

MDA No.: 1418

Title: Central London Bus Review Consultation

1. Executive Summary

1.1 At the Transport Committee meeting on 29 June 2022 the Committee resolved that:

Authority be delegated to the Chair, in consultation with the Deputy Chair and party Group Lead Members, to agree any output arising from the discussion.

1.2 Following consultation with the Deputy Chair and party Group Lead Members, the Chair agreed the Committee's response to the Central London Bus Review Consultation as attached at **Appendix 1**.

2. Decision

2.1 **That the Chair, in consultation with the Deputy Chair and party Group Lead Members, agrees the Committee's letter to the Mayor of London regarding the Central London Bus Review Consultation, as attached at Appendix 1.**

Assembly Member

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Printed Name:

Siân Berry AM, Chair of the Transport Committee

Date:

11 August 2022

3. Decision by an Assembly Member under Delegated Authority

Background and proposed next steps:

- 3.1 The terms of reference for the investigation informing the consultation response were agreed by the Chair, in consultation with party Group Lead Members and Deputy Chair, under the standing authority granted to Chairs of Committees and Sub-Committees. Officers confirm that the letter and its recommendations fall within these terms of reference.
- 3.2 The exercise of delegated authority agreeing the consultation response will be formally noted at the Transport Committee's next appropriate meeting.

Confirmation that appropriate delegated authority exists for this decision:

Signature (Committee Services): Paul Goodchild

Printed Name: Paul Goodchild

Date: 8 August 2022

Telephone Number: 07842 600832

Financial Implications: NOT REQUIRED

Note: Finance comments and signature are required only where there are financial implications arising or the potential for financial implications.

Signature (Finance): Not Required


Printed Name:

Date:

Telephone Number:

Legal Implications:

The Chair of the Transport Committee has the power to make the decision set out in this report.

Signature (Legal): 

Printed Name: Emma Strain, Monitoring Officer

Date: 10 August 2022

Telephone Number: 020 7983 6550

Supporting Detail / List of Consultees:

- Caroline Pidgeon MBE AM
- Nick Rogers AM
- Elly Baker AM

4. Public Access to Information

- 4.1 Information in this form (Part 1) is subject to the FoIA, or the EIR and will be made available on the GLA Website, usually within one working day of approval.
- 4.2 If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.
- 4.3 **Note:** this form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, until what date:

Part 2 – Sensitive Information:

Only the facts or advice that would be exempt from disclosure under FoIA or EIR should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? NO

Lead Officer / Author

Signature: Zoe Oliver-Watts


Printed Name: Zoe Oliver-Watts

Job Title: Assistant Director, Scrutiny and Investigation

Date: 10 August 2022

Telephone Number: 07840 857293

Countersigned by Executive Director:

Signature: 

Printed Name: Helen Ewen

Date: 11 August 2022

Telephone Number: 07729 108986



Siân Berry AM
Chair of the Transport Committee

Sadiq Khan
Mayor of London
Greater London Authority

(Sent by email)

11 August 2022

Central London Bus Review – Consultation

Dear Sadiq,

I am writing to you on behalf of the London Assembly Transport Committee about a range of issues resulting from our investigation into the bus network, and with a formal consultation response to the Transport for London (TfL) Central London Bus Review, which we are also copying to TfL's team.

The bus network, whilst not a perfect service, is something that Londoners are and should be proud of. TfL has made great strides with the bus service since 2000. It has become cleaner, greener and with improved accessibility. There have been improvements to fares with the introduction of the Hopper fare. There are still improvements to make, for example ensuring the network is fully accessible, but we cannot risk losing these achievements and see a return to a pre-2000 service.

In May, the Committee launched an investigation into London's bus network. TfL's consultation on reductions in bus services, which was announced 1 June, therefore became a significant aspect of our investigation.

The Committee held two evidence sessions as part of our work. During the first session on 24 May, we heard from bus passenger and driver groups to look at the impact the Bus Action Plan will have on London's bus passengers and drivers, including London TravelWatch, Bus Users UK, Transport for All, the Royal National Institute of Blind People (RNIB), Campaign for Better Transport and a retired bus driver. The Committee would like to thank TfL officers for attending our second session on 29 June, where Assembly Members asked questions about the format of the consultation and the

impact of the proposals. In addition, the Committee launched a call for evidence to seek Londoners' views.

The Committee's response to the consultation is informed by both the oral and written evidence received during the course of the Committee's bus network investigation. The Committee has divided this response into three main sections:

1. The consultation process and engagement with Londoners
2. Specific responses to the proposals for service changes
3. Recommended mitigations

1. The consultation process and engagement with Londoners

Consultation timeframe

The Committee welcomed TfL's decision to extend the deadline of the consultation by three weeks. However, it is disappointing that, given the scale and nature of the impact of the proposals on a large number of Londoners, TfL did not consider adopting a longer consultation timeframe from the outset. This would have given Londoners and transport groups more time to consider and plan their responses through the entire period of the consultation.

Recommendation 1 - For future proposed changes of this size, TfL should implement extended consultation periods from the outset.

