their health. Making interchanges as seamless as possible, with disabled passengers' needs at the forefront of decision-making, would significantly improve connectivity across the network.

Improved information provision is also a critical component. Real-time, accurate information about service disruptions, such as lift or escalator outages, is essential for disabled passengers. Yet, this information is often unreliable or incomplete. TfL must improve the accessibility and consistency of information across vehicles, stations, and streetspace, ensuring disruptions like streetworks or temporary obstructions are clearly communicated. Equally important is reliable staffing. Step-free access depends on staff being available to operate lifts or assist passengers, yet staff shortages can take lifts out of service with little notice. Guaranteeing consistent, reliable staffing at all stations is vital for ensuring accessible travel.

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Finally, providing comprehensive Disability Equality Training (DET) is key to improving service. Training should be based on the Social Model of Disability and developed and delivered by disabled people. Staff should have a thorough understanding of the legislation and guidance they are supposed to uphold. Too often, we hear disabled passengers report that frontline staff are unaware of basic accessibility policies, such as the provision of accessible taxis when step-free routes are unavailable or offering Turn Up and Go assistance. Equipping staff with the proper training will ensure they can deliver the reliable assistance that disabled passengers need, making the transport network more inclusive and better connected for all Londoners.

Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?

TfL's current data collection does not adequately reflect the needs of disabled Londoners. For example, there is a significant gap of reliable data on Turn Up and Go (TUAG) failures, largely because many stations are unstaffed or staffed only part-time. When a disabled person experiences a TUAG failure with no staff available to document it, the incident goes unrecorded. Moreover, many disabled passengers actively avoid stations known for unreliable TUAG services, leading to data that falsely suggests low demand at these stations. In reality, more disabled passengers would use these stations if they were reliably accessible. This creates a clear gap in the data, which does not accurately represent the need for accessibility improvements.

A similar issue is seen in TfL's [safety review of bus stop bypasses](#), which depends on STATS19 data. This data is unreliable due to under-reporting and does not indicate whether a person involved in an incident is disabled, omitting crucial safety information. TfL's analysis of bus boarding patterns also suggests that there has been no reduction in disabled passengers using bus stops with bypasses. However, many disabled passengers board buses in the middle section as it is the only door usable for wheelchair users, so therefore don't swipe in using a Freedom Pass, meaning their journeys are not fully captured in TfL's data. Furthermore, psychological barriers, such as the fear of colliding with cyclists at bus stop bypasses, are similarly not reflected in the data, even though they significantly influence disabled people's travel behaviours, including taking alternative routes.

Another area of data collection that needs improvement is TfL's reliance on the Public Transport Access Level (PTAL) index, which is of key importance considering the role it plays in informing planning policy. PTAL does not account for accessibility considerations, meaning that the needs of disabled passengers are often excluded from important planning decisions. In response to this, Transport for All has conducted an Accessibility Review of the PTAL index, which we have attached to this submission. The report assesses how the PTAL measure could be adapted to better serve disabled transport users by incorporating accessibility considerations such as step-free access, station crowding, and the availability of toilet facilities. Our findings conclude that incorporating these factors into the PTAL index is feasible and would make the measure more meaningful for disabled people, allowing for more inclusive and effective transport planning in London.

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How effective is TfL at involving all users in decision-making processes?

While TfL does provide opportunities for disabled people to participate in decision-making, the effectiveness of these initiatives often falls short. For example, the consultation process for the new Piccadilly Line trains, which aimed to improve step-free access, instead introduced new barriers due to a larger gap between the train and platform. This could have been flagged earlier had TfL consulted a broader, more representative group of disabled people, rather than relying solely on its Independent Disability Advisory Group (IDAG) – an eight-person disability panel at the time. This demonstrates the need for a pan-impairment approach, ensuring that the needs of all disabled service users are considered in decision-making processes.

A further example is TfL's recent partnership with Samsung to temporarily rename Old Street station to 'Fold Street'. This decision was made [without conducting an Equality Impact Assessment \(EIA\) or any consultation with disabled groups](#), including TfL's own IDAG. The name change posed significant accessibility and safety risks for disabled passengers, particularly those with visual impairments. Although TfL did consult staff at Moorfields Eye Hospital, they were not in patient-facing roles and were therefore ill-suited to advise on the impact on patients. Furthermore, Moorfields was only contacted a week before the project's launch, leaving little time to raise concerns or suggest necessary changes. This reflects a recurring issue in TfL's decision-making: accessibility is often an afterthought, when early, meaningful engagement could have prevented such problems.

A final example of inadequate involvement of disabled people can be seen in the rollout of Low Traffic Neighbourhoods (LTNs). Our [Pave the Way report](#) highlighted serious flaws in how LTNs were implemented, especially the lack of consultation with disabled communities. While opinions on LTNs vary among disabled people, our research found that many felt ignored by policymakers and were given no opportunity to voice their concerns. As a result, some disabled users faced increased travel costs, longer journeys, and difficulties accessing taxi services, which contributed to negative mental health impacts. In several cases, [LTNs required retrofitting or were removed altogether](#)—outcomes that could have been avoided through early engagement with disabled people.

Are there any improvements that could be made to ensure that all voices are heard?

Ensuring early and meaningful involvement of disabled people from the outset is crucial. Disabled people, including Disabled People's Organisations (DPOs), should be engaged at the very beginning of decision-making processes, not just after initial decisions have been made or when problems arise. This proactive approach would ensure that accessibility issues are considered during the design stage, avoiding the need for costly retrofitting. A co-production model, where disabled voices are integrated throughout the entire planning process, would result in more inclusive, equitable, and sustainable transport policies. Additionally, TfL must adopt a pan-impairment and intersectional approach, consulting with a wide range of disabled people, representing different impairments and intersecting identities.

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Accessible consultation methods are equally critical. TfL must provide materials in various formats—such as easy-read, large print, braille, and British Sign Language (BSL)—and ensure that digital platforms are compatible with assistive technologies like screen readers. TfL must also proactively engage with underrepresented and marginalised communities disproportionately affected by transport decisions. This must include remuneration for their time and expertise, recognising the value they bring to shaping an inclusive transport system.

Finally, meaningful engagement must go beyond tick-box exercises, ensuring that feedback from disabled people is genuinely considered and integrated into decision-making. Too often, input is collected but then overlooked in final outcomes. TfL must be transparent by providing regular updates on how feedback is shaping policies and demonstrating clear actions based on consultations. This transparency should also extend to EIAs where findings need to drive real change rather than being disregarded. For example, in the case of the 211-bus route, negative impacts on eight out of nine protected characteristics were ignored. TfL must show a clear commitment to adjusting decisions based on these assessments to avoid repeating such mistakes.

How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

Equity in Motion contains promising initiatives aimed at creating a fairer, more accessible transport network. However, it is difficult to assess its full effectiveness at this stage, as many of the actions are either still in development or have yet to begin. Additionally, the plan lacks transparency and specificity in key areas which raises concerns about its potential to drive meaningful change and influence decision-making across London.

An important action in the plan is the commitment to review and improve TUAG, an essential service for disabled passengers. TfL has pledged to invest in technology to keep TUAG running efficiently and to review its performance. However, the plan does not provide critical details on what this technology entails, whether disabled people have been involved in its development, or how it will be tested. Without this clarity, it is difficult to assess how impactful such an action might be. Similarly, TfL's commitment to reviewing its complaints processes by 2025 and creating more accessible ways for passengers to register complaints sounds promising, but again, the absence of clear timelines or concrete plans leaves doubts about how effective these changes will be in practice.

A particularly promising action in Equity in Motion is the establishment of an Inclusive Design Centre of Excellence, pledging to embed inclusive design throughout TfL projects. However, despite the 2024 deadline for its launch, little information has been provided about its structure, scope, or how it will engage with disabled users. With only a few months left in 2024, more transparency on its progress is urgently needed.

Furthermore, there are some actions in the plan that are concerningly vague. For example: "In future, ensure climate change adaptation measures across the TfL network and estate do not create additional barriers or inequalities". The use of "In future" is concerningly indefinite. Given the substantial barriers already faced by disabled passengers, ensuring no further barriers

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are created should be an immediate priority, not a goal deferred to an unspecified point in the future.

The plan's pledge to improve Dial-a-Ride by introducing an app and new booking service while keeping phone booking available is an example where implementation has fallen short. Transport for All members have reported ongoing issues with booking Dial-a-Ride services, particularly over the phone, during the rollout of the new app. Considering that [23% of disabled adults do not have access to the internet](#), it is crucial that TfL ensures online communications do not take priority over telephone booking, which remains essential for many.

Another area of concern is the plan's reliance on STATS19 data for actions related to road danger reduction. While the data identifies trends based on factors like deprivation, sex, and age, it does not account for whether individuals involved in incidents are disabled. This omission means that disabled people are being excluded from critical decision-making processes. Consequently, any actions in Equity in Motion or [Vision Zero for London](#) will not address the specific risks disabled people face, limiting the plans effectiveness and excluding disabled Londoners from key safety priorities.

For Equity in Motion to be truly effective, TfL must provide detailed, actionable steps with measurable outcomes, along with regular progress updates that are accessible to the public. Increased transparency and the involvement of disabled groups are essential for ensuring the plan delivers real, lasting change.

What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

To ensure ongoing accountability and transparency in delivering equitable and inclusive transport services, TfL must implement a range of measures that allow Londoners to clearly track progress and hold them to account. A key step is committing to the publication of regular progress reports on key initiatives such as Equity in Motion. These reports should be publicly available, providing a clear overview of actions taken to improve accessibility across the network.

Beyond providing regular updates, TfL must focus on increasing transparency in its overall accessibility strategies. It's crucial for TfL to set clear, concrete goals with specific timelines, so the public can understand both what TfL aims to achieve and when. Instead of vague commitments like "enhancing accessibility," TfL should outline specific actions—such as implementing Changing Places toilets across the network, with a detailed timeline for rollout. This level of specificity will prevent commitments from becoming overly open-ended, giving Londoners a clearer sense of when real progress will be made. Importantly, all information must be provided in accessible formats to ensure that disabled Londoners can easily track TfL's plans and hold them accountable for delivering on these promises.

TfL's accountability also depends on continual, meaningful engagement with disabled people and their representative organisations. Consulting regularly with DPOs such as Transport for All, is crucial for ensuring TfL's policies are shaped by those who are directly affected. By

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maintaining a ‘critical friend’ relationship with DPOs, TfL can ensure that the voices of disabled Londoners remain central in decision-making processes and that accessibility measures are developed with the lived experiences of disabled passengers.

EIAs are another vital tool in ensuring accountability, but only if they are used effectively. EIAs must be conducted thoroughly and TfL needs to show that the results are shaping their decisions, rather than being a tick-box exercise. If an EIA highlights that a particular transport policy will negatively impact disabled passengers, TfL must be transparent about what steps are being taken to mitigate these impacts. Publishing the outcomes of these assessments, along with explanations of how they are influencing decisions, would add an extra layer of transparency, and build trust with the public.

Additionally, TfL could introduce real-time reporting and feedback mechanisms to allow passengers to report accessibility issues or failed TUAG experiences as they occur. This could be through a mobile app or dedicated phone line where passengers can directly report problems, such as broken lifts or assistance failures. Currently, TUAG’s performance is primarily reported by station staff, but a passenger-focused system would give disabled users a direct voice in reporting failures and barriers. Real time reporting would also enable TfL to respond more quickly to issues and provide prompt updates on the status of accessibility services, reducing the potential for unnecessary disruptions.

Regular independent audits should also be carried out to assess whether TfL is meeting its accessibility objectives and to identify any areas that need improvement. A dedicated accessibility and inclusion body that is independent of TfL would provide an additional layer of accountability. This body could monitor progress, conduct independent audits, and offer recommendations on how TfL can improve its accessibility measures. Such oversight would not only provide an objective assessment of TfL’s work but would also ensure that there is a mechanism in place to address complaints or concerns from the public.

Finally, accountability must extend to TfL’s staff, particularly those in public facing roles. Comprehensive and regular DET is essential to ensure that frontline staff are equipped to assist disabled passengers effectively. TfL should also monitor the quality of these interactions, giving disabled passengers an easy way to provide feedback on their experiences with staff. This feedback can be used to identify areas where further training or improvement is needed, ensuring that TfL staff are held accountable for providing a high level of service to all passengers.

Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

[Merseyrail](#) and [Greater Anglia](#) have introduced sliding step technology, which allows for independent, level boarding at stations. This is a significant improvement as it reduces reliance on manual boarding ramps and staff assistance—both of which can be inconsistent or unavailable—promoting more independent and reliable travel for disabled passengers. If TfL were to implement similar technology, it could dramatically enhance accessibility across the

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network, enabling disabled passengers to navigate the system with greater ease and independence.

Looking internationally, the Netherlands offers an outstanding example of how to prioritise accessible transport for disabled people, with a goal to achieve complete accessibility by 2030. As of this year, [99% of its train stations feature tactile paving and digital displays](#), [97% offer barrier-free entry](#), and [74% of all trains have wheelchair accessible toilets](#). This progress stems from a comprehensive approach that includes [platform standardisation](#), ensuring all stations are step-free from street to platform, and introducing new rolling stock that guarantees level boarding at the national standard platform height. A key strength of the Dutch model is its early and ongoing engagement with disabled groups representing a range of impairments. Before implementing accessibility measures, [they pilot and test them with these groups to ensure usability and satisfaction](#). This approach is effective because it promotes consistency across the network, sets clear deadlines and achievable goals, and treats accessibility as a fundamental priority rather than an afterthought.

Transport for the North Ref No. AI019

Transport for the North (TfN) has been doing a range of work on accessibility and inclusion in transport planning – from how we can improve accessibility at the North’s railway stations, to measuring the extent of transport related social exclusion (TRSE) and how that can be mapped/considered in local transport plans.

Specifically, it might be helpful to look at:

Our work on [TRSE](#): the link will take you to our summary page, and that includes:

- . Our [original research](#) to determine the extent of TRSE in the North
- . Our [Connecting Communities Strategy](#) which sets our ambition to reduce TRSE
- . Our [Strategic Transport Plan](#), which has TRSE reduction as one of its three core ambitions (this Plan was approved by the North’s political leader earlier this year)
- . Work on the extent of severance in the North (with a mapping tool to help local transport planning) – full details and link to the tool are [here](#)

Our Rail North Committee has also established task and finish group working on station accessibility. The most recent paper is [here](#), and you can find past Committee papers (as it has been a standing item all year) as well on our website, which explains the scale of the issue in the North and how political leaders are seeking to address matters more quickly.

Transport Infrastructure Ireland Ref No. AI020

Thank you for your email and for reaching out to TII on this topic. We have done a lot of work in this space and continue to champion and share the rich learnings and insights from our research across the transport sector.

We published our report *Travelling in a Woman's Shoes: Understanding Women's Travel Needs in Ireland to Inform the Future of Sustainable Transport Policy and Design*, in July 2020, and, in July 2021 we published a practical gender checklist which we are now applying to the planning and design phases of our public transport projects (lightrail).

In April 2022, the Irish Department of Transport published the Irish National Sustainable Mobility Policy which features TII's *Travelling in a Woman's Shoes* report as a case study in the chapter on *People Focused Mobility*. In addition, there are specific actions outlined in the associated action plan for the period 2023 – 2025 which reflect some of considerations highlighted in our report. For example, the following action: *publish an annual public transport passenger safety and personal security report, and implement measures where appropriate*.

I attach the following documents for your information and hope that they are of benefit to you:

- . TII's report: [*Travelling in a Woman's Shoes: Understanding Women's Travel Needs in Ireland to Inform the Future of Sustainable Transport Policy and Design*](#)
- . Summary powerpoint presentation regarding TII's *Travelling in a Woman's Shoes* report
- . TII's gender checklist: *Applying a Gender Lens to TII's public transport projects*

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

The following documents were provided to the London Assembly Transport Committee as part of Transport Infrastructure Ireland's submission to this call for evidence. They are:

- TII Gender Checklist - July2021
- TII Travelling in a Womans Shoes Report - July2020
- Travelling in a Womans Shoes - presentation



Bonneagar Iompair Éireann
Transport Infrastructure Ireland

TII Publications



Applying a Gender Lens to TII Public Transport Projects

GE-GEN-01007
July 2021

About TII

Transport Infrastructure Ireland (TII) is responsible for managing and improving the country's national road and light rail networks.

About TII Publications

TII maintains an online suite of technical publications, which is managed through the TII Publications website. The contents of TII Publications is clearly split into 'Standards' and 'Technical' documentation. All documentation for implementation on TII schemes is collectively referred to as TII Publications (Standards), and all other documentation within the system is collectively referred to as TII Publications (Technical).

Document Attributes

Each document within TII Publications has a range of attributes associated with it, which allows for efficient access and retrieval of the document from the website. These attributes are also contained on the inside cover of each current document, for reference.

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TII Publications



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1. Introduction

TII is committed to incorporating sustainability objectives into its core functions as well as those projects included in Project Ireland 2040. In 2020, it released the ground-breaking study, *‘Travelling in a Woman’s Shoes: Understanding Women’s Travel Needs in Ireland to Inform the Future of Sustainable Transport Policy and Design’*. TII now seeks to improve integration of social sustainability and gender equality into its work.

TII, as part of this process, engaged the services of international expert advisor, Kelly Saunders.

1.1 Purpose of this Document

TII is building a set of tools to help staff, contractors and stakeholders to go further in applying social sustainability principles to its work, including using gender as a critical lens to achieve this.

This checklist tool is intended for **pedagogical purposes** including training workshops. It is a series of points designed to encourage new approaches and perspectives on designing and delivering transport projects and services. To effect real change, a set of concrete priorities needs to be agreed and incorporated into specific project requirements and championed through governance processes.

2. Key Points on Gender and Transport

1. Achieving sustainable mobility is about understanding everyday life and connecting people's lives with climate goals (see <https://sdgs.un.org/goals>).
2. Gender is a fundamental organising feature of society which shapes behaviour and lived experience..
3. Globally and in Ireland, research shows that men and women have different travel patterns and needs. These are for instance, driven by women's heightened concerns for personal security and current gender norms including around who does unpaid and paid care work.
4. Applying a gender lens:
 - provides a more complex understanding of mobility, recognising that people are 'situated' with families, roles, identities, fears, joys and thresholds.
 - highlights that transport decisions are social and political.
 - enables inclusion of public life opportunities into the design process.
 - challenges existing norms, standards and criteria used in projects.
 - affirms the importance of good approaches to placemaking, art and design, and greening infrastructure.
 - brings in bottom-up and democratic approaches to system design.
5. Gender-sensitivity recognises that 'gender' is not a binary concept and that there is diversity in the gendered experiences of people. This checklist tool recognises this difference by including gender diverse people who do not identify as either male or female – noting that this cohort can have particular safety concerns on public transport.
6. Gender-sensitivity also invites us to take an intersectional approach - understanding that people can experience discrimination for several aspects of their identity that *intersect* such as gender, sexual orientation, race, economic status, immigration status, ethnicity, and ability. This can compound feelings of insecurity and lead to increased harassment or violence when using public transport.

See: [Intersectionality-into-Practice-Edits05.30.17.pdf \(opportunityagenda.org\)](#)

This work is based on the idea that transport systems reflect what we value.

3. Checklist

3.1 Leadership and Commitment

In this field there is scope for TII to lead globally on policy development and best practice. First ask:

1. Is there political will and leadership for understanding women's and gender diverse travel needs for this project?
 - Is it agreed that this will assist with broader modal shift objectives?
2. Do the **written** objectives of the project include social sustainability and gender equality (in consultant procurement documentation, strategic plans, concept design, sustainability plans, specifications, operations and third-party contracts)?
3. Does this translate to funded initiatives in project requirements (including evaluating impacts)?
4. Are Ireland's human rights commitments reflected in the project? (i.e. democratic representation, freedom of movement, right to public life, active citizenship, stopping violence against women and LGBTIQ+ communities)?
5. Is a range of government departments involved (i.e. Health, Justice and Equality, Children and Youth Affairs)?
6. Do leaders have a good understanding of *gender mainstreaming* and intersectionality? (see best practice examples (in English):
[SDG-guide.indd \(stonewall.org.uk\)](https://www.stonewall.org.uk/sdg-guide))

3.2 Who Designs, Builds and Runs TII's Public Transport Projects?

7. Consider your own profile (sex, gender, age, race, socio-economic and relationship status, disability, family care roles) and mobility (including car and cycling and walking). How does your profile shape your perspective and approach?
8. What motivates you in your transport work? (i.e. technical, social, sustainability)
 - ✓ What are your potential blind spots?
9. If relevant, consider how your children travel to creche, school or university? Evidence shows this shapes future mobility.

3.2.1 Gender Equality in the Team

10. Is there diverse gender representation amongst the people with **power and influence** in the project? This does not guarantee new perspectives but creates space for them.
11. Are women, men and gender diverse people given similar 'stretch' and promotion opportunities on the project? How is this monitored?
12. Is there support for women-led and intersectional innovation? (see SNCF 'think and do' tanks:
<https://www.sncf.com/en/commitments/sncf-au-feminin/our-mission>)

3.3 Evidence and Engagement

3.3.1 Data

The Common Appraisal Framework for Transport Projects (CAF) asks projects to consider whether the project *improves access to jobs, key facilities (such as town centres and schools) and social and recreational opportunities for vulnerable groups including specifically women*. It states *if suitable data from the core cost-benefit analysis are available, analyse the distribution of user benefits by income group and other characteristics* (cl 4.3.4).

13. Who will benefit from a preferred route? Be specific. (i.e. commuters, surrounding business/industries, institutions and community services, leisure, children's activities, other users)
14. What data and analysis supports preferred route and design decisions?
 - does it permit the analysis of user benefits required by cl 4.3.4?
 - **is data disaggregated by gender** (and age)?
 - consider what additional data is needed and best methods to collect this data;
 - public research - data and ethnographic (see Gender + Age Tally: <https://gehlpeople.com/wp-content/uploads/2020/03/AGE-AND-GENDER-TALLY.pdf>),
 - public consultation,
 - customer surveys,
 - visual map-based data (i.e. GPS safety pins) see for example: [YourGround](#),
 - census data by employment status and gender,
 - space and user analysis for transport sites.
 - include analysis of competing interests,
 - include home-based care work (paid and unpaid) in analysis of 'job density' and 'work destination',
 - check if surrounding industries are heavily male or female dominated,
 - ensure care-related trips are **separately measured** from leisure, social, retail and education trips? Evidence shows many women make these trips as part of caring for others, known as the *mobility of care*,
 - portion of households are single parent households,
 - modal share in the area by gender,
 - car and bike ownership and use by gender.
15. Does data capture transport demand for trips less than 3km (often made by women)?
16. Collect data about Covid-19 related changes in mobility – increased work from home and new mobility patterns.
17. **Identify and address the barriers to using better data** (i.e. GDPR, wireless technology, ticketing system).

3.3.2 Consultation and Co-Design: Shifting the Expert

Transport planning remains a heavily male-dominated sector. Yet, women are the experts in what makes them use transport. They are a key resource designing safe and accessible transport systems.

18. Ensure consultation includes diverse voices and local knowledge.
19. Consult with women, gender diverse people, young and elderly people at key stages of the project to ensure customer-centric design.
20. Co-design with women to design customer safety and access procedures including:
 - gender safety audit,
 - emergency/incident response,
 - reporting, complaints and victim impact,
 - passenger information.
21. What community and strategic partnerships are part of the project? Consider working with:
 - community leaders (including LGBTIQ+ leaders),
 - women’s organisations (including industry mobility groups),
 - universities,
 - local interest groups and civil society.
22. Design tools for including the community in maintaining transport spaces.
23. Support local culture, sites and businesses.

3.3.3 Communications

24. Consider the images promoting the project. Consider:
 - men travelling alone with children,
 - women independently cycling and walking to stations,
 - artistic and green elements of the design,
 - young people’s independent mobility,
 - children exploring,
 - showing elderly, gender and racially diverse people enjoying the space,
 - coffee! (means people and safety),
 - support for breastfeeding-friendly spaces (see bus case study: <https://www.arrivabus.co.uk/latest-news/arriva-supports-breastfeeding-on-bus>)
25. Test how people respond to the ‘look and feel’ of project marketing.
 - use of masculine/feminine, corporate/community colours and design.
26. Include information for children and technology-free methods (community boards, letter drops).
27. Consider map-based community engagement (see www.crowdspot.com.au, [YourGround](#) and [She’s A Crowd - The Intersection](#)).
28. Do TII communications commit to:
 - stopping all gender-based violence and harassment (see SDG 5),

- a strong anti-racism message,
 - universal design [Customer Communications Toolkit for the Public Service - A Universal Design Approach | The National Disability Authority \(nda.ie\)](#)
 - support for LGBTIQ+ communities.
29. Ensure that site/tram stop naming policies do not favour historically significant men (including indirectly via street names).

3.4 Designated Area

3.4.1 Surrounding Land Use and Public Realm

Designing public transport is about both surrounding land use and the tram network. Land use and public realm policy is not always in TII's scope. However, it is critical for modal shift to find new ways to:

- understand existing land use and local needs,
 - identify transport user types,
 - partner with **local authorities and planning agencies**,
 - apply design standards flexibly according to local conditions.
30. Create a set of TII design tools to understand local context including a **public space/public life survey requirement for projects**.
- integrate elements of best practice design guides on Pedestrian Comfort, Public Life, Streets for Kids, User Types, universal design, and capture data about desire lines, social context, travel groupings. See:
 - [Pedestrian Comfort Guidance for London \(tfl.gov.uk\)](#)
 - [Tools Archive - Gehl \(gehlpeople.com\)](#)
 - [Designing Streets for Kids | National Association of City Transportation Officials \(nacto.org\)](#)
31. Ensure a joined-up government process to:
- expand pedestrian crossings, bike and footpaths to tram stops,
 - create family-friendly road conditions around stops including dropped kerbs at crossings, refuge islands, timing of traffic signals, traffic calming,
 - separate e-mobility (scooters, e-bikes) from pedestrians,
 - reduce carbonised vehicle road space (where feasible),
 - critically review land use, infrastructure, services and amenities in the vicinity (including unused transport land).
32. Do stakeholder training to build awareness of gender equality implications of land use decisions including:
- childcare and community services in the study area,
 - gender equal access to infrastructure and public realm (i.e. football pitches, skate parks, e-mobility),
 - experiences of public space by women, men and gender diverse people (in public space and moving through public space),
 - gender differences in travel patterns (with women statistically making more small local trips - called trip chaining.),

- land use and perceptions of safety.
- 33. Partner to develop criteria for retail and development in and around tram routes, such as:
 - interaction with site specific services (i.e. hospitals, schools),
 - limit retail that attracts anti-social behaviour (convenience stores, fast food),
 - prioritise health and wellbeing benefits (i.e. community services, access to healthy and affordable food shops, local cafes),
 - attractiveness and architectural quality,
 - appeal for people of all ages,
 - community value and local character,
 - opportunities for community participation and regeneration,
 - ecological footprint.
- 34. Include a gender lens in planning and designing connecting bus infrastructure.

3.4.2 Placemaking and Safety in Transport Spaces

Designing for gender equality means creating spaces that feel safe and welcoming. Good placemaking has a direct impact on perceptions of safety and access. This means spaces with character, warmth and conviviality. Overtly family-friendly spaces attract children and elderly people, making everyone feel safe. The presence of art, beauty and culture make a difference. Clear rules on vehicle speed are vital.

- 35. Conduct a site-specific **gender safety audit** to build on existing safety and passive surveillance criteria.
- 36. Ensure design guides and assessment criteria for placemaking approaches consider:
 - child-friendly spaces with sense of play and playfulness (colours, signage, murals and infrastructure for kids (seats, things to climb),
 - use of warm, layered LED lighting (not white, overly lit or flood lit),
 - creative lighting and art projects,
 - green space (noting need for sight lines),
 - space for community information including local events, small businesses led by women and men and gender diverse people,
 - access to toilets including small toilets for children and sanitary dispensers and bins,
 - space for breast feeding and parents to change babies,
 - wayfinding to social infrastructure (i.e. toilets, local libraries, swimming pools, parks, community gardens, food markets, cultural and other community places),
 - Consider future role of Mobility as a Service
 - signage for sporting fields used by men, **women, girls** and boys and other communities,
 - a plan for high quality busking, performance,
 - pleasant places to sit comfortably (consider age, disability, health and body types),

- local heritage (ensure gender diversity in narrative),
 - sense of humour,
 - assess walkability of places (human scale, not isolated);
 - consider mix of engineering, legislation and enforcement tools and behavioural measures (see <https://walk21.com/>),
 - highlight benefits of walking,
 - declutter public space and roads (see Public Realm Strategy | Dublin City Council).
 - easy and visible access to e-bike schemes, car share and taxis.
37. How can stops/unused transport land be used by the community beyond its transport function? (meeting rooms, gallery, services, café/bar),
38. Use '**visible ecology**' meaning the overt use of ecological and natural materials including:
- fire retardant wood for seats/facilities/shelters,
 - vegetable gardens, flowers, herb bushes,
 - efforts to compost and recycle,
 - overt use of recycled materials and equipment.
39. Consider a role for **operator curation** of tram network. This might require the operator to actively 'curate' and flexibly manage transport spaces, including:
- community engagement,
 - sub-contracts for 'pop up', temporary land use focusing on conviviality, art, music and cultural projects,
 - temporary displays.
40. Ensure **parking access** (including Park and Ride schemes) feels safe. Includes:
- a **gender safety audit** of the site,
 - facilities for getting changed, doing hair (see Sydney study [ON THE GO - A CASE STUDY ON ACTIVE TRANSPORT ACROSS SYDNEY](#)),
 - suitable parking for bikes including cargo bikes.

3.4.3 Stops and Trams

Designing for gender equality is about the comfort and appeal of the tram stops and trams. Seek opportunities to use colour palettes and features to create iconic personality and character. Networks doing this well:

- Melbourne [TramTile.jpg \(840×390\) \(creative.vic.gov.au\)](#)
 - Bordeaux [chl-bordeaux-tram.jpg \(500×320\) \(cuencahighlife.com\)](#)
 - Paris [6a00d83451b0bd69e2013487f471fa970c-600wi \(432×324\) \(eyepreferparis.com\)](#)
41. Are the sight lines on board the tram good for drivers and customers?
42. Consider designing for:
- barrier and step free travel with kids, bags *and* prams,
 - tram accessibility for double stroller and wheelchair at the same time,

- holding rails for children,
 - comfortable, artistic seating and tram shelter architecture,
 - spaces which cannot easily become dirty or dingy,
 - adequate shelter, permitting people to equip themselves and dependants with wet weather gear.
43. Ensure tram windows can be opened safely, providing natural ventilation.
44. Avoid excessively cold air-conditioned trams (which often cause greater discomfort for women).

3.5 Operations and Technology

For a substantive shift toward inclusive transport services, operators need clear contract terms, KPIs and deliverables which are priced for the life of the contract (as with other aspects of service delivery).

45. Do the contract and revenue model incentivise:
- operator-led R&D on social sustainability and inclusion,
 - meeting women's and intersectional needs through good data and projects,
 - operator curation of transport spaces (see (39)).
46. Continuously improving the ticketing system for fairness. Consider price for:
- several small trips compared with a single 'work commute' trip,
 - a parent travelling with several children,
 - multi-modal travel,
 - incentives for modal shift.

3.5.1 Technology

Technological innovation can play a key role in solving issues for women and diverse communities using transport such as feeling unsafe, exhausted and time poor. All transport actors need incentives to design solutions (which include finding new combinations of existing GPS, Bluetooth, ticketing, CCTV, web-based data sources). Consider:

47. Do diverse people have different information needs?
48. How do measures such as CCTV and text message services interact to make women and gender diverse people feel safe or unsafe? Evaluate impact.
49. How can MAAS be used to improve gender equality through better information and service coordination?
50. How can services integrate with 'new mobility' to solve last mile home challenges including for women and children (e-bikes, scooters, shared ride).
51. Is there fairness and transparency in automated systems which assume customer behaviours or characteristics?

3.5.2 Staffing, Training and Procedures

52. Prevent hiring of staff with violence or sexual criminal records.
53. Adopt a zero-tolerance policy on sexual assault and gendered harassment at work and on the network.
- ensure HR policies and management practice support this policy,

- zero tolerance of homophobic behaviour,
 - provide mental health and peer support for employees,
 - robust investigation of claims and staff discipline,
 - effective partnering with Garda on crime prevention and investigation.
54. Ensure **workplace and culture** at tram depots is safe and appropriate for all workers. This is an employer's legal obligation.
- are the 'breakout' spaces comfortable for women and gender diverse people? (i.e. zero tolerance of sexism and sexual and gendered harassment, suitable forms of recreation),
 - do facilities meet the needs of female and gender diverse workers?
 - are the uniforms and equipment adapted to various body types?
 - do enterprise agreements consider needs of female workers?
55. Integrate **gender-sensitive practices into existing training** for security and customer service staff (such as giving proper support for victims and survivors of gender-based violence or harassment on the network).
56. **Emergency response** – is the process clearly communicated and easy for female customers to use? Does it inspire confidence? Are there enhanced safety measures for night services? See co-design at (20).
57. **Reporting and investigating complaints** – ensure processes are gender-sensitive in responding to claims of sexual and gendered harassment and assault.
- ensure first responders and investigators are trained,
 - include follow up procedures to ensure victims and survivors are supported and claims thoroughly treated.
58. **CCTV policy** – ensure footage is safeguarded for a reasonable time.
59. Incentivise innovative management of over-crowding (women less tolerant of over-crowding). Consider partnering with employers to reduce peaks.
60. Include gender and transport as a theme in **training and education** of:
- engineers, planners,
 - schools and university,
 - community.
- including training on gender equality at work, women's travel needs, needs of LGBTIQ+ communities.
61. Improve off-peak services to support women's mobility
- coordinate connections with other modes and services,
 - increase frequency of services.
62. Ensure sanitation requirements (closing off facilities) during Covid-19 do not indirectly discriminate against people requiring regular access to toilets.

3.6 Key Contracts and Legal

It is critical that gender initiatives be included as specific and measurable requirements that are linked to performance in key contracts and engagement letters (including design, construct and operations contracts)

63. Build in clear KPIs.
64. Ask for expertise and track-record in gender equality and gender impact assessment when engaging global advisors and contractors.
65. Include *Social Considerations in Public Procurement* to require contractors to commit to gender equality including:
 - strive for gender balance in the teams working with TII,
 - zero tolerance of sexual and gendered harassment and assault,
 - equal pay and promotion commitments for women and LGBTIQ+ transport workers,
 - UITP/ITF on gender equality for transport workers [Microsoft Word - ITF UITP positive employer gender policy.docx \(itfglobal.org\)](#)
 - construction industry and LGBTIQ+ [InterBuild: The LGBTQ+ network for the property and construction industry - Home](#)
 - parental leave schemes for all genders,
 - domestic violence leave.

see: [Office of Government Procurement – Buying Social – A Guide to Taking Account of Social Considerations in Public Procurement \(ogp.gov.ie\)](#)
66. Prevent sexualised, macho or inappropriate advertising and tram wraps in contracts.
67. Budget for evaluation and audit of gender equality initiatives.
68. Ensure interface agreements between key stakeholders for managing public safety are updated to ensure better safety outcomes for women.
69. Advocate to ensure laws and regulations recognise and support women's and gender diverse mobility such as improving:
 - design and building regulations,
 - Laws relating to sexual and gendered harassment in public space.

3.7 A Word on Governance

Sustainable transport solutions that work for everyone and lead to modal shift require new approaches and advocacy within and outside of TII. Some of the initiatives in this checklist are a departure from current practice and will require strong championing through governance processes. Otherwise, there is a risk that these things will be labelled nice-to-haves and removed from scope.

