

# ▶ Central London Bus Consultation

## ▶ London Councils response

London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.

### Introduction

We welcome that TfL is reviewing the bus network in central London, as we know that the provision of bus services is a transport matter that boroughs are concerned about. As one of the more agile forms of fleet vehicle, bus networks can change and adapt as communities do, unlike rail, tube and trams which are fixed. We note that there will be further consultations on the future of Oxford Street.

We do however have a series of concerns about the approach TfL has taken to its review, which we outline in this response.

### Lack of strategic approach

We note that the principle driving these changes has been a desire by the Mayor of London to transform Oxford Street and reduce the numbers of buses using this route. We note that TfL was already considering the impact that the opening of the Elizabeth line would have in 2018/19, which we welcome; and that bus patronage is generally falling in central London.

We are disappointed that wider factors have not been taken into consideration, and as such we feel the ambition has not been high enough. For example, a major reason for reducing the numbers of buses using Oxford Street is due to poor air quality, but only once is 'air quality' mentioned in the West End Bus Review document<sup>1</sup> and at no point does the review consider the impact on air quality of changes to routes or changes to termini, which is disappointing; and nor is consideration given to bus routes serving the Clean Bus Zones. Regardless of the introduction of the ULEZ and the general improvement to TfL's bus fleet through retrofitting and the purchasing of a cleaner bus fleet, we feel that air quality impacts should have been part of the review process.

We also feel that opportunities to promote greater cycling and walking have been missed. There are references to 'broken links' (which we consider would have been better described as 'broken journeys') but only in a handful of places are references made to people being able to continue their journey on foot. We feel these have been

<sup>1</sup> Paragraph 1.1.4, West End Bus Services Review, TfL, [https://consultations.tfl.gov.uk/buses/west-end-bus-changes/user\\_uploads/west-end-services-review-november-2016.pdf](https://consultations.tfl.gov.uk/buses/west-end-bus-changes/user_uploads/west-end-services-review-november-2016.pdf)

portrayed as reducing inconvenience, rather than a positive encouragement to design a bus service that encourages walking. We also seek commitment from TfL that where it has identified buses 'stopping short' of previously termini, it will introduce clearly signed walking routes where this is clearly the expected behaviour (for example from Marble Arch to the middle of Oxford Street, a distance of 0.8 miles taking an indicative 16 minutes). In addition, no stated consideration has been given as to whether there is adequate provision of walking infrastructure in these places (for example wide enough pavements, or that pavements are not already full in peak hours).

In addition TfL could have used its review to give greater consideration to buses serving the Opportunity Areas and Intensification Areas in London. Instead, only one route proposal, route 23, will be changed to serve Wembley Stadium to support the regeneration in that Opportunity Area; and one additional service, route 425 will now Ilford. We feel that TfL could have been far more strategic in its approach, rather than narrowly focusing on Oxford Street changes. As a stakeholder, London Councils has continually called for TfL to be more holistic and this was a good opportunity to do so.

## The outcomes of the review

Using the maps provided as part of the review, we note the following outcomes for the key stops in and around Oxford Street.

	Now (November 2016)	Proposed (for 2017)	Percentage reduction in buses
Marble Arch (bus stop)	16	15	6.25%
Bond Street (bus stop)	13	8	38.46%
Oxford Circus (bus stop)	15	12	20%
Tottenham Court Road (bus stop)	10	10	0%
Oxford Street (road)	13	8	38.46%

Whilst we acknowledge the reduction of buses running along Oxford Street itself is close to the stated 40 per cent reduction, we are concerned that the wider benefits are minimal. We doubt that this represents a significant improvement of the pedestrian experience in the whole of Oxford Street, and have concerns about the displacement of air pollution to different areas. No mention of this is given in the consultation documentation.

## Introduction of the changes

We seek further clarification from TfL on when it plans to introduce the changes to the bus network. The maps provided as part of the consultation are labelled 2017 network; whilst other parts of the consultation documentation suggest phasing. The Elizabeth line has a phased opening with most of the line opening in December 2018 but the whole of the line not fully operational until December 2019. We would therefore be extremely concerned about changes that would be introduced in advance of this. Discussion with TfL officers indicates that infrastructure requirements, including driver facilities, are what will determine when the changes

happen. Whilst we acknowledge the importance of this, we seek strong assurances that there will not be a detrimental bus provision for passengers prior to the opening of the Elizabeth line.

