

London Chamber of Commerce and Industry's response to the London Assembly Transport Committee Investigation: *Accessible and Inclusive transport*

January 2020

INTRODUCTION

1. London Chamber of Commerce and Industry (LCCI) is the largest capital-focused business advocacy organisation representing the interests of small and medium-sized firms through to large, multi-national corporates. Our member companies operate within a wide range of sectors, including transport and logistics, education, manufacturing and retail, across all 32 London local authority areas and the City of London – genuinely reflecting the broad spectrum of London business opinion.
2. As the voice of London business, we seek to promote and enhance the interests of the capital's business community through representations to central government, the Mayor and London Assembly, Parliament and media, as well as international audiences. Through business surveys and commissioned research, LCCI seeks to inform and shape debate on key business issues.
3. LCCI continues to be a vocal campaigner across a broad range of issues that impact our members and the wider business community throughout the capital. For the past 140 years, LCCI has supported establishing: Heathrow and Gatwick airports, Canary Wharf's Docklands Light Railway (DLR), Crossrail, and London City Airport. More recently, LCCI has and continues to campaign for increased aviation capacity in the South East, East London river crossings and Crossrail 2.
4. The capital is expected to reach 'megacity' status by 2031/32 with a population of over ten million people¹. This rapid population growth will place London's infrastructure, particularly its transport system, under considerable pressure. It is critical that our transport network is able to accommodate the diverse needs of a growing population.
5. In order to service a truly diverse population and workforce, the capital's transport network must be capable of meeting the needs of all passengers by providing a fully accessible and inclusive system. Currently, only 29% of tube stations provide step-free access (78 out of 270 Underground stations)². It is clear that much more needs to be done to achieve a fully accessible Underground network. However, a genuinely inclusive system must deliver much more than step-free access.
6. The Mayor of London's Transport Strategy rightly recognises that the capital's transport system must accommodate "journeys made by people with a range of visible and invisible disabilities"³, including mental health conditions, long-term health conditions, impaired mobility and visual or hearing impairments.
7. Transport in London serves to do much more than move people and goods around. Efficient networks maintain economic growth, support jobs and unlock housing development. In short, it creates opportunities for people and businesses. It is therefore critical that the necessary plans

¹ ONS (2016) Subnational population projections for England: 2014 based projections

² Centre for London, Fair access: towards a transport system for everyone pp. 96

³ Mayor's Transport Strategy, March 2018, pp. 143

are put in place to ensure that this infrastructure is genuinely inclusive, enabling the whole of our capital's population to thrive.

What does an inclusive and accessible transport network mean to you?

8. For the full door-to-door journey experience to be fully accessible, London's transport network must be easy to use and understand. A single missing lift can prevent people with disabilities from interacting with the transport system or travelling. However, existing gaps can be partially filled by staff provision of support and guidance.
9. Journey planning is particularly important to achieving accessible transport. The provision of clear and thorough information upfront is vital to ensuring disabled people and other vulnerable individuals can plan in advance and build confidence in their ability to travel independently. Turn-up-and-go services, where customers do not have to pre-book assistance before arriving at a station, but can still access assistance from on-hand members of staff where necessary, are vital to providing a better passenger experience and encouraging people to travel on the TfL network.
10. TfL's turn-up-and-go service is available on the London Underground, the London Overground and TfL Rail, but not on the national rail network. This creates barriers for passengers transferring from TfL stations to stations under Network Rail's control. Keith Williams, independent Chair of the Rail Review, gave evidence to Parliament's Transport Select Committee⁴ in October 2019, highlighting a lack of standards for accessibility on the national rail network. A station with one accessible platform is deemed to be accessible overall even if passengers in wheelchairs can only access one platform in one direction of travel. This lack of consistency hides the true scale of the accessibility gap and excludes individuals with disabilities.
11. Passengers with hidden disabilities can find the places and processes involved in using the transport network particularly stressful and difficult, as they have different needs and experiences.
12. To ensure their journeys are as seamless as possible, TfL should look to adopt similar initiatives to those successfully implemented by London City Airport and Gatwick Airport. Gatwick Airport introduced the Hidden Disability Lanyard⁵, while London City Airport has rolled out the Sunflower Lanyard⁶. Both provide a discreet approach to advising staff of a hidden disability so that they can give the necessary assistance to passengers where necessary. Lanyards such as these are now being introduced in all other UK airports, in addition to being rolled out by other large companies, including supermarkets. This approach would enable staff on London's transport network to support an improved door-to-door experience for those with hidden disabilities.