Ensure the buy-in of senior managers for a list of priority initiatives (which may be a selection of the initiatives in this checklist that best fit the project).

Ask what the major costs in this checklist are. How might these costs be incorporated into the existing or new budget line items?

3.8 Measuring Success

Consider how success will be measured. Selecting priority initiatives and creating KPIs and measures are key next steps. Example KPIs include:

- number of 'public life' research observations of people using the system noting social inclusion, intergenerational usage, evidence of community use and enjoyment,
- number of empathy-building and collaboration initiatives built into the project (i.e. community co-creation, night walks, gender safety audits),
- number of partnerships with community actors and joint projects,
- establishment of cross-government forum on transport issues,
- an audit of zero tolerance measures on sexual crimes and harassment, discriminatory and violent behaviours,
- number and proportion of transport staff (customer facing, inspectors, supervisors) trained in sexual and gendered harassment awareness and appropriate responses,
- wellbeing study of transport workers at the depot disaggregated by gender.



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Travelling in a Woman's Shoes

UNDERSTANDING WOMEN'S TRAVEL NEEDS IN IRELAND TO INFORM THE FUTURE OF SUSTAINABLE TRANSPORT POLICY AND DESIGN

JULY 2020



Achieving gender equality and women's empowerment is integral to each of the 17 goals (SDGs). Only by ensuring the rights of women and girls across all the goals will we get to justice and inclusion, economies that work for all, and sustaining our shared environment now and for future generations.

UN Women

This study was commissioned by Transport Infrastructure Ireland (TII).

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CEO Foreword

As a leading transport agency within Ireland's transport community and the body directly responsible for delivering transport infrastructure and operating public transport systems, TII has a responsibility to provide sustainable transport networks for all on the island of Ireland. With women accounting for half of the population, TII recognises the importance of understanding and addressing the different mobility patterns and needs of both women and men.

This study, which investigates the needs and travel behaviours of women, is the first of its kind in Ireland, and TII is delighted to be part of an essential step towards developing deeper insights into the transport experience for women.

This deeper understanding of women and transport is not only important in terms of improving Ireland's transport networks for all users; it is also critical in the fight against climate change and urgent need to transition the sector to carbon neutrality by 2050.

Now is the time for Ireland's transport community to step up and commit to evolving our transport systems and networks for the benefit of all groups, including women in a truly sustainable manner.

Transport is often seen as gender-neutral, providing benefit to all equally. However, a growing body of international research highlights that this is not the case. Women and men can have different needs, constraints and expectations for using transport. If women feel more empowered and safe to use sustainable transport modes such as walking, cycling, public transport and carpooling, there will be less dependence on cars, more public transport trips taken across the day and night, and enhanced quality of life for all. At the same time, the planning and design of a safe, reliable and equitable transport system will also encourage men to become less car dependant and give them more sustainable transport mode choices as part of their daily routine.



In the context of the climate change targets, and TII's mission, we as a public agency need to promote these sustainable forms of transport. Exploring the experiences of women travelling in Ireland, their mobility barriers, and the challenges that they face, is a critical part of the sustainability agenda. Without a better understanding of women's needs, we will struggle to achieve modal shift.

Travelling in a Woman's Shoes tells real-life stories that demonstrate the characteristics of women's mobility in Ireland. The stories shed light on the disparities and the realities that women face every day, introducing a multiplicity of perspectives and enriched data that applies a gender lens to travel behaviour.

Ireland is not alone in exploring issues of equity in transport. In 2014, the United Nations Commission on the Status of Women found a male bias in the planning, provision and design of transport systems. This study will help identify the patterns, constraints and issues associated with women's mobility and the resultant social, societal and economic repercussions of gender bias within the transport system.

At an international level, there is increasing pressure on countries to implement plans to meet the commitments of the United Nations 2030 Agenda for Sustainable Development. This study was guided by the Sustainable Development Goals (SDGs), and in particular:

- Goal 5: Gender Equality
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

This study is the first step, a building block, towards improving women's travel experiences in Ireland. The report was finalised during the recent worldwide Covid-19 pandemic and we recognise that life as we know it has changed dramatically. Never has there been such a need to rapidly address and promote sustainable and active modes of transport such as walking and cycling. This is a huge opportunity for the Irish transport sector to come together and work collaboratively with our partners, stakeholders, and communities so that the findings from this report can influence modal shift and inform future policy and decision making - making sustainable transport options feel safer, more attractive, and more accessible to everyone.

I am very proud of this ground-breaking study and hope that together we can plan, design and operate our transport networks to create a more resilient and sustainable system—for all.

Michael Nolan

Chief Executive

Transport Infrastructure Ireland

Travelling in a Woman's Shoes

How do we design sustainable transport that everyone will use and love?

Supporting women and their travel needs will help Ireland transition to a carbon-neutral transport system.

Historically, transport has not been designed with the needs of women in mind. This study seeks to fill important gaps in our understanding, in order to encourage wide adoption of sustainable transport.

The study explores the drivers of car dependency for women including transport infrastructure, significant caregiving responsibilities, safety concerns and equality of access to quality services. Throughout the report policy opportunities are identified to provide a way forward. This study shows us that designing transport that people will use and love requires new ideas and a new level of gender-sensitivity in policy and practice.

KEY STATS

Women rely heavily on the car

Outside of Dublin,

81%

women own or have access to a car

95%

women consider the car to be a necessity

In Dublin,

66%

women own or have access to a car

79%

women consider the car to be a necessity

Women shoulder more caring responsibilities

84%

of women in families take on the primary or lion's share of childcare duties

30%

of women provide primary care to another adult

Mobility of care drives women's travel patterns

Women's primary reason for travelling is to drop off and collect children or family members, while men's primary reason is travelling for work

Women are impacted by safety issues

Safety is an issue for all people

1 in 3

public transport users have seen or experienced some form of harassment or violence while using public transport

7%

women in Dublin report having experienced sexual harassment on public transport

55%

of women stated that they would not use public transport at night

34%

of women stated that feelings of insecurity have prevented them from travelling

*“It’s easier to have a car with a baby,
you can just put him in his car seat
and be done with it”*

Natalie (35-44, Dublin)

KEY FINDINGS

1 MODES OF TRANSPORT

How can sustainable transport modes compete with the car?

For most Irish women today the car is their preferred mode of transport, supporting their basic functional needs as well as higher-order experiential and emotional needs. While women view cycling as good for health, this is negated by the perception that it is the least safe way to travel. Likewise, while women support the idea of public transport in general, they prefer the car as they perceive it to be attractive from a functional and experiential perspective.

To compete with the car, public and active transport modes need to get the basics right—safety, reliability, accessibility, convenience—while also delivering on higher-order needs—comfort, inclusion, joy, community, belonging.

Policy opportunities:

- Gender mainstreaming
- A “20 minute city” that is accessible by foot
- Safe cycling lanes and lessons
- Better public transport coverage
- New solutions for end-to-end mobility
- Better real-time information

2 FAMILY ROLES

From an early age, attitudes and perceptions of transport are shaped by the family. To support independence, some families are keen for young women to learn to drive, while other families encourage early public transport use. Most women learn to use public transport independently before age 18, often in their early teen years.

As women grow older and start to juggle work, household duties and childcare, their public transport habits are often eroded as the appeal of the car, perceived as family friendly and reliable, grows.

Habitual use of the car solidifies as women move through adulthood, becoming a daily routine that is hard to break. However, on weekends or holidays many women look to walking, cycling or public transport as a welcome “break from the car”

Policy opportunities:

- Enable children’s independent mobility
- Design child-friendly public transport and adjoining public space
- Promote car-free travel on the weekends to establish new habits

3 BEING SAFE

How can transport feel and be safe for women?

Staying safe is a top priority for many women when travelling, remaining vigilant at all times, particularly at night or when alone. As has long been the case, society places the primary responsibility on a woman to keep herself safe irrespective of the threats she may face. As a result, women often develop strategies like avoiding travelling at night, carrying car keys in their hands as a makeshift weapon or feigning listening to music while staying alert. Fortunately for most women, violent and unsafe incidents do not happen every day but the impact of such trauma is felt everyday.

A single incident often has a lasting impact on women's sense of safety and daily choices.

For women, a lack of safety infrastructure and support from fellow passengers, often exacerbates women's feelings of isolation and vulnerability when travelling. To build trust in alternative modes of transport, it is essential to create physical and psychological safety through social and physical infrastructure.

Policy opportunities:

- Joined-up solutions and partnering
- Better data
- Co-create with women
- Quality lighting around stops and streets
- Apply a gender lens to staff training and rosters
- Effective incident-reporting
- Women's safety audits
- School education for boys and girls
- Evaluate safety initiatives

4 BEING INCLUSIVE

How can transport consider the diverse needs and contexts of all women?

Not all women have equal access to mobility, or experience mobility in the same way. Women from Dublin use public transport regularly, shaping a more positive perception of it than those with less exposure, as confidence and comfort in using public transport is acquired through use. Women with higher household income are more likely to own or have access to a car, and therefore less dependent on public transport.

Women with lower household income are more dependent on public transport, and more likely to witness or be victims of violent behaviour and sexual harassment.

Exposure to risk, inconvenience, and vulnerability can be amplified for the most disadvantaged women, for whom low income can intersect with health issues, disabilities, reliance on social services, lack of family or partner support, and lack of opportunities.

Policy opportunities:

- Design for range of disabilities and age and health related issues
- Build a gender lens with diverse partners
- Promote diversity and inclusion through communications
- Understand local neighborhood transport challenges
- Take an integrated approach to land use
- Expose rural children to urban transport environment

"If my son takes the bus, it saves me half an hour sitting in traffic"

Amanda (25-34, Dublin)

5 DRIVING CHANGE

How can we accelerate sustainable behavioural change?

There is a high level of general awareness of climate change in Ireland, but this does not translate into significant transport behavioural change. To inspire change, there is a need to do more than discuss the benefits of decarbonisation, as for many the link between individual transport behaviour and sustainability is unclear. Policies need to recognise this gap, as well as the limitations of the existing car-centric land use and infrastructure in Ireland. Policies that promote practical and realistic ways of reducing car use may be more successful in the short term: including **promoting car-share schemes, ridesharing, multi-modal park and ride or switching to electric vehicles (EV)**. It is essential to ensure that efforts to reduce car use do not directly or indirectly penalise women. With school-aged children strongly influencing the attitudes and behaviours of the family unit, **schools can play a key role in the transformation**. The research showed that women in Ireland were generally open to change. We saw this particularly for women in Dublin, where public transport and density make it a more viable choice. There is an opportunity to leverage this openness to encourage behaviour change.

Policy opportunities:

- Improved walking and cycling infrastructure and amenities
- Facilitate multi-modal travel
- Apply a gender lens to carpooling and ridesharing schemes
- EV incentives
- Ramp up climate change education for all age groups
- Plan for changing flexible work and mobility patterns in wake of Covid-19

"I don't like places with bushes, I'm not saying they would but someone could jump out and fight you, that would put me off for good, then I'd never go anywhere"

Josie (45-54, Dublin)

Readers note: A detailed list of all policy takeaways and design challenges can be found in the Conclusion section. Here, we have only highlighted select opportunities.



Introduction & Context

INCLUSIVE DESIGN AND SUSTAINABILITY

The climate crisis poses an urgent need for a fundamental reimagining of how we live, and how we get around.

At a national level, Ireland has set out a Climate Action Plan (2019) to drive the decarbonisation of our transport system. As the national body charged with delivering transport infrastructure and services, Transport Infrastructure Ireland (TII) has been advancing this agenda - key aspects of which include major new infrastructure and service delivery projects such as the new Luas system in Cork and MetroLink in Dublin, and demand management strategies to facilitate a modal shift from private, low-occupancy transport to public transport modes. A new challenge in this transition is the global Covid-19 health crisis which has reduced public transport patronage and increased anxiety about shared mobility in the short term. Nevertheless, TII is clear that for long term well-being and prosperity in Ireland, it must continue to pursue safe, decarbonised mobility solutions.

NTA, 2020¹

290 million

Public transport passenger journeys were provided by Dublin Bus, Bus Éireann, Iarnród Éireann, Luas and Go-Ahead Ireland on 'Transport for Ireland' Public Service Obligation (PSO) services in 2019

9% rise

since 2018

While millions of public transport journeys are already taken every year, this endeavour is challenging in Ireland because of the country's historical land use policies and car dependency. Pre-pandemic, 75% of all trips were made by private vehicle, and the share of journeys made by public transport had fallen since 2014.² Car dependency is high, while EV penetration is low, at just 0.18%.³ From our primary research, we know that while awareness of the climate crisis is increasing, people don't yet associate it with a strong impetus to change their own daily behaviours. Transitioning Ireland to sustainable transport modes will, therefore, require both new infrastructure and land use approaches as well as behaviour change efforts.

It is now well established that transport is not gender-neutral. Women and men have different mobility realities. Global research by organisations such as the UN, show that women tend to have more complex patterns of mobility characterised by trip chaining (making numerous small trips as part of a larger journey such as running errands and buying groceries on the way to work) and caregiving duties (known as the 'mobility of care').⁴ Globally, personal safety is the most widespread concern for women when travelling.⁵ Women worry about their safety when travelling alone, at night, waiting in or moving through empty or isolated locations and in poorly lit or overcrowded transport spaces.

Meanwhile, gaps in gender disaggregated data in Ireland make it challenging to pinpoint and identify specific issues that need to be addressed. **In 2014, a male bias was found by the United**

◀ **Transport Infrastructure Ireland (TII) is responsible for Ireland's national road network, and the delivery and operation of public transport systems (in partnership with National Transport Authority) including the Luas Light Rail System, and the upcoming MetroLink.**

◀ **A note on gender identity and roles**
We acknowledge that gender is not binary. A spectrum of identities exist other than or in between "male" and "female", though limitations of data and literature today have led us to focus on these two groupings. Further, we note gender roles continue to evolve and studying gender differences should not be confused with gender stereotyping (that is making assumptions about differences between men and women in a way that is inaccurate, limiting or harmful to one or both sexes).

“I would absolutely support measures for less cars on the road, if the alternative is good enough, you can't do one without the other.”

Karen (45-54, Cork)

Nations Commission on the Status of Women “in the planning, provision and design of transport systems”, due to women’s under-representation in the sector.⁶ We see that traditionally male-dominated leadership and management has contributed to an unintended male bias in the design of transport systems, resulting in adverse outcomes for women.

In light of these challenges, **this study seeks to understand how women in Ireland experience transport and mobility today: why they make the choices they do, their daily challenges and aspirations, and opportunities for improvement.**

Study and Understand Women’s Mobility is the first principle of the Transformative Urban Mobility Initiative’s (TUMI) 5 Principles to Empower Women in Transport.⁷ Filling this data gap is crucial for designing future sustainable transport systems.

This study contributes to ongoing global research and policy exploring how sustainable transport can be inclusive, attractive and encourage wide-scale adoption.

THE ADDED VALUE OF DESIGNING FOR WOMEN

Studying and designing for women’s mobility compels us to step out of our comfort zone of traditional transport policy making and planning. It requires us to confront a level of discomfort or scepticism, increasing our collective and personal gender awareness. It requires us to listen differently—to stories of people not often heard in consultation forums—mothers, young women, older women and importantly, children. It requires us to think about purpose driven investment— what functions and purposes do we need to facilitate through good mobility to ensure resilient and sustainable communities?



¹ NTA. (2020). Massive Jump in Passenger Journey Numbers as Commuters Flock to Public Transport. Retrieved from [nationaltransport.ie: https://www.nationaltransport.ie/news/massive-jump-in-passenger-journey-number-as-commuters-flock-to-public-transport/](https://www.nationaltransport.ie/news/massive-jump-in-passenger-journey-number-as-commuters-flock-to-public-transport/)

² Department of Transport, Tourism and Sport. (2018). Transport Trends, An Overview of Ireland’s Transport Sector 2018. Dublin: DTTaS.

³ Fitzgerald, C. (2019, August 29). ‘We are on the road to nowhere’: Are electric cars and chargers enough to cut our transport emissions? Retrieved from [thejournal.ie: https://www.thejournal.ie/ireland-transport-climate-4785268-Aug2019/](https://www.thejournal.ie/ireland-transport-climate-4785268-Aug2019/)

⁴ Sánchez de Madariaga, I. (2013). The mobility of care. Introducing new concepts in urban transport. Fair shared cities. The impact of gender planning in Europe., 33-48.

⁵ Ng, W.-S., & Ashley, A. (2018). Understanding Urban Travel Behaviour by Gender for Efficient and Equitable Transport Policies. Paris: OECD.

⁶ Badstuber, N. (2019, May 21). Mind the gender gap: the hidden data gap in transport. Retrieved from [themandarin.com: https://www.themandarin.com.au/108874-mind-the-gender-gap-the-hidden-data-gap-in-transport/](https://www.themandarin.com.au/108874-mind-the-gender-gap-the-hidden-data-gap-in-transport/)

⁷ Women Mobilize Women. (2019). TUMI’S 5 PRINCIPLES TO EMPOWER WOMEN IN TRANSPORT. Retrieved from [womenmobilize.org: https://womenmobilize.org/publications/](https://womenmobilize.org/publications/)

CASE STUDY

VIENNESE GENDER MAINSTREAMING

Incorporating gender perspectives systematically into transport and city planning is entirely possible. In Vienna, making the city work for both women and men has been considered a priority since the 1990s. Before a project begins, data is collected to determine how different groups of people will be impacted by the project including women, a step that improves project outcomes for all.

Examples of its implementation include school yard design that ensures girls and boys enjoy yard space, gender-sensitive traffic planning, public lighting and roads and paths design. Areas of the city have been designed to allow convenient access for women to the essential services they are statistically more likely to access, e.g. childcare, medical centres, schools and parks. Pavement and footpath expansion are also practised in order to provide greater space for women with buggies and children or elderly people on foot. Many of the limitations of car-free mobility have been identified and embedded in the design of systems, removing hassle and making everyday journeys more comfortable and convenient.



Aspern Seestadt has an explicitly family-oriented design, with a specific emphasis on taking women's needs into account in its planning. Photograph: Daniel Hawelka for Seestadt

INTRODUCTION & CONTEXT

A SNAPSHOT OF HISTORY

THE RISE OF THE CAR

Throughout the 20th and early 21st century in Ireland, a swelling workforce and economic growth drove household incomes up, enabling car ownership and catalysing car-dependence.

20th century: *Extensive public infrastructure characterised by rail, tram, and bus services.⁸*

With an extensive railway system across Ireland and tramways all over Dublin, at the time the country was considered to have one of the most impressive public transport systems in the world. However, by the 1940s the rise of the bus service in the city eventually led to a decline in tram services.

1990 onwards: *Ireland's car culture is spurred by rapid economic growth.*

The “Celtic Tiger” brought about increased employment, higher wages, new development and land use patterns and more affordable private vehicles.⁹ The influx of wealth led to an increase in car ownership and use, which has continued to grow thereafter. As women's participation in the workforce has grown, reaching 77% rates in 2018¹⁰, there are more dual-income families owning and using two cars.

Car dependency is widespread across Ireland spanning all income brackets.¹³ Irish households are spending more on transport than in previous years, despite owning and running a car being a financial burden on some households.

The number of licensed vehicles in Ireland increased by

183%

from **960,000** in 1985-1989 to **2.7m** in 2018¹¹

The 2016 Census found that

77%

of urban and

91%

of rural households now own **at least 1 car**¹²

15%

of total household expenditure was spent on transport¹⁴

Average weekly household expenditure on transport was

€125

in 2015-2016 (increased from €116 in 2009-2010, largely driven by car purchases).¹⁵

⁸ McNamee, M. S. (2015, August 29). Dublin used to have a pretty amazing public transport system. Retrieved from thejournal.ie: <https://www.thejournal.ie/dublin-transport-system-rip-tracks-change-2294938-Aug2015/>

⁹ The Celtic Tiger refers to a period of rapid economic growth driven by foreign investment, it spanned the mid-1990s to the late-2000s.

¹⁰ European Commission. (2020). The EU and Irish Women. Retrieved from ec.europa.eu: https://ec.europa.eu/ireland/node/684_en

¹¹ CSO. (2019). Environmental Indicators 2019. Retrieved from CSO.ie: <https://www.cso.ie/en/releasesandpublications/ep/p-elii/eli19/transport/>

¹² CSO. (2016). Travel patterns. Dublin: CSO.

¹³ Ng, W.-S., & Ashley, A. (2018). Understanding Urban Travel Behaviour by Gender for Efficient and Equitable Transport Policies. Paris: OECD.

¹⁴ CSO. (2016). Household Budget Survey. Retrieved from CSO.ie: <https://www.cso.ie/en/statistics/housingandhouseholds/householdbudgetsurvey/>

¹⁵ Ibid.



THE RISE OF WOMEN

Parallel to the rise of the car and the country's overall economic growth story, the role of women in Irish society has changed dramatically in the last two centuries.

For centuries, women in Ireland were bound by the country's traditional patriarchal society that defined them as homemakers. Economic growth and liberation movements through the 20th century led to advancements in women's participation in education and work. Today, often balancing a dual role of homemaker and salary earner,¹⁶ Irish women have more rights and more responsibilities than their mothers, grandmothers and great grandmothers before them.¹⁷

Education

Irish women today are more likely to have a third level qualification than men.

55%

of women aged 25-34 have a third-level qualification degree (compared to **43% of men**).¹⁸

Employment

While women's employment rates have been rising gradually for many years, women still participate in the workforce less than men. Female employment at all levels tends to dominate certain sectors such as education, healthcare, social work, hospitality, and food services, and includes more part-time work.¹⁹

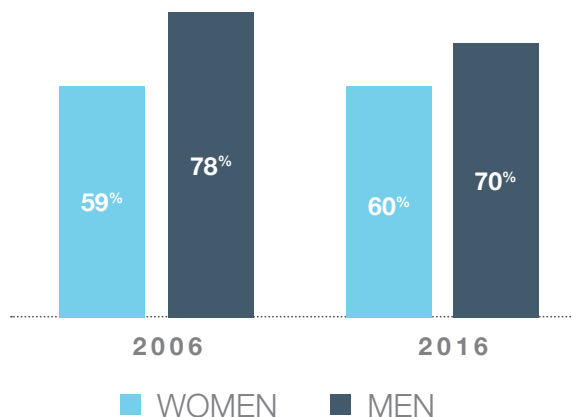
In 2016,

18%

of female first-year graduates started in the 'Health and Social Work' sector, compared to (compared to **4% of men**).²⁰

Employment rates for women

The 2016 rate is currently the lowest in the EU (compared to EU average of 61%)²¹



Caregiving roles

Existing research shows that in Irish households, women are still the primary caregivers, providing care and assistance to children, the elderly and family members with special needs. Women also perform the majority of household chores.

45%

of Irish women provide care for others on a daily basis (compared to **29% of men**).²²

Women spend

21 hours

a week on average providing care (compared to **11 hours for men**)²³

¹⁶ Sheehan, A., Berkery, E., & Lichrou, M. (2015). Changing role of women in the Irish society: an overview of the female consumer. *The Irish Journal of Management*, 162-171.

¹⁷ European Commission. (2020). The EU and Irish Women. Retrieved from ec.europa.eu: https://ec.europa.eu/ireland/node/684_en

¹⁸ Lynott, L. (2017, October 18). Latest CSO data reveals key differences between men and women in Ireland. Retrieved from independent.ie: <https://www.independent.ie/irish-news/news/latest-cso-data-reveals-key-differences-between-men-and-women-in-ireland-36240295.html>

¹⁹ CSO. (2016). Employment. Retrieved from cso.ie: <https://www.cso.ie/en/releasesandpublications/ep/p-wamii/womenandmeninireland2016/employment/>; National Women's Council of Ireland. (n.d.). Women and Employment. Retrieved from ncwi.ie: https://www.ncwi.ie/discover/what_we_do/womens_economic_independence/women_and_employment

²⁰ CSO. (2019). Higher Education Outcomes - Graduation Years 2010-2016. Retrieved from CSO.ie: <https://www.cso.ie/en/releasesandpublications/ep/p-heo/highereducationoutcomes-graduationyears2010-2016/wheredograduateswork/>

²¹ CSO. (2016). Employment. Retrieved from cso.ie: <https://www.cso.ie/en/releasesandpublications/ep/p-wamii/womenandmeninireland2016/employment/>

²² ESRI. (2019). Caring and Unpaid Work. ESRI.

²³ Ibid.



INTRODUCTION & CONTEXT

RESEARCH METHODS

To understand women's travel needs, the report stitches together studies from Ireland and around the world, as well as from new primary research, from an ethnographic study and a quantitative survey.

DESKTOP RESEARCH

As a starting point for our research, we reviewed a wide range of existing datasets for women's travel patterns and behaviours. We found limited relevant or gender disaggregated data.

For example, the CSO publishes data on transport, crime, and women and men in Irish society. Transport behaviour and elements of access (physical access and financial access) to transport are disaggregated by gender, but few sources capture women's experiences of safety, access, reliability or convenience, and comfort. Without this granularity within such data there is an incomplete picture of women's mobility experiences and needs.

To enrich our understanding, we examined studies from Ireland, Europe, Australia, the United States and South America. The review spanned academic work of women's mobility trends, studies from transport agencies, including LA Metro, and reviews from inter-governmental agencies, such as the European Institute for Gender Equality (EIGE) and the Organisation for Economic Co-operation and Development (OECD).

The literature makes clear how mobility patterns and trends differ between women and men, with women experiencing a greater 'travel burden' overall. Women's travel is inherently complex, shaped by the activities they undertake and the experiences they have along the way. Women are more likely to travel outside of peak times making them more dependent on lower frequency services. The destinations women travel to, often for work, health or child-related services, can be poorly served by public transport, requiring more stops, transfers and longer journey times.²⁴ Across the literature, four direct factors commonly influence women's mobility: **safety, access, reliability, and comfort and convenience**. Alongside, studies identified that transport policy and design need to consider the impacts of mobility on women such as **economic opportunities, social life and engagement, and health and well-being**.

The following studies were included in our review:

Central Statistics Office: The Transport Omnibus 2018, The Household Travel Survey 2018, The National Travel Survey 2016, The Women and Men in Ireland Survey 2016, The Household Budget Survey 2016, The Recorded Crime Survey, The measuring distance to everyday services in Ireland survey, Commuting in Ireland 2016.

Department of Transport Tourism and Sport: Transport Trends - An Overview of Ireland's Transport Sector 2018, Transport Trends 2016.

National Transport Authority: The National Household Travel Survey 2012 and 2017, The Greater Dublin Area Household Survey 2006, Customer Satisfaction Research 2017.

Road Safety Authority: Cyclist injuries, A review of 2012 Casualties.

The Economic and Social Research Institute: Caring and unpaid work in Ireland 2019, The Determinants of Mode of Transport to Work in the Greater Dublin Area 2008.

Plan International: Safe in Ireland 2018.

Transport Infrastructure Ireland: Luas Anti-Social Behaviour 2016 Survey, M50 Travel Surveys.

²⁴ Loukaitou-Sideris, A. (2011). What Is Blocking Her Path? Women, Mobility, and Security. In E. a. National Academies of Sciences, Women's Issues in transport: Summary of the 4th (pp. 103-121). Washington: The National Academies Press.

CSO, *Crime and
Victimisation 2019* ²⁵

36%

women felt unsafe walking in their local area at night (compared to **13% of men**).

Plan International, *study of women in Dublin 2018* ²⁶

1 in 3

women have been subjected to physical harassment in public

6 in 10

women don't feel safe taking the bus

47%

of women will choose a longer walking route if they perceive it as safer.

SAFETY

Safety and the perception of safety are shaped by the design of transport and public space, cultural context, socio-economic factors, security, confidence in reporting and emergency response mechanisms, and in particular the 'last mile' journey home.

Across the world, safety is consistently the primary concern for women's mobility, with 'not feeling safe' the strongest deterrent of public transport use.²⁷ This is not without reason, in France 87% of women declared they had been victims of sexual harassment, sexual assault or rape on public transport.²⁸ Similarly, a UK survey found that 28 percent of women who used public transport in the past 12 months had experienced unwarranted staring, sexual comments, bodily contact, wolf-whistling and exposure. These statistics are echoed widely, and likely understate the magnitude of the problem. It is estimated that 96% of incidents go unreported,²⁹ owing largely to fears of further victimisation or trivialisation.³⁰

Across the literature, there is a growing understanding that all incidences of harassment are severe, with none being 'less bad' than another, as all unsafe experiences have the potential to escalate. As a consequence, women modify their travel patterns to feel safer, such as by avoiding independent travel, avoiding certain routes, carrying items for self-defence, or avoiding travel altogether.³¹

With respect to cycling, women cycle considerably less than men in most countries with statistics ranging from 2.5 to three times less. In the UK, women account for only 27% of cycling trips. The Netherlands, which is known for high quality bike infrastructure, is a notable exception with women making 55% of cycling trips.³² Yet globally, women are deterred from cycling, due to the risks, as well as sexual harassment.³³

ACCESS

Access to transport encompasses: the physical accessibility, including gaps between the platform and vehicle, steps and narrow turnstiles; the quality of roads, paths and cycling infrastructure leading to and from transport; parking infrastructure for all modes; the location of passenger information, access to ticket machines and customer service staff; and transport affordability.

Despite progress in gender equality, women still perform the majority of caring and household duties.³⁴ In Ireland in 2016, 98% of people whose economic status was 'looking after the home or family' were women.³⁵ The journeys prompted by these responsibilities, referred to as 'mobility of care', are characterised by stress, many interchanges and access difficulties.³⁶ Consequently, women spend more money on transport as ticketing and fare structures are often not designed for trip chaining of this nature.

RELIABILITY

Reliability means that users can trust the system to be punctual, to run a frequent and predictable service, to provide reliable ticket machines, real-time passenger information, and that services are safe and usable upon arrival.³⁷

A reliable transport system is attractive to women and men alike. However, women's complex travel patterns and needs leave them unequally impacted by unreliable services. Services that do not show up, are early or late, do not allow passengers on, or have unreliable journey times leading to missed connections or delay all have an impact. This is most felt by women who: are travelling at off-peak times; are chaining many trips together; feel unsafe waiting; are travelling alone; or are taking care of someone. Women are more likely to accompany others to medical appointments, with delays leading to missed appointments and repeated journeys. To accommodate these delays, women must leave hours ahead of time.



CONVENIENCE & COMFORT

Convenience is the ‘absence of effort’ in using transport services that are ‘fit for purpose’.³⁸ Factors include, waiting times, crowding, ease of finding a seat, availability of toilets, small toilets or change tables, cleanliness and visible efforts towards cleanliness, and the presence of vandalism.

Convenience and comfort can determine whether a transport service is ultimately used. The characteristics of women’s mobility make them attuned to efforts to make transport easy and inclusive.³⁹ The absence of this effort can leave women to avoid travel or opt to use the car.⁴⁰ The car is seen as the convenient ‘hassle-free’ travel option, by providing easy access, door-to-door service, seating, space for companions and belongings, and the freedom to travel at any time.⁴¹

Building on these four factors, the literature suggests that transport policy and design need to consider the impacts of mobility on women such as economic opportunities, social life and engagement, and health and well-being.

ECONOMIC OPPORTUNITIES

Globally, women’s participation in the labour market is significantly hindered by poor access to transport. Employment opportunities for women improve with good access to safe transport.⁴² By contrast, unsafe or traumatic experiences using transport can lead to absenteeism and decreased productivity in women. Gender roles can further impact economic opportunities, with many women working closer to home than their male counterparts in order to juggle work with caring and household responsibilities,⁴³ termed ‘spatial entrapment’.⁴⁴

SOCIAL & PUBLIC LIFE

Equality for women and girls depends on mobility, and the active citizenship that this facilitates. Barriers such as poor transport contribute to the continued exclusion of women from quality education, high paying jobs and essential services. It can also hinder participation in community and public life. For many women, undertaking significant care or household duties leaves them time poor, and many have to forgo certain trips and sacrifice personal or leisure activities as a result. This reinforces gender inequalities such as the pay gap and precludes women from pursuing life affirming opportunities.⁴⁵

HEALTH & WELL-BEING

Poor mobility options for women can impact on their health and well-being, by limiting their use of walking and cycling, by inducing stress or trauma, with long journeys leaving them time poor, or by contributing to isolation. Time poverty was cited by the EIGE as an important indicator of well-being, in part as leisure or self-care activities are often the first to go.⁴⁶

³⁸ CSO. (2020). Crime and Victimisation. Retrieved from CSO.ie: <https://www.cso.ie/en/releasesandpublications/ep/p-cv/crimeandvictimisation2019/perceptionofcrime/>

³⁹ Plan International. (2018). ‘SAFE IN IRELAND’ REPORT FINDS A THIRD OF WOMEN SUBJECTED TO PHYSICAL HARASSMENT IN PUBLIC. Retrieved from plan.ie: <https://www.plan.ie/stories/2018-10-10-safe-in-ireland-report/>

⁴⁰ Ng, W.-S., & Ashley, A. (2018). Understanding Urban Travel Behaviour by Gender for Efficient and Equitable Transport Policies. Paris: OECD.

⁴¹ FNAUT. (2016). Inquiry into Sexual Harassment and Sexual Violence against Women on Public Transport. Paris: Fédération Nationale des Associations d’usagers des transports (FNAUT).

⁴² Allen, H. V. (2016). Safe and Sound: International Research on Women’s Personal Safety on Public Transport. FIA Foundation.

⁴³ Stark, J. a. (2018). Women’s everyday mobility: frightening situations and their impacts on travel behaviour. Transport Research, 311 - 323.

⁴⁴ Saunders, K. (2019). The Real Reason Why Mobility is Not Women-Friendly. Retrieved from urbanmobilitydaily.com: <https://urbanmobilitydaily.com/the-real-reason-why-mobility-is-not-women-friendly/> <https://urbanmobilitydaily.com/the-real-reason-why-mobility-is-not-women-friendly/>

⁴⁵ Stark, J., & Meschik, M. (2018). Women’s everyday mobility: Frightening situations and their impacts on travel behaviour. transport Research Part F: Traffic Psychology and Behaviour, 54, 311-323; Loukaitou-Sideris, A. (2011). What Is Blocking Her Path? Women, Mobility, and Security. In E. a. National Academies of Sciences, Women’s Issues in transport: Summary of the 4th (pp. 103-121). Washington: The National Academies Press.

⁴⁶ Buehler, R., Pucher, J. (2007) Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany, In Transport Reviews (pp. 495-528). Retrieved from: <https://www.tandfonline.com/doi/full/10.1080/01441640701806612>

⁴⁷ Williams, L. (2019, November 25). Harassment adds more danger for women cycling in Dublin. Retrieved from irishtimes.com: <https://www.irishtimes.com/opinion/harassment-adds-more-danger-for-women-cycling-in-dublin-1.4093485>

⁴⁸ European Institute for Gender Equality. (2016). Gender In Transport. Vilnius: European Institute for Gender Equality.

PRIMARY RESEARCH

42 hrs

of in-home
interviews

1,000

respondents
across Ireland

A review of global literature allows us to understand the universal challenges of women's mobility. While a useful foundation, the studies are rooted in their respective context and driven from localised data sources. With methods for collecting and categorising data non-standard between research, meta analyses can only go so far. In order to shape policy for Ireland, local concerns and characteristics are essential dimensions. Primary research is required to fill this gap and make recommendations for Ireland. Translating the themes surfaced in global studies into hypotheses for our own research allowed us to build upon academic and professional research, while ensuring local relevance.

Taking the global literature review as a starting point, we designed a bespoke methodology to validate the identified themes within an Irish context and discover new context-specific behaviours and constraints. Our goal was to capture how social, societal and economic factors translate into individual mental models, concerns, motivations, and choices. We focused on both the daily challenges people experience as well as positive drivers to identify the levers that can be used to design more user-friendly transport systems.