The Committee is also disappointed that not all information was available when the consultation was launched. TfL only provided a summary of the route changes, with links to the detailed proposals and maps two weeks into the consultation. Making these summaries available from the beginning would have helped Londoners accessing the consultation, especially those who rely on buses the most such as low-income Londoners, women, disabled and Londoners from Black, Asian and other minority ethnicity groups, and those who are least likely to be engaged or access consultations. The consultation launched on 1 June 2022, but the TfL website front page only included details of the consultation from 14 June. The British Sign Language (BSL) video did not become available until 21 June, 20 days after the launch of the consultation.

Recommendation 2 - TfL must ensure all relevant information is available from the date a consultation launches.

Equality Impact Assessments

At our 29 June meeting, the Committee heard from Geoff Hobbs, TfL's Director of Public Transport Service Planning, that TfL is trying to '*minimise the adverse impacts*' of proposals, and that its aim has been to find the '*least-worst option*'.¹ TfL officers told the Committee they have identified some of the impacts of the proposals on protected groups through the Equality Impact Assessments (EqIA). TfL published a programme-level EqIA which sets out the expected high-level impact of proposals on passengers, as well as scheme-level EqIAs for each set of proposals which set out the impact on passengers at local bus network and route level. The programme-level EqIA identifies a number of over-arching negative impacts on passengers, including: needing to interchange; increase in travel costs; reduction in capacity; access to information on proposed changes and increase in waiting times. The EqIA also identified a number of particular groups that would be more greatly impacted by proposals, this is examined further below. During the meeting, Geoff Hobbs used percentages to demonstrate how disabled Londoners are less impacted compared to the general

¹ London Assembly Transport Committee, [Agenda for Transport Committee on Wednesday 29 June](#)

population. However, this does not take into account the scale of the impact, which would be greater compared to the general population. It appears that TfL's bus planning does not adequately weight how important buses are for disadvantaged Londoners versus other modes of transport. The Committee accepts that the EqlA analysis at the point of consultation can only take account of information available at the time. However, Andy Lord, TfL's Chief Operating Officer, told the Committee that TfL hopes to receive feedback from the consultation so it can act to mitigate these issues before any proposals are implemented. Some of the issues raised by guests in our May meeting included social isolation as groups of Londoners, such as the elderly, disabled or visually impaired, will simply not leave their homes following these changes.

Recommendation 3 - TfL should conduct further equality analysis following the conclusion of the consultation using information received in responses. TfL should then publish updated EqlAs to incorporate any additional evidence of equality impacts. The Committee requests that TfL provides information on what, if any, equalities assessment was carried out on the proposal in the Financial Sustainability Plan of January 2021 to cut the bus network by four per cent, compared with alternative cost-saving initiatives, considering the importance of the bus to Londoners with a range of protected characteristics.

Clarity of information

During our evidence session on 24 May, the Committee heard evidence of the importance of ensuring that the consultation documents are as clear as possible to everybody who needs to respond, and that information is accessible for Disabled Londoners. Emma Gibson, London TravelWatch Chief Executive, told the Committee she was shown sample maps ahead of the launch of the consultation which were very complex, making them difficult to understand. The Committee also heard from Cyreeta Donaldson, Regional Campaigns Officer London at the RNIB, that the RNIB frequently receives feedback from its members on TfL consultations that TfL's use of pictures without alternative text descriptions or image-based PDFs is completely inaccessible.²

At the Committee's 29 June meeting, Geoff Hobbs answered questions on this issue and, conceded that the maps published as part of the consultation material: "*are admittedly quite complicated quadrant maps*". However, he also told the Committee that TfL has established a number of different formats in which Londoners are able to engage with the consultation including online, by telephone or by post. He told the Committee that the consultation material has been published in several different formats, including an easy-read version, in braille, and in different languages. It had been promoted via radio and television adverts, posters and displays at bus stations.

Although the Committee accepts and welcomes that TfL has created different formats to address disability and other requirements, the Committee is concerned that some consultation information remains inaccessible to particular protected groups of Londoners.

Recommendation 4 - In response to this letter, TfL should set out the specific actions it has taken when accessibility concerns have been raised by consultees during this consultation. The Committee requests assurances from TfL that clearer, more accessible map formats will be produced for future consultations on any changes to bus services and that it will actively engage with service users who have other requirements to make sure that any future documents are as accessible as possible.

Engagement with transport users and user groups

² London Assembly Transport Committee, [Transcript of Agenda Item 9 – The Bus Network in London](#), 24 May 2022

A longstanding concern for the Committee is the extent to which a diverse range of transport users and user groups have been engaged during TfL consultations. The Committee heard from the Community Transport Association in response to our call for evidence that the community transport sector in London does not feel adequately consulted by TfL on changes to the bus network. The Committee heard from Katie Pennick, Campaigns and Policy Manager at Transport for All, on the importance of engaging directly with disabled users: *“We want to see disabled people in the room, co-producing solutions in partnership with TfL, taking that pan-impairment approach to ensure all voices are heard and ensuring that solutions work for everyone across the impairment groups.”* Geoff Hobbs told the Committee that TfL did not directly involve any disabled representatives in shaping the proposals. The Committee also heard from Silviya Barrett, Head of Policy and Research at Campaign for Better Transport, and Claire Walters, Chief Executive of Bus Users UK, on the importance of engaging directly with bus users and user groups. Engaging with those Londoners most affected early on in the process, for example with disability groups or elderly Londoners, ahead of the formal consultation would assist to bring Londoners along with the changes, and to feel properly consulted. It would also allow TfL to see where issues may arise which are not picked up by the EqIA.

