**Purpose of document**

Transport for London (TfL) has a legal duty to eliminate unlawful discrimination, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not (section 149 of the Equality Act 2010).

Due regard is given to all London bus users through the process of planning bus services. This EqIA demonstrates the consideration given to each of the protected characteristics, as defined by the Equality Act 2010, throughout this process.

### 1. SUMMARY OF PROPOSAL AND RATIONALE

<table>
<thead>
<tr>
<th>Service</th>
<th>Current peak service</th>
<th>Proposed changes</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>186</td>
<td>5 buses per hour Northwick Park Hospital, St Mark’s Unit to Brent Cross Shopping Centre, Bus Station. Approximately 17,000 passenger trips per day.</td>
<td>Withdraw route between Harrow Bus Station and Northwick Park Hospital. Route will terminate at Harrow Bus Station.</td>
<td>Reduce excess capacity between Harrow Bus Station and Northwick Park Hospital. Reduce bus movements along College Road in Harrow, leading to reduced emissions and an improved town centre environment.</td>
</tr>
<tr>
<td>H9/H10</td>
<td>6 buses per hour Circular route starting/finishing at Harrow Bus Station. H9 – anticlockwise H10 - clockwise Approximately 13,500 passenger trips per day.</td>
<td>Move the terminus of both circular routes to Northwick Park Hospital, Maternity Unit (instead of Harrow Bus Station)</td>
<td>Provide new direct links to Northwick Park Hospital from South Harrow, Rayners Lane and other areas to the south west of Harrow town centre. Reduce bus movements in and around Harrow Bus Station, leading to reduced emissions and an improved town centre environment. Improve operational resilience of Harrow Bus Station.</td>
</tr>
<tr>
<td>H9/H10</td>
<td>6 buses per hour Circular route starting/finishing at Harrow Bus Station. H9 – anticlockwise H10 - clockwise Approximately 13,500 passenger trips per day.</td>
<td>Withdraw route from Northwick Avenue and Rushout Avenue, no longer serving the bus stop at Northwick Park Underground station. Service would run directly along Kenton Road.</td>
<td>Reduce bus movements along the small residential streets of Northwick Avenue and Rushout Avenue following numerous complaints from local residents, local councillors and an Assembly Member.</td>
</tr>
<tr>
<td>H14</td>
<td>7 buses per hour Hatch End, St Thomas Drive to Northwick Park Hospital, Maternity Unit Approximately 5,500 passenger trips per day.</td>
<td>Extend from Northwick Park Hospital, Maternity Unit to St Mark’s Unit, following the existing 186 route alignment, via the A&amp;E unit.</td>
<td>Increase frequency of bus services to stops at the rear of the hospital complex (from 5 to 7 buses per hour). Create new links from Hatch End and Headstone Drive to the rear of Northwick Park Hospital complex.</td>
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</tbody>
</table>
2. DETAILS OF CHANGES

Map 1: Proposed changes to bus route 186.

Map 2: Proposed changes to bus route H9/H10 at Northwick Park Hospital.
Map 3: Proposed changes to route H9/H10 at Northwick Avenue and Rushout Avenue.

Map 4: Proposed changes to bus route H14.
The following table summarises the main elements of the proposal that may impact on equalities groups and are therefore considered in this review:

<table>
<thead>
<tr>
<th>Ref</th>
<th>Change</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>186</td>
<td><strong>Removal of route section, Harrow Bus Station to Northwick Park Hospital</strong></td>
<td>This section of service 186’s current alignment (shown as the hashed box in Map 1 above) would be removed under the proposed changes. Route 186 would terminate at Harrow Bus Station and would no longer serve stops between Harrow Bus Station and Northwick Park Hospital.</td>
</tr>
<tr>
<td>H9/H10</td>
<td><strong>Relocate the terminus to Northwick Park Hospital, Maternity Unit, instead of Harrow Bus Station.</strong></td>
<td>Relocating the terminus of circular route H9/H10 to Northwick Park Hospital (green arrow in Map 2 above) would create new direct links to/from the hospital from areas in South Harrow and Rayners Lane (green dotted line in Map 2 above), but would break some direct connections to Harrow town centre (yellow dotted line in Map 2).</td>
</tr>
<tr>
<td>H9/H10</td>
<td><strong>Removal of route section, Northwick Avenue and Rushout Avenue</strong></td>
<td>This section of service H9/H10’s current alignment (highlighted in Map 3 above) would be removed under the proposed changes. Route H9/H10 would instead run directly along Kenton Avenue in both directions.</td>
</tr>
<tr>
<td>H14</td>
<td><strong>Extend bus service from Northwick Park Hospital, Maternity Unit to St Mark’s Unit.</strong></td>
<td>Extending the service of route H14 to St Mark’s Hospital Unit (red dotted ling in Map 4 above) would create new links to stops at the rear of the hospital complex from all existing stops along route H14 north of Harrow town centre.</td>
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3. IMPACT ASSESSMENT (see Appendix for further information)

**Route 186: Removal of route section, Harrow Bus Station to Northwick Park Hospital**
- Removing the 186 service between Harrow Bus Station and Northwick Park Hospital would reduce some of the excess bus capacity that currently exists between these locations.
- Around 400 passengers per weekday who currently have a direct link would need to interchange once as a result of this change. (Around 35 of these could still complete their journey on one bus service but with an additional 140 metre walk to an alternative bus stop.)
- The most logical place to complete the bus interchange would be Harrow Bus Station, which is a well used bus station providing a covered, well lit waiting area, with seats, information, public toilets and shops selling refreshments.

<table>
<thead>
<tr>
<th>Gender</th>
<th>Identity</th>
<th>Marriage, Civil P’ship</th>
<th>Ethnicity</th>
<th>Disability</th>
<th>Age</th>
<th>Religion, Belief</th>
<th>Sex</th>
<th>Pregnancy, Maternity</th>
</tr>
</thead>
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<tr>
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</tbody>
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**Interchange Assessment** – potential adverse impact on equalities groups

**Waiting Time** – potential adverse impact on equalities groups

**Route H9/H10: Relocation of terminus to Northwick Park Hospital, Maternity Unit**
- Relocating the terminus would create new direct links to Northwick Park Hospital, from South Harrow and Rayners Lane. This change is estimated to generate around 180 new trips per weekday, in addition to those passengers who already complete this journey by interchanging at Harrow Bus Station.
- Around 85 passengers per weekday who currently have a direct link to Harrow town centre would need to interchange once as a result of this change.
- The interchange can be completed at the Kenton Station stops on Kenton Road (same stop interchange). Onward connection to Harrow town centre is provided by bus routes 114, 183 and 223, with a combined service level of a bus every 3-4 minutes. The Kenton Station bus stops have shelters and seating.
Route H9/H10: Removal of route section, Northwick Avenue and Rushout Avenue

- Removing the H9/H10 service from Northwick Avenue and Rushout Avenue would reduce some of the excess bus capacity that currently exists on these residential streets.
- Around 500 passengers per weekday would lose their direct link to Northwick Park Station.
- These passengers would have an additional walk of around 350 metres to/from stops on Kenton Road. Controlled pedestrian crossings are in place on Kenton Road next to both pairs of alternative bus stops. Alternatively passengers could interchange with the H18/19 (a bus every 20 minutes) at shared stops on Kenton Road with shelters & seating.

Walking distance – potential adverse impact on equalities groups

Interchange Assessment – potential adverse impact on equalities groups

H14: Extension between Northwick Park Hospital, Maternity Unit and St Mark's Hospital Unit

Due to this being a service extension, there will be no adverse impacts on bus users.

Positive impacts on equalities groups

- New direct links between bus stops at the rear of the hospital grounds and all stops north of Harrow town centre on route H14.
- Increased service frequency for around 250 passengers per day between Harrow town centre and stops at the rear of the hospital (inc. A&E department and St Mark's Hospital).
4. MITIGATIONS & OTHER OPTIONS CONSIDERED

- What else was considered and not taken forward?
  The option for route 186 to continue serving the Maternity Unit at the front of the hospital grounds, with the H14 extended to St Mark's Hospital, was considered. However this would not reduce the excess capacity between Harrow Bus Station and Northwick Park Hospital, or reduce bus movements on Harrow town centre.
  In 2018, a review of the network in and around Harrow town centre was completed during which various options to change service levels and restructure routes were considered.