Have you noticed any improvement over the past few years regarding accessibility and inclusion within London's transport network and streets? If so where? This could be either an area of London or a part of the network?

13. Steps have been taken to improve accessibility on the transport network, and awareness of accessibility challenges is growing. During a recent London Assembly Transport Committee session, Kirsty Hoyle, CEO, Transport for All, noted that provision of disability and equality training for TfL staff has achieved positive results, particularly by developing increased understanding of passengers' needs⁷.

⁴ House of Commons Transport Committee Session, Oral Evidence, The Williams Review, Monday 28 October 2019

⁵ <https://www.gatwickairport.com/at-the-airport/passenger-services/special-assistance/hidden-disabilities/>

⁶ <https://www.londoncityairport.com/request-special-assistance/other-special-assistance>

⁷ London Assembly Transport Committee session, 8 January 2020

14. TfL, through its Temporary Traffic Management handbook⁸, sets out good practice for those involved with roadworks and other construction related activities, to help maintain safe walking routes, particularly for wheelchair users and other vulnerable groups. The Healthy Streets⁹ approach to street design is also encouraging and has broad societal benefits.
15. The introduction of a Changing Places facility at London Victoria¹⁰, introduced as part of the station's toilet refurbishment, is a positive step towards improving infrastructure provision for disabled individuals.
16. 'Please offer me a seat' badges are a welcome step to ensuring passengers who struggle to stand while using public transport, including people with disabilities and invisible impairments, are able to travel more comfortably.

What do you see as the main barriers keeping people from using the transport network and streets comfortably and confidently?

17. Multiple barriers prohibit people from using the capital's public transport, many of which work together to prevent and discourage disabled and vulnerable individuals from travelling on the transport network. These barriers can differ based on individuals' disabilities or how they identify.
18. Physical barriers include variation in kerb heights and unlevel surfaces, trip hazards, and pavement parking, which restrict movement for people using wheelchairs or prams and present hazards for the visually impaired. Psychological and emotional barriers must also be taken into consideration, including a lack of confidence in one's ability to make journeys independently, and fear of injury or harassment.
19. Insufficient staffing and poor staff training pose significant barriers. This can be overcome with improved training, as carried out by Gatwick Airport, which has provided staff with Dementia Friends training¹¹ to support this group of vulnerable passengers.
20. Safety and policing on the transport network are critical, particularly in light of recently publicised homophobic incidents. The British Transport Police (BTP) recently released figures revealing an increase in the number of recorded crimes they deal with on public transport. These affects all travellers, but particularly impact more vulnerable groups like the disabled, ethnic minorities, the LGBTQ community, and women, with the BTP reporting a 32% increase in the number of lifesaving interventions during the course of 2018/19¹².
21. With many companies and public services operating 24 hours per day, as well as in view of the need to sustain London's night time economy, provision of sufficient safety and security on the transport system at night is critical to enabling all passengers and staff to confidently use and work on the network, without experiencing or fearing harm.

⁸ <https://tfl.gov.uk/info-for/suppliers-and-contractors/traffic-management>

⁹ Healthy Streets for London: Prioritising walking, cycling and public transport to create a healthy city <http://content.tfl.gov.uk/healthy-streets-for-london.pdf> pp. 7

¹⁰ Ian Hanson, Network Rail's stations director - <https://www.accessandmobilityprofessional.com/network-rail-makes-closomat-installation-at-london-victoria-to-ensure-accessibility/>

¹¹ <https://www.gatwickairport.com/at-the-airport/passenger-services/special-assistance/hidden-disabilities/>

¹² <https://media.btp.police.uk/r/16745/british-transport-police-releases-annual-crime-st>

Where are these barriers? Are different parts of the network better than others?