Recommendation 5 - The Committee is concerned that those who will be most affected by the proposed cuts are not adequately aware of the plans. TfL should ensure that there is a transparent process, before and after consultation proposals appear, that widely engages with all users of services, including those who may be less likely to respond to consultations as well as with user groups. TfL should continue this engagement ahead of publishing proposals, to ensure that those groups that rely on the buses most are aware of any changes and respond to any consultations.

Andy Lord told the Committee that, as part of its engagement on the consultation, TfL has contacted 391 accessibility and mobility stakeholders, over 1,900 local organisations based within the London boroughs, 183 business improvement districts, the NHS and volunteer bureaux and volunteer centres in most London boroughs. The Committee requested the full list of the groups contacted by TfL as part of this consultation and, having reviewed this, Members are concerned about the varying representation across London, and whether people who rely on the buses most are aware of the proposals. There are some London boroughs in which only one or two groups are represented and other boroughs in which there are more than ten groups included in the list. While accepting that the geographical location of groups is out of the control of TfL, we believe more effort should have been taken to ensure the list fully reflects groups in every borough of London.

The Committee understands that TfL has difficult decisions to make in the context of a changed economy due to the pandemic and the current funding situation. However, to bring Londoners along with change and to properly consider their views on proposals, TfL must get the consultation process right. In not doing so, TfL compromises trust that Londoners have in the TfL network, which will have knock on impacts on perception of the service, and then ridership. Londoners have felt disappointed in how the consultation process has been conducted for these proposals.

2. Specific responses to the proposals for service changes

Recommendation 6 - Overall, the Committee is concerned that any reduction in bus services driven by cost savings will be counterproductive and therefore asks TfL to reconsider these proposals as a whole.

Below are specific comments related to the different assessed and potential impacts on groups of bus users based on the evidence and data reviewed during this investigation.

The EqIA identifies that the proposals will have a greater negative impact on certain groups of people. This includes older people; younger people; disabled people; women, pregnant passengers, and those with young children; individuals who are undergoing or have undergone gender reassignment; minority ethnic groups; individuals that share the protected characteristic of religion or belief; lesbian, gay and bisexual people and those on lower incomes.

The Confederation of Passenger Transport told the Committee that it was concerned that a reduction in bus services could result in the loss of jobs and the closure of a number of bus garages and depots. It highlighted concern about the long-term impact this would have on the industry.

Disproportionate impact on low income Londoners

The Committee is concerned about the disproportionate impact of the proposals on the poorest Londoners. London TravelWatch research shows that one third of all bus journeys are made by people in households earning less than £20,000 per year.³ Buses are the most affordable form of public transport in London and are therefore important to those on lower incomes who cannot afford the tube or train.

The Committee is concerned that the proposals will impact buses going through estates and areas where low-income Londoners live that may not also have nearby access to alternative forms of public transport, such as tube or rail. Low-income Londoners often do not have any other options to travel around London as cars, bicycles, tubes and trains are more expensive.

Bus fares increased by more than 55 per cent between 2012 and 2022, faster than both rail fares and the cost of motoring.⁴ The recent rise in bus fares of almost 6.5 per cent in April 2022 was higher than the average of 4.8 per cent across all TfL services.⁵ Whilst there are differing viewsⁱ on the current Mayor's fares freeze, a sharp increase at this time will be difficult for many Londoners.

Affordability of transport will be even more important in the autumn when the cost of living for Londoners will peak. In June 2022, inflation rose to a 40-year high of 9.4 per cent, up from 2.5 per cent in the previous June. In May 2022, the Bank of England announced that CPI inflation is expected to peak at over 10 per cent in the autumn of 2022. This will coincide with the increase of the energy price cap which may now be higher than predicted. Analysis by the Resolution Foundation found that in practice low-income households face a higher rate of inflation than higher income households. This is because items which have seen the highest price rises such as gas, electricity and food make up a higher percentage of spend for people in low-income households.

As we head deeper into the cost of living crisis, and the economy looks more bleak this autumn/winter, it becomes more important to maintain a public bus service. Londoners will start to question whether they can afford to use public transport or move towards cheaper transport services as their bills increase. The Committee is concerned that Londoners on low incomes will therefore have received a double blow of disproportionate increases in fares and a reduction in service if these proposals go ahead.

Disproportionate impact on Disabled Londoners

The Committee is also concerned about the disproportionate impact of the proposals on Disabled Londoners. According to London TravelWatch, 10 per cent of daytime bus passengers are disabled. As London's most accessible and affordable form of public transport, many disabled people rely on

³ London TravelWatch, [Who uses the bus?](#), 23 March 2022

⁴ RAC Foundation, [Transport price index](#), 2022

⁵ London TravelWatch, [Bus fare rise will hit the low paid hardest says watchdog](#), February 2022

the bus for their independence and to be able to get out and about, go to work or visit friends.⁶ The Committee heard from Geoff Hobbs that compared with the network as a whole, disabled people make up 3 per cent of passengers on the routes included in the proposals. However, the Committee remains concerned about the disproportionate impact that will be felt by these individuals. The Committee is concerned that these proposals come on top of cuts to frequency, which have been implemented by TfL without a consultation being carried out. TfL told the Committee that this consultation and the frequencies that have already been reduced represents 3.7 per cent cuts. The Committee is concerned that TfL is considering a possible more than four times increase in proposed service reductions, from 3.7 per cent to around 18 per cent, if it moves into a ‘managed decline’ scenario.

