

Department of the Built Environment

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Director of the Built Environment

To: Mr Peter Bradley

Head of Consultation Delivery
Transport for London

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Our ref KK/ABSDG2014
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Dear Mr Bradley

RE: Accessible bus stop design guidance

Thank you for giving the City of London Corporation the opportunity to comment on the proposed Accessible Bus Stop Design Guidance. We support the need for this guidance in order to provide consistent bus stop facilities throughout London.

There are often competing demands in the City of London, in particular between pedestrians, local occupiers and other road users. As a result, designs for bus stop layouts must take this into consideration, to cater for all road users and their needs within the often limited space available.

Please find attached with this letter, our comments to the draft guidance document. If you require any further information or clarification, please do not hesitate to contact my colleague [REDACTED], or [REDACTED] cityoflondon.gov.uk.

Yours sincerely,

[REDACTED]

[REDACTED]

Transportation & Public Realm Director
Department of the Built Environment

Specific comments	
Chapter	Comment
1	<p>Agreement that removing obstacles around bus stops as footway clearance is a criteria required for footway accessibility at bus stops. This would include the removal of signage nodes, visual barriers and street furniture to ensure vision is not restricted. This is important for all users but particularly people of a reduced height and wheelchair users. Agreement of Bus Stop Accessibility in terms of kerb heights and access free from impediments. Agree that planners and engineers need to optimise the location, design and consultation of bus stops.</p>
2	<p>City of London welcomes the use of powered ramps on all buses with suspension being an automatic function rather than provided at the request of the passenger. Agreement that buses should be capable of deploying a ramp, giving a 1:8 or 12% gradient onto a kerb range of 100-140mm in height. A ramp height above 140mm would be insufficient as it would provide a steep gradient making access onto/off the bus difficult. It is important to maintain the previous target benchmark of the bus stopping within 200mm of the kerb.</p>
3	<p>Agreement that accessibility should be considered in terms of the whole journey. In terms of location, it is important that the driver and prospective passengers are visible to each other. This is particularly important regarding visually impaired people and wheelchair users. Location of bus stops should be sought where there is adequate footway width and in an area that is not obstructed by visual barriers.</p>
4	<p>Agreement that the waiting area layout at the bus stops must consider the footway width to ensure sufficient space is provided for wheelchair users to complete a 360° turn in a space with a minimum of 1500mm x 1500mm as stated in the DfT's Inclusive Mobility Guidelines. Agree with the reference to minimum footway width in existing locations and new developments to provide sufficient space if a visually impaired person with a guide dog or cane needs to pass other waiting passengers. Where possible, wider footways should be considered in busy areas to segregate regular pedestrian flow from passengers waiting at bus stops. It is important to regulate this in the City of London where possible due to high pedestrian footfall.</p> <p>Agreement with Figure 8: Boarding and alighting zones. Agreement with details within bus passenger shelters whilst also ensuring sufficient lighting, seating (perched is suitable) and a visual countdown timer which is not only suitable for all people with a disability but particularly people with a hearing impairment. Consider including audible messages in the countdown bus passenger information for people with a visual impairment. Agreement with Figure 9 and Figure 10 regarding footway widths. At locations where high pedestrian flows are present, it may be appropriate to omit shelters to maximise and make better use of the space available.</p> <p>Sufficient and well maintained drainage is important for all users but particularly wheelchair users. Guidelines on ponding on the footways and at the carriageway kerbside must be adhered to.</p>
5	<p>In locations where there are strong competing demands for kerbside space, cage lengths below 25m may be necessary. Although there is no reference to the colour of bus stop lining and marking, it is important to consider the different requirements of each borough if a consistent approach is taken across London.</p>

6	Agreement with content on bus stop layouts.
7	<p>Agreement that the full width boarder (Figure 15) offers the best solution for buses and passenger access, ensuring footway width is maintained and additional space for bus passengers away from the adjacent pedestrian flow. However, the impact on streetscape needs to be taken into account. Figure 16: Alternative full width provides a visual barrier for wheelchair users and people of a reduced height to see the approaching bus due to insufficient length and adjacent parking bays causing a visual obstruction. Consider removing the first parking / loading bay on the approach to the bus stop for all bus boarders, particularly Figure 16 to avoid visual barriers. The impact on parking should be assessed at each location to ensure this is feasible.</p>
8	<p>Expand 1st paragraph to include “Bus bays (or lay-bys) present inherent operational problems for buses and they should not be used unless there are compelling safety, capacity or site constraints”.</p>
9	<p>Agreement with kerb heights and carriageway crossfalls to avoid drainage issues if kerb heights are raised. The consequences of footway levels and falls for surface water drainage must be considered if kerb heights need to be changed. Concern that if kerb height is too high and requires lowering to make accessible and meet the guidelines, issues with the presence of utilities under the surface could occur and also require lowering.</p> <p>Will a standard specification be provided by TfL for this work?</p> <p>Will TfL be providing the City of London with this funding so we can implement the raised bus stops utilising our term contractors? If so, would the funding be financial year dependent?</p> <p>The City of London would expect high end materials (granite kerbs, Yorkstone corduroy and Yorkstone paving) to be used for this work. Therefore, it should be noted that raised bus stops will cost more to deliver in the City of London than other local authorities.</p>
10	<p>Agreement of details provided about shared surfaces. Bus stop design needs to cater for different disabilities and users and therefore, each location should be thoroughly assessed to ensure measures are put in place for all user groups.</p>
11	<p>Agreement that when off-carriageway cycling is provided for, off-carriageway cycling facilities need to be designed to minimise conflict with pedestrians and maintain accessibility for all bus passengers. Agreement that the design considerations outlined should be included where possible for all off-carriageway facilities with particular attention towards safety for vulnerable bus passengers; crossing facilities; width of pavement, pedestrian flows and frontage uses; retaining bus shelter facilities; bus ramp options on the island and access; lighting; intervisibility; kerb height and drainage to cater for people with a disability. Cyclist – pedestrian conflict is a particular concern for people with a disability and should be factored into all designs for segregated cycle facilities.</p> <p>The revised London Cycling Design Standards has recently been consulted. It would therefore be appropriate to reference this document.</p>

General Comments	
Ref	Comment
1	Consider consistency in design which is a key consideration for visually impaired people.
2	Many references are made to the TSRGD 2002, however these regulations are expected to be updated in 2015. It may be beneficial to defer this guidance document until the TSRGD has been updated. Any revision to the regulations can therefore be incorporated, otherwise the guidance may soon be out of date.