22. Design of places and spaces create further physical barriers to accessing London's transport system. For visually impaired passengers, use of buses poses particular challenges due to their various makes and models. Buses on the same route can have very differing internal layouts. Consistency would support visually impaired people to travel with greater confidence, helping them to step onto the vehicle, move around it, find a seat, and disembark with greater ease.
23. Real-time information provided on London's transport network is often poor. For example, while noticeboards are available at stations and bus stops, there are significant gaps in audible announcements. As a result, passengers with visual impairments often have had to rely on members of the public for information¹³. Therefore, bus stops should be retrofitted with audible announcement facilities to enable these passengers to travel more confidently.

What are the main impact of these barriers?

24. Barriers to travelling by public transport encourage the use of private cars and taxis. People are therefore discouraged from using more sustainable modes of transport and are inclined to use those that are worse for the environment, air quality and congestion.
25. Inability to travel increases social exclusion and isolation, particularly for those on lower incomes who cannot afford taxi fares and private vehicles. The Mayor's Transport Strategy states that "currently 45% of disabled Londoners find planning and making trips by public transport stressful, sometimes having to rely on staff assistance to board and alight trains, as well as often having fewer alternative options should services be delayed or disrupted"¹⁴. This poses barriers to accessing work opportunities, social interaction and leisure activities, and the other opportunities the capital offers. Tackling these barriers is critical to boosting London's social cohesion and inclusion.

What are your top priorities for the transport network and streets?

26. Holistic planning aimed at improving consistency both across TfL's network and services, and stations under Network Rail's control, will be critical to encouraging passengers with disabilities to use London's transport system. As part of this, delivering significant improvements to step-free access should be a priority area of focus for London's transport system, as well as boosting TfL staff training and awareness to address existing accessibility gaps and provide passengers with the support they need.
27. The overall connectivity of the capital is equally critical. To further boost accessibility and inclusion, particularly within areas that rank relatively high on the Index of Multiple Deprivation (Lewisham & Southwark)¹⁵, delivering the Bakerloo line extension (BLE) will significantly improve their connections to rest of the capital, enabling communities in these areas to better access opportunities across London.
28. The National Infrastructure Commission identified insufficient orbital links, particularly in east London, "where limited river crossings by road are a major barrier to growth", as a key challenge

¹³ Centre for London, Fair access: towards a transport system for everyone pp. 55

<https://www.centreforlondon.org/wp-content/uploads/2019/12/Fair-Access.pdf>

¹⁴ <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf> pp. 143

¹⁵ Lewisham <http://www.lewishamsna.org.uk/health-inequalities/index-of-multiple-deprivation> & Southwark <http://modern.gov.southwark.gov.uk/documents/s85676/Document%20Indices%20of%20Deprivation%202019%20-%20JSNA%20Factsheet.pdf>

for London's transport infrastructure¹⁶. LCCI welcomes progress towards delivering the Silvertown Tunnel. However, connections in the east of London will need significant improvements to boost accessibility for its communities and open up links to opportunities across London's economy.

29. Boosting capacity on the network will also address overcrowding and congestion, which both dissuade and prevent passengers with disabilities from travelling. Delivering on TfL's existing line upgrades and improvements programme, as well as other key infrastructure priorities, namely Crossrail 2, will be critical to improving capacity and therefore passenger journey experiences.

Conclusion

30. With an ever-growing population, transport has a vital role to play in ensuring London is a truly inclusive and accessible capital. TfL has implemented many schemes, including the turn-up-and-go system, increasing the number of step-free stations, and providing staff disability and equality training, which have contributed towards improved accessibility and connectivity. However, much more needs to be done to make London a truly accessible and inclusive city for its population and workforce.
31. This consultation response has identified a number of steps that can be taken to boost inclusivity and accessibility on London's transport network, including addressing physical barriers, boosting staffing, training and security, improving the provision of information, initiatives to support people with hidden disabilities, and improving consistency across the transport system.
32. To truly uphold TfL's statement that "every journey matters", steps must be taken to address the barriers that prevent passengers with disabilities and other vulnerable individuals from using London's transport system, both to ensure all Londoners and visitors are able to travel comfortably and confidently, and to encourage the use of more sustainable modes of transport.
33. Furthermore, boosting the capacity of London's transport will be equally vital to tackling the overcrowding and congestion that prevents many passengers from travelling confidently and comfortably on public transport.

LCCI would be happy to clarify or provide further comment on any matter raised within this response.

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¹⁶ National Infrastructure Commission, Transport for a world city, pp. 8