Katie Pennick told the Committee that the proposals risked creating more crowded services, significantly longer journey times and a lack of alternative routes, all of which would disproportionately impact disabled bus users. She told the Committee that changes to bus services and service frequency should be informed by more intelligent data on who uses the buses and the impact the proposals will have on those users. According to Transport for All, this information should include the number of nearby step-free access tube and rail stations, alternative accessible options, and the demography of the area.

The Committee heard from transport groups that change in itself can be a barrier to using public transport for some disabled people if they have built up their confidence around using a particular journey. Cyreeta Donaldson told the Committee that cane and guide dog users memorise their routes to bus stops so any changes can be highly disruptive and traumatic for blind or partially sighted people.

Katie Pennick further told the Committee that planning journeys is incredibly important for disabled users. Motability research from 2020 found that 45 per cent of disabled people surveyed felt they could not travel spontaneously due to the need to thoroughly plan each journey.⁷ The Committee heard that this planning process is often hindered by the lack of information available, and Emma Gibson told the Committee that access to a whole-area bus map could help people to visualise and plan a route. The Committee heard from Claire Walters, Chief Executive of Bus Users UK: *“quite often what we see is that people on a particular bus service do not know it has been changed or altered, having travelled on that service every day.”* This highlights the importance of up to date and accessible information.

The Committee is also concerned that these proposed changes could risk disincentivising bus use amongst disabled and mobility impaired Londoners, particularly in view of the fact that, due to uncertainty around TfL’s current financial situation at the time of writing, TfL is unable to commit to new programmes to make any more of London’s Underground stations step-free or lift the restrictions on free travel before 9am for Londoners with a 60+ Oyster photocard or older person’s Freedom Pass.

Confidence in, and demand for, public transport

The coronavirus pandemic has had obvious short-term impacts on passenger numbers across all of London’s public transport network, including the bus network. London is now experiencing a recovery in passenger numbers, which is welcomed by the Committee as a sign that London is recovering more generally from the impact of the pandemic. The Committee heard from Emma Gibson during our May meeting that: *“There have been very high levels of ridership on the bus throughout the pandemic and that is probably largely because a lot of the people who did not have the jobs where they could work from home had to travel in, and those people are often in lower-paid*

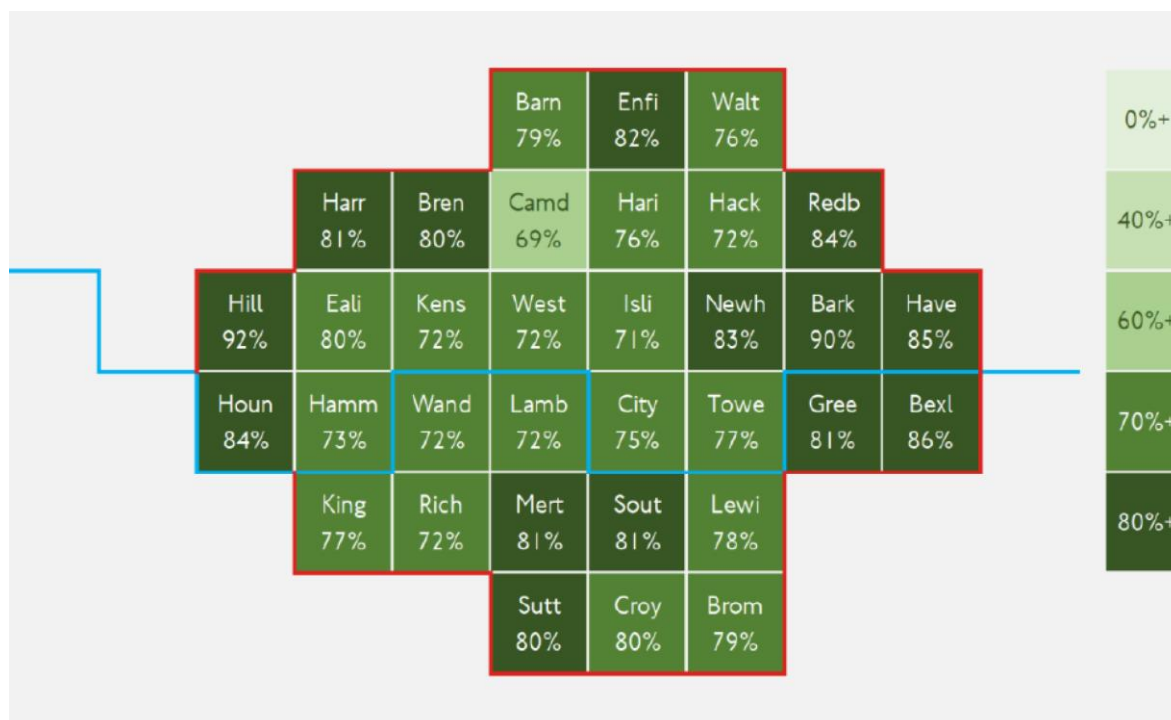
⁶ London TravelWatch, [Who uses the bus?](#), 23 March 2022

⁷ Motability, [Transport needs for disabled people](#), July 2020

jobs so they can only afford to use the bus to get to work.” Emma Gibson also told the Committee that bus use has been recovering better than tube use. Bus use may continue to recover further this winter as people could turn to more affordable modes of transport.