What motivates or constrains Irish women to select different mobility options?

What are women's travel aspirations, needs, current experiences, and barriers today?

We designed a two-step research process, first uncovering behaviours and needs, then validating the findings quantitatively.

STEP 1. DISCOVERY ETHNOGRAPHIC STUDY

Ethnographic interviews and observations with a small sample of female respondents to observe behaviours in context and uncover patterns, motivations and constraints.

These generate rich and unexpected insights about the barriers, challenges and mental models driving mobility choice, specific to the Irish context.

STEP 2. VALIDATION

QUANTITATIVE SURVEY

A robust nationally representative survey to validate the hypotheses generated from the literature review and ethnographic research.

These validate findings and identify correlations between gender, age, location, disability, income, with different travel behaviours and motivations. It allows us to size particular issues or pain points uncovered.

³⁵ CSO. (2016). Employment. Retrieved from cso.ie: <https://www.cso.ie/en/releasesandpublications/ep/p-wamii/womenandmeninireland2016/employment/>

³⁶ Sánchez de Madariaga, I. (2013). The mobility of care. Introducing new concepts in urban transport. Fair shared cities. The impact of gender planning in Europe., 33-48.

³⁷ Directorate-General for Mobility and Transport. (2014). She moves. Women's Issues in transport . Luxembourg: Office for Official Publications of the European Union.

³⁸ Wardman, M. (2014). Valuing Convenience in Public Transport. Leeds: OECD/ITF.

³⁹ Chowdhury, S. (2019). Role of Gender in the Ridership of Public Transport Routes Involving Transfers. transport Research Record: Journal of the transport Research Board, 855-863.

⁴⁰ Ryan-Christensen, A. (2019, 11 11). More Irish women drive to work than men. Here's why. Retrieved from RTE: <https://www.rte.ie/brainstorm/2019/0920/1077145-irish-women-driving-to-work-cars/>

⁴¹ OECD. (2014). Valuing Convenience in Public Transport. OECD/ITF.

⁴² International Labour Office. (2017). World Employment Social Outlook: Trends for Women 2017. Geneva: International Labour Organization.

⁴³ Aloul, S. N. (2018). Gender in Public transport. Sadaqa - Friedrich Ebert Stiftung.

⁴⁴ Waddell, P. (1996). Accessibility and Residential Location: the Interaction of Workplace, Residential Mobility, Tenure and Location Choices.

⁴⁵ European Institute for Gender Equality. (2016). Gender In Transport. Vilnius: European Institute for Gender Equality.

⁴⁶ European Institute for Gender Equality. (2016). Poverty, gender and intersecting inequalities in the EU. Luxembourg: Publications Office of the European Union.

ETHNOGRAPHIC RESEARCH

Research participants were selected to represent diverse demographic and geographic backgrounds, and varied daily transport behaviours. The women interviewed had a range of occupations including student, unemployed, childminder, play school teacher, nail technician, legal freelancer, psychologist, engineer, business partner, government administrator, full time mums and retired women. Their family status spread across single, partnered, married, with dependants or caring for others. All names used in this report are pseudonyms to protect the participant's privacy, in accordance with GDPR regulations.

21

in-home interviews
with women in
Dublin & Cork

Cork interviews





Dublin interviews



QUANTITATIVE SURVEY

A survey was issued to 1,000 respondents representative of the Irish population. The survey was co-designed, issued and managed by Spark, an International Insights and Research Agency based in Dublin. The table below summarises the demographics of the respondents.

GENDER MIX	Male 48.8%			Female 51.2%			
AGE MIX	18-24 11.2%	25-34 20%	35-44 20.1%	45-54 15.8%	55-64 14.5%	65+ 18%	
EMPLOYMENT STATUS	Working full time 35.4%	Working part time 15.7%	Self-employed 4.5%	Student 8.1%	Unemployed 8.6%	Retired 19.1%	Home-maker 8.6%
REGION	Dublin 28%		Rest of Leinster 27%		Munster 27%	Connaught / Ulster 18%	
LIVING CONTEXT	City/urban area 43%		Small town 29%		Rural 28%		
NUMBER OF CHILDREN	None 38%		1-2 child 38%		3 or more children 24%		

INTERPRETATION AND LIMITATIONS

Throughout this report, when comparing differences (such as between men and women), we will only note differences of 5% or greater to ensure statistical significance for the sample size of the study.

Like all surveys, the findings draw from, and are limited to, the self-reported perceptions and behaviours of the respondents. Many psychological factors influence a person's ability to answer a question accurately. For example a lack of self-awareness and various cognitive biases, like confirmation bias and the "halo effect". Confirmation bias is where people tend to view a choice that they have already made in a more positive light than the alternatives. Take the example of a consumer survey comparing automanufacturers. Typically, respondents will ascribe the highest scores to brands they are already using. The "halo effect" is another form of this bias, where the positive impressions of one thing extend to its associated factors. For example, the studies have found that when survey respondents rate people as good-looking, they also tend

to believe that the person has positive personality traits and more intelligent.⁴⁷ In a similar vein, in user research, there is a known gap between what people say and what they do. Gender research, for instance, has often found discrepancies between men and women's reported versus actual household contributions.⁴⁸ With the limitations of the research methods in mind, the findings explore the survey data, ethnographic research and literature together to construct a robust picture of perceptions, attitudes and behaviours.

It is important to note Covid-19 will have implications for social life, gender roles, work and transport demand. At the time of writing, these implications were largely unknown. The report discusses plausible implications, as appropriate, but acknowledges a degree of uncertainty.

While the survey was undertaken at the beginning of Ireland's Covid-19 lockdown period, respondents were asked to answer the questions with their usual behaviour in mind.

⁴⁷ Cherry, K. (2020, February 09). Why the Halo Effect Influences How We Perceive Others. Retrieved from verywellmind.com: <https://www.verywellmind.com/what-is-the-halo-effect-2795906>

⁴⁸ Miller, C. C. (2020, May 8). Nearly Half of Men Say They Do Most of the Home Schooling. 3 Percent of Women Agree. Retrieved from nytimes.com: <https://www.nytimes.com/2020/05/06/upshot/pandemic-chores-homeschooling-gender.html>



Research Findings

Research findings from the survey and ethnographic interviews explore the reasons why 95% of women in Ireland (excluding Dublin) and 79% in Dublin view the car as a necessity.

By examining the experiences of women we explore the appeal of the car and compare cycling, walking and public transport to highlight how these modes could be improved to increase their competitiveness. Moving beyond modes, we explore three central themes of the research: that is, how family, safety and diversity shape transport choices.

Reflecting Ireland today, the traditional family unit is central to many women's lives. However, a traditional family narrative does not fit all women or all experiences. Women who identify as LGBTI+ or single were included in this research but numbers were too small to provide meaningful data. By contrast, the impacts of traditional heterosexual family were clear across all interviewees and the survey. Reflective of this majority, the research findings emphasise the influence of the traditional family unit. Further research can address the needs of LGBTI+ women, as well as unpack the differences in needs between single and partnered women in Ireland.





RESEARCH FINDINGS

WOMEN'S MOBILITY PATTERNS AT A GLANCE

Irish men and women rely heavily on the car. Car reliance is the highest outside of Dublin, where both density and provision of public transport is lower.

WOULD YOU CONSIDER YOUR CAR A NECESSITY FOR EVERYDAY LIFE?	MEN	WOMEN
Yes – Dublin	88%	79%
Yes – Rest of Ireland	93%	95%

▲
The car is seen as a necessity for everyday life, especially outside Dublin.

Drawing on existing and original survey data we can better understand women's travel. Data shows that men and women's travel patterns differ, both the modes they choose and their reasons for choosing them.

Despite lower car ownership women use the car at a higher rate, travel locally more and undertake more journeys for education, household duties, and family and child-related pick up and drop offs. Their reliance on the car is driven by caregiving responsibilities, a lack of access to adequate public transport and cycling infrastructure, and safety issues experienced when walking, cycling or using public transport.



⁴⁹ CSO. (2016). National Travel Survey 2016 - How We Travelled. Retrieved from cso. ie: <https://www.cso.ie/en/releasesandpublications/ep/p-nts/nts2016/hwt/>

⁵⁰ 21st to the 31st of March, 2. 24th to the 28th of June, 3. 24th to the 30th of September, 4. 25th - 30th of November. These results summarise all 4 waves.

⁵¹ Interactions Ltd. (2019). Debrief Pack. M50 Users 2019 Report (pp. 1-36). Dublin, Ireland: TII, Interactions Ltd.

⁵² CSO. (2016). National Travel Survey 2016 - How We Travelled. Retrieved from cso. ie: <https://www.cso.ie/en/releasesandpublications/ep/p-nts/nts2016/hwt/>

WOMEN HAVE LESS ACCESS TO CARS

Consistent with the literature, we found a universally high dependency on cars in Ireland, particularly outside of Dublin, where 81% women and 85% men either own or have access to a car.

CAR OWNERSHIP	DUBLIN		REST OF IRELAND	
	MALE	FEMALE	MALE	FEMALE
I own or can access a car	80%	66%	85%	81%
Own a car (sub-total)	67%	50%	79%	70%
Don't own but can access (sub-total)	13%	16%	7%	11%
No, can drive but no access	10%	14%	7%	7%
No, and not able to drive	10%	20%	7%	12%

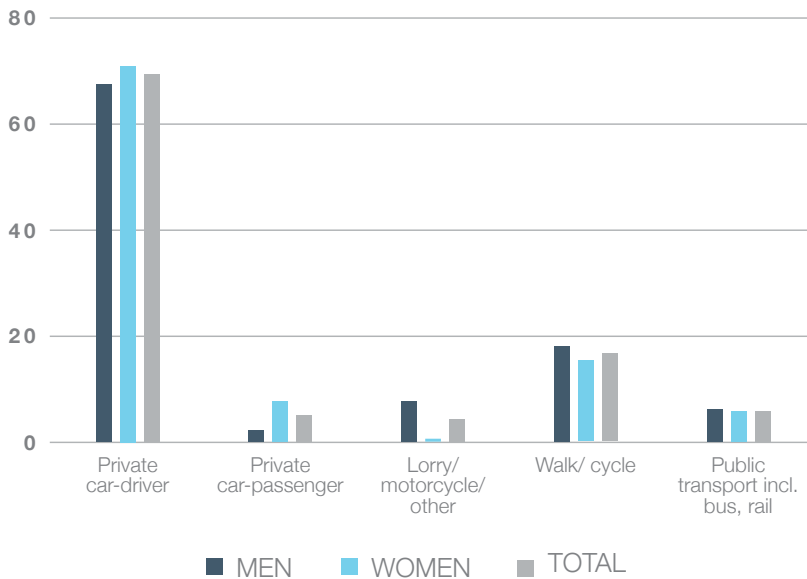
The discrepancy between men and women is amplified in Dublin, where only 66% women own or have access to a car (compared to 80% men). Compared to all other categories, women in Dublin are most likely to not be able to drive (20% women). This data suggests less dependency on the car and a higher reliance on alternative transport modes, particularly for women in Dublin.

WOMEN RELY ON THEIR CARS MORE

While our survey found that women are less likely to own a car, the 2016 Census found that women are marginally more likely to make a trip by driving a car.⁴⁹

By comparison, the recent 2019 M50 Travel Surveys⁵⁰ found that, for a given day, more men travel on the M50 motorway, while women are significantly more likely to have never travelled on the M50.⁵¹

Each source explores different aspects of car ownership and use. However taken together we can see that, women who own cars will use them more and make more frequent local trips. It could also suggest that women without access to a car are more limited in their mobility, and are making fewer journeys.



In 2016, females were more likely than males to travel by car as the driver, with 71.2% of journeys taken by females compared with 67.4% of journeys by males. This differed from 2013 and 2014 where males and females were equally likely to travel by car as the driver.

In 2016, females were nearly four times more likely to travel as a passenger in a private car than males. Travel by public transport (including bus, rail, DART and Luas) was largely similar for both males and females.⁵²

CARING RESPONSIBILITIES SHAPE CAR USE

Consistent with global trends, our survey found that in addition to work and education, women in Ireland are responsible for the largest share of society's caregiving, childcare, and household responsibilities.

Amongst women with children,

84%

women consider themselves to have the sole or lion's share of responsibility for childcare (compared to 48% men)

30%

of women surveyed provide primary care to another adult, either in a professional or personal setting.

Caring and household responsibilities heavily influence travel patterns. Comparing the daily travel of men and women with families, men's primary reason for traveling is work, while for women it is picking up or dropping off children or family members.

Looking at the table to the right, we also see a higher proportion of women with families traveling daily to pursue education, reflecting broader demographic data on the rising higher education levels being pursued by women in Ireland.

CHILDCARE RESPONSIBILITIES	WOMEN n=364	MEN n=325
Has sole or primary responsibility for childcare	84%	48%
Shares equal childcare responsibility with a partner	12%	33%
Partner or other person has primary responsibility for childcare	5%	19%

FREQUENCY OF JOURNEY TYPES PERCENTAGE OF MEN AND WOMEN MAKING THESE TRIP TYPES DAILY	WOMEN WITH FAMILY n=364	MEN WITH FAMILY n=325
Drop and Collect Children/Family	21.4%	14.0%
To and From Work	20.5%	26.4%
To and From Education	14.7%	7.6%
Self-Care/Health (e.g. gym/yoga/shopping for pleasure etc.)	12.0%	10.3%
Family Time (e.g. day trips, leisure activities with family)	9.7%	12.8%
Household Shopping or Other Domestic Errands	6.5%	9.9%
Socialising With Friends (e.g. at restaurants/pubs)	6.5%	5.1%
Community Engagement (e.g. volunteering/church work etc.)	3.2%	3.7%
Other	5.5%	10.2%

USE OF PUBLIC TRANSPORT AND CYCLING

Women in Dublin on average use public transport at the highest rate, on average 2.6 hours a week, accounting for 14% of their total travel time, while all other groups use public transport for less than 2 hours a week. Travelling to education or to work were the primary use cases for public transport for women.

Men outside of Dublin cycled the most, on average 1.3 hours a week, while women outside of Dublin cycled on average for only 0.5 hours a week. For women, cycling was most frequently used to travel to school, or other education.

HOURS A WEEK PER TRANSPORT	DUBLIN		REST OF IRELAND	
	MALE n=169	FEMALE n=111	MALE n=326	FEMALE n=394
Walking	4.6	5.8	6.1	5.2
	26%	32%	34%	29%
In a car	4.7	4.1	5.7	5.6
	26%	23%	32%	31%
On public transport	1.9	2.6	1.7	1.4
	11%	14%	9%	8%
On a bicycle	1.0	0.8	1.3	0.5
	5%	5%	7%	3%
In a taxi	0.3	0.7	0.4	0.2
	2%	4%	2%	1%
Total travel time (hours)	12.5	14.0	15.1	12.8

▲
Hours per week women spend in each travel mode, also represented as a percentage of their total travel time.



SAFETY CONCERNS AND WORKAROUNDS

Of particular note was the experience and outsized impact of safety issues on behaviour for both men and women. Up to 1 in 3 public transport users have seen or experienced some form of harassment or violence while using public transport. While safety is an issue for both sexes, women, and especially women in Dublin, are particularly vulnerable to sexual harassment and assault.

1 in 3

public transport users have seen or experienced some form of harassment or violence while using public transport.

55%

of women say they would not use public transport after dark/late at night **compared to 35% of men.**

34%

of women say their feelings of insecurity when travelling have stopped me on occasion from going out **compared to 24% of men.**

81%

of men and women think women can, on average, feel more unsafe on public transport than men compare.

As a consequence of these unsafe experiences and associated safety issues, 55% women stated that they would not use public transport “after dark/late at night”, and 34% women stated that feelings of insecurity have stopped them from travelling on occasion. While safety incidents and concerns are experienced by both sexes, men and women both overwhelmingly agree that safety disproportionately impacts women when using public transport.

EVER EXPERIENCED		
	FEMALE	MALE
Verbally harassed or made to feel uncomfortable	21%	19%
I witnessed violent behaviour or sexual harassment happening to someone else	14%	18%
I was the victim of violent behaviour	3%	4%
I was the victim of sexual harassment	4%	1%
I was the victim of sexual assault	2%	1%
Prefer not to say	5%	5%
None of the above	62%	61%

▲
Negative experiences by sex, for all of Ireland

CHALLENGES AND OPPORTUNITIES FOR SUSTAINABLE TRANSPORT IN IRELAND

With an understanding of the experiences and perceptions of women, we focus on 5 questions in order to help policy makers to drive sustainable and inclusive transport, which meets the needs of women.

MODES OF TRANSPORT

How can sustainable transport modes compete with the car?

FAMILY ROLES

How can an understanding of the family unit influence sustainable mode choices?

FEELING SAFE

How can transport feel and be safe for women?

BEING INCLUSIVE

How can transport consider the diverse needs and contexts of all women?

DRIVING CHANGE

How can we accelerate sustainable behavioural change?



MODES OF TRANSPORT

HOW CAN SUSTAINABLE TRANSPORT MODES COMPETE WITH THE CAR?

This chapter starts to unpack how sustainable transport modes can compete with the car and encourage use by women. By contrasting women's current experiences across various transport modes, we highlight why the car is the preferred choice for most travel today and identify potential ways to nudge changes. Exploring how, despite the car's disadvantages, a mistrust in cycling and public transport reduce their use over time.

It is easy to see why the car dominates women's travel in Ireland. Across the survey and interviews, the car is considered the most pleasant, least stressful, safest, most child-friendly option. It gives women 'me time'—second only to walking—and is even viewed as good for health—third to walking and cycling. Walking was also praised by respondents showing it is an important part of the Irish mobility story. However, the limitations of distance, sprawling land use planning across much of Ireland makes it difficult for walking to contend with the car alone. This suggests the potential for multi-modal solutions that include walking. Cycling and public transport have the ability to compete directly with cars, but currently fail to meet many women's needs.

RANK OF MODE BY ASSOCIATION FOR ALL WOMEN IN IRELAND							
	Pleasant way to travel	Good for my health	Less stressful	Time to myself	Safe	Child friendly	I can rely on it
most ↑	Car	Walking	Car	Walking	Car	Car	Car
	Train	Cycling	Walking	Car	Walking	Walking	Walking
	Walking	Car	Train	Train	Train	Train	Train
	Cycling	Bus	Bus	Bus	Bus	Bus	Bus
east ↓	Bus	Train	Cycling	Cycling	Taxi	Taxi	Cycling
	Taxi	Taxi	Taxi	Taxi	Cycling	Cycling	Taxi

▲
The car and walking rank the highest for women across seven indicators driving mode choice.



“The car is my happy place, you can have a chat and a laugh. You feel safe together... I always get out of the car and think ‘wow’ about the time spent.”

Dora (55-64, Dublin)

Women’s perceptions of each transport mode is consistent with the average number of trips taken using each mode each week. On average, the car is the most popular way for women to travel, followed by walking, then public transport.

ON AVERAGE HOW MANY TRIPS A WEEK DO YOU COMPLETE FOR EACH MODE	FEMALE
Car	8
Walking	5
Public Transport	2
Bicycle	1
Taxi	0

“I really don’t like driving, I never have, but I just have to do it”

Natalie (35-44, Dublin).

CAR

Conflicting feelings for the car

Today, compared with the alternatives, the car offers some women independence, joy and safety. For Dora, the car is the ideal way to travel with her three grandchildren and spend quality time together.

However, for many women the situation is more conflicted and the car falls short of meeting key needs. Throughout the interviews, respondents (e.g. Amanda, section 4) felt the exhaustion of constantly driving and the anxiety caused by traffic and parking. **Siobhán** (45-54, Cork) *complained about driving into town, “I love the independence of the car...but it’s a hassle to take the car into town where the gym is. Parking and paying for parking is a hassle. In the last 5 years the traffic has become a lot busier all the time. There is a huge quantity of cars on the road.”*

Despite these shortcomings, many women who rely on driving have learned to live with these issues. Both nervous drivers, Natalie and Gillian dislike driving and are cautious about the places they go. Out of necessity and after many years of practice, they have become used to managing their discomfort and anxiety.

Despite its inconveniences, the car is recognised by the women surveyed as the preferred option of modes available today. In part, this can be explained by confirmation bias, the tendency to reaffirm one’s existing choices, a known phenomenon in consumer and behavioural research. With high car dependency in Ireland, it is unsurprising that people defer to the car positively, an unconscious justification of their choices. However, a preference for the car can also be explained by land use planning and limitations of current infrastructure. It raises questions about local neighbourhood ‘place making’ including services and shops available on foot or by bike. The appeal of the car is accentuated in the winter months where inclement weather and shorter daylight hours can further deter use of alternative modes. However, weather alone does not need to have this impact. In many countries, for example Sweden and the Netherlands, similar annual rainfall does not deter use of public transport, cycling or walking. This can be explained by high quality and user-friendly infrastructure.



CYCLING

A lack of safe cycling infrastructure negates the appeal of the health benefits

Many of the women interviewed enjoy cycling for leisure on the weekend, but most do not consider it appropriate for commuting due to a lack of safe cycling infrastructure and culture. Without adequate infrastructure women require a high level of experience and confidence to cycle in urban areas. Unlike driving or taking the bus, fewer women are introduced to cycling at a young age and are able to practice and build the confidence needed, in large part due to unfriendly road design. Without adequate infrastructure and experience, the perceived danger of cycling is a stressful and unappealing proposition, ultimately outweighing any appeal of health benefits.

“No one taught me how to cycle on the road - I wish someone would teach me now... I hope my son grows up to be confident enough to cycle on the road.”

Amanda (25-34, Dublin)



Lilian (45-54, Dublin) *loves cycling, she fondly remembers renting an e-bike in Central Park with her family on a trip to New York. When at home, Lilian relies heavily on her car for her everyday travel, but will occasionally cycle locally to maintain good health. Her husband worries about her when she is on her bike, concerned for her safety as there is no bike path and winding roads make it hard for vehicles to see her.*

“I love cycling—it is independence—you can go anywhere and it doesn't cost you anything”

Josie (45-54, Dublin)

With Covid-19 challenging conventional notions of safe transport design, Ireland, like much of the world, is promoting and investing in cycling as a sustainable and socially-distanced mode of transport. With growing public interest in cycling there is an opportunity to advance cycling mode share and diversify its users, including women. For any new cycling investment, it is important to consider the interdependence of infrastructure, training and established habits, to encourage everyday use.



PUBLIC TRANSPORT

Needs to be more attractive to be a woman's first choice

Public transport is neither preferred, nor unlikable, and ranks as the middle choice for most attributes (see table on page 23). Despite being rarely the first choice, public transport is often enjoyed. Throughout the interviews many women shared anecdotes or commended the services.

Primary reasons for not using public transport

For **Anna** (25-34, Dublin), mother of two, her journey to work on the private coach bus is one of the highlights of her day. Seated in a quiet space, feeling respected, she has the time to listen to podcasts, text friends, talk on the phone and, unwind between work and caring for the family. Anna enjoys the extra privacy and comfort the coach bus affords her, compared with the public bus. The public bus can be a social space for young women. **Emily** (18-24, Cork) enjoys taking the bus with friends and whenever there is a nice view along the route.

However, enjoyable moments are often negated by poor services or unpleasant experiences getting to, from or on transport. The largest detractors are, limited services, poor reliability, slow speeds, sparse stops and long walking distances from home. The last mile of travel, that is the journey to or from home to a public transport stop, is often a significant pain point, with women being frequently deterred from using public transport because of the distance, poor quality, overgrown or dark routes, and unsafe spaces to wait.

WHAT WOULD BE THE MAIN REASONS YOU WOULD NOT CONSIDER USING PUBLIC TRANSPORT FOR SOME OR ALL OF YOUR JOURNEYS?	FEMALE
Limited Public Transport availability in my area	42%
Transport is too slow / journeys take too long	27%
The pick-up / drop off points are too far from my house	27%
It is too inconvenient	23%
The pick-up / drop off points are too far from my destination	25%
Services are not on time or fail to turn up	23%
Total time required to get to and from Public Transport	18%
It is expensive vs. other alternatives	19%
The Public Transport in my area is not physically accessible	13%
I don't feel safe on Public Transport	8%
I don't feel comfortable taking Public Transport alone	7%
N/A - I use Public Transport for all my journeys	4%
I have health requirements preventing me from taking Public Transport	4%
I cannot travel with children/person I need to take care of on Public Transport	4%
I don't know what Public Transport to take	3%



A failure to deliver on these basic needs can have severe consequences for women's lives by taking up valuable time, impacting school, work, or other responsibilities, and constraining their independence directly or indirectly (by making those they take care of more reliant on them).

Emily (18-24, Dublin) *is a young student who relies on the bus to get to university. She always checks the TFI bus app before leaving the house to see whether the bus is delayed or cancelled. As this is the only way for her to get to university, Emily will have to wait for the next bus if it is cancelled, making her late or absent from class.*

Lilian (45-54, Dublin) *has three school-aged sons. Where they live there is only one local bus route, which runs once an hour. To fulfil their travel needs Lilian spends much of her day driving them 15 minutes to and from the nearest Luas stop, leaving her with less time for her own activities.*

Over time a lack of reliability begins to erode trust, and many women who once relied on public transport start looking for alternative modes.

"I used to take the bus everywhere... but it is not reliable anymore. The bus sometimes decides to change direction and you don't know when that is happening until it is happening [even with the app]. If the bus was accurate and reliable, I would definitely use it more as it is so expensive to park in the city"

Gillian (65+, Cork)





We draw on Maslow's Hierarchy to better understand women's unmet needs. The framework explains how people are motivated to meet higher order needs once their more basic needs are met. Through this framework we see the importance of providing for basic needs, like sanitation, in order to enable women to achieve higher-order goals, like education attainment. As a starting point, public transport coverage, reliability and safety must be improved to make public transport more viable for women. However, to make it an attractive choice consideration needs to be given to a woman's higher order needs: belonging, self-actualisation, and esteem.

Self-actualisation	Avoiding travel for any of these reasons limits a woman's quality of life and potential by restricting social life, access to jobs or education. Alice (18-24, Cork) and her friends cancelled their St Patrick's Day plans and decided to postpone a friends birthday to avoid having to go into town at night.
Esteem	Those with special health needs or hidden disabilities often feel unable to ask, or judged by other passengers when asking for assistance or priority. Lucy (18-24, Cork) suffers from fatigue as a result of a recent stroke, but worries she will be judged by other passengers if she requests a seat on the bus.
Love / belonging	It is difficult to travel with children or as a family when there is not adequate space or seating. Ciara (35-44, Dublin) finds it difficult to use the bus with her double buggy, as it is hard to alight and find a space for it on board. During busy periods there will often already be a wheelchair user or other buggy occupying the designated space.
Safety <i>See section 3.3 for more detail about safety</i>	Women feel unsafe on and around transport, particularly after a traumatic experience. After Hermione (25-34, Dublin) experienced unsafe incidents on the Luas while living in Smithfield, she moved to a different part of town with her sister, so she could take the DART and travel with her sister each day.
Physiological	Inadequate sanitation facilities along the journey are problematic for women, the elderly and young children, especially when experiencing long journeys or waiting times. Amanda (25-34, Dublin) recalls having to get off the bus to change her baby's diaper, wait for the next bus, then get on again.

▲
Consideration of women's transport needs with respect to Maslow's hierarchy of needs.

RESEARCH FINDINGS

MODES OF TRANSPORT SUMMARY

SUMMARY OF FINDINGS

- For most Irish women, the car is the preferred mode of transport today as it largely delivers on both basic functional needs and higher-level, experiential and emotional needs.
 - While women view cycling as good for health, this is negated by unsafe experiences and a perception that it is the least safe way to travel because of a lack of quality infrastructure.
 - While women support the idea of public transport and find aspects of the car tiring and anxiety-inducing, they continue to drive.
 - Alternative transport modes need to get the basics right (by being reliable, accessible, convenient, safe) while also delivering on higher-level needs (comfort, inclusion, health, joy, community, belonging).
-

POLICY TAKEAWAYS

- Gender mainstreaming in policy to introduce gender-sensitive perspectives across all aspects of the transport industry (including gender budgeting as needed).
- **Walking**
 - Improve 'last mile' walking journeys to unlock more public transport journeys.
 - Consider policies that support the '20 minute city' where key services are accessible locally.
 - Improve and widen walking paths to prioritise pedestrians.
- **Cycling**
 - Improve cycling infrastructure to increase safety.
 - Establish clear cycling etiquette and laws to increase safety and confidence for cyclists.
 - Promote cycling lessons and information about safe equipment and practices for all to establish cycling habits.
 - Improve driver awareness about cyclists.
- **Public transport**
 - Better public transport coverage and new solutions for end-to-end mobility.
 - Reduce walking distance between stops and minimise waiting times.
 - Improve the reliability of information, including better real-time information.
 - Increase physical and psychological safety.
 - Design for the 'mobility of care' and those with health and special needs.
 - Promote civic duty and social, respectful culture on public transport.
 - Actively promote the positive attributes of public transport.



RESEARCH FINDINGS

FAMILY ROLES

HOW CAN AN UNDERSTANDING OF THE FAMILY UNIT INFLUENCE SUSTAINABLE MODE CHOICES?

This chapter discusses the role of the family in shaping women's transport choices and explores how this shifts over a lifetime. It looks at how the opinions held by families can be passed down, the role of women in the family and how caregiving responsibilities can lead to car dependency. It explores the opportunities to grow the use of sustainable modes by families.

A woman's relationship with various modes of transport changes throughout her life. From an early age, **habits and perceptions of transport are often socialised in families**, with parents often projecting their experiences and views of different modes onto their children and nudging them accordingly.

In many Irish families knowing how to independently use public transport is a vital skill, and is actively encouraged, offering many girls and young women the opportunity to travel without supervision at an early age.

In other families learning to drive and getting a car is a coming of age moment, but can be considered a priority for young women in particular. **Siobhán** (45-54, Cork) has a daughter aged 21 and a son aged 24. For Siobhán, making sure that her daughter has access to a car was crucial. Siobhán and her husband both encouraged their daughter to learn to drive from a young age while they didn't encourage this as much for their son. "It's very important for a girl if you're ever in an awkward situation that you aren't happy with that you get your car keys and leave."

43%

of women surveyed started using public transport independently between 11 to 15.

Before the age of 18,

77%

had used it independently.



▲
Natalie buckles her son into the car

"It's easier to have a car with a baby, you can just put him in his car seat and be done with it"

Natalie (35-44, Dublin)

“As I’ve learned over the years of having children, sometimes when you’re driving you can ask the most awkward questions because there’s no escape”

Siobhán (45-54, Cork).

As a young woman enters adulthood, life becomes more complex, and we observe women juggling many duties at once - work, education, household responsibilities and community activities.

Having a child is often a turning point for a woman's relationship with mobility. With children and a pram in tow, women often find that it is neither convenient nor enjoyable to use public transport. At this point, many women who previously used public transport switch to the car, perceiving it as the most reliable and child-friendly transport option. For many, this involves purchasing their first car, which often shifts their habits permanently.

Both **Amanda** (25-34, Dublin) and **Gillian** (65+, Cork) were confident public transport users growing up, relying on it to get to school, work, and to visit friends. When the women had their first child and established their own home, both found it difficult to navigate public transport with a pram and groceries, and instead learnt to drive or bought their first car.

Care responsibilities often influence a woman's daily mode choice. **Ciara** (35-44, Dublin) lives in Clontarf, an area well served by public transport, and has two daughters aged three and one. Although she loves public transport and uses it often, there are many factors which she has to consider if she's taking her daughters with her on a trip to town. Ciara considers the following factors when deciding which mode to use: time, facilities, distance and drop off.

From this point onwards, driving becomes a habit, established as part of family life. As children grow up, start school and build lives of their own, the car remains integral to the family dynamic. Often, it falls on the mother to act as the family “chauffeur”: picking up and dropping off children to activities until they are fully independent. **Emily** (18-24, Dublin) has graduated from secondary school and is currently working part-time in retail while pursuing a degree in Beauty and Spa therapy. She lives at home, but travels independently to school and work by public transport. Occasionally, late at night, or if the bus is cancelled, she calls on her mum for a lift, even though both her parents and her older brother have cars and full time jobs. Many women view driving children and family members as not just a duty, but also a joy. Driving a child to school or to a friends' houses gives them time to catch up, chat and listen to music together, a time that is often cherished.

Ciara's Mental Checklist

What she thinks about before using public transport with her children.

- ☐ **Time** – how busy will the bus be? Will there be a space for the pram as there is usually already a pram or wheelchair user onboard when it is busy?
- ☐ **Facilities** – is the lift in the closest DART station working? I can't carry the pram up the stairs to the platform so I need the lift.
- ☐ **Distance** – should I walk to the further DART station where the lift usually works or take a chance by walking to the closer one, where the lift might not work?
- ☐ **Drop off** – Will the DART bring me to where I want to go in town? The station isn't located in a convenient location for where I want to go.



“Cillian would ring me first, I’m the first port of call, and if he can’t then he’ll ring his dad, and if he can’t get his dad it’ll definitely be his brother”

Josie (45-54, Dublin)

Even for women who primarily use public transport to commute, having a car is often still seen as a ‘necessity’ for undertaking daily chores and the occasional emergency. Because many women carry the collective worry within their households, the car provides them with reassurance, knowing that they can go where they need to when they need to. As opposed to public transport which “I can’t control”, the car is seen to be reliable and to give them the control they desire. The need for control and reliability drive a perception that the car is a necessity for women, particularly as their work and household duties grow.

“It’s the freedom and independence that driving gives you, and the reassurance of knowing that the car is there. That’s just too important.”

Karen (45-54, Cork)

Survey data reflects the same trend, with young women using public transport regularly, but these habits are replaced by the car as many women have a family. Once a woman grows used to the convenience of the car, she will tend to favour this mode of transport for the majority of trips.

“Once I’m in the car,
I’ll stay in the car”

Siobhán (45-54, Cork)

ON AVERAGE HOW MANY TRIPS A WEEK DO YOU COMPLETE FOR EACH OF THE FOLLOWING?	FEMALE					
	18-24 YEARS	25-34 YEARS	35-44 YEARS	45-54 YEARS	55-64 YEARS	65+ YEARS
Car	7	7	10	10	7	4
Walking	8	5	5	6	5	4
Public Transport	4	3	2	1	0	1
Bicycle	1	2	1	1	0	0
Taxi	1	1	0	0	0	0

Similarly, on a daily basis women tend to favour staying in the car to complete all their journeys.

Despite this dependency on the car, most women are open to sustainable modes of transport, with women with children tending to enjoy using it on occasion. Women view downtime on the weekend as a chance to avoid the car, especially if walking, cycling or public transport can get them where they need to go while offering a change of pace, or fitting in with other weekend needs - such as relaxing as a family.

"I value that on the weekends you don't have to get into a car, you can walk to the shop. All of the kids' weekend sports activities are within walkable distance"

Karen (45-54, Cork).

For some, public transport can even be an adventure, or a break from their daily routine. For example, **Dora** (55-64, Dublin) takes her grandchildren on the bus when they come to visit her. "My grandchildren like the bus because they are so used to their mum driving them everywhere, going on the bus is a huge novelty for them—'can we sit on the top'—they always ask?" Dora hopes that her grandchildren will want to use public transport for more than just the novelty as they grow up. In other cases, families with young children who are very accustomed to public transport see that their children find trips in the car and car seats restrictive and unpleasant. Womens' desires to have breaks from the car and children's appetite for public transport provide opportunities to introduce alternative modes of transport and establish new habits that gradually shift behaviours away from the car.

