

Consultation Response Transport Strategy Draft of the Royal Borough of Greenwich

Organisation: Culture Access CIC, a disabled people's organisation based in the Royal Borough of Greenwich, managed and led by disabled people with a strong focus on accessibility and inclusion, signed up to the Royal Greenwich Equality and Equity Charter.

Email: [Hello@cultureaccess.co.uk/](mailto:Hello@cultureaccess.co.uk)

eleanor@cultureaccess.co.uk

Address: 50 Kilby Court, Greenroof Way, London, SE10 0PY

1. Culture Access welcomes the development of a transport strategy for the Royal Borough of Greenwich (RBG). We strongly believe that transport plays a vital role in equality for all residents. Transport is essential to access health care, employment and all other areas of life. Residents need accessible transport to be able to participate fully. There will be no equality without an accessible transport system for all.
2. Therefore, accessibility and inclusion must be engrained in all projects and decision-making processes from the beginning, not only "considered as a standard" as the transport policy draft mentions under "Policy 1a".
3. Equality impact assessments must be part of every stage of the development and decision-making process. That is not only the case when drafting this Transport Strategy but is even more important for projects and decisions regarding transport. Some Equality Impact Assessments we have seen in the past were not fit for purpose; some didn't mention disabled people and the impact a project would have on this group. It's also essential that every Equality Impact Assessment covers the nine protected characteristics of the Equality Act and doesn't only mention "Equalities" in general. We strongly recommend rewording section 9.8 of the Transport Strategy draft to clarify

what Equality Impact Assessments are for. They are not a box-ticking exercise but an essential tool in guiding transport projects and decisions.

4. The Public Sector Equality duty is not mentioned in the Transport Strategy draft. We think the pro-active approach to eliminate discrimination and support equality based on the Public Sector Equality Duty is essential in the draft.
5. We welcome that you want to engage with disabled people (Policy 1A). This is not only needed for this strategy but when developing transport projects in general. This must be a proactive approach in support of the Public Sector Equality duty. The engagement has to happen in an accessible way, acknowledging and respecting the lived experience of disabled people in the community. It must be an engagement of people with different impairments and with an intersectional approach.
6. In section 4.7, you write that you want to increase the level of journeys by active means to support a healthier lifestyle, including for disabled people. We know that disabled people want to participate in Active Travel, too; it is, first and foremost, a matter of equality. All modes of transport should be as accessible as possible for everyone. The Transport Strategy draft mentions conditions disabled people are affected by that you want to eliminate with this strategy. The way this paragraph is worded is not very inclusive, if not even ableist. We would appreciate the use of a more inclusive approach in this document, not written from a healthy, non-disabled, privileged perspective but from an inclusive perspective that doesn't call out people for their health status but gives the impression that the goal is to remove the barriers for them to participate. Otherwise, you will exclude people before the strategy even comes to life.
7. Under Policy 1A, you mention you want to create new design guidelines for the RBG. There are specific design standards in place which are best practices for years. It would be essential to get them enforced in planning permissions. Designers should respect these standards available already. We don't see a need to develop a standard for Greenwich but to use what has been national best practice for years.

8. Buses are a lifeline for many disabled people because many railway stations in the RBG are inaccessible or only partly staffed or not. The RBG is the only borough with access to two stations of the Elizabeth Line, the most accessible line in London. Unfortunately, as mentioned in paragraph 3.34, the North-South bus connections in the borough are poor. So people struggle to reach these accessible assets from the South of the borough. It would be essential to improve the connectivity to the Elizabeth Line from the South of the borough, e.g. with express buses. Changing buses or very long bus journeys will not encourage people to use public transport and make the Elizabeth Line currently unreachable if residents in the South don't have a car.

9. In policy 1b, the transport strategy draft mentions "high quality, pedestrian-friendly pavements". We support this goal, but it can only be achieved with strict parking enforcement, which is currently lacking. Illegal pavement parking is a massive barrier for disabled people; it is a Health & Safety issue and caused accidents with pedestrians in the past. Part of the Transport Strategy should be an enforcement strategy that tackles pavement parking and parking on Blue Badge spaces without a Blue Badge or misuse of Blue Badges.

10. Even with the best public transport, some disabled people will need to use a car to participate and to be able to leave the house. Therefore, Blue Badge parking and parking regulations, in general, are important for them. The new Transport Strategy is a chance to look into rules and regulations for Blue Badge parking in the RBG and how this topic is managed by the borough.