TfL has provided the Committee with data for each borough comparing the current number of weekday morning bus boarders with pre-pandemic levels. In March 2022, this data showed bus boarder numbers were between 65 and 88 per cent of pre-pandemic levels. By May 2022, the recovery shown by this data had risen to between 69 and 92 per cent of pre-pandemic levels. A schematic map showing the May 2022 figures is below. The Committee notes that this data is not based on comparisons between the same week in each comparison year, but believes it demonstrates that bus demand has been recovering rapidly in recent months.

Weekday AM (7am – 10am) bus boarders by local authority [w/c 16/05/22 versus w/c 20/05/19]



Source: Briefing from TfL to Assembly Members

The Committee is concerned that any proposals for bus cuts risk stifling this recovery. User group representatives told the Committee that the proposals risk damaging passenger confidence, and Silviya Barrett, Head of Policy and Research at Campaign for Better Transport, said that: *“once services disappear then passenger confidence will decline much more steeply,”* while Emma Gibson told the Committee that she believed a reduction in service frequencies would affect the number of people using the bus.

In response to our call for evidence, the Community Transport Association told the Committee it is concerned that a reduction in bus services could leave some Londoners isolated by the removal of a service they depend on. The Committee also heard that the community transport sector feels that bus cuts might reduce the use of public transport, which would likely increase the number of people dependent on community transport organisations to travel around London.

The Committee also heard from the Confederation of Passenger Transport, in response to our call for evidence, that a reduction in bus services may disincentivise the use of public transport and force passengers to seek other alternatives. It told the Committee that for Londoners that have access to a private car, this might mean opting to drive instead of using public transport, resulting in more road traffic, increasing carbon emissions and reducing air quality.

Analysis supplied to the Committee by London TravelWatch found that in order to achieve the Mayoral target of 80 per cent of journeys in London being made by walking, cycling or public transport by 2041, bus use will need to increase by 40 per cent from pre-pandemic levels. The Committee is concerned that there is unlikely to be an increase in ridership as a result of the proposed changes, and they may instead result in a cycle of decline on the network. The Committee questioned Geoff Hobbs on the effect the proposals will have on future ridership levels based on TfL modelling, who told the Committee that: *“The impact is that you reduce bus ridership by a bit and some of that transfers to other public transport”*.

This was confirmed at the June meeting where Andy Lord, Chief Operating Officer, TfL also said: *“If we do not get the long-term funding we need then we are going to be into significant reductions of buses beyond this and significant reductions, potentially, on rail and other services as well. What we*

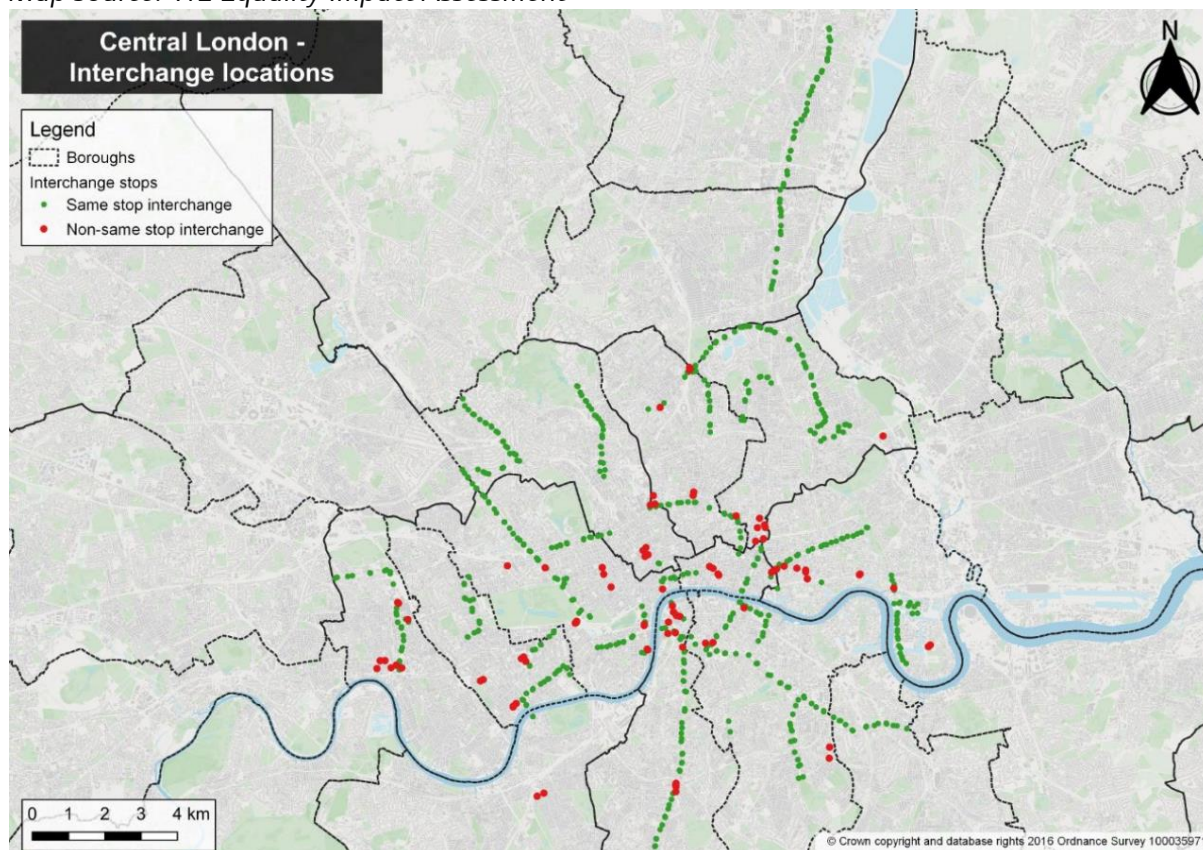
need to be doing is encouraging people back on to our network. We need to be encouraging people to use all our services, so that we can increase our revenue and increase our income, which will then enable us to get off the revenue support from Government and at the same time get the long-term funding... you can see from other sectors, if you get into a spiral of reductions and service reductions it ultimately leads to the inevitability of customers moving away from that mode."