◀ Women aged between 35 and 54 take on average 10 journeys per week by car in comparison to only 7 journeys for those aged between 18 and 34. For women aged between 18 and 34, walking and public transport makes up the majority of their weekly journeys (8 - walking, 4 - public transport), whereas for women aged 45-54, these figures fall (6 - walking, 1 - public transport). This further exemplifies how women become more dependent on their cars as their progress through life.

RESEARCH FINDINGS

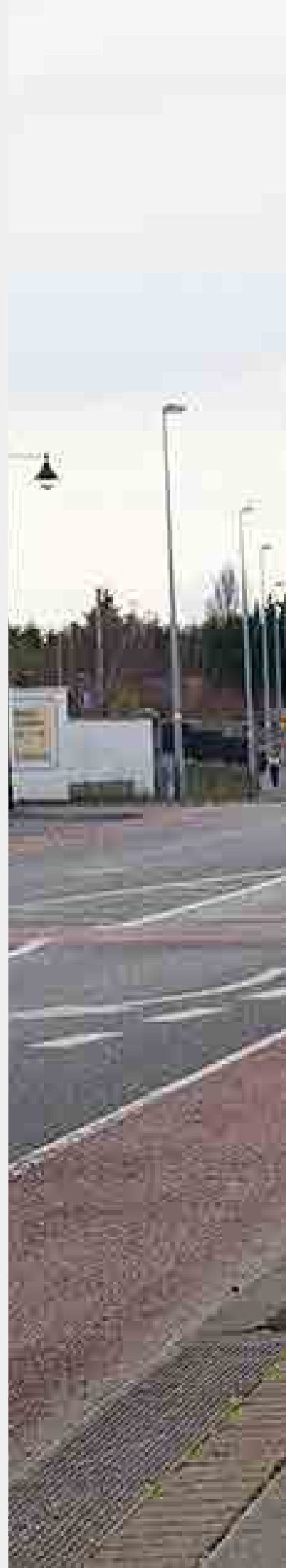
FAMILY ROLES SUMMARY

SUMMARY OF FINDINGS

- Attitudes and perceptions of transport are shaped by families from an early age.
- In Ireland most women learn to use public transport independently before age 18, often in their early teenage years.
- As many women grow older and life become more complex with work, family and caregiving responsibilities, public transport habits are replaced with car use, as it is seen to be more family-friendly and reliable.
- Car habits are solidified as women move through adulthood.
- Many women turn to walking, cycling, or public transport for a break from the car on weekends and holidays.

POLICY TAKEAWAYS

- **Start early:** encourage sustainable transport habits from a young age through community, school and families.
- **Be child-friendly:** design child-friendly public transport and adjoining public space. Enable children's independent mobility.
- **Be reliable:** help women feel that they don't need to own a car "just in case".
- **Form new habits:** promote car-free travel on the weekends to establish new habits.
- **Infrastructure and route planning:** design systems and services that go where women need to go at hours they need to travel.





RESEARCH FINDINGS

BEING SAFE

HOW CAN TRANSPORT BE AND FEEL SAFE FOR WOMEN?

Safety is a primary concern for women and influences their daily travel choices. Many will not take public transport at night, opting for a taxi, asking for a lift or choosing not to travel. This chapter explores how and why women feel unsafe, and points to policies which could improve women's experiences and increase their use of transport.

Safety concerns impact nearly half of Irish women, causing anxiety and a heightened sense of vigilance on a daily basis. Persistent feelings of insecurity can influence major life choices such as where to live, who to live with, and what activities to do. It can affect well-being and lead women to avoid going out, especially at night. Over half of the women surveyed, 55%, would not use public transport after dark or late at night, with a further 34% of women stating that this insecurity has on occasion stopped them from going out altogether.

	MEN	WOMEN
I have no concerns about my safety on public transport	44%	34%
I would not use public transport after dark/late at night	35%	55%
My feelings of insecurity when travelling have stopped me on occasion from going out	24%	34%

Also from the survey, 1 in 3 public transport users have seen or experienced some form of harassment or violence while using public transport. Both men and women across Ireland are equally likely to experience violence, but sexual harassment and assault are predominantly experienced by women, especially in Dublin.



“I don’t like places with bushes, I’m not saying they would but someone could jump out and fight you, that would put me off for good, then I’d never go anywhere”

Josie (45-54, Dublin)

	FEMALE		MALE	
	DUBLIN	REST OF IRELAND	DUBLIN	REST OF IRELAND
Verbally harassed or made to feel uncomfortable	26%	19%	27%	15%
I witnessed violent behaviour or sexual harassment happening to someone else	23%	11%	23%	15%
I was the victim of violent behaviour	4%	3%	5%	4%
I was the victim of sexual harassment	7%	3%	0%	1%
I was the victim of sexual assault	3%	1%	2%	0%

◀ Harassment, violence and sexual assault by sex and location

Whilst unsafe and violent incidents are not an everyday occurrence for most women, they have an outsized impact on a woman's sense of safety, well-being and her travel choices. One bad incident is enough to fundamentally alter a woman's relationship to transport. **Siobhán** (45-64, Cork) *was attacked by 3 men while going to the bank when she was 8 months pregnant. 20 years on, she remains hyper-aware of her surroundings, “Even now in the middle of the day, there are certain places I wouldn’t walk to for no rational reason at all. There are just alarm bells going off.” Each day she will check her car before getting in, is wary of enclosed parking garages and drives with her car doors locked. “This has impacted everything - that fear factor is there. I would get into a car at any time of the day and I’d be very conscious. I try not to let it impact my day to day life, but it does.”*

In a similar way, the experiences of friends, family, or those heard on the news can make women more vigilant or prepare accordingly when going out. This builds on the fact that women have historically been victim to more harassment and violence, especially sexual harassment. *After hearing of violent incidents at her nearby Luas stop* **Elizabeth** (45-54, Dublin) *has started to worry about the safety of her teenage daughters. She used to feel comfortable with them walking alone the short distance home, but now insists on her or her husband going to collect them.*



SAFETY IS IMPORTANT ALONG THE END-TO-END JOURNEY

Safety issues are not confined to riding on transport, but extend to the journey to and from a stop or station. In many cases, this was a women's primary concern, or reason for avoiding public transport. Many women remarked about feeling unsafe when walking through large open spaces, or parks, especially at night or when there are not many people around.

Unreliable services can leave women waiting for extended periods in poorly lit, isolated or unsavoury places. This concern is often felt both near to home, and in town. Many reported that both bus stops and train stations attracted anti-social behaviour and were to be avoided whenever possible.

Lucy (18-24) a student from Cork, doesn't drive and relies on public transport to get to her classes and her part-time job. She has started to feel unsafe as she has noticed several people at the bus stop in town who are under the influence of drugs. "There are people who are very high on drugs and they're shouting, banging their heads on the bus stop. I don't feel very safe on my own." Filled with angst, when she gets off the bus close to her house, she picks up her walking pace so she can get home as quickly as possible.

Josie (45-54, Dublin) tried walking from the Luas stop back home one night. It is a walk she does frequently during the day, but found it frightening at night and would not do it again. "When you're coming up that road there are bushes either side and it's an open road. You have your wits about you if you're walking home, especially if you've had a few drinks. I did it one night and I ended up running home, I didn't feel safe."



STRATEGIES FOR STAYING SAFE

Many women employ strategies to feel and be safe when travelling. Strategies include: stringently planning their route; travelling one stop further than required to avoid an unsafe station; holding keys in their hand when walking home as a makeshift weapon; calling someone along the way; or asking that someone meets them at that station. Many women spoke of dressing down to avoid attracting attention. This affects a woman's sense of security and limits her independence and expression. It also impacts on her ability to be spontaneous.

When **Dora** (55-64, Dublin) is travelling on public transport she always dresses in comfortable shoes and she doesn't wear tight clothing "I like to blend into the crowd and not stand out." Similarly, for **Josie** (45-54, Dublin), "I try to have sensible shoes on, so if I need to run, I need to run".

Hermione (25-34, Dublin) and her friends will call each other if someone starts interacting with them in a way that they are not comfortable with.

When confronted with harassment women often try to avoid eye contact and confrontation as much as possible.

"I just keep my head down and mind my own business"

Josie (45-54, Dublin)

For some, these workarounds have not helped, and the persistent feeling of insecurity and lack of safety has forced them to relocate. **Hermione** (25-34 Dublin), a young law graduate originally from Tipperary, moved to Dublin for work. She often felt unsafe travelling home when she lived in Smithfield, she "hated the journey to work on the Luas" and would often come across people drinking, on drugs or approaching her for money. One night she saw someone rummage through a girl's backpack. While nothing was stolen, it frightened her and she doesn't travel with a backpack anymore, instead holding her handbag close to her body. Over time the combination of feeling cramped on the Luas and dreading the prospect of walking home, led her to move to a more expensive area. "It was a particular winter where the commute was really horrible, cramming onto the Luas and feeling unsafe. I realised I would prefer to feel safer than to save money and am a lot more relaxed now". Now she lives with her sister and they travel together to work. Her parents feel much more comfortable knowing they can look out for one another.



◀ The overgrown and underlit path to Josie's Luas stop.



PASSING ON ADVICE AND WORKAROUNDS

Women often pass on their experiences to their children shaping their perceptions. Often parents pass on their traumas, fears or biases, teaching their children to be vigilant and aware of their surroundings when travelling, and urging girls and women to be especially careful.

Laura (45-54, Cork), has two teenage daughters. Her eldest, aged 13, is starting to travel by bus to the local shopping centre by herself to meet with friends. To ready her for independent travel, Laura advised her daughter to avoid sitting on the upper deck of the bus, don't go to McDonalds on the main street, and about what to do when she felt unsafe or found herself in an uncomfortable situation: "I've already given her a strategy - she has learnt the knack of sitting on the outside seat on the aisle when there are two seats together. So, if someone came and sat next to her and she wasn't comfortable with wouldn't be pinned in"

"People make a place safe"

Lena (45-54, Cork)

WHAT WOULD MAKE WOMEN FEEL SAFER?

When women recount traumatic incidents they have experienced when travelling, the lack of support from bystanders contributes to feelings of anger, helplessness and vulnerability. **Skye** (25-34, Dublin) vividly recalls sitting on the top deck of a bus looking out the window when she was younger. Despite many seats being available, a man sat down next to her, staring, coming progressively closer, eventually breathing on her face. Skye was most frustrated by other passengers who ignored the interaction, despite her vulnerability and visible fear.

By contrast, support from a friendly or familiar face can help women to feel comforted and safer. For instance, **Josie** (45-54, Dublin) used to be anxious about her autistic son taking public transport alone. Over time Josie and her son got to know the drivers. "The bus drivers would wait for him if he was late, drop him out the front of his school so he didn't need to cross a busy road. There were four bus men on that route and they all knew us, they were absolutely amazing." One day he left his school bag on the bus, and the driver rang the school so Josie could retrieve the bag before he returned to the depot. The driver's attentiveness and kindness reassured Josie that her son was in safe hands, relieving her anxiety. While women can feel alone when trying to manage the safety of their children, a sense of community support and familiarity can help to ease anxieties and allow children and their mum's to be more independent.

Infrastructure, services and amenities can also contribute to a woman's sense of safety and reduce anxiety. Infrastructure that directly and indirectly improves safety, throughout a woman's journey on the streets and in the vehicle are necessary. Important aspects of infrastructure and services identified through our survey included: more trained staff, increased frequency of services (especially at night), street lighting and improved visibility, better technology and easier ways to report incidents. The women interviewed also relied on nearby shops and cafes to feel safe while waiting for transport, showing us that convivial placemaking is also key. For men, more direct action and visible security measures were preferred.



Compared to 59% of men, only 50% of women would like more security guards or customer personnel. Like many women, those interviewed felt heavily responsible for their own safety and tended to prefer good infrastructure and convivial places. This may suggest a certain realism about the ability to police public space. It also alludes to an uncertainty about what feels safe. A report into Protective Service Officers in Melbourne investigated numerous complaints against security staff of 'predatory behaviour towards members of the public', which led women to feel unsafe and intimidated in their presence.⁵³



Many women, like Skye, carry their keys in their hand in order to feel safe.

WHAT WOULD HELP YOU FEEL SAFER USING PUBLIC TRANSPORT?	DUBLIN		REST OF IRELAND	
	MALE	FEMALE	MALE	FEMALE
More security guards / customer personnel	59%	50%	41%	40%
More frequent services, especially at night	34%	34%	30%	36%
Better lighting at the bus stop / stations etc.	25%	41%	27%	40%
Better visibility around the location of the bus stop / station	29%	33%	24%	33%
Better safety related technology	26%	28%	24%	21%
Easier / clearer incident reporting process	20%	17%	17%	21%
Family friendly areas on Public Transport	13%	21%	17%	20%
I already feel completely safe using public transport	12%	11%	21%	15%
None of the above	6%	4%	10%	12%
Other	3%	2%	2%	2%

Attributes that would make men and women, inside and out of Dublin feel safer when using public transport.



NOT JUST A WOMAN'S RESPONSIBILITY

When talking about safety, most women viewed it as their responsibility, and were hesitant to express issues they were experiencing out of fear for not being believed or being seen to be dramatic. Some women worried that they would lose their independence if they told others. Instead, women often try to resolve these issues by limiting what they do, or instituting elaborate workarounds. This discourse is often passed down within families, who often send different messages to young boys and girls growing up. *"My dad would always tell me to pinch them at the back of the neck if someone were to come at you. If I were a boy, I don't think he would have taught me that"* **Hermione** (25-34, Dublin). **Lilian** (45-54, Dublin) has one daughter and three younger sons. Growing up she encouraged the boys to travel on the Luas and bus, but never expected her daughter to take public transport alone, instead chauffeuring her around.

Compounding the message shared within families, discourse in the workplace and educational institutions can also perpetuate the harmful idea that it is up to women to protect themselves. Increasingly, women, especially younger women reject this notion, expecting a more open discourse about gender and violence, as well as education targeted to both sexes. *When the HR department at Skye's* (25-34, Dublin) workplace held a seminar to teach women how to protect

themselves and stay vigilant against sexual assault she was appalled.

While appreciating that the intent was to educate women, she felt it unduly placed responsibility only on women. "Why is it targeted towards women - the victim and not the perpetrator?" Skye complained about the seminar to HR in an attempt to improve the programme.

With 81% of men acknowledging that women, on average, feel more unsafe using public transport than men, there is an opportunity to work with men to build on this understanding. This might include learning how their own behaviour and choices can improve or exacerbate a woman's experience. The 'Walk like a Woman' campaign from Plan International sets out five tips for men to support women feeling safe in public: keep your distance, don't run up from behind, don't stare, keep comments to yourself, keep your friends in line, be an active bystander and educate others.⁵⁴



▲
An example of a woman's walk home.

⁵³ IBAC. (2016). 'Transit Protective Service Officers: An exploration of corruption and misconduct risks'. Retrieved from <https://www.ibac.vic.gov.au/docs/default-source/research-documents/transit-protective-services-officers---an-exploration-of-corruption-and-misconduct-risks.pdf?sfvrsn=4>

⁵⁴ Plan International. (2020). 'Walk like a Woman'. Retrieved from <https://www.plan.org.au/get-involved/join-the-movement/walk-like-a-woman>

RESEARCH FINDINGS

BEING SAFE SUMMARY

SUMMARY OF FINDINGS

- Staying safe is a primary concern for many women. Staying vigilant when travelling, particularly at night, is a common practice.
 - Women have developed strategies to stay safe, including avoiding travelling at night, on certain modes of transport, or going out altogether.
 - While unsafe or violent incidents do not occur everyday, for most women the impact of a traumatic incident has a lasting impact on a women's sense of safety, well being and travel choices.
 - Mothers pass on their experiences and strategies to their children, teaching them to be vigilant and aware of their surroundings. This can perpetuate a car culture and limit choices.
 - The 'last mile' from a stop or station is often perceived as unsafe and deters travel.
 - A lack of support from fellow passengers can make women feel more isolated and unsafe.
 - Current social norms typically make a woman responsible for her own safety. There is little focus on the role men can play in ensuring women's safety.
 - Creating physical and psychological safety is key to building women's trust in active and public transport modes.
-

POLICY TAKEAWAYS

Social infrastructure

- Increased presence of transport staff throughout the network.
- Apply a gender lens to staff training and rosters to build community relationships and foster a sense of safety.
- Cultivate a more supportive bystander culture.
- Provide joined-up solutions and partnering by working with key stakeholders like universities, schools. Provide adapted training programmes for both sexes on issues of safety, violence, assault, and consent.
- Build awareness around support and counselling for women who have experienced violence or harassment of any kind.
- Co-create solutions with women.

Physical infrastructure

- Collect better data to enable gender analysis of projects.
- Undertake regular women's safety audits and develop effective incident reporting mechanisms.
- Plan for end-to-end mobility, including quality lighting and visibility at all points along the journey.
- Improved service frequency, especially for night services.
- Better safety related technology.
- Plan for convivial place-making.

RESEARCH FINDINGS

BEING INCLUSIVE

HOW CAN TRANSPORT CONSIDER THE DIVERSE NEEDS AND CONTEXTS OF ALL WOMEN?

This chapter discusses how challenges relating to transport are not evenly distributed, but vary based on where someone lives, their income, and other special needs. In order to build an inclusive transport system, consideration needs to be given to diverse needs and the most vulnerable populations.

DUBLIN COMPARED TO THE REST OF IRELAND

Dublin is Ireland's largest city with the country's most comprehensive public transport system. Across the survey findings, transport experiences and perceptions varied considerably between women living in Dublin and elsewhere in the country. These differences and some of the drivers are explored below.

AVAILABILITY OF SERVICES

Availability of services is a large driver of the discrepancy between use.

48%

of women outside of Dublin said they would not consider using public transport for all or some journeys given limited availability, compared to only

20%

Dublin women.

MODE USAGE

Women outside of Dublin drive more and use public transport and walk less than those in Dublin.

ON AVERAGE HOW MANY TRIPS A WEEK DO YOU COMPLETE FOR EACH OF THE FOLLOWING	DUBLIN	REST OF IRELAND
Car	5	8
Walking	7	5
Public Transport	4	1
Cycling	1	1
Taxi	1	0

EARLY SOCIALISATION

Women in Dublin are significantly more likely to have taken public transport independently by the time they are 18.

WHAT AGE DID YOU FIRST START INDEPENDENTLY USING PUBLIC TRANSPORT?	DUBLIN	REST OF IRELAND
Under 10	12%	13%
11-17	73%	63%
18-29	10%	17%
30-49	3%	1%
50+	1%	2%
Never used public transport independently	1%	4%

STRESS

Women in Dublin are more likely to consider driving as stressful, while those outside of Dublin are more likely to find using the bus stressful.

IT'S LESS STRESSFUL	DUBLIN	REST OF IRELAND
Walking	66%	76%
Car	18%	27%
Train	27%	21%
Bus	20%	12%
Cycling	9%	6%
Taxi	7%	4%
None of these	2%	3%

HARASSMENT OR ASSAULT

Perhaps given a higher rate of use, women in Dublin are also significantly more likely to have experienced or witnessed violent behaviour or been verbally harassed or sexually assaulted on public transport.

WHICH, IF ANY, OF THE FOLLOWING SITUATIONS HAVE YOU EXPERIENCED USING PUBLIC TRANSPORT?	DUBLIN	REST OF IRELAND
Verbally harassed or made to feel uncomfortable	26%	19%
I witnessed violent behaviour or sexual harassment happening to someone else	23%	11%
I was the victim of violent behaviour	4%	3%
I was the victim of sexual harassment	7%	3%
I was the victim of sexual assault	3%	1%



SAFETY

When asked how safe each mode felt, women across all of Ireland ranked walking highly. This shows the role for walking in any multi-modal transport planning and the importance of the last-mile for unlocking women's mobility. The low performance of the car in Dublin can be explained by safety related concerns around parking, carparks and making the journey alone by foot.

IT'S FEELS SAFE	DUBLIN	REST OF IRELAND
Walking	62%	72%
Car	23%	26%
Train	15%	23%
Bus	24%	19%
Cycling	11%	13%
Taxi	10%	9%
None of these	5%	5%

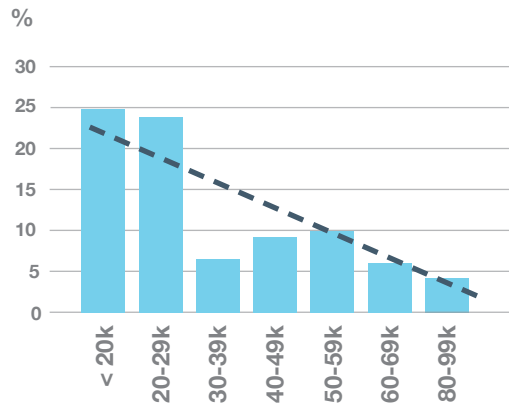
The findings demonstrate a strong correlation between access to public transport with early and regular use, and confidence or comfort in the mode. Young women who grew up in rural areas can feel unprepared, experiencing shock and heightened vulnerability when moving to a city and using public transport alone for the first time. **Alice** (18-24, Cork) moved from a small village outside of Cork into town, there's no public transport where she is from so her journeys in Cork are her first experiences. She uses public transport regularly, but she doesn't feel comfortable waiting at the stop in town or taking the bus at night. By contrast, **Amanda** (25-34, Dublin) grew up in Dublin using buses from an early age. While she uses the car a lot these days for family, at 26 she still knows the routes and reliability of many of the buses off by heart. Amanda shows resilience and confidence in using public transport and attributes this to her early socialisation.

It is worth noting that attitudes to public transport are in flux and Covid-19 may encourage more people into their cars or onto active modes.

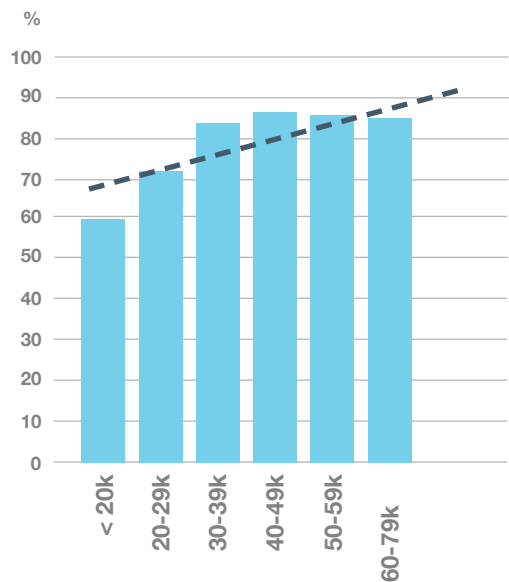


BY INCOME

Personal and household income affects the transport options available and affordable to women. It affects the neighbourhood they can live in, educational options and childcare support. Women with a higher household income are more likely to own a car and less likely to be public transport users.



Percentage of women using public transport by income level.



Percentage of women who own a car or have access to a car by income level.

It is critical that public transport is seen as a viable option for all, not just for those of lower income households. Middle class women are open to public transport, however, many still defer to the car as their mode of choice. Urban sprawl means many middle income suburban neighbourhoods are not well served by public transport or cycling infrastructure. **Lilian** (45-54, Dublin) is a full time home mum living in the suburban neighbourhood of Enniskerry. The suburb is only served by a single bus route, running hourly. The closest Luas stop is in Sandyford, a 15 minute drive away. Even if they wanted to use public transport, the options nearby aren't adequate. Instead, Lilian spends a considerable amount of time each day chauffeuring the boys to school, extracurricular activities or the Luas.

More dependent on walking and public transport, and often living in poorer neighbourhoods, women with lower household income tend to be exposed to safety issues. These women are more likely to witness or be victim to violent behaviour or sexual harassment.

For the most vulnerable women, limited financial means can be paired with a lack of family support, low education attainment, dependency on social services, experiences of racism, health issues, disabilities, and unemployment. This cumulative disadvantage heightens a woman's vulnerability and compounds daily mobility hardships.

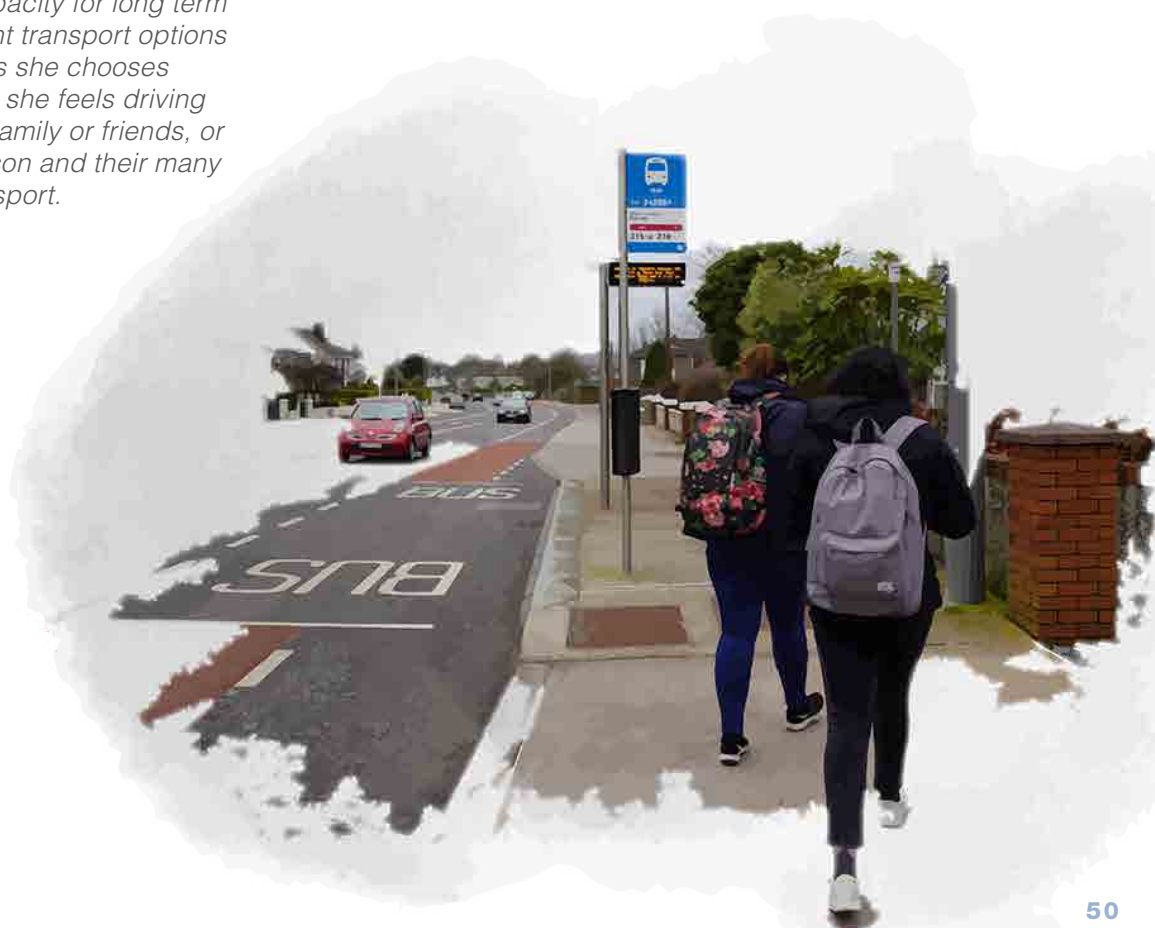
Natalie (35-44, Dublin) is a single mum with two boys, aged thirteen and two. As their sole carer, Natalie does not work and relies on social services and family support. "It isn't fair (having to take care of the kids alone) but I've gotten used to it. Some weeks I feel it's fine and sometimes it's not, I do what I can". Natalie had been on the Council housing waiting list for a long time, holding out for a place near her mum's house. Her mum lives in the area where Natalie grew up, this is where her son goes to school and where her community is. When her previous landlord decided to sell their property she had no choice but to take any Council house on offer. Unfortunately the one she moved into is far from her mum's house, and in an area Natalie doesn't feel safe. "At night I don't feel safe because you hear of muggings and people being attacked".

The neighbourhood feels especially unsafe at night, and Natalie worries about her son being hassled if he is out walking. "There are gangs around the corner so I prefer if my son doesn't walk by himself. Once, when he was at the shops with my friend, and the other kids shouted at him and called him fat."

As her own car is broken, Natalie has borrowed a car from her brother and uses it for most of her trips. Despite considering herself a nervous driver and feeling overwhelmed by the expense of driving, she thinks of it as the only convenient option for travelling with her youngest son. Each week petrol costs her €60 to €70, consuming a sizable portion of her government benefits. As she is constrained for money, Natalie typically tops up €5 or €10 of petrol at a time, a practice that has left her broken down a number of times after running out of petrol and having to walk to a garage or call on family for help.

Despite having free access to public transport Natalie does not use it everyday, as she finds it inconvenient with children and at times unsafe. "Sometimes you'll get a bus and there will be a group hanging around, people on drugs, that sort of thing. But you just try to avoid sitting near them."

For Natalie most days are stressful, with little childcare support or time for herself. Her financial situation is a constant concern and she worries about how her children will manage in the future. Pressures of daily life leave her with very little mental capacity for long term planning. Her current transport options add to this stress, as she chooses between the anxiety she feels driving across town to see family or friends, or struggling with her son and their many bags on public transport.





BY AGE AND HEALTH NEEDS

Health issues influence a woman's sense of independence and mobility choices. The research found that, for example those with disabilities are less likely than the general population to be able to drive, to own, or have access to a car.

OWN A CAR	WOMEN WITH DISABILITIES	WOMEN WITHOUT DISABILITIES
I own a car or have access to a car	72%	78%
No – I can drive but have no access to a car	5%	9%
No and I am not able to drive	23%	13%

While health issues can impact all women they tend to worsen as women get older. Fear of losing one's ability to drive, having to ask family members for help, and losing independence, was a concern for many aging women, like Gillian who shares her story in Section 4.



Health issues and disabilities can make active modes of travelling such as walking and cycling particularly challenging. **Lucy** (18-24, Cork) *had a stroke when she was eight years old, which has left her with weakness in the right side of her body causing fatigue and migraines. "I can walk perfectly, but it's just fatigue at the end of walking that would get me." When she is travelling, Lucy is always mindful to conserve her energy along the way.*

For women with health needs, public transport has the potential to provide them with independence and reduce their reliance on others. Today, unreliable and unsafe services impact disproportionately on women with disabilities, often preventing them from using public transport. Data shows that 12% of women with disabilities are not comfortable taking public transport alone, while 22% of women with disabilities stated that health requirements prevent them from using public transport, indicating that existing infrastructure does not adequately provide for the needs of these women.

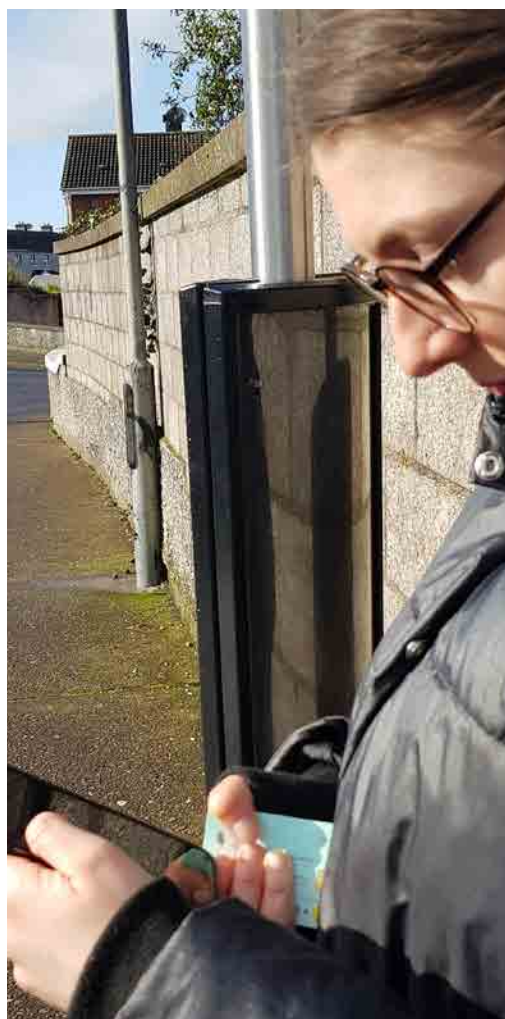
Without any shelter, seats and proper lighting Lucy often feels vulnerable waiting long periods at the bus stop.



BARRIERS PREVENTING PUBLIC TRANSPORT USE.	WOMEN WITH DISABILITIES	WOMEN WITHOUT DISABILITIES
Services are not on time or fail to turn up	30%	22%
I don't feel safe on Public Transport	17%	6%
I don't feel comfortable taking Public Transport alone	12%	7%
I have health requirements preventing me from taking Public Transport	22%	2%

Health needs and disabilities can be challenging to design for, particularly as many of these needs are invisible. In addition to the inconvenience and physical pain women experience when travelling, many also feel judged or scrutinised when asking for support.

Lucy (18-24, Cork) was recently waiting for the bus into town to go to the gym when it didn't show up. There is another bus route a 10 minute walk away, but she decided to wait rather than expend walking and be tired when she arrived in town. The bus is small, operates a long route and infrequent services, meaning the bus is often full and Lucy won't get a seat. As Lucy's disability is not obvious, she often feels embarrassed or unable to ask for a seat. Even after spraining her ankle and was using crutches, nobody offered her a seat and instead she experienced scrutiny for asking to get on the bus first, "I looked around and got off". When she was forced to stand on the bus "there's nowhere to put your crutches and there's nowhere to lean. I stumbled a few times."



◀ Lucy is often left waiting at the bus stop, waiting 30-45 minutes for the next bus to turn up.



BY RACE AND ETHNICITY

While there is general openness and acceptance of immigration in Ireland, everyday racism and xenophobia is still felt. This has significant impacts on women's mobility, including the cost and well-being.

For **Amanda** (25-34, Dublin), *growing up as one of the only mixed race people in the area she experienced regular racism. "I didn't know what to do then, I just told myself I needed to toughen up my skin."*

Lena (45-54, Cork) from Poland has lived in Ireland for over 10 years. Her and her two sons are very connected with their local community, "they all smile at me, they say hello, I feel I'm part of a community." Despite this, on many occasions taxi drivers have taken her the long route assuming she is not from Ireland. "Sometimes I'll take a taxi back from the airport and they'll hear my accent and think I'm not from here, then I say the address, and they'll take me the long way around."

RESEARCH FINDINGS

BEING INCLUSIVE SUMMARY

SUMMARY OF FINDINGS

- Women in Dublin view the car more negatively and are slightly less dependent on it than those living elsewhere in Ireland.
- Women in Dublin have more exposure to and use public transport more frequently. Their perception of it is also more positive.
- Confidence using public transport and active modes is acquired over time.
- Women with higher household incomes are more likely to own or have access to a car and to be less dependent on public transport.
- Women with lower household income are more likely to witness or be victims of violent behaviour and sexual harassment.
- Everyday racism and xenophobia is still felt by minority ethnic or non-Irish backgrounds and impacts the mobility of women today.
- Exposure to risk, inconvenience, and vulnerability can be amplified for the most disadvantaged women, for whom low income can intersect with health issues and disabilities, reliance on social services, lack of family or partner support, and a lack of employment or education opportunities.

POLICY TAKEAWAYS

- Design for a range of disabilities and age and health related issues.
- Promote diversity and inclusion to foster understanding and encourage supportive behaviours on and around public transport.
- Improve public transport coverage and quality in regional and rural Ireland.
- Take an integrated approach to land use and understand local neighbourhood transport challenges.
- Build a gender lens with diverse partners to protect the most vulnerable women, bringing transport policy together with land use planning, social and justice services, childcare and education.
- Expose rural children to urban transport environment.

