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| Friday 12 August 2022 | London Councils |

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|  | Response to TfL’s central London bus review consultation |

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# Introduction

London Councils regrets that TfL is proposing the changes outlined in the central London bus review consultation. These changes would affect 78 bus routes with the complete withdrawal of 21 routes, amounting to a 4 per cent reduction in bus kilometres. TfL has assessed that this would require passengers to change buses for around 24 per cent of journeys compared to 19 per cent as is currently the case.

Buses are the backbone of London’s transport infrastructure. They are crucial to boosting London’s economy post pandemic, reducing congestion across the capital and meeting our climate goals. Outer London remains worse served by public transport than central and inner London and London Councils therefore understands the approach taken by TfL to focus any changes on routes that run through central and inner London. There should be no reduction in bus services in outer London; indeed, bus services in outer London should be increased.

London Councils is strongly concerned that the proposed changes would have significant adverse effect on disabled and older residents. We are also concerned that these changes would disproportionately affect lower income Londoners during a cost of living crisis. London Councils therefore urges TfL to reassess some of its proposals and to introduce the mitigation measures outlined in this response.

TfL’s engagement on this issue with individual boroughs and London Councils, particularly once the consultation had launched, has been appreciated. TfL must continue to meaningfully engage with boroughs and London Councils once the consultation period closes and as it assesses responses and decides on its next steps.

Several boroughs have submitted their own consultation responses which TfL should also carefully consider.

# Recognising the importance of buses

Buses play a vital role in London’s transport system. The bus serves all parts of the city and is London’s most accessible and flexible mode. Before the pandemic, more than six million bus journeys were made on a typical day, equivalent to around one in five of all journeys made in London.

Buses are currently an attractive public transport option, helping to reduce car use, congestion and air pollution across the capital. As a public transport mode buses also play an important role in helping London reach net zero emissions and will continue to do so as more electric buses are rolled out.

Any changes that are made must fit within the framework and ambition put forward for buses in the Mayor’s transport strategy and Bus Action Plan and this must be demonstrated in the documentation published by TfL.

TfL must ensure that buses remain an attractive option for Londoners and that momentum on improving the bus network across London is not lost.

# Equalities impacts

When introducing any changes, TfL must be mindful of the equalities impacts these may have on Londoners, including on those with protected characteristics.

London Councils is concerned that the proposed changes will have a particularly negative impact on residents with disabilities. Buses are generally an accessible form of public transport meaning they are often relied upon by older people, people with mobility impairments, people with buggies or luggage and people with disabilities.

London Councils is also concerned that the proposed changes could have a negative impact on Londoners’ safety, particularly at night and particularly for women and girls.

TfL must carry out engagement with relevant stakeholder groups and ensure a range of views has been considered before implementing any changes to the network. Any negative impacts must be properly assessed, avoided if possible, and mitigated against.

Equalities impacts which must be considered are highlighted throughout this response in the sections below.

# Impact on lower income residents

Londoners are currently facing a cost of living crisis, which is set to exacerbate in the coming months.

Buses are the cheapest public transport option and often the only public transport option for Londoners on lower incomes. This is particularly the case in central and inner London where residents are less likely to own a car overall with the lowest income residents least likely to own a car.

Lower income residents who are more likely to rely on the bus include essential workers working in sectors such as health, education, retail and hospitality. Children and young people are also likely to have a higher reliance on buses, including for travelling to school. Shift workers and workers on insecure contracts are also likely to rely on buses, particularly at night.

TfL must ensure its changes do not lead to higher costs for bus users, and generally minimise any negative impacts to the bus network as these will disproportionately affect Londoners on lower incomes.

Impacts on lower income Londoners are highlighted throughout this response in the sections below.

# Bus frequency

TfL must ensure that all bus routes run frequently, particularly in areas affected by a route withdrawal. Not doing so would risk lengthening journey time and affect the attractiveness of buses compared to other modes including private cars and taxis.

TfL must publish its proposals for bus frequency for routes that have been altered and those which will see additional usage as a result of the changes proposed. This is key to assessing the impacts of the changes being proposed.

# The Hopper Fare

Under the proposed changes, more people will need to change buses to complete their journey and journeys are likely to take longer as a result.

TfL must carry out a detailed assessment of how journey times will be impacted, how this might affect ridership, and how this might affect the overall income received through bus fares.

Those on lower incomes who rely on the Hopper fare, for example for commuting, will be disproportionately affected by journey times increasing to over an hour.