Rising costs and increased interchanges

Currently around 19 per cent of bus journeys made on central London bus routes involve a change of bus. TfL estimates that this would increase to 24 per cent under the consultation proposals.⁸ The EqIA acknowledges that this will raise costs for some bus passengers and TfL has noted that this could present accessibility issues for disabled passengers, older Londoners, those with mobility issues and parents with young children, particularly where the interchange involves moving between stops. It will also result in overcrowding and increase journey times, making using the bus a less attractive option, which could impact on ridership. The map below, taken from the EqIA, shows how these proposed new interchanges are distributed throughout London. The 88 locations where the interchange is not at the same stop are shown in red, and the 653 locations where the interchange is at the same stop are shown in green.

Map of the locations where interchanges are necessary

Map source: TfL Equality Impact Assessment



The Committee heard from Katie Pennick that having to move between stops can be an accessibility barrier for disabled users. She told the Committee of the importance of ensuring that, if a journey requires a change of bus, the change happens at the same bus stop, rather than the passenger needing to identify another bus stop and perhaps having to cross a road. Even a short journey between bus stops may create a barrier for disabled people using public transport.

⁸ TfL, [Central London Bus Review](#)

Analysis supplied to the Committee by London TravelWatch estimates that if the proposals go ahead in their entirety, over 93,000 daily journeys will involve a new change of bus. This analysis also estimates that one in five night bus passengers who can currently take a direct bus to their destination will in future need to change routes. The Committee is also concerned about the additional safety issues that would result from these proposed changes to night bus services. London TravelWatch research found that people on lower incomes are more likely to use the night bus. They also found that 51 per cent of people travelling on the night bus use it to travel to work.⁹ Emma Gibson told the Committee that safety is an important factor when considering any changes to the night bus and looking at how long people are going to have to wait at bus stops as part of this. Emma Gibson said: *“If there are people in the middle of the night having to change onto a different bus and waiting for a really long time at a bus stop, I am genuinely concerned about not just perceptions of safety but the actual safety of those people as well.”*

Recommendation 7 - TfL should ensure that, where a change of bus is unavoidable, it can be made at the same bus stop. We do not believe that the 88 new interchanges in the proposals requiring a change of bus stop are acceptable. The Committee recommends that no change of bus is required on night buses, due to the risk to safety.

Recommendation 8 - A majority of the Committee considers that TfL should explore the cost and feasibility of extending the Hopper fare to 90 minutes to allow low-income Londoners to complete their journeys in view of extended journey times and the added pressures of the rising cost of living.¹⁰

Comments on specific routes serving sensitive locations

The Committee has sought information about particular locations and public services whose residents and users would be harmed by the proposals through our call for evidence, and Committee members have also received direct communications from many Londoners concerned about particular impacts of individual changes to services. This response is not intended as a comment on every proposal but, as a Committee, we wish to highlight the following particular proposals and their impacts on Londoners.

- **Brent Cross South, routes 16 and 189**

Brent Cross South is currently served by the 16 and the 189. TfL’s proposals include cutting the 16 and re-routing the 189. These two routes are the only routes going into central London from the Brent Cross South area, at a time when the area is seeing large population growth as a result of new development.

- **Royal London Hospital, route D3**

The D3 bus is the only step-free link to the Royal London Hospital from Wapping. Under the proposals it is being replaced in part by the 100 or the D7, but there are a number of stops that are not being replaced. Wapping Station is not fully step-free accessible. There is concern over the impact on elderly Wapping residents, those with disability issues and the connection to the Royal London Hospital.

- **Chelsea and Westminster Hospital, routes 14, 211, 414 and C3**

The Chelsea and Westminster Hospital is currently served by the 14, 211, 214 and C3. Under TfL’s proposals bus routes 14 and C3 will be cut and the 211 will no longer go to Westminster. There is a

⁹ London TravelWatch, [Who uses the bus?](#), 23 March 2022

¹⁰ The Conservative Group does not support this proposal due to the potential financial implications of extending the Hopper fare. In their view, the financial priority should be to use any available funds to make the savings needed to reverse these proposed bus cuts.

hospital cluster in this area and the Royal Marsden Hospital and the Royal Brompton Hospital will have similar issues. The Chelsea and Westminster Hospital is not served by other transport links, as it is not particularly near a tube station. It has a number of specialisations including HIV, mental health and paediatrics.