RESEARCH FINDINGS

DRIVING CHANGE

HOW CAN WE ACCELERATE SUSTAINABLE BEHAVIOURAL CHANGE?

At the heart of this project is Ireland’s ambitions to achieve a low carbon and sustainable future. In addition to improving public transport, walking and cycling infrastructure, as described in previous sections, how can public policy accelerate this shift? This chapter discusses the lessons learnt from our research to identify how to get people to rally behind this challenge and change their own behaviour.

72%
of women say they are concerned about the environment and climate change.

45%
would consider changing their transport routine to help the environment.

Only
12%
of women recognise Public Transport as eco-friendly.

CLIMATE AWARENESS IS A WEAK MOTIVATOR

Across Ireland, awareness of climate issues is high. Amongst those surveyed, 72% of women stated that they are concerned about the environment and climate change. 45% said they would consider changing their transport routine to help the environment. However, these concerns about the environment don’t translate into actions. As we know, car ownership and use is high, and in fact only 6% women place “environmental friendliness” into their top eight decision-making factors when deciding how to travel.

TOP 8 TRAVEL DECISION FACTORS	FEMALE	MALE
It will get there quickly	21%	23%
It feels safe	17%	14%
I can rely on it	13%	13%
It's a cost-effective option	11%	11%
It's easy to access	9%	9%
It's environmentally friendly	6%	6%
It's less stressfull	5%	5%
It's a pleasant way to travel	4%	4%

“Dad thought that global warming wasn’t real, but now he said, you’re onto something climate change is everywhere”

Alice (18-24, Cork)

In part, this inaction can be attributed to a limited understanding of the link between individual transport behaviour and climate change. During the ethnographic interviews, most women referred to recycling, purchasing reusable items, reducing consumption of red meat, and protecting wildlife and natural habitat when talking about day-to-day sustainability actions. Quantitatively, only 12% of women surveyed considered public transport to be eco-friendly. A more targeted public policy campaign is needed to build an understanding of the link between transport choices and climate.

For women who are aware of the role of transport in climate action, they often described it as a difficult area to change. *“I know it’s selfish: I fly to see family or go on vacation every other week, it’s terrible the amount of pollution I cause”* **Skye** (25-34, Dublin). *Despite being the most educated and passionate interviewee on climate issues, Skye would still like to own a car. Living in central Dublin, Skye is deterred by the high cost of renting a parking space near her house. Instead, her and her boyfriend use a car subscription service, called Go Car, giving them easy access to a car when they need to. Skye’s story demonstrates that the cost of parking is an effective disincentive for owning a car; that car share schemes can provide women with the reassurance they seek from car ownership.*

COST OF PARKING AND COST OF THE CAR AS AN OPPORTUNITY

Like Skye, many other women pointed to the high cost of parking, particularly in the inner city, as one of the strongest, if not only, effective motivators to avoid the car. The full cost of a car is rarely taken into account when women compare transport options. The women interviewed often didn’t consider the upfront or upkeep cost of the car, instead they often compared petrol and parking costs with the cost of a public transport ticket, giving the illusion that the car is more cost effective than it actually is. To shift behaviour, showing the holistic cost of the car could prove effective for policymaking for influencing women’s transport choices based on cost.

PROMOTING PRACTICAL PATHWAYS FOR MODAL SHIFT

Shifting women away from their cars is a sizable challenge in Ireland, given high car dependency rates, a mindset that the car is a necessity, and the time required to provide adequate cycling and bus infrastructure. In the short term, it is unlikely that women will have the appetite or ability to give up their cars altogether. Instead, promoting practical pathways like multimodal park and ride, car-sharing, ride-sharing, or electric vehicles (EV), are more likely to be effective at influencing behaviour change today, and start to shift women away from car ownership in the long term. *For example, Amanda* (25-34, Dublin), *wants Ireland to invest in more EV infrastructure and provide better subsidies to help families transition. When she was upgrading her car a few years ago she looked into getting an EV, but decided against it as she wasn’t able to get a charging station installed at the council flat she rents. Laura* (45-54, Cork) *has also considered switching to an EV, but felt it was not suitable for her long distance travel needs.*

WOMEN’S OPENNESS TO CHANGE

As discussed earlier in the report, the research showed that women in Ireland were generally open to change. We saw this particularly for women in Dublin where public transport and density make it a more viable choice. There is an opportunity to leverage this openness to encourage behaviour change through targeted programmes and policies. It also demonstrates the potential for change in rural communities across the country where public transport will be provided.

	FEMALE		MALE	
	DUBLIN	REST OF IRELAND	DUBLIN	REST OF IRELAND
Already taken action to reduce car use	39%	34%	44%	29%
Have considered taking action to reduce car use	47%	38%	34%	42%



Emma loves walking to work alongside the canal





THE INFLUENCE OF CHILDREN AND FUTURE GENERATIONS

As discussed, changing long-established habits can be challenging and is often met with resistance. However, women interviewed who had school-aged children were often more open to change than their peers. Many referred to instances where their children have come home from school with information about and a passion for climate issues, challenging them to think about their own behaviours and institute new practices at home. Most women were supportive, and often impressed, by their children's civic mindedness and were eager to support along the way.

Lilian (45-54, Dublin) *noted how her 13 year old son was more engaged with topics like gender and climate than her older sons, aged 18 and 20 are. Lilian considers him part of a new generation, where he proactively brings home challenging discussions, applies pressure on her to consume sustainably (e.g. biodegradables), challenges her use of gender stereotypes, and is much less enthusiastic about learning to drive. Lilian believes that the city needs to improve cycling infrastructure to support these changing attitudes and adapt to "what the kids want". "I think for kids going forward, they seriously need a much better transport system. In this area, kids are being forced into driving because they can't get around. They don't have the type of transport options that they need."*



◀ Living close to her office, Laura walks home from work with ease each day

IT TAKES A VILLAGE: CHANGE REQUIRES FAMILY AND SOCIETAL SUPPORT

It is important to note that, while behaviour change from women is an important dimension in Ireland's decarbonisation, that collective effort is required by all. A broader reflection is needed on how we all live and define a good life. Today women's choices are shaped by the options they have available to them as well as:

- Narratives passed on by family and society
- The type of transport options their peers are using
- The actions of men and bystanders on and around public transport
- Division of labour, roles and responsibilities in the home

For women to feel more confident and comfortable using sustainable transport modes, services and infrastructure need to cater to the needs of the entire family.

COVID-19 AND FLEXIBLE WORKING ARRANGEMENTS

We have discussed how a woman's many responsibilities put them under constant time pressure, especially for women who are working and have children, such as Karen (45-54, Cork). In Ireland, as in many other countries, Covid-19 has enforced an unprecedented closure of both schools and offices throughout March, April, and May 2020. Throughout this period, the dual responsibilities of working from home and caring for children has placed greater pressure on many working women. However, attitudes to remote and flexible working have relaxed particularly amongst men, and may extend beyond Covid-19. This may reduce pressure on women, challenging the necessity of commuting during peak hours and giving men and women more flexibility to explore alternative transport options.



RESEARCH FINDINGS

DRIVING CHANGE SUMMARY

SUMMARY OF FINDINGS

- There is general concern for climate change, however the link between individual transport behaviours and sustainability is not well understood.
 - Cost of parking is a strong incentive to reduce car use, whilst the full cost of running a car is often underestimated.
 - Support practical pathways to reduce car use through car share schemes, ridesharing, or switching to EV.
 - Women in Dublin are the least likely to use a car, and are most willing to reduce their car usage even further.
 - School-aged children play a central role in shifting attitudes and behaviours in the family.
 - Behaviour change requires the full support of society and families.
 - Beyond Covid-19 flexible working arrangements could influence the distribution of household duties and travel demand.
-

POLICY TAKEAWAYS

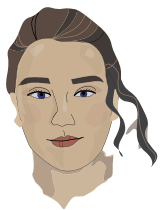
- Facilitate multi-modal travel by understanding connectivity through a gender lens.
- Design for households as well as individuals.
- Apply a gender lens to carpooling and ridesharing schemes to improve services and reduce car use.
- Provide EV incentives and infrastructure to reduce barriers for households switching to EVs.
- Ramp up climate change education for all age groups, and promote ways individuals and families can reduce their carbon footprint through their transport choices.
- Plan for changing flexible work and mobility patterns from Covid-19. Prioritise integrated approaches to work, caregiving and mobility - understanding that flexible work arrangements, parental leave and affordable childcare all impact on mobility choices.



Stories From The Field

FIVE WOMEN ACROSS FIVE LIFE STAGES

Through this series of women's stories we explore how different modes of transport make up a woman's journey and daily life, over a lifetime. Each story is the real experience of one of the women we interviewed. One-by-one the stories invite us into a moment in a woman's life and immerse us in her experiences. Steeping us in their lives, we explore experiences and perceptions of transport modes, family roles and responsibilities, safe and unsafe experiences, and privilege and disadvantage as they influence women and travel.



Alice | Cork
19 years old

▼ University student and part-time barista, wanting to explore and socialise but struggling to feel safe after dark.



Karen | Cork
45 years old

▼ Associate director at engineering firm and mum of four young kids, balancing a career and childcare together with her husband.

◀ Participant names, details, and faces have been anonymised to protect their identities.



Amanda | Dublin
26 years old

▼ Single mum, childminder and soon-to-be psychotherapist, juggling her responsibilities and ambitions, tethering her to the car.



Gillian | Cork
70 years old

▼ Retired but busy helping to take care of her grandkids, worried about losing her ability to drive.



Josie | Dublin
48 years old

▼ Stay-at-home mum and multi-generational carer, balancing caring for the family with her own wellness.



ALICE

For Alice, 19, a young woman just entering university, her new found independence comes with its challenges as she explores a new city. After some unnerving experiences, being out after dark requires extra vigilance.

ABOUT ALICE

▼
19 years old
University student
Cork

Alice lives in the suburbs of Cork with her grandparents. She moved in with them so she could travel easily to university as there is no public transport from her village. In addition, she appreciates being able to save on rent while enjoying the comforts of family.

Balancing part-time work as a barista, studying nutritional science, and maintaining a relationship with her boyfriend keeps her busy. Alice aspires to own her own home, have a car, and explore the world one day. She knows she will need a good job for that.

Alice prefers to make her own way around Cork without burdening her ageing grandparents for a lift. The bus is her main way of getting to school, to work, or to see friends.

"I just want a job where I get paid enough that I don't have to live pay check to pay check, I want to be able to buy a house, get my license and a car, and I'd like to be able to travel around I want to see the world a bit"

Originally from a small village, Alice finds that the city can be a scary place, especially lately, given many recent news stories of violent crime. These reports, combined with her own late night experiences, like getting cat-called or harassed by groups of men at night, have put her and her friends off going out at night for now.

BEING OUT AFTER DARK FOR A YOUNG WOMAN IN CORK



▲
Internet cafe Alice waits inside

Coming home from work
Navigating independence and feeling safe.

Waiting for the bus in a nearby internet cafe

Alice finishes work in town at 8 pm. She doesn't feel safe waiting at the stop as there is a soup van set up next to it, attracting men who linger around. Instead, she takes refuge in an internet cafe down the road and runs to the bus when she knows it's about to arrive.

Keeping quiet so she isn't an inconvenience

Even when Alice has negative experiences, she prefers to keep quiet rather than bothering her grandparents by asking for help.

"I wouldn't tell my grandparents what happens because then my nan would make my grandad come and pick me up from everywhere, and I don't want him to have to do that."

A night out with friends

Preparing for a night out

Alice and her friends are always thinking ahead when getting ready to go out. They have developed their own workarounds to feel safe - by bringing a coat to cover up, wearing sensible shoes to run at any time, always keeping an eye on their drinks, and staying in groups.

Survival strategies as a group

Alice and her friends are often harassed by men on a night out. It often starts with cat-calling and name-calling, and sometimes escalates to groups approaching or becoming aggressive when the young women don't engage. They will always stick together at all times, and if situations become unmanageable they will hide inside a venue or leave abruptly to avoid any further escalations.

Educating girls and boys

On reflection, Alice would have appreciated being taught better coping strategies in school, but thinks it is equally important for boys to be educated on how their behaviour affects women.

"You want to draw the least attention to yourself as possible. I bring a big coat so I can wrap up and hide in it. If you need to run you don't want to waste time getting your heels off."

"It's about safety in numbers, we're constantly watching out for our group. We'd be holding hands walking, bringing our drinks to the bathroom. If one of us wants to leave - we all leave".

"I wish that in schools they taught you how to handle yourself. When you're younger you don't know what to do, you have to learn from experience. Oh and boys too, they need to be taught how they make people feel, a lot of the time they just think they're having a laugh, but I don't know any girl who likes it-respect people's boundaries!"

"There's no fear [among the perpetrators] anymore, [crime and harassment] is too widespread. I'd rather wait to go out until it quietens down"

POLICY CHALLENGE

How can sustainable transport policy empower Alice to live a full life—working, exploring and socialising anywhere in town and at any time of day —without worrying about her safety?

Implications for:

- Transport policy and planning
- Land use policy
- Security measures
- Transport infrastructure
- Community education
- Cross-departmental collaboration



AMANDA

At 26, Amanda's life is built around juggling multiple responsibilities as a single mum, a university student, and a childminder. Financially constrained, Amanda does her best to care for her son, while striving for her own future. The car enables her to get all of this done, but constant driving has become a burden.



ABOUT AMANDA

▼
26 years old

Single mum,
childminder,
and soon-to-be
psychotherapist

Dublin

Amanda lives with her 9 year old son in social housing in Dublin. Dependent on social support, she works as a childminder for a family of three small children, so that she can save on childcare and spend time with her son. On the weekends, she is pursuing a part-time degree in psychology to secure a better future for herself and her family.

"I had a baby at 16, so I never got to have a career - this is important for me."

Managing pick-ups and drop-offs for four children every day, household duties, and her own commute to school leaves Amanda with little contingency for delays. At first, getting a car was liberating for Amanda, it gave her more time in her day to get everything done. Over time, her reliance on it and seemingly endless hours driving, has become a burden.

"If we're late in one part [of our daily children pickup routine] that's going to screw us up picking up everyone else".

Growing up taking the bus, Amanda knows the Dublin route map by heart. Being the only person of colour in a poor neighbourhood, she endured routine verbal harassment on public transport. Yet looking back, she sees these experiences as confidence- and empathy-building. Amanda wants her son to have the same confidence and encourages him to take the bus to his jiu jitsu classes twice a week. It saves her time sitting in traffic too. Cycling is a different story, she never learnt to cycle on the road and is afraid to do it now, but wants her son to learn so that he isn't held back.

"Him taking the bus saves me half an hour sitting in traffic. He's mature beyond his age, so it's pretty much safe, and it's right beside my mum's house"



▲
In the car

“I drive pretty much all the time, driving kids from A to B all the time.”



THE CONTRADICTIONS OF THE CAR

The car as freedom

When Amanda was living closer to town she didn't need a car. But when she moved to this new apartment block as a new mum, the distance to the grocery shop made walking with a child and groceries challenging. Her brother bought her a car for her 21st birthday.

The car as a burden

Amanda spends her weekdays in the car doing pick ups and drop offs for her son and the children she minds. For her, the car is the only way to make all of these trips possible, though sitting in traffic daily is exhausting and repetitive.

“I think you need a car if you've got a child, you've always got heavy stuff.”

Public transport as freedom

When Amanda finishes university and becomes a psychotherapist, her routine will change. By then, her son will be in secondary school so the school she selects must be easy for him to get to on his own. No longer having childminding responsibilities and with her son travelling independently, Amanda hopes to be out of her car and onto public transport.

“Wherever he goes to secondary school needs to be within walking distance or on a good bus route because I'm going to be working.”

When her son takes public transport independently it gives Amanda extra time in her day. However, when things go wrong it can require Amanda to drop everything, and can be more of a hindrance than a help. Once when her son was on his way to judo and the bus didn't arrive, fortunately he had a mobile phone with him that day and was able to call on her.

POLICY CHALLENGE

How can sustainable transport policy enable Amanda to continue her complex childcare and education routines, without always feeling dependent on a car?

Implications for:

- Child-friendly design for public transport.
- Real-time route information, planning tools.
- Planning bus routes and frequencies that suit women's travel needs, including social housing and schools
- Services supporting children travelling independently.
- Cycling infrastructure and services for beginners.

JOSIE

Josie, mum of two and wife to Paul, runs the household with impressive efficiency. Her daily routine is structured around caring for her autistic son, with a goal to help him gradually become more independent. Alongside her duties as a mum, it is important for Josie to be social and active every week.



ABOUT JOSIE

▼
45 years old
Stay-at-home
mum, multi-
generational
carer, and avid
cyclist
Dublin

Josie and her husband live with their two sons, Joseph, 23 and Cillian, 19 who has autism. When Cillian was diagnosed at 3 years old, Josie quit her job to be his full-time carer. Her husband Paul is enrolled in a Master's degree alongside his job - this demands a large portion of his time and Josie supports him however she can.

She makes sure she has enough time for herself: by being active at the gym or on her bike, and by having nights out or coffee dates with friends. This year, she and "the gym girls" are training to do the Ring of Kerry cycle route. Josie loves a challenge and cycling is one way she can push herself and feel a sense of personal achievement.

"I don't want to end up like my parents. I don't want to rely on other people to come and help me [when I'm old], so since I turned 40 I've been getting fit."



▲
Image caption

Josie plans her days carefully and drives only when she needs to. For local trips, she prefers walking or cycling. On top of caring for her immediate family, Josie helps her elderly father go grocery shopping. While he can take the bus, he relies on a lift from Josie for shopping and other big errands. Josie doesn't mind helping but finds it frustrating when her dad expects more of her than they have planned.

"My dad will always ask me for help. He thinks 'Josie can do it, she doesn't work'."

Josie worries about her son and works tirelessly to grow his independence, and with it her own. Using transport is a skill she is keen for him to master. Over the years Josie has supported Cillian by cycling alongside with him to school as he learnt to ride on the road, or even hiding in the bushes as he walked to the Luas alone for the first few times.

ACQUAINTING CILLIAN WITH TRANSPORT

A year on the bus together

When Cillian started at a new school that was too far for him to cycle to, Josie taught him how to use the bus. At 13, he had taken the bus with Josie before but needed some practice to be ready for travelling alone. Josie accompanied him to school each day for almost a year, getting to know the four bus drivers along the way. Now he can confidently take the bus, the Luas, or walk wherever he needs to go. .

"My son's independence is so important to me, it means he's not attached to me. I know parents who can't go anywhere [without their autistic child]."

Familiar bus drivers provide much needed reassurance

Josie couldn't help but worry about Cillian travelling alone, but her initial concerns were allayed by familiar bus drivers who assured her that cameras allow them to keep an eye on him. Diminishing her stress, these bus drivers gave Josie the time to go to the gym and see friends. Josie felt their empathy when one day Cillian left his bag on the bus and they notified his school and waited for her to pick it up.

"The drivers knew when to expect him and it was almost as though they would wait for him each day at the bus stop and always drop him out the front of his school so he didn't need to cross a busy road"

Silently communicating with others about Cillian

When Josie travels with Cillian on public transport she sometimes worries that people won't understand his behaviour. She is conscious not to label him by telling everyone of his autism directly, instead she uses subtleties in her communication with him to signal his disability to others. Mostly she finds that people are kind and make allowances for him.

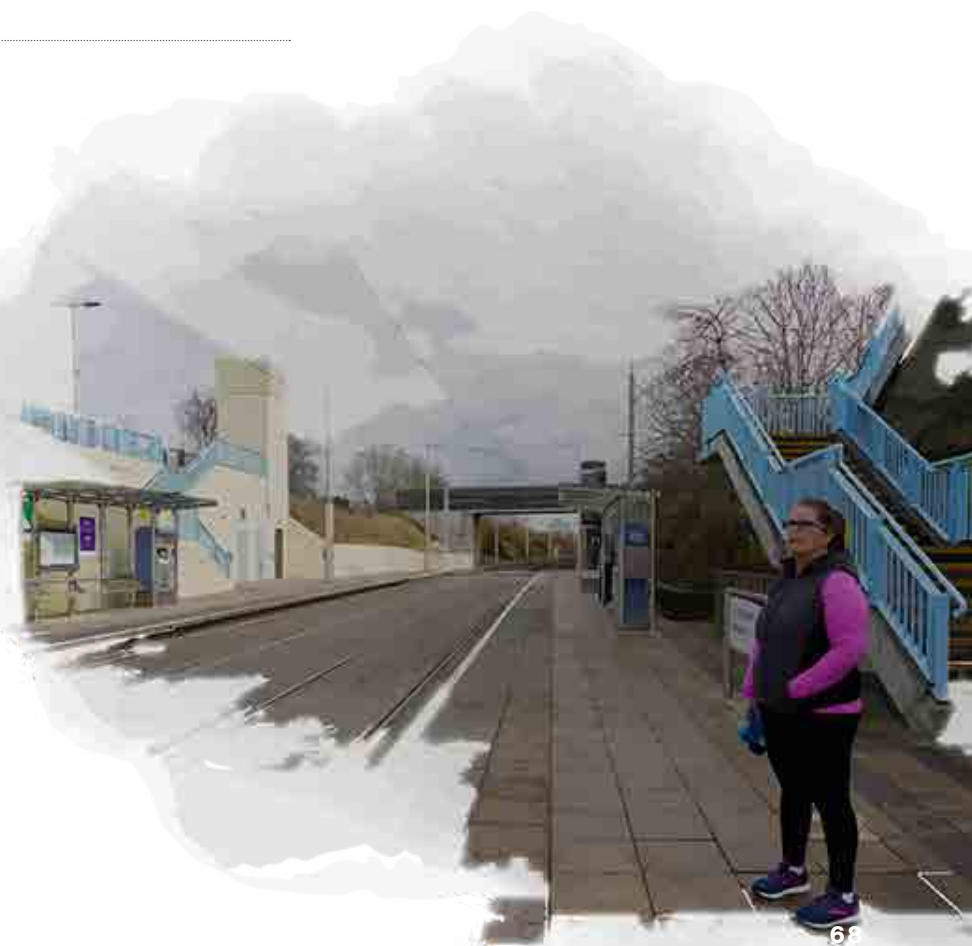
"I don't like to label him so I'm subtle about it but it's obvious from the way I'm talking to him [that he has a disability]."

POLICY CHALLENGE

How can sustainable transport policy alleviate some of the stress Josie feels when her disabled child is travelling alone, and give her some time back to pursue the things she loves—socialising, volunteering in the community and being active?

Implications for:

- Services supporting disabled children and adults to travel independently.
- Customer service training for transport staff
- Public awareness and education campaigns
- Community cycle lanes





KAREN

Karen, 45, and her husband juggle their high-powered careers with the care of their four young children. Whoever has the kids has the car, without it, there wouldn't be enough time. Environmentally conscious, they would love to be on public transport more but instead, they do their part with an electric car.

ABOUT KAREN



45 years old

Associate Director
in an international
consultancy and
mum

Cork

Karen, 45, and her husband live in the suburbs of Cork with their four children aged 12, 11 and twins aged 5. At work, Karen is responsible for 280 employees, managing clients and large projects. Work can be stressful, and for leisure, Karen enjoys keeping fit and sailing as a family in the summer.

Karen and her husband John work in the same company, have similar routines, and share household duties almost equally. They share one car in the family and plan ahead to work around complex childcare arrangements and work schedules. Fairness is important, so they alternate drop-off duties. For Karen and John their biggest constraint is time, so predicting their travel time is important for scheduling, despite congestion on their commute they rely heavily on the car for this.

"It's the freedom and independence that driving gives you, and the reassurance of knowing that the car is there in case you get a call saying the kids need to get picked up. That's just too important."

Karen's work keeps her informed about the climate and she tries to make more conscious choices in her own life. The family is too dependent on the car to get rid of it, and instead they have bought an electric car. If she could, she would take public transport more, and delights in the fact that on the weekend they can walk to the shops and the kids sporting activities.

"Our preference would be to use public transport, but we have just bought an electric car because we recognise that a lot of the trips are very local so there's no need to have a petrol or diesel car."

"When you're picking up a child what I would feel most is anxiety, you need to get there on time."

TRANSPORT OPTIONS NARROW WITH A GROWING FAMILY

Public transport is associated with youth and freedom

Karen spent eight years living in London when she was younger. Being able to explore the city and go anywhere using the Tube and the bus was a highlight for her. She misses the time she had to herself when travelling.

"I quite enjoyed the bus because it's half an hour to read. You don't get that [time to yourself] driving."

Car size grows with the family

When Karen moved to Cork and started a family, they bought a sedan, as the reliability and frequency of buses were incompatible with picking up kids at a specific time. For a long time, they used the car in combination with public transport and her husband's motorbike. The car was for family use, while public transport was reserved for work commute or going places alone. As Karen's family grew, she found herself using public transport less. Eventually, they needed an even bigger car and upgraded from a 4-seater to a 7-seater SUV.

"When we had twins, we had to go for a 7-seater. Previous to that, John had a motorbike and that kind of went by the wayside too."

BALANCING IDEALS AND REALITY, CONVENIENCE, AND LOCATION

Karen and her husband are both committed environmentalists who support decarbonisation transport policies. However, they are realistic that with the current policy and their current family needs, they still require a car, but have tried to make it an electric vehicle to offset climate impact. They are discussing moving further away from Cork in the future to a bigger home that can accommodate the expanding family, and are wary that public transport won't be available there, requiring a second car.

"I would absolutely support measures for less cars on the road, if the alternative is good enough, you can't do one without the other."

ENSURING FAIRNESS BY ALTERNATING DRIVING DUTY

As they only have one car, Karen and her husband decide who will take it on a given day. One of them will do the drop-offs in the morning and the other will take the bus to work at around 7:30 am.

If she has the car for the day, she leaves at 7:50 am to drop the twins off at preschool and the older children with their minder. Afterwards, she makes the 25-45 minute journey in the car to work, where she has an allocated parking space.

The twin's creche closes at 6pm, so she has to leave work at 5pm as the roads are congested. Next, she collects the older children from the childminder and they all head home.

If she takes the bus to work she will travel back the same way.

"We would share (the car) so one person would probably use public transport, the other person would drive, and it depends on who's taking the children."

POLICY CHALLENGE

How can sustainable transport policy encourage Karen to act on her environmental consciousness, while not taking time away from her thriving career and family demands?

Implications for:

- Gender-sensitive decarbonisation policy
- EV infrastructure and car pool policies
- Park and ride
- Public transport route coverage





GILLIAN

Gillian, 65, spends most of her time in retirement caring for her grandchildren. Despite being a nervous driver, it is an essential part of her role as a carer. As she gets older, she worries how long she'll still be able to drive.

ABOUT GILLIAN



65 years old

Retired but busy helping to take care of her grandchildren

Cork

Gillian has been married to Jim for 40 years. Together they have two daughters and three grandchildren. Until recently, Gillian was caring for her elderly father, who recently passed away. Now, she helps more with the care of her grandchildren. Gillian keeps herself active with water aerobics and looks forward to an occasional drink in town with Jim.

Her father and another neighbour both recently passed away, and her husband suffers from Crohn's disease. This makes Gillian think more about herself ageing. Appreciative of the good life and health she has, Gillian is more committed than ever to spending time with family. She is set on exercising and staying healthy to remain independent and nimble for as long as she can.



▲
Gillian during the interview1

"You get used to the hassle of driving, then you just take it on the chin, it is what it is".

DRIVING IS AN ASPECT OF IDENTITY SHE HOLDS ONTO, EVEN IF IT IS NOT ENJOYABLE

Gillian describes herself as a nervous driver and has never enjoyed it. Despite that, she sees it as an essential life skill. When she became a mum, she learnt to drive to take the kids to school and appointments. Driving expanded her world. Before that, she could only take the children to and from home and her parents' house.

Having taken care of others her whole life, Gillian worries about the day she won't be able to drive and will have to rely on her kids to get around. She would encourage everyone to learn to drive because of the independence it affords them.

"I saw it with my dad when he had to stop driving. Not having the independence of a car and being able to pop into his children's houses for a cup of tea was upsetting him - it is an awful drawback of getting older."

LOSING TRUST IN THE BUS OVERTIME, EVEN IF IT'S FREE

When she was a young student, the bus was the only form of transport Gillian had, and she used it for everything. Over time her confidence in the bus diminished, and even though as a senior the bus is virtually free she would rather pay for parking than use it. Today Gillian will only take the bus if she can't drive, usually when visiting town for a drink with her husband. If they weren't travelling together she wouldn't feel comfortable to use the bus.

Lack of reliability made her lose the bus habit

Gillian used to think the bus was reliable, but this is no longer the case. When she was young, she knew she could rely on the schedule and could easily make plans around it. Today, she has enough stories of unreliability to have turned her off using it. Most recently, her and Jim were waiting in the torrential rain for the bus that never came. Now, out of habit and with little incentive to try again, Gillian prefers to drive whenever she can and park in the city despite the expense.

"We would definitely use the bus more often if the bus times were accurate and the bus actually came!"

Scary incidents make her nervous taking the bus alone

Several times, Gillian and Jim were on the bus in the evening when teenagers threw stones at the bus, forcing the driver to terminate the service. With no alternative, they had to walk home, on one occasion more than 20 minutes in heavy rain. Now, she doesn't take the bus alone anymore, and will only go with Jim.

"There have been two or three occasions when Jim and I have been on the bus when it was attacked with stones. Legally, the bus driver is not allowed to continue driving so you have to get off the bus and risk it. You would then have to walk home and I would not want to walk home if that happened so I prefer taking a taxi if I am going out without Jim."

New tech with bad data erodes trust even further

Gillian was intrigued to try the new Bus Eireann app, which they were introduced to by their children. Gillian started using it to plan their trips, but soon realised that the app couldn't be trusted either as sometimes the bus decides to change direction suddenly, and you wouldn't know until it is happening.

"You usually don't know what is happening until you get onto another bus and someone says that the bus came by and changed direction half an hour ago but the app is not showing that the bus is being pulled and it says that the bus is still coming."

POLICY CHALLENGE

How can sustainable transport policy help Gillian to continue to travel independently as she ages and sustain her role in the family?

Implications for:

- Bus service for the elderly
- Service frequency and reliability
- Real-time information and planning apps
- Safety and security



Conclusion

TOWARDS A BETTER TRANSPORT SYSTEM: SUSTAINABLE, SAFE, INCLUSIVE

CALL TO ACTION

Considering women's needs through co-creation

Stitching together qualitative and quantitative data, this report sets out the complex landscape of mobility patterns and behaviours in Ireland, while pointing towards opportunities for sustainable modal shift. Ireland's current petrol and diesel fuelled car dependency is a product of many factors: including lack of cycling, public transport, and EV infrastructure; as well as entrenched habits and perceptions. Irish women's mobility is hindered by existing household gender dynamics that largely place the burden of care onto women. Women are also adversely impacted by being and feeling unsafe in public, in particular when walking and using public transport. Social norms persist that places the responsibility of safety on those most at risk, including victims of sexual harassment and assault.

Despite these challenges, the report found that there is a widespread desire to contribute towards a more sustainable Ireland, particularly amongst women in Ireland. Women are generally open to cycling, public transport, and EVs. Yet, tangible support is needed to make switching an easier choice.

Thus, designing sustainable transport infrastructure becomes synonymous with designing inclusive, safe, and high-quality experiences that consider women and the needs of their family. Doing so will require a highly integrated approach, including a number of physical, social, and policy interventions across public and private bodies. The solutions to many of these issues are woven into the women's stories. Highlighting the opportunities for joining up land use planning, cycle and public infrastructure design, signage, child-care policy, parental leave, social housing, gender and climate programming in schools.

It is worth noting that research has found that in some instances, policy nudges intended to encourage sustainable mobility by increasing cost can disproportionately increase the time or financial burden for women. This further exacerbates gender roles in families.⁵⁵ These lessons learned point to the importance of directly involving women users in the co-creation of policy to reduce the chance of unintended consequences.



⁵⁵ Peters, D. (2013). Gender and Sustainable Urban Mobility - Global Report on Human Settlements 2013. Los Angeles.

Below, we have listed some early provocations for policy design, along with relevant global case studies. These should not be viewed as conclusions, but starting points grounded in data and evidence to encourage consideration of what might good policy and infrastructure design look like. As a next step, we suggest a process of co-creation that brings together different stakeholders, importantly including women and women's organisations to identify appropriate solutions. This could, for instance, take the form of a series of design workshops on specific topics. The outcome of co-creation can include:

- Tangible implications for infrastructure, rolling stock, services design.
- A checklist tool that would assist policy makers, planners and project managers to ask themselves new questions and consider alternative perspectives to ensure transport programmes meet the needs of women and girls.
- Practical pathways to enable women to shift to sustainable transport at all stages of their lives.



FIVE DESIGN CHALLENGES

The following provocations for co-creation are grounded in the research findings.

1 ■ HOW CAN SUSTAINABLE TRANSPORT MODES COMPETE WITH THE CAR?

LESSONS FROM RESEARCH

To compete with the car, walking, cycling and public infrastructure have to deliver on the breadth of women's needs.

- Functional needs: being reliable, safe, accessible and convenient.
- Experiential needs: provide comfort, inclusion, joy, community and belonging.

GENERAL LESSONS:

- Gender mainstreaming in policy to introduce gender-sensitive perspectives across all aspects of the transport industry (including gender budgeting as needed).

LESSONS FOR WALKING:

- Improve 'last mile' walking journeys to unlock more public transport journeys.
- Consider policies that support the '20 minute city' where key services are accessible locally.
- Improve and widen walking paths to prioritise pedestrians.

LESSONS FOR CYCLING:

- Improve cycling infrastructure to increase safety.
- Establish clear cycling etiquette and laws to increase safety and confidence for cyclists.
- Promote cycling lessons and information about safe equipment and practices for all to establish cycling habits.
- Improve driver awareness about cyclists.

LESSONS FOR PUBLIC TRANSPORT:

- Better public transport coverage and new solutions for end-to-end mobility.
- Reduce walking distance between stops and minimise waiting times.
- Improve the reliability of information, including better real-time information.
- Increase physical and psychological safety.
- Design for the 'mobility of care' and those with health and special needs.
- Promote civic duty and social, respectful culture on public transport.
- Actively promote the positive attributes of public transport.

Lessons on how to improve safety are specifically found in Challenge 3 (overleaf).

CASE STUDIES

MAPPING FOOTPATHS (VIENNA)

GIS-based analytic maps were developed for all municipal districts of Vienna in the context of the Gender Mainstreaming Model Districts project. These maps comprise both qualities and deficiencies of the footpath network. Network qualities include highlighting parts of the maps which show sufficiently wide pavements, while network deficiencies show areas where the paths are too narrow or accident danger zones for pedestrians. The maps also highlight destination zones which usually experience high volumes of pedestrian traffic. This helps to support planning future measures.⁵⁶

THE 20-MINUTE NEIGHBORHOOD (MELBOURNE)

In 2018, Melbourne launched the 20 minute neighbourhood program which is about living locally - giving people the ability to meet most of their daily needs within a 20 minute walk. It assessed the walkability of suburbs, focusing on pedestrian safety and convenience, facilities and the character of local shops. The project found planning and service delivery were divided between government departments and councils leading to fragmented delivery and gaps. It found that 'place based' planning was effective, meaning integrated responses focused on local place making including good walking, cycling and public transport options specific to a neighbourhood.⁵⁷

CYCLE YOUR CITY (LONDON)

In 2020, TfL launched a Cycle Your City campaign to run a series of workshops and events with the intention of encouraging more women to take up cycling. Through the campaign, TfL will work with a diverse group of women and organisations to help build a picture of women's experiences of cycling across London. TfL aims to 1) Inspire a change in perceptions about cycling by highlighting women's personal stories about the benefits of cycling 2) Commission new research to better understand the barriers to cycling faced by women and 3) Establish what further work TfL can do to tackle these barriers.⁵⁸

⁵⁶ European Institute for Gender Equality. (n.d.). Transport. Retrieved from eige.europa.eu/gender-mainstreaming/policy-areas/transport

⁵⁷ Victoria State Government. (2019). 20-Minute Neighbourhoods, Creating a More Liveable Melbourne. Melbourne: State of Victoria.