- Information about bus services will be made available at all fixed bus stops.

- Where passengers will need to access the bus network via alternative routes, with interchanges required to replicate their previously direct services, the Hopper fare will mean that there is no financial penalty.

5. CONSULTATION FEEDBACK (to be reviewed after public consultation)

<table>
<thead>
<tr>
<th>Comments</th>
<th>Response/Action</th>
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<tbody>
<tr>
<td>To be updated following consultation</td>
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</tbody>
</table>
According to the 2011 census data, the local demographics for Harrow are:

- **Ethnicity composition:**
  - White - 42% (National Average 86%)
  - BAME - 58% (National Average 14%)

- **Disability composition:**
  - Day to day activities not limited - 85.4% (National Average 82.1%)
  - Day to day activities limited a little - 7.8% (National Average 9.4%)
  - Day to day activities limited a lot - 6.8% (National Average 8.5%)

- **Age composition:**
  - 0-17 - 23% (National Average 21.3%)
  - 18-24 - 8.9% (National Average 9.4%)
  - 25-44 - 30.4% (National Average 27.4%)
  - 45-64 - 23.6% (National Average 25.4%)
  - 65+ - 14.1% (National Average 16.4%)

According to the 2011 census data, the local demographics for Brent are:

- **Ethnicity composition:**
  - White - 36% (National Average 86%)
  - BAME - 64% (National Average 14%)

- **Disability composition:**
  - Day to day activities not limited - 85.5% (National Average 82.1%)
  - Day to day activities limited a little - 7.5% (National Average 9.4%)
  - Day to day activities limited a lot - 7.0% (National Average 8.5%)

- **Age composition:**
  - 0-17 - 22.6% (National Average 21.3%)
  - 18-24 - 10.1% (National Average 9.4%)
  - 25-44 - 35.6% (National Average 27.4%)
  - 45-64 - 21.1% (National Average 25.4%)
  - 65+ - 10.6% (National Average 16.4%)

In section 3, each of the detailed changes listed in section 2 were addressed and consideration given to their potential adverse impacts on the following protected characteristics defined by the Equality Act 2010:

- Gender Identity
- Marriage, Civil Partnership
- Ethnicity
- Disability
- Age
- Religion, Belief
- Sex
- Pregnancy, Maternity

Due to the nature of the proposals, the review focused on evaluating the potential adverse impacts on walking distances, waiting times and interchange using the following keys:

**Walking Distances**

Lengthening walking distances may adversely impact on equalities groups with mobility impairments, greater concerns around safety or security, or where there is a particular demand attractor (key destination) affected.

- **Low potential adverse impact:** Any service access requirement is at the same stop or less than 200 metres away.
- **Medium potential adverse impact:** If the service access is between 200-400 metres away.
- **High potential adverse impact:** If a service access point is greater than 400 metres away, or any distance that requires a road crossing without formal crossing infrastructure.
### Waiting Times

Longer waiting time may adversely impact on equalities groups with greater concerns around safety or security.

- **Low potential adverse impact**: Any service reduction that would mean average wait times increase by up to 25%
- **Medium potential adverse impact**: Any service reduction that would mean average wait times increase by up to 50%
- **High potential adverse impact**: Any service reduction that would mean average wait times increase by up over 50%

### Interchange assessment

Increased interchange may adversely impact on equalities groups with mobility impairments, greater concerns around safety or security, or where there is a particular demand attractor (key destination) affected.

- **Low potential adverse impact**: Any interchange requirement is at the same stop or less than 200m
- **Medium potential adverse impact**: Any interchange requirement that is between 200m and 400m
- **High potential adverse impact**: Any interchange requirement is greater than 400m, or any distance that requires a road crossing without formal crossing infrastructure.