

Consultation Response: Central London Bus Review

Submitted by: BusinessLDN

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Introduction

1. BusinessLDN is a business campaigning group with a mission to make London the best city in the world to do business, for the benefit of the whole UK. We convene and mobilise business leaders to tackle the key challenges facing our capital. We are made up of 180 leading employers across a wide range of sectors, including strong representation from the transport sector. We welcome the opportunity to respond to this consultation from Transport for London (TfL).
2. The proposed changes to more than 50 bus routes and the complete withdrawal of over 20 routes would represent a significant loss to London's bus network across 23 boroughs, and would affect the attractiveness of public transport as a whole in the capital city. It represents a 4 per cent reduction in bus kilometres in the city and comes on top of previously agreed reductions to services which have taken effect this year. Particularly concerning in these proposals is the projected increase in the number of passengers needing to change bus to complete their journeys. Coupled with lower reliability on newly lengthened routes, service reductions leading to longer wait times, and the potential for increased traffic and therefore slower journeys as former passengers use alternative modes to complete their journeys, these proposals risk catalysing a spiral of decline.
3. We recognise the pressures on TfL's finances and the conditions attached to recent funding deals that have necessitated these changes. We also recognise that on current ridership levels and in light of changing travel patterns there is a compelling case for some change and rationalisation within the central London bus network, but that any change of this nature inevitably has losers too. We hope that the substantial public engagement as a result of this consultation will lead to the least worst outcome possible.
4. Buses remain the (often under-appreciated) workhorses of the London economy. They are the most used mode of public transport and 6 in 10 Londoners take a bus at least once a week. Since the expansion of the network in the years following TfL's establishment, more than 96 per cent of Londoners live within 400m of a bus stop and 9 in 10 Londoners live within 400m of a high-frequency bus service. These services keep the city moving and enable individuals to access jobs, education, services, and leisure pursuits. Twenty-nine per cent of journeys in which bus is the main mode of travel are work related, a figure that increases to 53 per cent for journeys where the bus is used to access another mode. The figures for shopping, leisure, and personal business trips are 46 per cent and 32 per cent respectively.

These bus journeys play a substantial role in facilitating the capital's economic activity.

5. The ambition set out in the recently published Bus Action Plan is to be welcomed and we would like to see more detail about how the service changes outlined in these proposals are compatible with the target of increasing bus passenger numbers by 50 per cent by 2041, in support of the Mayor's Transport Strategy target to have 80 per cent of all journeys in the capital taken by public or active modes by the same date. To the same end we would welcome more detail about how these proposals will help to address the underlying pre-pandemic challenges that the bus network in the capital was facing. Following TfL's establishment in 2000 there was rapid growth in bus journeys until the financial crisis. A further period of slower growth took bus ridership to a 2014/15 peak of around 2.4 billion journeys annually, twice the level for most of the 1980s and 1990s. But the years immediately before the pandemic saw a slight decline alongside falling bus speeds. These current proposals appear to accept that decline rather than seek to reverse it.
6. Our primary concern is that if the net effect of these changes is a less attractive bus service for existing passengers then it could kick-start a cycle of decline. The loss of capacity, frequency, and reliability could be coupled with the individual costs of adjusting to these changes to produce a drop in bus ridership. This in turn could lead to higher levels of subsidy for services and calls for further cuts. There are worrying signs of this trend on a number of routes that have already been trimmed at their extremities and are now in line for further losses of stops around their termini. Justifying this on the basis of low ridership around a terminus ignores the nature of many bus routes which fill up through the central section of their route and lose passengers as they approach the end. There is a careful balance to be struck, however, as overstressing routes can undermine reliability. It is not always clear in these proposals how those competing pressures have been weighed.
7. Additionally, with the recovery from the pandemic ongoing, some of the commuter-heavy routes to and from central London rail termini appear to be being cut on the basis of current passenger numbers despite travel patterns to and from the Central Activities Zones (CAZ) still being in flux. This appears to be premature and could risk holding back the economic recovery as commuters start to travel again only to find their journeys less convenient than they remember and therefore decide to further delay their regular return to the CAZ.
8. Whilst we acknowledge that managing a complex and heavily used bus network will always involve trade offs between capacity and simplicity, the significant increase in the number of "broken links" – passengers newly having to change buses to complete their journeys – is concerning. The headline increase of 5 percentage points equates to approximately 93,000 journeys per day. On some routes such as the 12 and the 78, more than a third of passengers will be forced to change bus. This could be enough for many of these people to seek alternative modes of travel