⁵⁸ Transport for London. (2020, March 6). TfL launches campaign to support women into cycling. Retrieved from tfl.gov.uk/info-for/media/press-releases/2020/march/tfl-launches-campaign-to-support-women-into-cycling

2. HOW CAN AN UNDERSTANDING OF THE FAMILY UNIT INFLUENCE SUSTAINABLE MOBILITY CHOICES?

LESSONS FROM RESEARCH

By considering family needs, routines, and habits, policymakers can potentially support and influence a large part of the population.

- **Start early:** encourage sustainable transport habits from a young age through community, school and families.
- **Be child friendly:** design child-friendly public transport and adjoining public space. Enable children's independent mobility.
- **Be reliable:** help women feel they don't need to own a car "just in case".
- **Form new habits:** promote car-free travel on the weekends to establish new habits.
- **Infrastructure and route planning:** design systems and services that go where women need to go at hours they need to travel.

CASE STUDY

MAKING LONDON CHILD FRIENDLY FRAMEWORK

In 2020, The Mayor of London released Making London Child Friendly: Designing places and streets for children and young people, a comprehensive framework for measuring and improving children's independent mobility. The multi-faceted project included gender as a core component for designing better mobility for children. Numerous projects were rolled out exploring road closures, safe transport teams, assessing student mobility patterns and including children as stakeholders in workshops to think about alternative modes of transport and life without cars. The report identified the need for further research into independent mobility in lower density areas to understand the relationship between different housing typologies, streets, transport and independent mobility.⁵⁹



⁵⁹ Mayor of London. (2020). Making London Child Friendly - Designing Places and Streets for Children and Young People. London: Greater London Authority.

3. HOW CAN TRANSPORT BE AND FEEL SAFE FOR WOMEN?

LESSONS FROM RESEARCH

A combination of social and physical infrastructure is required to create physical and psychological safety for women.

SOCIAL INFRASTRUCTURE

- Increased presence of transport staff throughout the network.
- Apply a gender lens to staff training and rosters to build community relationships and foster a sense of safety.
- Cultivate a more supportive bystander culture.
- Provide joined-up solutions and partnering by working with key stakeholders like universities, schools. Provide adapted training programmes for both sexes on issues of safety, violence, assault, and consent.
- Build awareness around support and counselling for women who have experienced violence or harassment of any kind.
- Co-create solutions with women.

PHYSICAL INFRASTRUCTURE

- Collect better data to enable gender analysis of projects.
- Undertake regular women's safety audits and develop effective incident reporting mechanisms.
- Plan for end-to-end mobility, including quality lighting and visibility at all points along the journey.
- Improved service frequency, especially for night services.
- Better safety related technology.
- Plan for convivial place-making.

CASE STUDY

HARRASSMAP (EGYPT)

Smartphone apps have become ubiquitous, and along with websites are now being used in the mapping of women's experiences in cities. These create spaces where women can share their experiences, report incidents, track passengers, and create maps with hotspots where these incidents happen such as HarassMap in Cairo, Egypt. Websites such as 'Hollaback' in London and New York and elsewhere allow women to report when and where they were harassed, including in and around public transport, allowing the authorities to see zones where women may be at more risk.⁶⁰

DIFFUSED STREET LED (AUSTRALIA)

In 2019, ARUP partnered with XYX Lab in Australia to consult with 600 women about current street and transport lighting. They discovered that current lighting practices did not make women feel safe. Current design focuses heavily on the evenness and intensity of light, these being requirements in engineering and design standards. However the effect of this intense spotlighting made women feel like they were on display and unable to see someone in the dark. The project found that diffused LED lighting was more effective in creating a feeling of safety amongst women.⁶¹

RAISE THE ALARM CAMPAIGN (FRANCE)

In 2018, French transport operators RATP and SNCF launched a major public awareness campaign "Never Minimise Sexual Harassment: Victims and Bystanders, raise the alarm!"⁶² Notable features of this campaign were:

- New transparency on the forms and frequency of unsafe experiences of women using public transport
- Employment of extra customer service and security officers with the idea that 'nothing replaces a human presence'
- Expanded training to officers dealing with victims in partnership with experts
- Insight into the back office - what happens when you call a panic button and how long will it take?
- Buses stopping on demand after 10pm
- Understanding the impact of beauty on feeling safe

⁶⁰ Hollaback. (n.d.). About us. Retrieved from ldn.hollaback.org/about/

⁶¹ Arup. (n.d.). Making Cities Safer for Girls and Women. Retrieved from research.arup.io/story/cities-for-girls

⁶² RATP. Press Service. (2018). Campagne de lutte contre le harcèlement dans les transports "Ne minimisons jamais le harcèlement sexuel". Retrieved from [ratp.fr: https://www.ratp.fr/groupe-ratp/newsroom/securite/campagne-de-lutte-contre-le-harcèlement-dans-les-transports-ne](https://www.ratp.fr/groupe-ratp/newsroom/securite/campagne-de-lutte-contre-le-harcèlement-dans-les-transports-ne)

4 ■ HOW CAN TRANSPORT CONSIDER THE DIVERSE NEEDS AND CONTEXTS OF ALL WOMEN?

LESSONS FROM RESEARCH

A wide range of policy will be needed to encourage the adoption of sustainable transport modes and protect and serve those with a low income or particular vulnerabilities:

- Design for a range of disabilities and age and health related issues.
- Promote diversity and inclusion to foster understanding and encourage supportive behaviours on and around public transport.
- Improve public transport coverage and quality in regional and rural Ireland.
- Take an integrated approach to land use and understand local neighbourhood transport challenges.
- Build a gender lens with diverse partners to protect the most vulnerable women, bringing transport policy together with land use planning, social and justice services, childcare and education.
- Expose rural children to urban transport environment.

CASE STUDY

TRAMLAB (AUSTRALIA)

In 2019, the Victorian Government initiated the TramLab project in partnership with several universities,⁶³ focused on improving public transport for women and girls. The project includes a major co-creation element with stakeholders of diverse backgrounds and experiences. It included

- Designing a women-led reporting tool for women to report incidents
- Asking women to prioritise areas for further research
- Developing a women's safety checklist to provide to all levels of government for getting to and from PT, waiting and interchanging and travelling on PT.
- Seeking women's feedback on advertising and safety campaigns and how they impact on perceptions of safety
- Imagining perfect mobility for women
- Reflecting on place of technology in improving women's mobility
- At the time of publication, this work is still in progress.

GENDER AUDITING CHECKLIST (UK)

The Department for Transport in the UK published its first Guidance and Checklist for Gender Auditing on Public Transport in 2002. The checklist is intended to inspire and provide support to public transport providers in carrying out a gender audit in their company and of their services. In 2006, the Department also implemented the Gender Equality Scheme Action Plan 2007-2010 in order to oblige all public authorities to produce a gender equality scheme with the intention of eliminating sex discrimination and sexual harassment, and ultimately promote gender equality.⁶⁴



⁶³ Taft, A., & Ison, J. (2019). Tramlab: Improving the safety of women and girls on public. Retrieved from latrobe.edu.au: <https://www.latrobe.edu.au/news/announcements/2019?a=1081601>

⁶⁴ European Institute for Gender Equality. (n.d.). Transport. Retrieved from eige.europa.eu: <https://eige.europa.eu/gender-mainstreaming/policy-areas/transport>

5 ■ HOW CAN WE ACCELERATE SUSTAINABLE BEHAVIOURAL CHANGE?

LESSONS FROM RESEARCH

In addition to improving current infrastructure, a mix of incentives, campaigns, strategies, and policies can be leveraged to accelerate and encourage adoption:

- Facilitate multi-modal travel by understanding connectivity through a gender lens.
- Design for households as well as individuals.
- Apply a gender lens to carpooling and ridesharing schemes to improve services and reduce car use.
- Provide EV incentives and infrastructure to reduce barriers for households switching to EVs.
- Ramp up climate change education for all age groups, and promote ways individuals and families can reduce their carbon footprint through their transport choices.
- Plan for changing flexible work and mobility patterns from Covid-19. Prioritise integrated approaches to work, caregiving and mobility - understanding that flexible work arrangements, parental leave and affordable childcare all impact on mobility choices.

CASE STUDY

CAR FREE DAY (BOGOTA)

In Bogota, 70% of car trips were made for journeys under 3km. The city decided to close 120km of road to cars for seven hours each Sunday to enable people to walk, ride, jog and skate. People have found a new social life and enjoy the drop in pollution. The initiative is well supported with nine out of ten people agreeing with the car free day.⁶⁵

LIVEABLE STREETS EDUCATION (NEW YORK)

The Livable Streets Education programs in New York City help teachers and schools bring important ideas about urban living into their classrooms. With a focus on people, LSE works to help redesign communities around public transport; walkable, bikeable streets; and healthy, livable and affordable urban environments through special projects.⁶⁶

⁶⁵ Green Learning Canada, (2010), Sustainable transport Case Studies. Green Learning Canada.

⁶⁶ Eckerson, C. (2009), Introducing Livable Streets Education. Retrieved from nycstreetsblog.org/2009/03/26/introducing-livable-streets-education/





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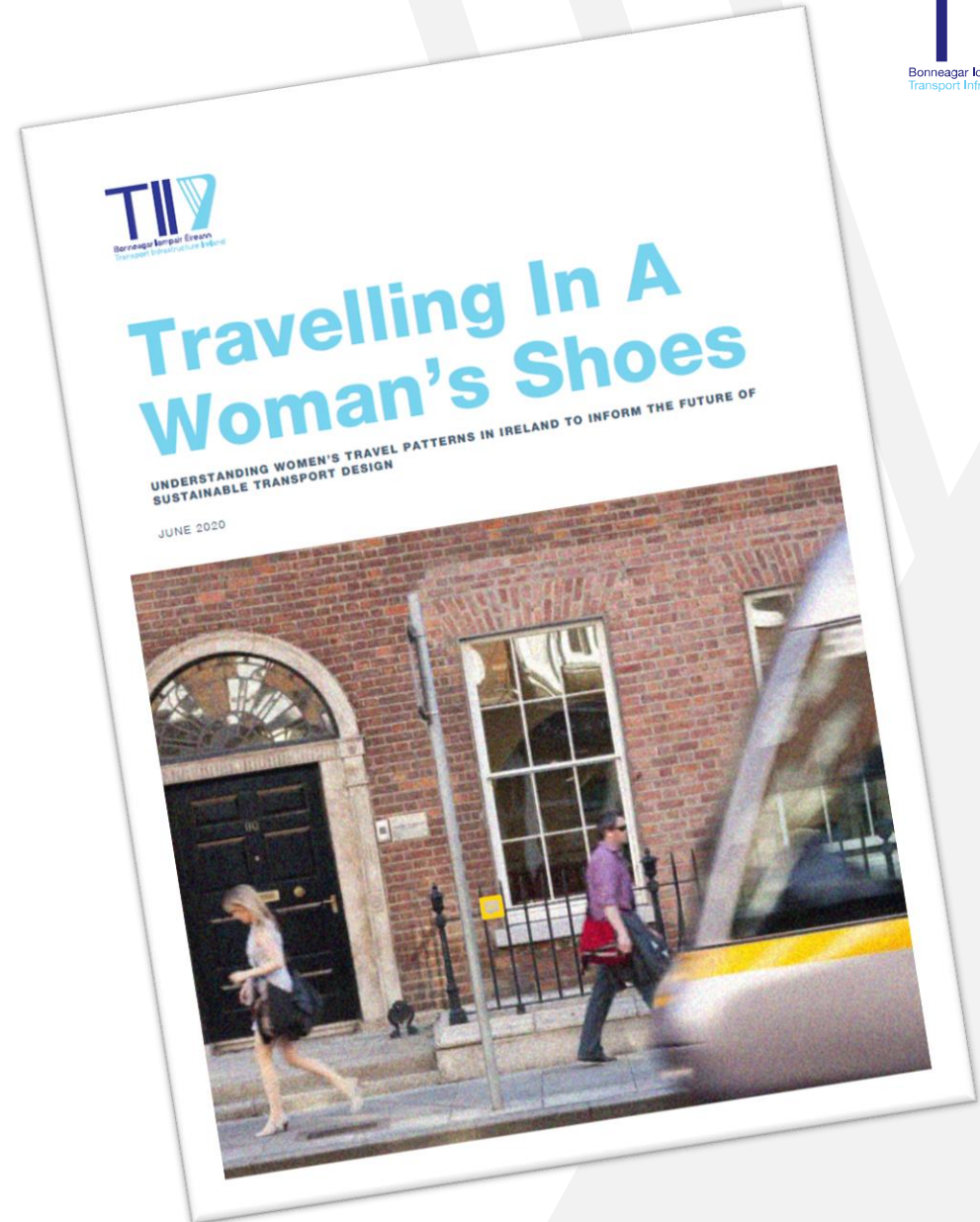
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Travelling in a Woman's Shoes

UNDERSTANDING WOMEN'S TRAVEL PATTERNS IN IRELAND TO
INFORM THE FUTURE OF SUSTAINABLE TRANSPORT DESIGN



How do we design new sustainable transport infrastructure that everyone will use and love?

The climate crisis poses an urgent need for a fundamental re-imagining of how we live, and how we get around - acutely impacting the mobility and transport sector.

The UN's Sustainable Development Goals capture the challenges for mobility most prominently in Goal 11 (Sustainable Cities and Communities) and Goal 13 (Climate Action).

This endeavour is challenging in Ireland because of the country's historical car dependency; while awareness of the 'climate crisis' is increasing, people see it as an abstract issue and don't yet associate it with a strong impetus to change daily travel behaviours.

Transitioning Ireland to sustainable travel modes will, therefore, require both extensive new infrastructure provisions and efforts to change behaviours.

With regard to changing behaviours, it is now well established that transport is not gender-neutral:

- Women and men have different mobility realities
- Global research shows that women tend to have more complex patterns of mobility characterised by trip chaining and caregiving duties.
- Women's concern for personal safety during travel is also heightened.
- Gaps in gender aggregated data in Ireland make it challenging to pinpoint and identify specific issues that need to be addressed.
- The traditionally male-dominated leadership of transport planning and projects has driven disproportionate outcomes for women and men when interacting with the public transport system.

In light of these challenges, this study seeks to understand the realities of how women in Ireland experience transport and mobility today: why they make the choices they do, what are the daily challenges and aspirations they face and how can these be better addressed.

Growing Awareness amongst the wider industry

International Transport Forum (ITF)



The changing role of women in Ireland

Mobility and car dependence

In 2016, females were more likely than males to travel by car as driver –

71.2%

of journeys taken by females compared with

67.4%

of journeys by males.

Car dependency in Ireland is extremely high in comparison to other countries.

75%

of all trips were made by private vehicle, and the share of journeys made by public transport had fallen since 2014.

Education

In 2019,

51%

of those who participated in third-level education were women.¹⁷

55.1%

of women aged 25-34 have a third-level qualification degree (compared to **42.9% of men**).¹⁸

Employment

In 2014,

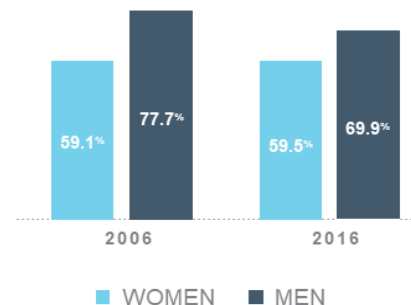
304,800

women were employed in part-time work (compared to **145,400 men**).²²

18.1

married women work 40+ hours per week (compared to **50.7% of married men**).²⁴

Employment rates²¹ for women:



▲ The 2016 rate is currently the lowest in the EU (compared to EU average of 61.4%).

Caregiving Roles

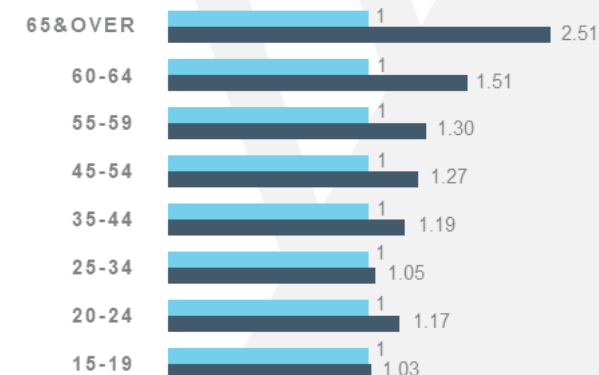
45%

of Irish women provide care for others on a daily basis (compared to **29% of men**).²⁶

Women spend

21.3 hours

a week on average providing care (compared to **10.6 hours for men**).²⁷



▲ The gap between women and men's participation in the workforce grows with age, for every woman in the workforce there are the following men (2016).²⁵

What is the international research telling us?

Safety - The most prevalent characteristic of women's mobility globally is concern for personal safety, and not feeling safe is the strongest deterrent for women choosing public transport.

Access - Across the world, women are still responsible for the majority of caring and household work and for mobility of care, which can increase the number of journeys and transfers women make, and exacerbate any difficulties associated with access.

Reliability - Reliability means that users can trust the system to be punctual, to run a frequent and predictable service, to provide reliable real-time passenger information (RTPI), and that the service is safe and usable when it arrives. The impact of an unreliable system on women can be greater due to the nature of women's mobility and their more complex travel needs and patterns.

Convenience and comfort - Convenience is the 'absence of effort' in utilizing transport services that are 'fit for purpose'. This may be experienced through the length of wait times, levels of crowding, the ability to find a seat, time spent in transit as part of a journey, the ability to find a toilet or change table, efforts at cleanliness or the presence of vandalism.



Our Research Methods

- The central research question - **What motivates or constrains Irish women to select different mobility options?**
- We designed a two-step research process to exploratively discover behaviours and needs then validate findings quantitatively.
 - **Step 1:** Discovery - *Ethnographic Research*
 - **Step 2:** Validation – *Quantitative Survey*
- Interviews – **21 women** between Cork and Dublin. **42 hours** of in home interviews, **1000** survey respondents
- Participants represented a diverse demographic and geographic background, included varied transportation usage and behaviour



Our Survey Findings

Women rely heavily on the car

Consistent with literature, we found a universally high car dependency in Ireland - particularly outside of Dublin, where **81% women** and **85% men** either own or have access to a car.

Women in Dublin on average use public transportation at the highest rate, for

27%

all trips while all other groups use public transportation

12-15% of the time.

Men in Dublin were most likely to cycle, for

10% trips,

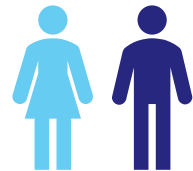
while all other groups cycle at a lower rate of

6-8% of the time.



Women in Dublin are eager to drive less compared to men

47% women Vs 34% men



79%

of women consider the car to be a necessity compared to

88% of men



Our Survey Findings

Women shoulder more caregiving responsibilities

Consistent with global trends, our survey found that, in addition to work and education, women in Ireland are responsible for a large portion of society’s caregiving, childcare, and household responsibilities.

30%
of women surveyed provide primary care to another adult, either in a professional or personal setting.

Amongst women with children, **84%** women consider themselves to have the sole or lion’s share of responsibility for childcare (compared to 48% men).



Journey Purpose

Comparing men and women with families, on a daily basis, men’s largest reason for traveling is work, whereas for women it is to drop off and collect children/other family members.

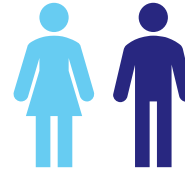


% of men and women making these trips daily	Women with family	Men with family
Drop and Collect Children/Family	21.4%	14.0%
To and From Work	20.5%	26.4%

Our Survey Findings

Women are impacted by safety issues

Safety is an issue for all people.



1 in 3 public transport users have seen or experienced some form of harassment or violence while using public transport.

7%

of women in Dublin report having experienced sexual harassment on public transport.

55%

of women stated that they would not use public transport at night.



34% of women stated that feelings of insecurity have prevented them from travelling.

Results and Findings

What drives women to choose their primary transportation methods?

Transportation habits are socialised from an early age. For some, learning to drive and getting a car is a coming of age moment while for others, using public transport allows women to be independent from caregivers. Several women we spoke to talked about the **freedom** public transport gave them.

However, **when life becomes more complex women typically become more time poor**, balancing job requirements and household tasks with the arrival of children. **Public transport no longer becomes a viable option** for complex trip-chaining and is not seen as being child friendly.

Even for many women who use public transportation to commute, having a **car still remains a 'necessity' for chores** and other spontaneous emergencies, given how unreliable public transportation can be.

How do women experience different mobility options today?

Women consider the car to be the most **pleasant and least stressful mode of transport**, in comparison to the bus, for example. The car can also be associated with **empowerment and joy**.

However, over time, **for many who drive everyday, it can become stressful**, tedious, like a burden chore - especially given traffic congestion and for women with young children who don't feel confident driving.

For women, **the main issues with public transport include**; indirect routes and long wait times, lack of reliability, lack of support for care-giving needs, lack of feeling safe.

How do socio-economic and geographic factors influence women's mobility experience?

Across regions, cities, and neighbourhoods, women have different relationships with mobility and public transportation.

In many rural areas, public transport is not available; as such growing up, women do not have the opportunity to learn how to navigate a public transport system. They may experience different forms of freedom and independence but are less experienced with public transport, density, anti-social behaviour etc - which can be challenging when moving to a city for school / jobs.

Results and Findings

What happens after a negative experience with mobility?

- **Safety is an issue for all:** up to 1 in 3 public transport users have seen or experienced some form of harassment or violence while using public transport.
- **Sexual harassment and assault on public transport disproportionately affect women,** with women in Dublin being the most vulnerable: 7% women in Dublin report having experienced sexual harassment on public transport
- **55% of women stated that they would not use public transport at night, and 34% of women stated that feelings of insecurity have prevented them from travelling.**

How do social factors influence more fundamental behavioural changes?

Children influence adults to think differently. People accept that the younger generation (gen X particularly) will have a different worldview and outlook, particularly when it comes to gender and climate.

Several women we spoke to who were hesitant to talk about 'gender' or 'climate' policy and were very accepting/ supportive when talking about the future generation.

Beyond the family unit, **a supporting partner/friend/social network is also necessary for women to explore alternative modes** of transportation that make them feel more empowered.



So how can we respond to the travel needs of women in Ireland?



How can transport be and feel safe for women?

For Alice to live a full life—working, exploring and socialising anywhere in town and at any time of day —without worrying about her safety?

- Land use policy - place making, creating safe, women friendly spaces
- Transport security
- Location & design of bus waiting areas.
- Bus service frequency
- First and last mile journey
- Safety at stations/stops



How can we accelerate sustainable behavioural change?

For Karen—helping her to act on her environmental consciousness, while not taking time away from her thriving career and family demands?

- Decarbonisation policy
- EV infrastructure
- Car pool policies
- Route coverage
- Schools as catalysts
- Cost of parking
- Family friendly policy



How can an understanding of the family unit influence sustainable mobility choices?

For Amanda- helping her to continue her complex childcare and education routines, without always feeling dependent on a car?

- Child-friendly public transport.
- Planning tools.
- Route location
- Services supporting children travelling independently.
- Cycling infrastructure & services for beginners.
- Bus priority



How can transport consider the diverse needs and context of all women?

For Gillian-- to continue to travel independently as she ages and sustain her role in the family?

- Bus service for the elderly.
- Service frequency & reliability.
- Real-time information.
- Improved security measures



How can sustainable transport modes compete with the car?

For Joanie– could transport policy help her feel less stressed when her disabled child is travelling alone, and give her some time back to pursue the things she loves—socialising, volunteering in the community and being active?

- Support for walking and cycling
- Services for disabled children and adults to travel independently.
- Training and empowerment for transport staff.
- Public awareness and education campaigns.

Conclusion



Summary of Findings

Irish women’s mobility is hindered by existing **household gender dynamics that largely place the burden on women.**

Women are also adversely impacted by being and **feeling unsafe in public, in particular when walking and using public transport.**

Designing sustainable transport infrastructure becomes synonymous with designing inclusive, safe, and high-quality experiences **that consider women and the needs of their family.**

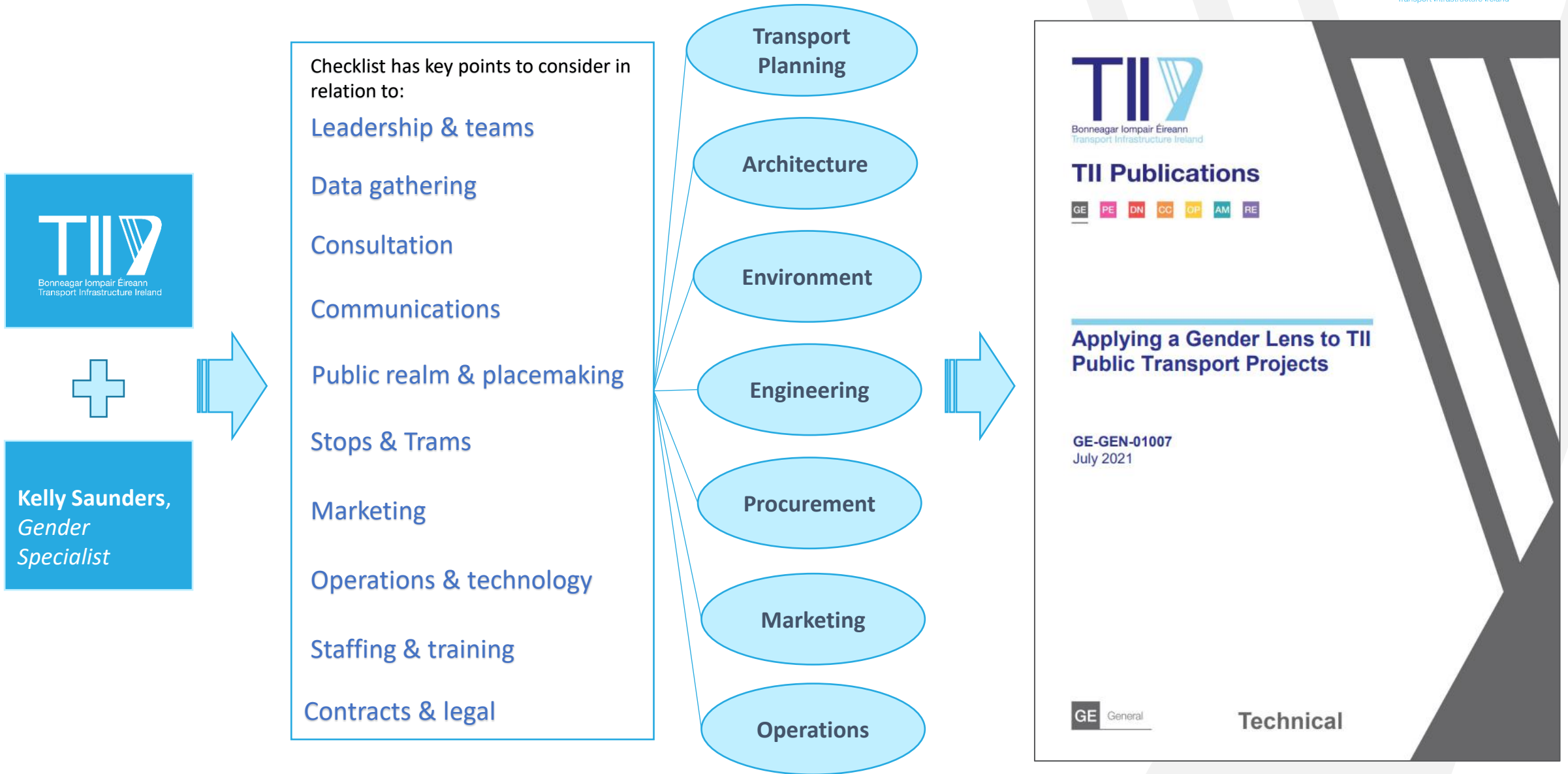
Involving women users in the **co-creation of policy to reduce the chance of unintended consequences.**

Implications

The real-life stories of women allowed us to explore additional **central themes which influence mobility:** that is, how family, safety and diversity shape transport choices.

Themes	Policy Opportunities
Modes of transport	• A “20 minute city” that is accessible by foot • Safe cycling lanes and lessons • Better real-time information
Family roles	• Enable children’s independent mobility • Design child-friendly public transport and adjoining public space
Being safe	• Considering women's needs through co-creation • Quality lighting around stops and streets • Women’s safety audits • Evaluate safety initiatives
Being inclusive	• Design for range of disabilities and age and health related issues • Build a gender lens with diverse partners • Understand local neighbourhood transport challenges
Driving change	• Facilitate multi-modal travel • Apply a gender lens to carpooling and ridesharing schemes • EV incentives • Ramp up climate change education

TII EMBEDDING FINDINGS



TII GENDER CHECKLIST

3. Checklist

3.1 Leadership and Commitment

In this field there is scope for TII to lead globally on policy development and best practice. First ask:

1. Is there political will and leadership for understanding women's travel needs for this project?
 - Is it agreed that this will assist with broader modal shift objectives?
2. Do the **written** objectives of the project include social sustainability and gender equality (in consultant procurement documentation, strategic plans, concept design, sustainability plans, specifications, operations and third-party contracts)?
3. Does this translate to funded initiatives in project requirements (including evaluating impacts)?
4. Are Ireland's human rights commitments reflected in the project? (i.e. democratic representation, freedom of movement, right to public life, active citizenship, stopping violence against women)?
5. Is a range of government departments involved (i.e. Health, Justice and Equality, Children and Youth Affairs)?
6. Do leaders have a good understanding of *gender mainstreaming*? (see best practice Vienna reference manual (in English): <https://www.wien.gv.at/menschen/gendermainstreaming/pdf/gender-mainstreaming-made-easy.pdf>)

3.2 Who Designs, Builds and Runs TII's Public Transport Projects?

7. Consider your own profile (sex, age, race, socio-economic and marital status, disability, family care roles) and mobility (including car and cycling and walking). How does your profile shape your perspective and approach?
8. What motivates you in your transport work? (i.e. technical, social, sustainability)
 - ✓ What are your potential blind spots?
9. If relevant, consider how your children travel to creche, school or university? Evidence shows this shapes future mobility.

3.2.1 Gender Equality in the Team

10. Is there gender balance amongst the people with **power and influence** in the project? This does not guarantee new perspectives but creates space for them.
11. Are men and women given similar 'stretch' and promotion opportunities on the project? How is this monitored?
12. Is there support for women-led innovation? (see SNCF 'think and do' tanks: <https://www.sncf.com/en/commitments/sncf-au-feminin/our-mission>)

3.3 Evidence and Engagement

3.3.1 Data

The Common Appraisal Framework for Transport Projects (CAF) asks projects to consider whether the project improves access to jobs, key facilities (such as town centres and schools) and social and recreational opportunities for vulnerable groups including specifically women. It states if suitable data from the core cost-benefit analysis are available, analyse the distribution of user benefits by income group and other characteristics (cl 4.3.4).

13. Who will benefit from a preferred route? Be specific. (i.e. commuters, surrounding business/industries, institutions and community services, leisure, children's activities, other users)
14. What data and analysis supports preferred route and design decisions?
 - does it permit the analysis of user benefits required by cl 4.3.4?
 - **is data disaggregated by gender** (and age)?
 - consider what additional data is needed and best methods to collect this data;
 - o public research - data and ethnographic (see Gender + Age Tally: <https://gehlpeople.com/wp-content/uploads/2020/03/AGE-AND-GENDER-TALLY.pdf>),
 - o public consultation,
 - o customer surveys,
 - o visual map-based data (i.e. GPS safety pins),
 - o census data by employment status and gender,
 - o space and user analysis for transport sites.
 - include analysis of competing interests,
 - include home-based care work (paid and unpaid) in analysis of 'job density' and 'work destination',
 - check if surrounding industries are heavily male or female dominated,
 - ensure care-related trips are **separately measured** from leisure, social, retail and education trips? Evidence shows many women make these trips as part of caring for others, known as the mobility of care,
 - portion of households are single parent households,
 - modal share in the area by gender,
 - car and bike ownership and use by gender.
15. Does data capture transport demand for trips less than 3km (often made by women)?
16. Collect data about Covid-19 related changes in mobility – increased work from home and new mobility patterns.
17. **Identify and address the barriers to using better data** (i.e. GDPR, wireless technology, ticketing system).

3.3.2 Consultation and Co-Design: Shifting the Expert

Women are the experts in what makes them use transport. They are a key resource designing safe and accessible transport systems.

- attractiveness and architectural quality,
- appeal for people of all ages,
- community value and local character,
- opportunities for community participation and regeneration,
- ecological footprint.

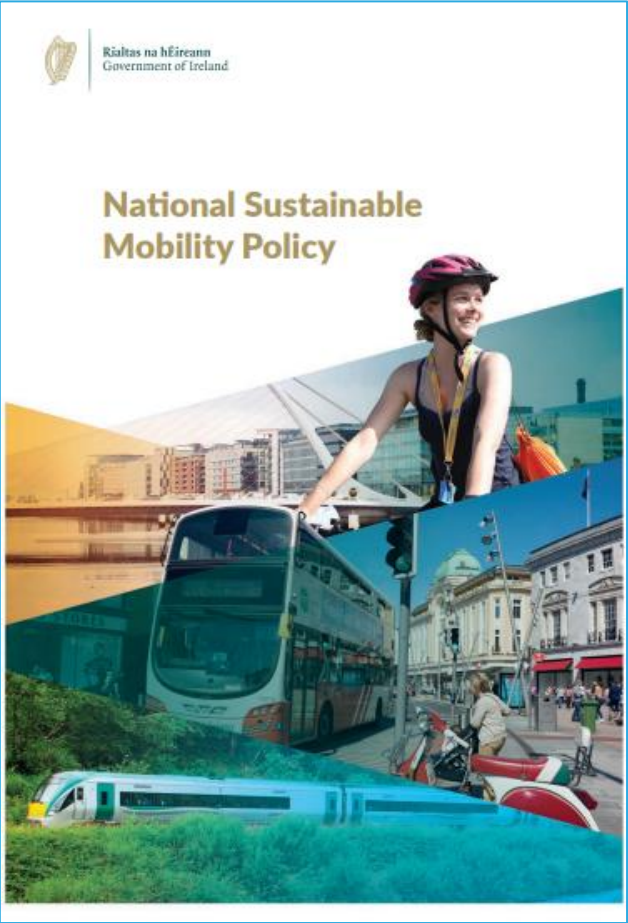
34. Include a gender lens in planning and designing connecting bus infrastructure.

3.4.2 Placemaking and Safety in Transport Spaces

Designing for gender equality means creating spaces that feel safe and welcoming. Good placemaking has a **direct impact** on perceptions of safety and access. This means spaces with character, warmth and conviviality. Overtly family-friendly spaces attract children and elderly people, making everyone feel safe. The presence of art, beauty and culture make a difference. Clear rules on vehicle speed are vital.