- **Whittington Hospital, route 4**

Bus route 4 is currently the only direct route to the Whittington Hospital from a range of locations in Camden and Islington, and is a double decker service. TfL's proposed abolition of route 4, with a switch to an extended 236 single decker service likely to suffer from crowding at busy times, will reduce the accessibility of this hospital to many of its current users.

- **Peckham, routes 78 and 12**

Bus routes 78 and 12 are the worst affected routes with regards to the number of 'broken links'. Overall, the number of interchanges increases by 24 per cent but varies considerably between routes. For these two routes, it rises to 36 per cent and equates to thousands of daily journeys. Furthermore, withdrawing the bus route 78 without replacement south of Peckham would significantly impact passengers in Nunhead who question whether there will be sufficient capacity on alternative route P12 between Peckham and Nunhead.

- **Homerton hospital, routes 135 and 242**

The proposal to replace route 242 with the 135 route would double the journey time of new route 135. The increase of approximately 50 minutes onto the off-peak running time, which will be higher in peak time will risk journeys being curtailed to maintain reliability, with a particular impact on passengers at either ends of the route. Extending route 135 to Homerton Hospital would also restore the direct link from Homerton and central Hackney to Liverpool St. There is additional concern that by withdrawing the 236 between Homerton Hospital and Hackney Wick, there would be insufficient capacity on route 276 in future between those two points.

Furthermore, TfL needs to look at the messaging with regards to inner and outer London. Whilst Londoners in inner London may be considered to have more access to bus routes or alternative options in contrast to outer London, this is not always the case. Many communities in inner London are not served well by the TfL network and the removal of some of these routes from estates and pockets of London will exacerbate already existing gaps in provision.

3. Mitigations in the event of service cuts

The following measures are put forward by the Committee to reduce the harm of cuts to bus services. However, the Committee does not believe that these mitigations will fully eliminate harm from the proposals put forward by TfL. The Committee remains concerned about the harm that any reductions to services will cause to the network.

Increasing frequencies of remaining services

TfL officers discussed the option of increasing the frequency of specific services as a means of mitigating any potential capacity issues and helping to minimise additional waiting time where passengers need to change buses. Geoff Hobbs told the Committee: *"what one can do fairly readily with the bus network is to increase frequencies and therefore capacities of the routes in their format."*

However, correspondence received from Geoff Hobbs ahead of the 29 June meeting with TfL officers shows that nearly all bus routes affected by the consultation proposals will not see an increase in service frequency, with some associated buses (such as the 214, which is an existing alternative service for some passengers currently using the 88) seeing their frequency reduced through the proposals. The Committee is concerned that, although TfL has identified increasing frequencies as a potential mitigation measure, they have not yet implemented this.

Recommendation 9 - The Committee does not consider that increasing frequencies on remaining routes could fully mitigate for the loss of routes in these proposals. However, if service changes do go ahead the Committee recommends that TfL sets out how they will increase frequencies on associated routes.

Improvements to bus stops

The Committee questioned TfL officers on the proposed actions to mitigate the impact on Londoners. The Committee raised a number of issues relating to bus stops including a lack of and poor quality information, cleanliness and graffiti. In response, Andy Lord indicated that TfL was exploring 'service planning' options, such as changes to the location of bus stops, both to reduce the number of required interchanges and to enable easier interchanges on affected routes. The Committee believe this is a vital area of mitigation to explore further.

Recommendation 10 - TfL should set out in its consultation report and decision documents how it will make specific improvements to facilities at bus stops where passengers will in future need to change buses, including improvements to real-time journey information, bus shelters and seating areas.

Information and communication

Tom Cunnington, Head of Buses Business Development at TfL, was asked by the Committee how TfL will communicate any changes that are implemented with bus users who will have to take new routes or make new changes. The Committee is concerned about how TfL will communicate any changes given the issues with the consultation itself. It is important that passengers are provided with clear and accessible information on any alterations to their regular journeys, and that clear details of alternative routes are provided. This includes information that is accessible for blind and partially sighted users. This is particularly important for people who will be required to change bus as a result of any changes implemented.

Recommendation 11 - If TfL goes ahead with any of the proposals under consultation, it should make simultaneous improvements to its communications in order to ensure that people are well informed of any changes, and that this information is clear about alternative routes and accessible to all users.

Recommendation 12 - TfL should work with London TravelWatch and user groups to develop new ways to communicate with users, including better information on buses and for bus stop displays.

Finally, the Committee heard from Andy Lord that the proposals will save TfL £35 million in revenue per year. London TravelWatch has said that the impact of the changes on Londoners is disproportionately large compared with the amount of money which will be saved by making them.

The Committee understands the difficult decisions that need to be made at this time. TfL saw a £2.5 billion reduction in revenue during the pandemic while people were prevented from travelling, and only gradually returned to regular commuting. Since then TfL has received only short-term funding settlements from the Government, and Andy Lord, Chief Operating Officer at TfL, explained to the Committee that if TfL does not get the long-term funding it needs, Londoners could see significant reductions of buses beyond these proposals and significant reductions on rail and other services. TfL needs to be clear with Londoners too why it feels compelled to propose these cuts, including whether these cuts are simply efficiency savings, or whether they are being driven by the lack of a long-term sustainable funding deal.