It may be suitable to make changes to the Hopper fare, which currently allows passengers to pay only a single bus fare for all bus journeys taken within an hour. This could be reviewed and the time limit extended beyond one hour in order to account for longer journey times.

# Reliability

As part of the consultation, TfL has proposed that several routes should be rerouted and expanded, thus covering longer distances.

Routes may become more unreliable as a result. For example, it may become harder to make up time for delays occurring at the start of a route and delays could lead to the early termination of routes, meaning buses may not always reach the end of their destination.

Any such impacts will be harder to deal with for those more vulnerable. Furthermore, unreliability and delays will have a particularly negative impact on those needing to change buses in order to complete their journey as users may miss their second or third bus.

Measures must be put in place to mitigate against these risks, for example reviewing changes proposed which create the longest routes and increasing frequency on the longest routes.

# Bus capacity

Under proposed changes it is likely that some buses will see increased ridership. This is particularly the case where a bus route running alongside another route is withdrawn.

This could lead to congestion and a lack of space on buses, which could mean buses unable to take on new passengers at all bus stops. Lack of space on the lower deck will particularly impact those with mobility issues, those with a wheelchair, and those with luggage or a pushchair.

TfL must mitigate against this risk by ensuring there is adequate frequency along the busiest the routes.

# Access to strategic destinations

TfL must ensure that access to important destinations is safeguarded.

These locations must be identified by TfL following engagement with boroughs and community groups. They include, for example: hospitals, GP practices, schools, places of worship, high streets and new opportunity areas.

Failure to preserve adequate access to these destinations could particularly affect disabled residents, older residents and other vulnerable groups.

When making any changes, reliable and fast access to these locations must be prioritised.

# Night buses

Under current proposals, nine 24-hour or night bus routes will be withdrawn and many more night routes altered.

This would restrict access across the capital at night, where much of the tube system is unavailable, hindering the recovery of London’s night-time economy and potentially prompting a shift to car use. These changes would disproportionately impact lower income Londoners who may not be able to rely on alternatives, as well as shift workers and early commuters who rely on night buses to reach work. The need to change buses at night may lead to safety issues (see below).

While these changes may affect comparatively lower numbers of people, we would ask TfL to rethink its approach and prioritise safeguarding night buses and 24-hour bus routes.

# Interchanges

Under current plans to alter many routes, there will be new interchanges at or between bus stops. TfL also estimates that passengers will need to change buses for around 24 per cent of journeys compared to 19 per cent.

TfL must minimise the number of interchanges taking place between two different bus stops, rather than at the same bus stop. This will ensure shorter journey times.

Older residents, disabled residents, pregnant residents and residents with children or luggage will be particularly negatively affected by interchanges between bus stops where walking is required. Needing to change buses could give rise to safety issues for Londoners travelling at night, particularly women and girls.

Interchanges must be located strategically and at safe locations.

Where interchanges occur at the same bus stop, TfL must ensure there is enough footway space to accommodate a higher number of people. Bus stops must be of high quality and have a shelter.

Where interchanges require walking to a different bus stop, the distance between stops must be minimised. These must be clearly signposted and accessible, for example with dropped kerbs and pedestrian crossings. The journey between bus stops must be at safe locations, for example brightly lit and avoiding crossings at busy roads.

# Communication with the public

These changes will have significant impacts on Londoners’ journeys and their daily lives. Therefore it is of the utmost importance that any changes be communicated with the public clearly and well in advance of being introduced.

Communication should be accessible and reach all Londoners, with particular regard for residents who may find it harder to access online information, for example those with disabilities or older residents. Those with learning disabilities in particular may find it hard to access information and become used to new routes.

Once the changes are introduced, these must be clearly marked on the streets and at bus stops. Information at bus stops should be up to date and clearly visible. As above, any new interchanges between bus stands should be clearly signposted.

Reliable electric countdown signs should be introduced wherever possible to ensure passengers are informed of bus routes and timings. In addition, the TfL journey planner must always have up-to-date information on the entire public transport network to enable journeys to be well planned.

# Engagement with London Councils

TfL must continue to engage with borough officers, councillors and other stakeholders as it develops these plans.

Borough officers and Councillors must be kept up to date with developments and given the opportunity to feed into the decision-making process. TfL must continue to engage with London Councils and with borough officers through the bus working group co-ordinated by London Councils.

TfL must provide London Councils with the opportunity to feed into its response to the consultation and to scrutinise any decisions made once the consultation period is concluded.