35. Conduct a site-specific **gender safety audit** to build on existing safety and passive surveillance criteria.
36. Ensure design guides and assessment criteria for placemaking approaches consider:
 - child-friendly spaces with sense of play and playfulness (colours, signage, murals and infrastructure for kids (seats, things to climb),
 - use of warm, layered LED lighting (not white, overly lit or flood lit),
 - creative lighting and art projects,
 - green space (noting need for sight lines),
 - space for community information including local events, small businesses led by women and men,
 - access to toilets including small toilets for children and tampon dispensers,
 - space for women to breast feed and parents to change babies,
 - wayfinding to social infrastructure (i.e. toilets, local libraries, swimming pools, parks, community gardens, food markets, cultural and other community places),
 - o Consider future role of Mobility as a Service
 - signage for sporting fields used by men, women, girls and boys,
 - a plan for high quality busking, performance,
 - pleasant places to sit comfortably (consider age, disability, health),
 - local heritage (ensure gender balance in narrative),
 - sense of humour,
 - assess walkability of places (human scale, not isolated);
 - o consider mix of engineering, legislation and enforcement tools and behavioural measures (see <https://walk21.com/>),
 - o highlight benefits of walking,
 - o declutter public space and roads (see [Public Realm Strategy | Dublin City Council](#)).
 - easy and visible access to e-bike schemes, car share and taxis.

NATIONAL SUSTAINABLE MOBILITY POLICY 2022 - 2025



Case Study | Travelling in a Woman's Shoes

The Travelling in a Woman's Shoes report^a was published by TII in 2020. It highlighted key insights and findings from a study to better understand women's travel patterns and needs in an Irish context, and to inform future sustainable transport policy and design.

The study found that women in Ireland rely heavily on car transport and highlighted significant caregiving responsibilities, safety concerns and equality of access as drivers of this car dependency. It found a strong desire among women to use more sustainable modes of transport and identified policy opportunities to support this modal shift.

By addressing the barriers that women face in the access and use of transport, we can better support the travel needs of all users and ensure that sustainable mobility is safe, accessible, reliable, convenient, comfortable and inclusive for everyone – including women, children, older people and people with disabilities.

Further measures will be put in place to support many of the policy opportunities identified in the report including initiatives that support:

- a "15 minute city" that is accessible by walking and cycling
- safe cycling lanes and lessons
- better public transport coverage
- solutions for end-to-end mobility
- better real-time information
- joined-up solutions and partnering
- effective incident reporting
- safety audits
- design for range of disabilities and age and health related issues
- diversity and inclusion through communications
- local neighbourhood transport needs
- integrated approach to land use
- improved walking and cycling infrastructure and amenities
- multi-modal travel



ACTION

1. Develop and publish an annual public transport passenger safety and personal security report, and implement measures where appropriate.
2. Continue awareness campaigns with the aim of promoting inclusivity, courtesy and respect for all when travelling on public transport.

United Cabbies Group Ref No. AI021

Written Evidence Submission - Accessibility and Inclusion in Transport Planning

I welcome the opportunity to share the views of our members and more importantly the feedback from the passengers we transport so their voices are clearly heard.

Our passengers tell us they feel as disabled people they are constantly being designed out of urban environments and we have seen this accelerate at pace since a number of road schemes were implemented under the guise of Covid-19 and subsequently retained under the rationale to enable the Mayor to achieve Net Zero targets for 2030.

A licensed taxi is part of London's public transport offer and is why as a publicly hired vehicle our conditions of fitness require the purpose-built taxi we drive to be wheelchair accessible and operate a TfL regulated meter for which fares are currently out to public consultation.

The public consultation on taxi fares TfL say is to try to strike a balance between drivers being fairly paid and taxi customers being charged a fair and affordable fare. The fare is measured on time and distance so restrictions to access to roads for licensed taxis extend journey times and have an impact not taken into consideration in our view.

The number of taxis and black cab drivers in London are both falling at an unsustainable rate.

We are experiencing a net loss of c.1,000 drivers per annum from the trade- between 2012 and 2024 there was a 37% fall in the number of taxis on London's roads.

Licensed taxis are the capital's only door-to-door service that is fully accessible: just a third of Tube stations and half of Overground stations are currently step-free. It is why so many passengers with mobility issues rely on black cabs for crucial journeys.

A number of TfL and borough road schemes since Covid have restricted road space for licensed taxis or removed appropriate kerbside access. Features like floating bus stops are a nightmare for visually impaired people, but the same is true for people with reduced mobility or sensory processing difficulties. They can also be challenging for older passengers who use a frame or stick and need more time to cross.

All 4 visually impaired charities have called bus bypasses out as have members of the GLA.

These do not only impact bus passengers but also taxi passengers with visual impairments or mobility needs who need to navigate across a cycle path when the crossing points are not adhered to, so they can be seen to hail a licensed taxi but also to be able to get across the cycle lane, with or without assistance from the driver to safely board at the kerbside.

A notable example of how due regard has been overlooked in the design phase of transport planning is the implementation of a bus bypass by a major London hospital on Westminster Bridge.

We do not share the view that licensed taxis should be removed from roads that buses can use, and this has consequences for those who rely on licensed taxis. We currently have the farcical situation where 3 of the mainline stations have restrictions on the surrounding roads impacting taxis getting to waiting passengers or leaving the station and ensuring the journey time and cost is not increased due to unnecessary circuitous routes.

A number of key journeys are made from London's mainline stations as passengers with booked assistance via rail services for disabled or older passengers are accompanied to the taxi rank for their onward travel. When a passenger is returning to a mainline station to meet their booked assistance the additional time now to undertake the journey to the station due to restricted access for taxis has consequences and if they miss their train, they also have to meet the cost of

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

purchasing a new ticket; all of which can be avoided by inclusive approach to transport planning.

In addition, we have restrictions on Bishopsgate, Bank Junction and Tottenham Court Road in key through routes where tube stations are not step free or the route services key journeys from mainline stations to hospitals such as UCH, Macmillan Cancer Centre and Guys where the journey times and increase costs disproportionately impact disabled passengers, older passengers, pregnant passengers and those who are vulnerable.

We hear the analogy of “build it and they will come” with regard to increasing cycling infrastructure and to encourage more active travel but this should not be at the expense of accessibility. The same zeal should be used to ensure those inequalities do not exist and instead remove those barriers in travelling by those passengers including making the road infrastructure and access for those delivering that service fit for purpose.

Transport planning often considers the needs of disabled or older passengers as an afterthought with Equality Impact Assessments being treated as tick box exercises by TfL and the boroughs not looking to really mitigate the impact and have due regard to the Equality Act. Many London boroughs take the TfL lead from the Mayor’s Transport Strategy and seek to justify the extensive longer journey time and costs as a trade off because their perceived projected outcome is to hope more people will cycle or wheel or skew the equality assessment to the increase in active travel is a benefit so it is okay to disadvantage those who cannot cycle or wheel. What should be embedded and delivered is a genuine commitment to make travel inclusive for all.

Many consultations we respond to as stakeholders which will be after the extensive design work is done at significant cost, surveys often have loaded questions, low response rates and we have to go back regularly and ask why there is not kerbside access or why cycle wands are not spaced to enable a licensed taxi to respond to a hail and be able to safely load or safely unload a passenger.

24% of respondents to Transport for All’s survey said that a lack of a suitable kerbside pickup or drop off location was a barrier to taxi travel. This could be because of litter or other obstructions on the kerb, or because there are cycle lanes along the wayside that make crossing to the vehicle unsafe and in our members experience the constant blocking of ranks or kerbside space with dockless e-bikes is becoming a major factor.

The following is one example of how transport design appears more focussed on cycling and not accessibility or inclusion for all who travel in London:

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Visual segregation (wands) along sections of Harrow Road to provide additional protection to cyclists.

The purpose of the wands is to improve cyclist safety by providing a visual separation for motor vehicles. They will highlight the presence of the cycle lane and prevent any motor vehicles entering the cycle lane which will in turn improve cyclist safety.

Wands have perceivable benefits when used to support the provision of cycling infrastructure and these includes the following:

- Wands take up minimal carriageway space but still provide segregation between motor vehicles and cyclists and an improved perception of safety over white lining alone.*
- Less expensive and easier to implement than other measures such as refuge islands.*

We need to clearly understand how licensed taxis/Black Cabs can access the kerbside to respond to street hails to pick up and safely load passengers and ask for clarity if the wands will have sufficient space to load and unload passengers protected under the Equality Act 2010.

Taxis/Black Cabs are disproportionately used by those with mobility issues and those on the lowest incomes. They can also form an important part of car-free living, increasing the range of public transport, walking, and cycling trips. Taxis have a distinct legal status and are part of the public transport offer in London as they are publicly hired and hailed the same as a bus and operate with a TFL regulated meter.

The requirement to be able to hail safely and conveniently is of particular significance for disabled persons, who may find it more difficult than non-disabled persons to spot taxi/Black Cabs and to attract their attention. It is also of particular relevance given the stringent accessibility requirements to which taxis/Black Cabs are subject – including the requirement to be able to accommodate a standard-sized wheelchair.

As you will be aware we need to ensure access to the kerb to either utilise the wheelchair ramp at a safe gradient which requires the kerb or kerbside access for a visually impaired passenger where it is not possible for the passenger to see cycles and get safely assisted onto the pavement across a cycle lane or bus bypass.

This does in the case of the ramp require the white line on an unsegregated cycle lane with wands to be breached for the time it takes to load or unload the passenger as we need to open the boot to get the final bit of the ramp out which balances on the kerb. Using the Lambeth to Chelsea Bridge example following our feedback it was agreed in the consultation by TFL every other wand was removed to aid access to the kerbside for emergency vehicles and taxis/Black Cabs.

The above example regrettably took about 4 attempts of feeding back to ensure greater kerb access which would now be consistent with the findings of Eventech which is case stated and whilst primarily relating to bus lane access there are clear findings as to why proximity to the kerb is vital for a publicly hired taxis/Black Cabs that are hailed by the passenger and also required to unload safely.

TFL also clarified taxis/Black Cabs may only enter cycle lanes when setting down and picking up passengers, naturally not the segregated cycle superhighways like Victoria Embankment.

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Taxis/Black Cabs may also need to cross the solid white line of a cycle lane if it is turning left or accessing private property.

Please can you clarify there will be sufficient space between the wands on the sections identified to permit the safe loading and unloading of taxi/Black Cabs passengers and we are able to access the kerbside safely with sufficiently space wands to respond to street hails which is our USP.

I have also emailed the Eventech case law with highlighted references to the kerbside access requirements.

The 2023 Transport for All report “ARE WE THERE YET? – Barriers to transport for disabled people” powerfully captures what our member drivers hear daily from their passengers.

Caroline Stickland, CEO of Transport for All says:

“TfA holds the belief that disabled people’s voices, lived experience, and expertise must be central in shaping the policies that affect our lives. Yet as a community, we are almost never given a real seat at the table when it comes to transport infrastructure and design and so, brick by brick, disabled people have been designed out of public life.

Therefore, when asked ‘where is the data’, we say this: disabled people have been speaking up about our experiences and the barriers we face for decades. The evidence of our lived experiences is there, but for change to happen we must be listened to and believed. Evidence of our experiences is no less valid if it comes directly from the community, instead of polling by a non-disabled research agency.”

Whilst the Transport for All report is a national view, it does acknowledge all licensed taxis in London are 100% wheelchair accessible and highlights some of the challenges our members have faced since the introduction of a number of Covid-19 road changes since 2020 which have restricted taxi access and have since been made permanent along with the acceleration of Low Traffic Neighbourhoods which have an inconsistent approach with some boroughs having licensed taxi exemptions and others who perceive a licensed taxi the same as a private car doubling the journey time and cost.

I enclose the response we did to TfL in 2023 on Low Traffic Neighbourhoods as they asked for feedback on the taxi trade concerns, and we have yet to hear any response or how they can be adapted to remove barriers to travel for our passengers.

How is TfL’s Equity in Motion plan being implemented, and what will it achieve if it is successful? Is there anything that Equity in Motion does not adequately cover, and if so, what steps should TfL take to rectify this?

TfL describe this report as their “journey to creating a fair, accessible and inclusive transport network” and from our lived experience of playing a key role in transporting our passengers is far from fair, accessible or inclusive.

London held the Olympics followed shortly after the Paralympics in 2012 yet 12 years on whilst the Elizabeth Line is step free, the road infrastructure for when a passenger needs to make an onward journey from a tube station and use a form of publicly hired surface transport such as buses or licensed taxis which are the only fully 100% wheelchair accessible fleets is not fit for purpose.

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An example of this is the proposal that a taxi rank situated on Oxford Street by the Elizabeth Line was not operational until 7pm. How does this support anyone who needs to access a taxi for onward travel when they leave the step free access of the Elizabeth Line; do TfL not expect them to make the journey until 7pm when the rank can be used?

Page 27 of the Equity in Motion report entitled a Case study: Safety in taxis and private hire vehicles focuses on DfT statutory standards but does not tackle their own policies, how they approach the design of road schemes and implement them in a way that is not inclusive and impacts on taxi passengers who are protected under the Equality Act by restricting taxis for using the road. Our member drivers are put in a position where they have to stop prior to the restriction and explain to someone who is visually impaired or with limited mobility how they have to navigate the 350 metres they are restricted from; this should not be happening in London.

What are the main barriers to accessible and inclusive travel on London's transport network, including public transport, walking and cycling, and what is TfL doing to overcome these? We see very little from TfL in overcoming barriers to road access, in fact they created the narrative and set the tone.

Transport for All refer to traffic reduction measures like Low-Traffic Neighbourhoods, road user charging policies such as congestion zones, and one-way systems were also barriers for 23% of their respondents. This suggests that while measures must be taken to reduce traffic, that these measures must also account for the access needs of disabled people, or they can end up replicating the very problems they seek to address, as well as creating new ones.

Given the extensive barriers to public transport and active travel, as well as the large proportion of disabled people who cannot drive or have no household access to a vehicle, licensed taxis fill a vital gap in disabled people's mobility options. This is reflected in Government statistics: disabled people with 'mobility difficulties' make more than double the number of trips per year than non-disabled people. Despite the essential role taxis play, access barriers remain – road and kerbside access the most fundamental.

Taxi / Private Hire Vehicle Disabled people have a generally positive experience of taxis compared with other modes, giving taxis an average rating of 1.88 out of 3. 22% reported that they use taxis easily and with confidence.

Keeping travel affordable ensuring cost of travel isn't a barrier to inclusion is key and for taxis road access and global exemptions that permit access via modal filters and bus gates in all schemes across our licensing area keeps the cost for the passenger affordable.

The DfT have previously said the following:

"While many take for granted the ability to travel easily from A to B, this is not the reality for everyone. For our ageing population, and the fifth of people who identify as having some sort of disability, access to transport can be far from straightforward. That is why this Government is determined to make sure that disabled people have the same access to transport as everyone else, and that they are able to travel easily, confidently and without extra cost. We have a manifesto commitment to get a million more disabled people into work by 2027, and this Strategy will help to deliver that."

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The Department for Transport's Strategy (achieving equal access for disabled passengers) states that taxis should;

"...be as accessible to disabled passengers as it is for those who are not disabled. This should mean not only that vehicles are sufficiently accessible to provide for people with a range of access needs, but that the means of hiring them is accessible, that passengers can be picked up or dropped off at a location convenient to them, and that no disabled person is ever left at the kerbside or charged extra for their journey."

Taxicard enables over 80,000 members in 32 participating boroughs to take around 1.3million trips per year. The Taxicard scheme offers London residents with mobility impairments or who are sight impaired subsidised travel. The scheme enables members who may have difficulty using public transport, such as buses, trains and tubes, to get out and about and enjoy the city. It is a matter of accessibility and in line with the Equality Act which explains that having **due regard** for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.
- Encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

Until TfL embed this into their transport design, nothing will change.

Who is using different TfL services and how can TfL ensure that its provision of services across London is accessible and inclusive? What information gathering can TfL do to assist with this? TfL use a lot of data but in essence this is often used to achieve outcomes for TfL overarching policies for Active Travel, Cleaner Air and so on. TfL, say they listen but really need to hear what passengers say and those who deliver these services. Inclusion and accessibility is in essence treated like a tick box exercise and now we see bad cycling behaviour being designed into schemes rather than a safer and more inclusive environment for all.

TfL also do not monitor their schemes after implementation to see if the outcomes they were intended to achieve have worked; many in practice have not worked but there is no accountability or desire to change what does not work and improve it. TfL also does not practice what they preach. TfL issued guidance to boroughs, and we have yet to see one borough, or one TfL scheme provide any pre or post monitoring:

6.9 Taxis

Taxis have a distinct legal status and should be considered within monitoring plans. Where a monitoring plan is collecting road user data, TfL recommends that a fully classified approach is taken in order to be able to understand the benefits and impacts of a scheme on taxi journeys, as well as other classes of traffic including private hire journeys if possible (see 3.3.2 All vehicle traffic counts).

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Where taxis are likely to be impacted, flow and classified turning count data that distinguishes taxis from other vehicles will show the scale of these impacts. Public surveys should seek to understand the outcomes of a scheme on taxi passengers, and particularly older and disabled people.

What is TfL doing to embed accessibility and inclusion into its transport planning and design process?

Reference is made to talking to disability groups, it really needs to test out proposed designs with Ambassadors from groups like Access Able who have worked on the ground testing out schemes in Westminster and identified a number of issues which were then corrected.

They need to test with real passenger needs on the group to see the potential impact and mitigate it. They need to listen and hear those from delivering the service. Plans implemented seem to ignore if a bus or taxi can access the kerb for those who need it, can the emergency services get round vehicles on blue lights and so on.

What does good public engagement in accessible transport planning look like in practice, and how can TfL improve its 'engagement culture'?

TfL needs to listen to a wider range of stakeholders and look at how it uses questions. At the moment these are phrased to get the outcome they want and are questionable if the outcomes are not pre-determined and are at odds with the Gunning Principles. Many of our members have lost faith in the engagement and now view transport planning as a fait accompli and no longer see the point in raising concerns as they are ignored. This needs to change as London is no longer the inclusive and accessible city it once was, and you will not achieve inclusive travel without a willingness to change.

Wandsworth Community Transport Ref No. AI022

Wandsworth Community Transport

[personal information redacted for publication]

Managing Director

Response to Call For Evidence: Accessibility and Inclusion in Transport Planning

I am writing in response to your call for evidence concerning accessibility and transport in London. In particular I will be responding to the first two of the areas you are looking to investigate, namely:-

- Understanding what is being done to provide accessible transport in London
- Identifying measures TfL could consider to improve its services.

Wandsworth Community Transport is just one of the many Community Transports that operate around London and we have a wealth of knowledge on this subject. We are a registered charity with 29 minibuses and a turnover of more than £1 million/annum. We started Dial-a-Ride (DAR) in Wandsworth in the 1980s and more recently have provided DAR services for TfL. In Wandsworth we provide services for 2000 elderly and disabled members (shopping shuttle, outings and Shopmobility) as well as the group work we do with all the community organisations in the borough. I will be concentrating on the work we do with individuals, but there is a lot more that could be said.

Public transport in London is fantastic and increasingly accessible, but there is still a huge need for Dial-a-Ride, Taxicard and Community Transport for those who can't use public transport.

But it is not a "one size fits all". We each have our strengths and need to work together to better cover the need.

DAR has the vast majority of the funding and does an incredible job, but it is only a relatively small percentage of its membership that regularly manages to get rides. Many have given up completely because the type of trips they want just won't fit into the DAR schedules, or they can't handle the booking system.

Taxicard is very useful to a small minority, but again, for many, it doesn't work. No guarantee of getting a return journey, poor taxi coverage in outlying areas, poor accessibility for all but small standard wheelchairs and cost, are all significant factors. It is often cheaper just to get an Uber.

Community Transport is the local option for many and works very well, but because it concentrates on people travelling together to the same destination, it doesn't suit those with ad-hoc requirements. The plus side is that it is very cost effective because it is multi-occupancy. In Wandsworth we do over 12,000 individual trips/year, which is very significant when you compare to DAR's stats in our area.

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Transport for Health for Doctor's and hospital appointments is an additional category and very difficult for many. People try and get whatever they can for these essential journeys, and there is a definite need here.

There is clearly no single answer that works for everyone and having many different options is likely to give more people an option that suits them and makes the system fairer.

An integrated approach is equally important (which is typical of the Community Transport sector), making best uses of resources. For example one of our minibuses might do a school run in the morning followed by a shopping trip, followed by taking people home from a day centre, with an evening booking from a disability group taking its members to a meeting. This greatly improves efficiency and reduces downtime, but needs a lot working in partnership.

We think that Community Transport can really help reach those who are missing out on accessible transport in London at the moment, and we provide a much more efficient and cost effective solution.

But we need funding to do this. Most Community Transports are unfunded, but they manage to do an incredible amount of fantastic work, though many are on a knife edge and several have been forced to close. Just a little support from TfL could really help deliver more accessible transport. TfL have already really helped the sector by using Community Transports under contract to deliver DAR, and hopefully that will continue and expand.

In conclusion, we think a review of the whole accessible door-to-door transport sector would be very welcome and is long overdue. Working in partnership is key to improving the situation. The Community Transport sector is a vital part of the equation and we want to be involved at the heart of these discussions and in delivering accessible transport. We have a wealth of knowledge and experience and much to offer because of our involvement and expertise at a local level.

In addition, some of the significant elements that could merit some discussion and investigation are as follows

1 *Door-to-door accessible transport is very expensive, with a single DAR trip costing around £50. Our own cost is less than £10 per single trip, so you can see what kind of savings could be made.*

2 *DAR have many pre-booked group bookings for day centres and clubs that involve some degree of multi-occupancy and enable them to keep their statistics up. But many think this is not right and diverts resources from individuals, who can't get the rides they want as a result.*

There is certainly an argument that this kind of work could be done much more efficiently and cheaply at a local level by Community Transports, thus freeing up DAR for individual work.

3 *The same thing could be said for shopping trips, which monopolise much of DAR resources, and which could be delivered more efficiently at a local level. Our shuttle takes passengers every week, without the need to book. They make friends, have a cup of tea and we provide them a volunteer and mobility aid where needed. Obviously some ad-hoc shopping trips*

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are still necessary, but people really do love our regular shopping services and those offered by other CTs, which could be easily replicated across London, freeing up DAR for other requests.

4 *We get the impression that only a small percentage of members of DAR are regular users. They are good at making bookings and their types of local requests are easy to fit into the DAR schedules. Many others have totally given up on DAR because they can never get the rides they want, or can't be guaranteed the return journey.*

If there was some kind of way of rationing trips or prioritising members who really cannot use any other type of transport, this could be helpful and fairer. There is perhaps too much emphasis on counting trip numbers, which doesn't factor in the extra resources needed for those with the greatest mobility problems.

5 *Many DAR members are able to use a taxi and are increasingly internet savvy and could use services like Uber, again at a fraction of the cost of DAR. Uber ACCESS is an increasingly available option which can also take wheelchairs in proper rear entry single wheelchair vehicles, as opposed to London cabs which are generally not suitable for most wheelchairs. Could this be a way to free up resources for DAR to concentrate on the most needy? Are personalised transport budgets an option?*

6 *Transport for Health is another area where Community Transports run some very effective services, ensuring people get to appointments, vaccinations, falls clinics and the like, and saving many home visits for GPs. DAR get a lot of requests in this area, but again an integrated approach could give better results.*

Wheels for Wellbeing Ref No. AI023

London Assembly Transport Committee Call for Evidence: Accessibility and Inclusion in Transport Planning

Wheels for Wellbeing are a Disabled people's organisation (DPO) who campaign for equitable access to cycling, active travel and multimodal journeys for Disabled people on a pan-impairment basis.

1. What do Londoners use transport for and how does this differ among demographic groups?

For Disabled people accessibility is the main determinant of the transport that they use – this includes physical accessibility such as level/ramped access, lifts; sensory accessibility such as information in accessible formats e.g. audio, visual, tactile; social accessibility and safety in terms of attitudes of staff and other customers. Across London there remains very little transport provision that meets all accessibility requirements on a pan-impairment and intersectional basis – for example, taking into account that many Disabled women are also carers for other Disabled people and/or children. Which journeys and types of transport are most used and most appropriate for certain demographic groups?

Disabled people (and other minoritized groups) should be able to make all journeys with the same ease, choice, comfort and convenience as non-disabled people. It is not appropriate to segregate transport or journey type by disability/protected characteristic.

b. How could the transport network better serve and connect London's communities with the places they travel to?

Full accessibility on all transport modes, including for multiple Disabled people to travel at any one time and using a range of mobility aids.

2. How does TfL use data and engagement to plan accessible and inclusive services?

There are a number of concerns with the way that TfL (and others) use data to plan for accessibility. For example, when evaluating the impact of changes to bus provision, travel by freedom pass holders is used to measure any negative impacts for Disabled people (such as the introduction of bus stop bypasses or proposed changes to the 205 service). However, those who use wheelchairs and similar mobility aids board and leave by the centre doors without presenting any pass. Thus, Disabled people's use of the service is under-recorded and negative (or positive) impacts cannot be measured.

a. Does the data TfL uses to plan services and infrastructure sufficiently inform the planning of services to meet the needs of Londoners facing additional barriers? Do they need to collect different and additional data?

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Good quality baseline data about how Disabled people currently travel and how they would like to travel is essential in order to measure the actual impact of any new service/infrastructure for Disabled people. It is essential to establish robust figures for the transport gap between Disabled and non-disabled people across London (with regional and overall data) to set targets to eradicate this differential, to target the most poorly served first, and to measure how effective the interventions are. This data does not currently exist.

b. How successful is TfL at engaging with diverse groups of users when planning and designing infrastructure and services?

c. How effective is TfL at involving all users in decision-making processes?

d. Are there any improvements that could be made to ensure that all voices are heard?

To address points b, c and d we suggest that TfL/The Assembly recognises that accessibility and inclusion in transport planning is highly detailed and requires ongoing co-production at all stages with expert DDPOs as well as careful consultation with Disabled individuals across London and beyond. We suggest that, as a first step, the London Assembly commission expert DDPOs to contribute to development of a structure for transport planning for all modes from a pan-impairment perspective. Such expert input should be paid at consultant rates, with appropriate time provided and appropriate weight given to these contributions.

3. How effective is TfL's Equity in Motion plan, and how well does it influence decision-making across London? How could it be improved?

We would like to see a much wider range of mobility aids allowed on public transport, more than one Disabled person accommodated at a time, and a complete rethink about how public transport vehicles are designed and configured so that there is much more flexi-space available for multiple users with different needs to travel at the same time in safety and comfort e.g. parents with pushchairs, mobility aid users, passengers with assistance dogs, people with luggage and cycles.

a. What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

There must be full accountability and penalties for any failure in accessibility, especially where these are driven by attitudes – such as bus drivers refusing to lower the ramp for a wheelchair-user or taxis refusing to take someone with an assistance dog. TfL/the Assembly must take on the burden of monitoring accessibility and holding those who fail to account rather than the burden falling on individual Disabled people to pursue complaints through the courts and inaccessible complaints procedures.

4. Are there any best practices from other cities both in the UK or abroad that TfL could adopt?

See answer to 2 b,c,d.

Women's Budget Group Ref No. AI024

Submission on Accessibility and Inclusion in Transport Planning

October 2024

About Us

The UK Women's Budget Group (WBG) is the UK's only think tank focused on exploring the economy through a gender-equal lens. We provide evidence and analysis on women's economic position and propose policy alternatives for a gender-equal economy. We act as a link between academia, the women's voluntary sector and progressive economic think tanks.

We welcome the opportunity to submit evidence to the London Assembly Transport Committee's investigation into accessibility and inclusion in transport planning.

Summary

1. Data on transport use is limited, however the most recent overview shows that women, Black and Asian people, Disabled people and those not in paid work or working part-time as less likely to cycle than white people, non-Disabled people, men and full-time workers, and women and part-time workers are more likely to walk.
2. The TfL report on travel in London does not go into the demographics of other forms of transport or the reasons. The gendered division of domestic and caring responsibilities means women make more frequent, short journeys throughout the day, accompanied by those they care for, whereas men make fewer but longer journeys during peak hours.
3. Radial planning that prioritises peak hour commutes fails to serve the mobility needs of women, children, teenagers, the elderly, informal workers and others with more varied journeys.
4. Transport is largely framed as a technical issue that requires engineering, economic and technological skills and solutions. This reflects a technocratic paradigm, which privileges 'technical' over 'social' considerations.
5. The technocratic paradigm creates barriers to women's participation and leadership in the transport sector, as STEM (science, technology, engineering and mathematics) and economics are male-dominated fields.
6. Enabling women, ethnic minorities and Disabled people to make more use of public transport and to participate in active travel is key to achieving climate goals. Gender-

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Responsive Budgeting (GRB) can support the Mayor of London's ambitions to "Make London a fairer, greener, healthier and more prosperous city".

7. This is about doing budgeting and planning better to achieve improved outcomes by understanding the full implications of budget and policy decisions at any level of government or institution.
8. There are lots of examples of good practice to draw on, we have provided several in the main body of this submission: Barcelona City Council, the City of Vienna, the Women's Design Service, Leeds 'women-friendly city', and Women in Transport.

Recommendation

9. The Mayor of London and TfL should adopt Gender-Responsive Budgeting and gender-responsive participatory planning to involve diverse women, particularly those whose voices are underrepresented or excluded, in local planning and decision-making processes.
10. Transport for London should collect and publish sex-disaggregated data on use of transport types; where people are travelling to and from, reason for travel and the length of journeys taken. As far as possible, the data should be collected and broken down by other protected characteristics in line with the Public Sector Equality Duty to assess the impact of multiple and intersecting characteristics on transport use.
11. Numerical data should be supplemented by qualitative data collected on a periodic basis in order to explore the reasons for gendered differences. TfL should also engage different groups as they make proposed changes and allocate budgets to ensure effective service provision and facilitate ongoing consultation and engagement.
12. Under its Equity in Motion plan, TfL should review its objectives to ensure that beyond connectivity and health inequalities, London's transport system meets all of the travel needs of Londoners including for example, for the provision of unpaid care.
13. Bus networks should be reviewed to ensure they serve journeys beyond standard commuter patterns.
14. Investments in safe, quality active travel infrastructure are needed to enable safe local journeys to key services by walking or cycling. Physical infrastructure investments should be accompanied with investments in education, outreach and peer support schemes to promote cycling among underrepresented groups.
15. Work with organisations like Women in Transport and invest in mentoring programmes to diversify the transport sector.

Transport use

16. According to the most recent published overview of travel in London: women, Black and Asian people and people who are not in paid work are still significantly less likely to cycle than men, white people and workers⁵⁸.
17. Women and those who are not working or working part-time however, are more likely to be taking walking trips than men and women are more likely to be in part-time or unpaid work due to their disproportionately carrying out unpaid care work than men⁵⁹.
18. The report does not publish the demographics of users of the other forms of transport including roads, buses and tubes. However, we know from existing evidence that the uses of these forms of transport are gendered.
19. The gendered division of domestic and caring responsibilities means women make more frequent, short journeys throughout the day, whereas men make fewer but longer journeys during peak hours. However, transport systems tend to be designed to optimise peak-hour long distance radial journeys into city centres, which reflects a male bias⁶⁰.
20. In the UK, men are twice as likely as women to make commutes lasting at least an hour, while women make the majority (55%) of trips lasting less than 15 minutes. In 2019, men in England made 8% fewer overall trips than women but travelled 17% further. Men in England also made 36% more commuting trips and 24% more business trips than women in 2019, whereas women made 36% more education/escort education trips than men⁶¹.
21. Radial planning that prioritises peak hour commutes fails to serve the mobility needs of women, children, teenagers, the elderly, informal workers and others with more varied journeys (e.g. shift workers, night-time economy workers), who may experience longer wait times for transport services in emptier train stations and bus stops, which can feel less safe.
22. Despite its social, cultural and political dimensions, transport is largely framed as a technical issue that requires engineering, economic and technological skills and solutions. This reflects a technocratic paradigm, which privileges 'technical' over 'social' considerations. This makes gender and inclusion seem irrelevant, produces male bias in

⁵⁸ Transport for London (December 2023) [Travel in London 2023 Annual Overview](#)

⁵⁹ ONS, (2023), [Time use in the UK: 23 September to 1 October 2023](#)

⁶⁰ Tiffany Lam for WBG & WEN (2021) [Towards Gender-Inclusive and Sustainable Transport Systems](#)

⁶¹ *ibid*

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transport systems – as evidenced in the primacy of radial transport planning, and encourages top-down, technology-driven solutions, like electric vehicles, to complex societal problems.

23. The technocratic paradigm creates barriers to women's participation and leadership in the transport sector, as STEM (science, technology, engineering and mathematics) and economics are male-dominated fields. In the UK, only 5% of women work in STEM occupations, compared to 28% of men⁶². In the UK, women represent just 14% of the built environment sector and 21% of the transport sector, and Black, Asian and minority ethnic people represent just 4% of the transport planning workforce^{63,64}.
24. A 2020 study of car dependency and women in Ireland commissioned by Transport Infrastructure Ireland for example found that women's use of public transport ranked above taxis and cycling but below cars and walking. Women in the study reflected some enjoyable moments on public transport but these were often negated by unpleasant experiences such as limited services, poor reliability, slow speeds, sparse stops and long walking distances from home. The last mile of travel from the public transport stop to home is referred to as a significant 'pain point' due to distance, dark routes and unsafe waiting spaces⁶⁵.
25. Enabling women, ethnic minorities and Disabled people to make more use of public transport and to participate in active travel is key to achieving climate goals. Active travel projects must be distributed in a spatially just way and meaningfully involve underserved communities in planning processes.

Data and engagement

26. One effective approach to improving understanding of transport use as well as reviewing data collection and engagement, is through the application of gender-responsive budgeting (GRB) principles to transport planning.
27. Applying these principles can support the Mayor of London's ambitions to "Make London a fairer, greener, healthier and more prosperous city" by recognising the ways in which women are situated differently to men in the economy and therefore impacted differently by almost all public policy decisions, including transport.

⁶² EIGE, 2019, [Gender Equality Index 2019: United Kingdom](#)

⁶³ European Commission, 2019, EU Transport Scoreboard: United Kingdom

⁶⁴ Commission for Architecture and the Built Environment, 2005, Black and Minority Ethnic Representation in the Built Environment Profession

⁶⁵ Transport Infrastructure Ireland (2020) [Travelling in a Women's Shoes: Understanding women's travel needs in Ireland to inform the future of sustainable transport policy and design](#)

28. Implementing GRB is not about doing an additional budget, but rather doing budgeting and planning better to achieve improved outcomes by understanding the full implications of decision-making.
29. Sustrans, the national charity working to support everyone to walk, wheel and cycle, for example, worked with our sister organisation Scottish Women's Budget Group to explore how to apply gender budgeting to active travel investment in Scotland.
30. Key to doing effective gender-responsive budgeting is asking the right questions around the gendered impact of decisions around revenue raising and spending and collecting the necessary quantitative and qualitative data to find the answers.
31. For example, like in London, men in Scotland are more likely to cycle than women. They are also more likely to think that cycling is safe than women. In her blog for Sustrans on this topic, Tiffany Lam sets out how GRB might improve active travel planning⁶⁶, example questions include:
 - What proportion of the budget has been allocated for physical infrastructure (e.g. cycle lanes) vs. social infrastructure (e.g. education, outreach, behaviour change), which is needed to get more diverse groups of people (e.g. women, Disabled people, people of colour, people with low incomes) cycling?
 - What is the balance between physical infrastructure that facilitates movement (e.g. cycle lanes) vs. infrastructure that facilitates stillness (e.g. cycle parking, benches)?
 - What types of journeys will physical infrastructure facilitate (e.g. work commutes, care journeys, leisure trips)?
32. In order to comprehensively adopt GRB principles, Transport for London needs to collect and ideally publish sex-disaggregated data on use of transport types; where people are travelling to and from, reason for travel and the length of journeys taken. As far as possible, the data should be collected and broken down by other protected characteristics in line with the Public Sector Equality Duty to assess the impact of multiple and intersecting characteristics on transport use.
33. The design of surveys and other quantitative methods should be done in coproduction with affected groups to ensure that the right data is collected in a way that is useful for gender-responsive budgeting.