or choose not to travel at all. Combined with lower frequencies across the network, longer wait times can be expected. This has negative implications on a number of fronts, not least personal safety which will be of particular concern to those on the four night bus routes that will also see more than a third of their passengers experiencing new broken links.

9. The nature of bus travel and the demographics of bus users mean that all of these issues are exacerbated and the equalities impacts are likely to be significant. As TfL's own Equality Impact Assessment rightly notes, "Women, older people, those on low incomes, and some Black, Asian and minority ethnic people are more likely to use buses (and many people will fall into more than one of these groups). There are also people who are more likely to be impacted by the planned changes, particularly older and disabled people as well as pregnant women and those travelling with small children." For many journeys in the capital, buses remain the only accessible mode of transport on offer for those with disabilities. It is a similar situation for those with children and pushchairs who are often left competing for a single space with wheelchair users. These proposals are likely to increase bus loadings resulting in more competition for these spaces. Equally, as the cheapest mode of public transport available, buses are used disproportionately by those on low incomes who may be effectively cut off from education, employment opportunities, and other services as journey times lengthen as a result of these changes. The safety concerns outlined above will also impact those in low paid night time economy employment, as well as women and girls. Beyond the question of equity, we wish to emphasise this as an economic issue for the capital. London's economy relies on a diverse range of talent being able to travel at all times of night and day. These proposals undeniably add friction, inefficiency, and cost to individuals and businesses across the capital.
10. A more positive strategy for London's buses would reflect many of the priorities expressed in the recent Bus Action Plan. We welcome the proposed changes to services that ensure the new developments around Battersea Power Station and Nine Elms are well served. It is critical to ensure good public transport connectivity for new developments from the outset. Similarly, ensuring strong multimodal connectivity at bus hubs – with cycle and e-scooter hire available – will help to mitigate some of the effects of the newly broken links. Whilst there may be a case for more substantial growth in the network and new services in outer London, the problem in inner London remains primarily a question of congestion. Research from Greener Journeys shows that a 10 per cent increase in bus journey time results in a 6 per cent fall in demand. And bus speeds in London are falling. Freeing up road space for buses through strategic interventions in infrastructure, traffic management, and parking must remain a priority. Some of the proposed changes will see heavier traffic on roads that appear ill-equipped to handle it without further intervention.
11. The other element of a fair, balanced, and efficient public transport network is fares. This is not solely a bus issue as the absolute and relative prices of different modes

interact to shape demand, including on the bus network. Where bus services have been reduced in part due to overall public transport capacity in a given area it will be important to ensure that those alternatives are accessible and affordable. The current tools for managing this are blunt. The hopper fare has been transformational for many bus passengers who were previously penalised – unlike those on the tube – for changing buses. It will be important to maintain this as the number of broken links increases, whilst recognising the risk that the hopper fare could become less valuable as bus journeys take longer. This is particularly concerning given the current cost of living pressures and warrants a policy review to ensure that the one hour time limit is still appropriate. We would also welcome a comprehensive review of discounts and exemptions across the network to ensure that those who can afford to pay are paying and those who cannot have the widest possible access to services.

12. Finally, we wish to emphasise the importance of communication in mitigating the impacts of any changes. Much wider availability of real time bus schedules on displays at bus stops is critical to this, especially at the points in the network that will now become the site of significant interchange between buses. Equally, communicating the changes themselves on buses, at bus stops, and elsewhere – and in a format that recognises the diverse needs of bus users – will be critical. Simplicity will be key and to that end further consideration should be given to the numbering of the routes that remain at the end of this process to ensure that they are fit for the future, not just reminiscent of the past.