Recommendation 13 - The Committee agrees with London TravelWatch's assessment that the impact of the changes on Londoners is disproportionately large compared with the amount of money which will be saved by making them and remains unconvinced over the need for these cuts to bus services. The Committee suggests that TfL carries out more work to find alternative, less damaging ways to save this level of revenue if savings are still required subsequent to any new funding arrangements with the Government.

We would be grateful if you could provide a response to this letter by 21 September 2022. Please copy your response to Eleanor Haigh, the Committee's Policy Adviser.

Yours,



Siân Berry AM
Chair of the Transport Committee

Copied to:

Seb Dance, Deputy Mayor for Transport

Andy Byford, Commissioner, Transport for London

Andy Lord, Chief Operating Officer, Transport for London

Geoff Hobbs, Director of Public Transport Service Planning, Transport for London

Tom Cunnington, Head of Buses Business Development, Transport for London

Summary of recommendations:

Recommendation 1 - For future proposed changes of this size, TfL should implement extended consultation periods from the outset.

Recommendation 2 - TfL must ensure all relevant information is available from the date a consultation launches.

Recommendation 3 - TfL should conduct further equality analysis following the conclusion of the consultation using information received in responses. TfL should then publish updated EqlAs to incorporate any additional evidence of equality impacts. The Committee requests that TfL provides information on what, if any, equalities assessment was carried out on the proposal in the Financial Sustainability Plan of January 2021 to cut the bus network by 4 per cent, compared with alternative cost-saving initiatives, considering the importance of the bus to Londoners with a range of protected characteristics.

Recommendation 4 - In response to this letter, TfL should set out the specific actions it has taken when accessibility concerns have been raised by consultees during this consultation. The Committee requests assurances from TfL that clearer, more accessible map formats will be produced for future consultations on any changes to bus services and that it will actively engage with service users who have other requirements to make sure that any future documents are as accessible as possible.

Recommendation 5 - The Committee is concerned that those who will be most affected by the proposed cuts are not adequately aware of the plans. TfL should ensure that there is a transparent process, before and after consultation proposals appear, that widely engages with all users of services, including those who may be less likely to respond to consultations as well as with user groups. TfL should continue this engagement ahead of publishing proposals, to ensure that those groups that rely on the buses most are aware of any changes and respond to any consultations.

Recommendation 6 - Overall, the Committee is concerned that any reduction in bus services driven by cost savings will be counterproductive and therefore asks TfL to reconsider these proposals as a whole.

Recommendation 7 - TfL should ensure that, where a change of bus is unavoidable, it can be made at the same bus stop. We do not believe that the 88 new interchanges in the proposals requiring a change of bus stop are acceptable. The Committee recommends that no change of bus is required on night buses, due to the risk to safety.

Recommendation 8 - A majority of the Committee considers that TfL should explore the cost and feasibility of extending the Hopper fare to 90 minutes to allow low-income Londoners to complete their journeys in view of extended journey times and the added pressures of the rising cost of living.¹¹

Recommendation 9 - The Committee does not consider that increasing frequencies on remaining routes could fully mitigate for the loss of routes in these proposals. However, if

¹¹ The Conservative Group does not support this proposal due to the potential financial implications of extending the Hopper fare. In their view, the financial priority should be to use any available funds to make the savings needed to reverse these proposed bus cuts.

service changes do go ahead the Committee recommends that TfL sets out how they will increase frequencies on associated routes.

Recommendation 10 - TfL should set out in its consultation report and decision documents how it will make specific improvements to facilities at bus stops where passengers will in future need to change buses, including improvements to real-time journey information, bus shelters and seating areas.

Recommendation 11 - If TfL goes ahead with any of the proposals under consultation, it should make simultaneous improvements to its communications in order to ensure that people are well informed of any changes, and that this information is clear about alternative routes and accessible to all users.

Recommendation 12 - TfL should work with London TravelWatch and user groups to develop new ways to communicate with users, including better information on buses and for bus stop displays.

Recommendation 13 - The Committee agrees with London TravelWatch's assessment that the impact of the changes on Londoners is disproportionately large compared with the amount of money which will be saved by making them and remains unconvinced over the need for these cuts to bus services. The Committee suggests that TfL carries out more work to find alternative, less damaging ways to save this level of revenue if savings are still required subsequent to any new funding arrangements with the Government.

ⁱ The Conservative Group opposed the fares freeze as in their view, the Mayor's decision to freeze fares was fiscally irresponsible and has been a key contributing factor to TfL's financial difficulties under the current Mayor. The Labour Group is supportive of the fares freeze because following the 42 per cent rise in fares over the duration of the previous administration, Sadiq Khan's fare freeze helped some of the poorest Londoners to access public transport in order to travel around the city. The Green Group was broadly supportive of the freeze on TfL-only fares but made proposals for more work from the Mayor to include travelcards and caps (which were never frozen) and has also proposed further concessions for key workers, as well as a restructuring of the fare zones to bring down costs in outer London.