⁶⁶ Tiffany Lam for Sustrans (2024) [The case for gender budgeting in active travel](#)

34. Ideally data should be collected at a local level as the issues affecting women may be hyper-local such as the lighting at a particular station, staffing levels at an interchange or the design of a cycle junction.
35. Numerical data should be supplemented by qualitative data collected on a periodic basis in order to explore the reasons for gendered differences. TfL should also engage different groups as they make proposed changes and allocate budgets to ensure effective service provision and facilitate ongoing consultation and engagement.

Equity in Motion plan

36. We welcome the Equity in Motion plan's recognition of the significant impact of male violence against women and girls on women's experiences of safety while using public transport.
37. The plan commits to conducting gender safety audits, which are a participatory tool to understand women's and girls' perceptions and experiences of safety in public space. Similarly, the plan says TfL will carry out accessibility audits near developments, though this could be widened to audit routes as highlighted by the Disabled community.
38. Gender safety audits and accessibility audits should be used in the gender budgeting process to ensure that budgets on issues such as lighting, wayfinding and staffing reflect the concerns of women and enable their use of public transport.
39. There is a real gap in the plan in including and addressing the gender differences in patterns of travel resulting from the underlying difference in provision of unpaid care and work.
40. The Cycling and Walking Action Plan that is linked through the Equity in Motion plan does reflect the gendered difference in cycling and the fact that women make more and shorter trips than men. There has been an incremental increase in women cycling compared to men, and the cycling plan states that diversifying cycling is a priority so we would recommend that TfL uses GRB and engagement with the groups it is targeting to ensure efforts are successful.
41. The Equity in Motion plan reflects that 44% of women surveyed think TfL provide value for money compared to 53% of men but does not go into the potential reasons for this lower rate of satisfaction.
42. We would recommend that TfL reviews its objectives to ensure that beyond connectivity and health inequalities, London's transport system meets all of the travel

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needs of Londoners including for example, for the provision of unpaid care. The dial-a-ride service is a good example of a public transport method essential for carers.

Best practice examples

43. Barcelona City Council (BCC) has adopted gender mainstreaming in line with Spain's 2007 legislative requirement for effective equality between women and men⁶⁷. BCC has done so through regulatory and planning instruments such as the Directives for Preparing Municipal Rules (2015), the Government Measure on Gender Mainstreaming at Barcelona City Council, the Plan for Gender Justice (2016–2020) and the Regulations for Gender Equity at Barcelona City Council.
44. Council budgets, tax policies and urban development plans have to be accompanied by gender impact reports using a consistent methodology.
45. Examples include: If a draft regulatory tax bylaw for the Road Tax is analysed, mention must be made of the differences between the city's women and men regarding car ownership and having driver's licences, the reasons they use public or private transport, mobility guidelines, etc.
46. The City of Vienna was an early adopter of gender-responsive budgeting. Since 2006, all municipal departments and city districts must evaluate the distributional impacts of public spending and service provision to ensure they do not exacerbate gender or other inequalities. Some districts collected gender-disaggregated data on urban mobility and found that women walk and take public transport more than men. Officials then allocated resources for pedestrian safety improvements⁶⁸.
47. Although currently dormant, the Women's Design Service was founded in 1984 to increase women's participation in urban design and planning in the UK and promote gender inclusive built environments and transport systems. Between 2002 and 2005 they conducted gender safety audits in London, Manchester and Bristol and developed recommendations to improve women's safety (e.g. rerouting paths, public art).
48. Leeds will become the UK's first women-friendly city, following a successful bid from Women's Lives Leeds, a consortium of 11 local women's and girls' organisations. A women-friendly city is a city where women can access health, education, social services, employment opportunities, high quality and comprehensive infrastructure (e.g. transport, housing) and protection from gender-based violence. Engagement with local

⁶⁷ Department of Services of Gender Mainstreaming and Time Policies (2020) [Feminist methodological guidelines #3 Gender impact assessment of economic policy: municipal budget and tax system](#)

⁶⁸ City of Vienna, Gender mainstreaming in Vienna, https://www.rtpi.org.uk/media/4471/george-pepler-report_200301_final.pdf

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women and girls and gender-responsive participatory planning are necessary for a women-friendly Leeds that supports women's full participation in urban life⁶⁹.

49. Women in Transport, a membership-based organisation to promote gender parity in the UK transport sector, offers professional development, mentoring and networking opportunities. Women in Transport designed a unique mentoring programme for members, Advance, which is in its fourth year and has supported 160 mentors and mentees so far⁷⁰.

⁶⁹ Women friendly Leeds: <https://womenfriendlyleeds.org/>

⁷⁰ Women in Transport: <https://www.womenintransport.com/>

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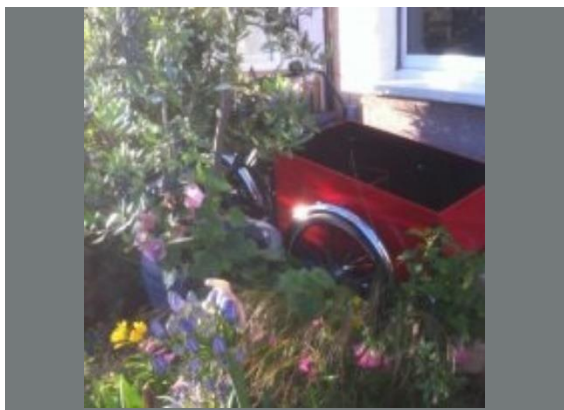
Ref No. AI025

Thank you for your opportunity to respond to this.

Your requirement for a word document is inaccessible for me and I am submitting my evidence in this email and the enclosed links.

Please see and study carefully attached links.

My blog “about me” gives information about my knowledge philosophy and experience



About Me

clivedurdle.wordpress.com

The key problem is of siloing subjects and not understanding that sustainability, inclusion and logistics are nearly completely overlapping sets.

[personal information redacted for publication]

Rail is also not understood as the key utilities network provider and probably the future largest energy producer in the UK.

TfL could easily be heating London by using the ideas Rotterdam is using.

TfL your business plan is far too narrow. You should not be siloing issues from example “accessibility” but should be continually improving by looking for and implementing holistic whole system “ways”.

<https://goexplorer.org/rotterdam-strategic-transition-to-a-clean-heating-network/>

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Ref No. AI026

I'm **@CLondoner92** on X (formerly known as Twitter), Mastodon, and BlueSky. I have volunteered to submit evidence in a document that includes my ideas and suggestions to help improve public transport in Greater London. As stated in your call for evidence document, I can answer the questions that are relevant to me.

How could the transport network better serve and connect London's communities with the places they travel to?

Improved Accessibility:

- **Infrastructure Upgrades:** Ensuring that all stations provide step-free access, lifts, and ramps is essential for enhancing accessibility for those with mobility issues. Many Underground stations currently lack step-free access, making travel particularly difficult for elderly individuals, disabled passengers, and those with heavy luggage. Retrofitting older stations and ensuring that new developments meet accessibility standards is crucial.
- **Real-Time Information:** As Transport for London (TfL) provides real-time updates on transport services, I suggest including information about lift breakdowns on the TfL Go and other apps, such as Citymapper. This can help users plan their journeys more effectively. Clear communication about bus routes that run parallel to the Underground, London Overground, Elizabeth Line, and National Rail services is particularly important during disruptions.

Community Engagement:

- **Local Consultations:** Engaging with local communities through workshops, surveys, and public meetings can help identify specific transport needs and preferences, including understanding the unique challenges faced by different demographic groups. This is vital for developing services that cater to specific needs, such as late-night transport for hospitality workers or dedicated services for schoolchildren.
- **Tailored Services:** Developing services that cater to specific demographic needs can improve connectivity and accessibility. For instance, increasing the availability of accessible bus routes that run parallel to Tube and railway services is essential for those who rely on public transport.

The Importance of "Turn Up and Go" Bus Services: Bus services in London are essential for enhancing accessibility, particularly for wheelchair users and those with mobility challenges. Designed to be wheelchair accessible, these buses allow passengers to board and disembark with ease. The "turn up and go" nature of bus services offers vital flexibility and convenience, enabling passengers to travel spontaneously without worrying about lift availability or long walks.

Procedures for Wheelchair Users: A Freedom of Information request to TfL has revealed the procedure for wheelchair users when staff fail to provide a wheelchair ramp at the destination

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station. TfL advises users to activate the emergency passenger alarm at the station where they expect to depart. If a member of staff is not present to assist them off the train, wheelchair users can alert the driver using the emergency passenger alarm, prompting the driver to contact the Service Control team. This team will arrange for assistance at the destination station. If the train departs before assistance can be provided, Service Control will coordinate with the next accessible station to ensure the passenger receives help and can replan their journey as needed.

Reducing Injury Risks: Providing step-free access can significantly reduce the risk of injuries among passengers, minimising delays caused by accidents and alleviating pressure on emergency services, including paramedics.

The Role of Station Staff: Well-trained station staff are vital for ensuring a smooth travel experience, particularly for people with disabilities who often require assistance. Their presence fosters a sense of security and confidence among those who may find travel challenging. Addressing staffing shortages through hiring more personnel can help maintain operations and provide better support for passengers.

Expanding Coverage: Expanding bus routes to run parallel to Tube and railway lines is crucial for increasing coverage across Greater London. This ensures that accessible options are available throughout the city and in areas beyond. For example, when the London Underground's Central Line is disrupted, particularly in sections outside Greater London, such as Epping Forest District in Essex, there is currently no convenient, high-frequency bus service during the day, evening, and night for passengers heading to or from Epping. This lack of service forces them to pay for expensive alternatives, such as taxis, minicabs, or rideshares from Debden or Theydon Bois stations.

Challenges for Overseas Visitors in Journey Planning Due to Expensive Roaming Fees:

International visitors to the United Kingdom, particularly in London, often encounter connectivity challenges due to high roaming fees and the limited availability of public Wi-Fi. Many travellers prefer to maintain their connection with their home network providers, which may discourage them from purchasing a UK SIM card for short stays. Additionally, some individuals may not possess dual-SIM or eSIM-compatible devices, further complicating their access to local data services. This issue is particularly significant for overseas disabled users, especially wheelchair users, who may need to utilise apps provided by local transport authorities to identify journeys that accommodate their mobility requirements.

In terms of Wi-Fi availability on Transport for London (TfL) services, all London Underground (Tube) stations, nearly all London Overground stations, all Elizabeth Line stations under Central London, and Victoria Coach Station are equipped with Wi-Fi. However, international tourists are unable to access these services, as they are exclusively available to customers of certain UK mobile network operators. Public Wi-Fi options are often limited, requiring registration or payment, and may be inaccessible to international tourists without UK mobile numbers. While TfL has made efforts to enhance mobile coverage within the Underground, these improvements primarily benefit users with a UK mobile contract. Consequently, international visitors without data access are unable to download journey-planning apps, which impedes their ability to navigate the transport system effectively.

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Retention of the One Day Travelcard: In 2023, TfL proposed the withdrawal of the One Day Travelcard, a decision that would have caused considerable inconvenience for various groups. Concerns about this potential removal were raised by me on X, highlighting the impacts on:

- Individuals with disabilities, including Railcard holders and their companions
- Low-income individuals
- People without bank accounts
- Those who had lost their bank cards or smartphones with virtual bank card apps and were awaiting replacements
- Infrequent visitors, including those from overseas

It was highlighted that other regions in England provided multi-mode day passes similar to the One Day Travelcard. Examples included:

- Merseytravel – Saveaway Ticket
- Nexus – Network One Adult Day Rover
- Robin Hood Network – Day Ticket
- Transport for Cornwall – Ride Cornwall Ticket
- Metro – West Yorkshire DaySaver Bus and Rail ticket

Disadvantages of the Oyster and Contactless Pay As You Go System: One significant disadvantage of the Oyster and Contactless Pay As You Go (PAYG) system was the implementation of maximum journey times. This policy resulted in commuters being charged a maximum fare, equivalent to the price of a zone 1-9 single fare, if they exceeded specified journey times within the zones. This issue affects disabled and wheelchair users, especially those residing outside of Greater London, where they are unable to obtain a Freedom Pass and must use a Railcard, which allows them to have discounts on an Oyster Card. The issue also includes residents from Epping Forest, where they are served by a small number of TfL bus services and the Central Line.

While it is possible to request refunds for maximum fares to correct overcharges, this option is limited to three occurrences per calendar month. The PAYG system was primarily designed for regular commuters travelling within, to, or from Greater London. To address the issue of maximum journey times on PAYG, it is proposed that a day ticket option be introduced for the Oyster card, thereby eliminating the need to purchase a separate paper ticket. Additionally, it is mentioned that certain smartcards from National Rail's Train Operating Companies allow users to add Travelcards directly to their smartcards.

What measures should TfL put in place to ensure ongoing accountability and transparency in delivering equitable and inclusive transport services?

- **Public Reporting:** Regularly publishing detailed reports on the progress of the Equity in Motion plan, including successes, challenges, and areas for improvement, can enhance transparency. These reports should be accessible to all Londoners, using clear language and formats that cater to diverse audiences.

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- **Independent Oversight:** TfL's Independent Disability Advisory Group (IDAG) should publish their minutes and agenda reports on the TfL Board website. This transparency will not only keep the public informed but also help TfL save costs by minimising Freedom of Information requests for these documents from the general public.
- **Community Engagement Initiatives:** Implementing ongoing community engagement initiatives, such as community meetings and consultations through the "Have Your Say" section of the TfL website, can help TfL gather feedback and maintain a dialogue with users. This engagement should be inclusive, ensuring that all voices, particularly those from under-represented groups, are heard.
- **New Forum for Accessibility Discussions:** TfL should establish a forum similar to "Talk London" on the Greater London Authority website specifically for disability and wheelchair users. This platform would allow users to discuss accessibility issues when using TfL services and suggest improvements, fostering a collaborative environment for addressing concerns.
- **Transparency in Decision-Making:** TfL should be transparent about how community feedback influences decision-making. This includes sharing information about how user input is incorporated into planning and service design, as well as the rationale behind specific decisions.

Are there any best practices from other cities, both in the UK and abroad, that TfL could adopt?

Singapore: Double-Deck Buses with Enhanced Accessibility Features

- **Overview:** Singapore's public transport system is renowned for its efficiency and accessibility. The introduction of double-deck buses with three doors, two staircases, and two designated wheelchair spaces is a significant innovation aimed at improving the flow of passengers and accommodating those with mobility challenges.
- **Key Features:**
 - **Three Doors:** The three-door design allows for quicker boarding and alighting, reducing congestion at bus stops and improving overall travel times, particularly beneficial during peak hours when demand is high.
 - **Two Staircases:** The presence of two staircases facilitates smoother movement within the bus, allowing passengers to access the upper deck more easily and reducing bottlenecks.
 - **Wheelchair Spaces:** The allocation of two wheelchair spaces ensures that the needs of passengers with disabilities are prioritised, making public transport more inclusive.
- **Potential Adoption by TfL:**
 - **Bus Design:** TfL could explore the introduction of similar single-deck and double-deck buses with multiple doors and staircases to enhance accessibility and reduce boarding times, particularly on busy routes.

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- **Accessibility Standards:** Implementing new accessibility standards for all new vehicles, including designated spaces for wheelchairs and prams, can ensure that TfL's fleet meets the diverse needs of Londoners.

Hong Kong: Efficient and Accessible Public Transport System

- **Overview:** Hong Kong boasts one of the most efficient public transport systems in the world, characterised by its extensive network of buses, trams, ferries, and the MTR (Mass Transit Railway). The city has made significant investments in accessibility.
- **Key Features:**
 - **MTR Accessibility:** The MTR primarily operates underground with ten lines serving 93 stations, offering nearly complete accessibility. It connects Hong Kong Island with Kowloon, Lantau Island, and the New Territories. Out of the 93 stations, 90 are equipped with lifts or ramps for easy access from the street to the concourse. Where lifts aren't available, there are stair lifts and wheelchair aids to assist passengers. Every station can accommodate wheelchairs, although some may require staff assistance. If you need help using a stair lift or climber, simply inform a staff member using the call boxes located at the station entrances or exits.
 - **Bus Services:** Certain tri-axle buses operated by KMB include two wheelchair areas, ensuring better accommodation for passengers with mobility challenges.
 - **KMB Mobile App:** KMB provides valuable information for wheelchair users through their mobile app, 'App1933.' This app reminds users of their next bus and indicates if the bus has two wheelchair spaces, particularly on routes serving hospitals. The app also includes boarding and alighting reminder functions, allowing users to set reminders based on their route and bus stop.

Summary of Best Practices for TfL: By adopting best practices from these cities, TfL can enhance the accessibility and inclusivity of its transport services, ultimately creating a more equitable system for all Londoners. Implementing innovative designs and ensuring robust engagement with diverse communities can lead to a transport network that meets the varied needs of its users.

I have provided further suggestions in a number of different articles on my website to help improve public transport services and accessibility in London:

- [London's Bus Services Play A Vital Role In Accessibility For Tube And Railway Stations That Don't Have Step-free Access.](#)
- [Reviewing and Suggesting a New Common Bus Specification for London, Greater Manchester and Other Franchised Areas](#)
- [Why is Creativity in Public Transport Important, Including Bus Route Planning and Branding?](#)
- [Suggestion: Transport for London Should Revive the Old Speedbus Proposal From the 1970s as Part of Phase 2 of the Superloop](#)

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- [Suggestion: London Passenger Transport Area Including London Country Buses Should Be Revived To Enhance Cross-Boundary Connections](#)
- [My Suggestions To Help Create The Most Accessible Zero-Emission Bus For London And Elsewhere!](#)
- [Suggestion: Improvements To Wheelchair Accessibility At Railway Stations Should Include Allowing Other Staff To Use The Wheelchair Ramps](#)
- [Suggestion: I Believe It's Time for a New Regional Transport Body for the South East of England?](#)

Further articles in relation to accessibility, especially for disabled and wheelchair users:

- [Why is It Important for the London Borough Councils to Be Competent in Issuing Freedom Pass \(a Free TfL Travel Concession\) for Disabled People?](#)
- [Advice For Wheelchair Users In The Event of Missed Assistance \(Staff With Wheelchair Ramp\) At Railway Stations](#)
- [Fact Check: Disabled And Older People's English Bus Pass \(ENCTS\) Users Are Valid On London Buses](#)
- [Fact Check: Wheelchair Users Get Free Travel And Priority On London Buses](#)

References

My posts on X:

- [personal information redacted for publication]: "The removal of the One Day Travelcard will affect:
 - The disabled (including Railcard holders & companions)
 - Low incomes
 - People without bank accounts
 - People who had their cards stolen and had to wait for replacements
- Infrequent visitors (including overseas)" [personal information redacted for publication]
- [personal information redacted for publication]: "I do say that other areas in England have multi-mode day passes equivalent to the One Day Travelcard." Includes an image listing day tickets by different transport authorities in England. [personal information redacted for publication]

Articles from my website and other websites:

- [personal information redacted for publication]
- [Singapore: LTA to Deploy Three-Door Double-Deck Buses from 2021](#)
- [Singapore: New Electric Bus Features for Safer and Inclusive Journeys](#)
- [Hong Kong Public Transportation](#) – Wheelchair Travel

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- [Hong Kong: KMB and LWB to offer free rides for Disabled on International Day of Persons with Disabilities Be rest assured with Boarding and Alighting Reminder functions on App1933](#)

My Social Media Accounts

[personal information redacted for publication]

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July 2025

Ref No. AI027

London Assembly Transport Committee Scrutiny

Accessibility and Inclusion in Transport Planning

September 2024

Submission by Vincent Stops

1. I worked for 20 years for London TravelWatch, London's transport user watchdog. For much of that time I was its Streets Policy Officer. I worked on all aspects of access and inclusion covering walking, bus, streets and town planning issues. Much of that work was alongside TfL and to a lesser degree the London boroughs. I wrote a number of reports on accessibility and developed the organisation's streets policies.

2. From 2002 to 2022 I was a councillor in Hackney serving as lead member for transport for two years and chair of its planning committee for 16. I now volunteer for the National Federation of the Blind of the UK.

3. During my time at London TravelWatch the transport networks undoubtedly became more accessible. London's bus fleet was the first in the world to become a low-floor bus fleet. This was a really important move because buses are overwhelmingly the most important public transport mode for older and disabled people, with a network that covers the entire capital, 24/7. As significant was the announcement by Mayor Johnson in 2012 that 95% of London's 19,000 bus stops would be accessible by 2016. This meant all bus stops would be of a consistent design. Impediments to alighting and boarding (lamp columns, bins etc) would be removed; a clearway introduced to stop parking and waiting etc; and crucially the kerb height standardised to facilitate ramp access.

4. This submission focusses almost entirely on the new barrier to bus services for blind people who have lost access to the only public transport they can use. The bus stop bypass.

Key questions

How is TfL's Equity in Motion plan being implemented, and what will it achieve if it is successful? Is there anything that Equity in Motion does not adequately cover, and if so, what steps should TfL take to rectify this?

The following statement in the plan is laudable.

By focusing on those who experience the most significant barriers or disadvantages, we can make people's lives easier and increase the appeal of sustainable travel over private car use.

There are more than 30,000 registered blind and partially sighted in London. Amongst them are real people who cannot access the bus today as they used to and must now either stay at home or change their travel arrangements. As more bus stops are converted to accommodate cycles

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more people will be affected. Even having a local accessible bus stop will exclude blind people if their destination stop is or might be inaccessible. Beyond the registered blind many other visually impaired Londoners will be fearful of using these stops. Some will choose to no longer travel by bus.

The statement is absolutely correct. The blind are in the vanguard of the campaign against these stops because they are the most affected. But beyond blind people there are many other older, younger and disabled Londoners who will now regard these bus stops as a barrier to access.

To answer your second question above. Equity in Motion has one mention of blind people. There is no mention of the problems of these bus stop designs. TfL should halt the roll out of these stops and remove those already implemented.

What are the main barriers to accessible and inclusive travel on London's transport network, including public transport, walking and cycling, and what is TfL doing to overcome these?

As described above, the bus service is the most important public transport for older and disabled people. It operates 24/7 across London and is priced such that it is inclusive for everyone.

Access to and from the bus stop and then onto the stop is important. There are three issue:

i). Pedestrians need clear level pavements with convenient crossing facilities. The management of our streets is grossly inadequate insofar as there is too much clutter. Highway authorities have a legal duty to keep the highway clear of obstructions. Too many think obstructing the pavement is OK, too little is spent on adequate management and enforcement against highways obstructions. TfL does better than many, for example removing A-boards, but could do so much more on its own network and encouraging the boroughs. The approach to micro-mobility of TfL and the other highways authorities is disappointing in this regard.

ii). Hail and Ride services are convenient for some, but impossible to catch for others. TfL know this, but there isn't the political will to introduce fixed stops.

iii) The bus stop designs discussed above.

Who is using different TfL services and how can TfL ensure that its provision of services across London is accessible and inclusive? What information gathering can TfL do to assist with this?

TfL understand the problem of bus stop bypasses. It is a policy decision for the Mayor of London. TfL needs to present the Mayor of London with what it is being told by blind people.

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What is TfL doing to embed accessibility and inclusion into its transport planning and design process?

I worked alongside TfL for 20 years representing transport users. Overwhelmingly TfL have risen to the challenge of accessibility and inclusion. They think it through, generally implement well and have embedded many good practices including training of its staff. There are failures and day to day difficulties of course. The most problematic areas are where there are conflicting needs between different modes and users.

The policy decision to introduce segregated cycle lanes running through and around bus stops is one such area of conflicting needs where TfL and London's highways authorities have failed disabled people, indeed they have failed bus passengers more widely. In this case, policy was embedded before consultation. Inaccessible bus services, not access, are embedded in policy!

It has been clear to everyone involved, from day one, that there was a conflict between cycles travelling at speed through and around bus stops without yielding, let alone stopping for bus passengers crossing the cycle tracks. It was always clear that blind people would be most affected.

The decision to introduce these bus stops was made in 2013 by Mayor Johnson, and I presume Andrew Gilligan his cycling commissioner, without any consultation with bus passengers, let alone disabled passengers. The first assessment of an off-road trial bus stop bypass was made by TRL, commissioned by TfL, and a report published in December 2014 which said:

There was a general feeling of being wary of using the bus stop bypass facility. Also, the majority of blind and partially sighted participants stated that they would be deterred from using buses on routes where there were bus stops with a cycle bypass track.

Few were affected by the first stops implemented on Stratford High Street and TfL delayed publication of further studies by TRL until after other cycle superhighways had been built. Disabled people were consulted during the TRL work, but their concerns set aside. Disabled people were consulted again as part of a review of bus stop design. Transport for All responded. Again they were ignored. Since then the policy has been maintained.

Equality Impact Assessments have been undertaken by promoters and flushed out the same issues for older and disabled people. But in these, the impacts on disabled persons access needs are balanced off against the needs of other protected groups, such as women, that might cycle!

What does good public engagement in accessible transport planning look like in practice, and how can TfL improve its 'engagement culture'?

Policy needs to be informed by consultation with disabled people alongside other groups so that there is a joint understanding of each others issues. Sometimes this happens. In the case of bus stop bypasses the policy was decided in 2013 prior to any consultation with those most negatively affected.

Subsequent engagement with blind people continues to be ignored.

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July 2025

Ref No. AI028

London Assembly Transport Committee

Inquiry on Accessibility and Inclusion in Transport Planning

Submission by Tom Cohen PhD, Reader in Transport Policy, Active Travel Academy, University of Westminster

This brief submission largely tackles Question 3 and potential improvements to *Equity in Motion* (EiM) in particular.

To begin, EiM is hugely welcome. Every action set out in the document has at least the potential to improve the transport system from the perspective of equity; certain actions are very likely to make a significant positive impact. The following remarks need to be seen against this very positive appraisal of the document.

It is almost certainly too early to say how effective the EiM plan is. This will become clear over the coming months and years. At the moment, we are limited to assessing its potential as a plan. On that front, the *intention* behind EiM is laudable. In particular, the distinction between equality and equity is well made and very important. This distinction is easily missed, and much policy (in transport and other sectors) has been founded on the goal of achieving equality when it is not what is needed. That said, EiM does not maintain its focus on equity as consistently as it might. One crucial quotation illustrates this:

“In considering equity as we deliver these action plans, we can direct focus towards addressing the greatest inequalities, allocate existing funds where they will have the greatest impact, and identify areas requiring greater attention in future years” (EiM, p41).

The quotation is of critical importance because allocating existing funds where they will have the greatest impact is exactly what TfL should do, but the mention of the greatest inequalities is odd. There are some areas where inequality is definitely the issue: in road danger, example, we should be acting to reduce the gap between the danger faced by people in deprived communities and the rest of Londoners. But, as the image on Page 10 of EiM nicely demonstrates, we often miss the point if we try to give everyone the same thing. A term such as *equity gap*, though inelegant, would probably be more appropriate.

The emphasis on removing barriers is another laudable aspect of EiM and is of course central to delivering an accessible and inclusive system. And it is heartening to see reference to both the Equality Act’s protected characteristics and other important attributes such as wealth as factors that should inform decisions. But, whilst the removal of barriers is necessary to the achievement of an equitable transport system, it is less clear whether it is sufficient. That is, we can remove all the apparent obstacles to Muslim women cycling, say, and still see a relatively low level of adoption. On the one hand, Muslim women are no longer *prevented* from cycling but should not feel obliged to cycle if they do not wish to – the benefit lies in their having the option; on the other, they could be enjoying the wide range of benefits that derive from cycling. Which scenario do we consider more “equitable”?

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This leads to the main point about EiM: it does not set out a view of what an equitable transport system would look like. In other words, it does not provide its stakeholders with a means of judging the extent of progress. There is the 2030 target of a more equitable network but this could be achieved by improving the lot of one currently disadvantaged traveller.

The question of *what* an equitable system would look like is undeniably challenging; it also is understandable that TfL has not attempted to articulate this as to do so would make the organisation to some extent a hostage to fortune. But it only becomes possible to decide how best to spend money when there is a well-defined objective setting out both the *what* and the *when*. TfL is clearly aware of this issue and certain of the actions in the plan⁷¹ point to addressing some of them. But equity, whilst intuitive enough as a concept, is surprisingly difficult to define in transport terms. Do we expect those living in outer London to enjoy the same access to the public-transport network as in central London? And, if not, on what basis would we determine what a fair level of access is, reflecting the inevitably lower densities of service at the edge of London (Cohen, 2020)?

Associated with the lack of a working definition of equity is a sense of scale: *how much more* equitable do we expect the system to be by 2030? Judging the success of EiM depends on having an answer to this question.

To return to a point made earlier, every action in EiM has the potential to increase equity. What is not clear is whether these actions represent the best use of TfL's resources. This is something which will be refined as the plan evolves, enabling the action plan to be adjusted as understanding grows of which measures are delivering the greatest equity return on investment.

More detailed points

It seems fitting that much attention in EiM is directed at certain protected groups and to responding to their needs. It would be good in addition to see fuller acknowledgement that the users of certain modes on average face greater disadvantage – in particular, both those walking/wheeling and those using the bus are poorer and more ethnically diverse than users of other modes. Thus, improving conditions for walkers/wheelers and bus users is likely to be an equity win, whether or not a particular social group is being targeted in the process. So it is welcome that the action plan speaks of considering deprivation when as part of the signal timing review plan. But the wider justice point is that retiming *all* signals to give more green time to pedestrians is likely to deliver major equity benefits, whether those signals are in deprived areas or not (Cohen and Almarwani, 2022). (It is surprising, meanwhile, that the Walking Action Plan's signal retiming programme is not listed in EiM amongst the "beneficial actions from other plans".)

There is a variety of precision in the definitions of actions in EiM. This is to some extent unavoidable – opening a new lift at Surrey Quays is well defined and its equity impacts predictable; conducting a review or feasibility study may produce much that is valuable but this

⁷¹ For example, a new measurement framework is promised under *measuring our progress*; "develop our range of connectivity assessment techniques" appears under *closing gaps in connectivity*.

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will be known only when the work is well advanced. Having said that, there is much to be said for using SMART⁷² targets even where work is relatively speculative. This makes it easier to monitor progress from the perspective of process (as opposed to outcome).

References

Cohen, T. (2020). Tools for addressing transport inequality: A novel variant of accessibility measurement. *Journal of Transport Geography*, 88, 102863. Available from <https://doi.org/10.1016/j.jtrangeo.2020.102863>.

Cohen, T. and Almarwani, M. (2022). Addressing the unjust treatment of pedestrians at signalised intersections. *Transportation Research Procedia*, 60, 12–19. Available from <https://doi.org/10.1016/j.trpro.2021.12.003>.

⁷² Specific, Measurable, Attainable, Relevant and Time-bound. (Other formulations exist but they cover much the same ground.)

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Ref No. AI029

Email sent to Assembly Member Thomas Turrell, which was later submitted as evidence to this investigation.

Hi Tom - [personal information redacted for publication] told me about yesterday evening's interesting meeting & some of the plans you are developing re: 'accessible Beckenham'. I'm very interested and will be happy to help in any way.

This is the email trail between myself and Liam Conlon....

INITIAL REQUEST...

Dear Mr Conlon

As one of your constituents in Beckenham I'm hoping you will be able to offer assistance and advice on a transport related issue.

I have previously emailed TFL but did not receive a response.

I use an electric wheelchair and rely heavily on the bus network but find manoeuvring into the wheelchair space very difficult ...

[image redacted for publication] In this photo you'll see there are 2 poles to negotiate which involve several 3 point turns

- resulting in awkwardness

for other passengers and bus delay.

I feel that these poles could be replaced by 'overhanging straps'

for the safety of standing passengers

[image redacted for publication] In this photo you will see that the permanent pole has been replaced

by a 'lift up' side guard - AN EXCELLENT IDEA - which I've only seen once.

I appreciate that this is a small cog in the grand scheme of 'transport issues'

but these difficulties deter people from attempting to use the buses.

I hope that as PPS to the Louise Haigh (Transport Secretary) and with your campaigning interest in ***improving access to transport for disabled people*** you will be able to consider this heartfelt plea for support.

kind regards

[personal information redacted for publication]

Below is the response I received from Liam Conlon's caseworker.

On 24 Oct 2024, at 12:22, Liam Conlon MP wrote:

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Dear [personal information redacted for publication]

I hope you are well.

I'm just getting back in touch because TFL have now provided a response to our enquiry, which I am copying in below:

Dear Liam,

Thank you for your email regarding wheelchair accessibility on our buses.

We are committed to ensuring that all Londoners are able to travel safely and accessibly on our network, and we know that it is vital that our vehicles are designed inclusively. We always take on board feedback from our customers regarding accessibility, and I have passed on [personal information redacted for publication] comments to the relevant team.

From the first picture [personal information redacted for publication] has attached, we believe she was travelling on one of our New Routemaster buses. We have worked with our bus manufacturers to increase the space available for electric wheelchairs and mobility scooters on these vehicles from 1.3m to 1.6m in length, to enable wheelchair and mobility scooter users to manoeuvre more easily. The poles on these buses are strategically placed to offer wheelchair and mobility scooter users some protection when the bus is moving, and the poles are also load bearing. We have previously explored the idea of having hanging straps like [personal information redacted for publication] suggested, but we decided against them as they are not accessible to many people, including children, as they are unable to reach these.

The second vehicle [personal information redacted for publication] is pictured on, with the movable arm, is one of our oldest buses and only a few remain across the network. We moved away from this design as we were aware that not all wheelchair users knew to put the arm down which left them unprotected from any movements of the bus. There were also other safety concerns, including incidents of young children catching their fingers in the mechanism.

We regularly review our bus design and since 2016 our new buses have included a space of up to two metres for wheelchairs and mobility scooters. They also feature a revised handrail design that helps to cradle the wheelchair user without the need for a vertical handrail.

I hope this clarifies our reasoning regarding the design of our buses, and please don't hesitate to contact me if you have any further questions.

I hope that this response is of some use, and would like to thank you for taking the time to write to Liam.

Please do not hesitate to contact us again if you require further support on this or any other matter in future.

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

Kindest regards,

[personal information redacted for publication] Caseworker to Liam Conlon MP
Member of Parliament for Beckenham and Penge

LONDON ASSEMBLY

Accessibility and Inclusion in Transport Planning – written evidence

July 2025

Ref No. AI030

Email sent to Assembly Member Thomas Turrell, which was later submitted as evidence to this investigation.

Good Morning Thomas

It was nice to meet you again at the residents meeting on Monday evening.

I spoke to you about the inaccessibility of some of the local buses that serve Beckenham. Due to the internal layout of the smaller single deck buses nos. 352, 351, 162, 367, 289 and some of the smaller designed 194 and 227.

Travelling on tfl busses is a challenge, as an independent electric wheelchair user, too say the least. I have on occasions had to wait for the 5th or 6th bus as the wheelchair bay has been full of not wheelchairs. And bus drivers understandably don't want the confrontation of asking people to move

Away from bus transport, as I mentioned at the meeting I feel disabled people are being designed out of Beckenham with Bromley councils consent and also our local councillors blinkered views (as expressed by Councillor Harris regarding disabled toilets). I have done toilet walk around with [personal information redacted for publication] but as to the time of writing this email no improvements have been made I fact they have got worse with the loss of starbucks and their accessible toilet. Lack of toilet facilities means I no longer go out to meet friends in local independent cafes/restaurants and am becoming increasingly socially isolated with hospital visits now considered a day out!

I don't know if you can do anything about the buses or toilet situation. There are also the ongoing problems of pavement furniture, cafes/restaurants blocking pavements with tables and the illegal pavement parking.

I look forward to hearing from you and possibly working with you to improve the lives of the disabled and mobility impaired in Beckenham.

Kind regards

[personal information redacted for publication]