We are also concerned by TfL's assumption that it is acceptable for people to be required to change buses, as there is no longer a financial penalty due to the Hopper fare. We acknowledge this is the case, but only within a single hour and at present only on two journeys. We note both the plans to extend this to unlimited journeys within one hour from 2018 and that a bus daily cap exists, which is £4.50. The research we commissioned with Trust for London and London TravelWatch on the affordability of travel means we know that bus journeys are often used instead of train or tube journeys because they are cheaper. We believe that there may already be people who undertake two bus journeys, one from home into central London, and another within central or inner London. Breaking this second journey may lead people to incur a financial penalty, as the third journey may take place after an hour of the first journey. We do not consider the daily cap of £4.50 to be adequate when a person travelling both ways could previously have achieved two journeys for £1.50 but may now have to pay £3 for three bus journeys. If the same is true of their return journey, whilst they will cap out at £4.50 each day, they could have paid £3 in total. We have examined some of the longer-distance routes TfL has included in its consultation, and note that journey times are already approaching one hour on some of these services, before consideration of early termination is taken into account.

TfL also assumes that price is the only inconvenience for passengers. Alighting from one bus to stand in the pouring rain or freezing cold is not given any consideration; and we ask that TfL gives consideration to its provision of bus shelters and whether changing buses will require a walk to a nearby bus stop. We welcome information from TfL officers that where possible, onward journeys will be from the same bus stop where this is practical. We feel this should have been referenced in the consultation.

We also note there is no discussion of a trial period, or any review once the changes have been introduced. We want to see TfL give consideration to how it will review the success or otherwise of the changes, particularly on routes where significant changes are taking place, for example routes 13 and 23. TfL must also provide effective messaging so that people understand what is changing, and when.

## Justification for the changes

We note that some of the proposals create new routes, for example route 23 going to Wembley, route 13 going to Victoria, route 425 going to Ilford, route 3 going to Russel Square. However, there is no justification given in the consultation documentation for why these changes are beneficial – the assumption appears to be that new route equals benefit. We wish to understand further whether there is any more sophisticated modelling behind this; for example, is there evidence that people in North Finchley wish to get to Victoria by bus, and evidence that people living in Crystal Palace wish to get to Russell Square? Having discussed this issue with TfL officers, it would seem that TfL does have data indicating demand for travel to these changed routes. This information should have been part of the consultation documentation so that stakeholders and individuals could scrutinise the benefits and disbenefits.

Further we are disappointed that the messaging around the proposed changes is all about “making better use of our [TfL] resources”. Whilst we acknowledge that TfL must operate its business more cost-effectively, the

justification for the changes should also have been about making journeys better or more reliable for passengers and reducing poor air quality.

## Night buses

We note that a reduction in Night Bus services along Oxford Street is also proposed. This will impact on Londoners who rely on the bus for their journey to and from work, many of them low paid. Many work in catering, cleaning and security trades around Oxford Street and Marble Arch as well as the many government offices around Victoria. The consultation document mentions the Night Tube as a replacement but this does not run Sunday to Thursday and so we want TfL to give further reassurance about the impacts for night workers of these changes.

## Impact assessment

We note that an equality impact assessment has not been published. Given the Mayor's focus on social inclusion and that the bus network is particularly used by lower-paid Londoners and disabled and elderly passengers because it is more accessible than the tube network, we are disappointed not to see any reference to the impacts on these groups of needing to change routes.

We also note from the paragraph below, that TfL concludes that overall there is disbenefit to passengers. Further detail on how some of this is mitigated should be provided.

"The benefits of the proposals are mainly to TfL in that they save money. This would release funding to be re-invested elsewhere in the network where demand is growing. Overall there is disbenefit to passengers due to lower frequencies and broken links. There are some increases in passenger benefit, predominately due to the provision of new direct links and some frequency increases like on route 390."<sup>2</sup>

## Conclusion

Overall, London Councils supports efforts by TfL to look at appropriate bus provision in the West End with the opening of the Elizabeth line. However, this work has become a consultation that preludes work to transform Oxford Street into a better place for pedestrians. As a result, TfL has focused too narrowly on the opening of the Elizabeth line and Oxford Street changes, when there were greater benefits possible under the review. As such we do not feel the proposals are ambitious enough, and they do not achieve the wider objectives that London wants to see, including improved air quality, greater walking and cycling, and a better connected city.

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<sup>2</sup> Paragraph 7.1.5, West End Bus Services Review, TfL, [https://consultations.tfl.gov.uk/buses/west-end-bus-changes/user\\_uploads/west-end-services-review-november-2016.pdf](https://consultations.tfl.gov.uk/buses/west-end-bus-changes/user_uploads/west-end-services-review-november-2016.pdf)