

Response to Transport for London's Central London Bus Services Review November 2018

Background

At Bus Users UK, our mission is to bring people and communities together, through socially inclusive transport.

Bus Users is an approved Alternative Dispute Resolution (ADR) Body for bus and coach passengers, and a nominated body for dealing with complaints under the European Passenger Rights Regulation 2013 / (The Rights of Passengers in Bus and Coach Transport (Exemptions and Enforcement) (Amendment) Regulations 2017). Bus Users UK Charitable Trust is a Registered Charity number 1178677 and a Company Limited by Guarantee Registration Number: 04635458

We have worked closely with the Department for Transport to advise on passenger rights, the passenger involvement aspects of the Bus Services Act 2017, the detail of the proposed Accessible Information Regulation and all other matters where input on behalf of passengers is needed.

We work alongside communities to try to make the case for continuing service provision and subsidy. We also hold regular events in rural and urban settings to enable residents to make local transport providers and policymakers to understand their needs and the impact of poor transport on people at risk of social exclusion.

Comments

We will not be commenting on the detail of proposed changes to individual bus routes, since such advice will come more usefully from local residents, businesses and London Boroughs affected.

However, we would like to make the following general points:

1. We welcome the fact that you are consulting in this way, setting an excellent example to other transport authorities and bus service providers. We trust that the results of this consultation will be taken into account when finalising the future plans and that you will follow good practice in explaining how your final plans took account of suggestions made.
2. There is no equivalence between bus and tube services in central London in terms of accessibility, since only 70 out of 270 Tube stations have some degree of step-free access and only half of those are step-free from the platform on to the train¹. By contrast, the entire London bus fleet is accessible as are the majority of bus stops. This was also the point made most consistently in the consultation meeting we recently attended, arranged by London TravelWatch.

¹ Transport for All

3. There is also no affordability equivalence in cost between tube and bus, bus being cheaper for all journeys and better value on longer journeys. This point is very important in terms of inclusion and access for people on low incomes who are neither disabled nor over 60.

4. For these reasons we do not agree that the tube offers a reasonable alternative to any shortened or cut bus services in central London.

5. Shortening bus routes so that passengers needing to make a longer journey must change at some point will clearly have severe impacts on bus users with physical impairments but these will be even worse for passengers with learning difficulties. These passengers may have put a lot of effort into learning a simple journey and be unable to learn a more complex one.

6. The "400 metres rule" to trigger a "low impact" score in an impact assessment seems to date from an older, much less inclusive time and should be reconsidered and updated. Indeed, DfT guidance from 2005 clearly states that bus use falls off sharply if the distance to bus stops is greater than 250 metres, or 200 metres for people with disabilities. Therefore, a 200m distance between stops is regarded as best practice for areas where disabled or infirm people are likely to be regularly present, which would include most shopping centres, leisure facilities and tourist attractions. It would be interesting to know TfL's own disabled traveller representative group's view on this, as well as that of DPTAC.

7. A London rail terminus should have at least one bus serving it. This should be a matter of principle. This plan proposes to cut Fenchurch Street Station's only bus link. While other bus routes do pass at Aldgate and at Tower Hill, both are too far away, and in the latter case also via too complex a route, to reasonably be said to serve Fenchurch Street Station

8. You cite congestion as a reason for falling bus usage and for cutting services. It is accepted by transport planners that creating road space nearly always induces demand. This only fails to happen when there is no demand to induce, for instance in very sparsely populated rural areas. Central London is definitely an area where repressed demand exists, and road capacity freed up by removing buses will be filled by other vehicles, currently kept away by that same congestion. It is the use of private car that needs to be curtailed, not that of public transport.

9. For the same reason, no long-term improvement in air quality should be expected by these proposed cuts, especially since plans have already been announced to remove all diesel buses from London routes by the end of 2020.

10. We are not suggesting that changes should never be made to any bus routes in perpetuity but some of these changes seem ill-considered. A more useful approach would be to use the wealth of data TfL possesses and look at bus routes across the whole of London to analyse patterns or movement. It could be that a revised network of long routes would both serve bus users better and deliver cost savings. Many of London's bus routes are very old, and it could be that some new, long routes would deliver better patronage and give the opportunity to remove duplication in central London. Such an approach would remove the need for mid-journey changes which is the chief problem with the proposed cuts.

11. Patterns of travel are evidently subject to change and it is not unreasonable to review routes from time to time, but the proposed changes do not seem to be planned in the best interests of all passengers. It is clearly in the interests of all Londoners and the millions of visitors we receive if a more inclusive approach is adopted. Bus Users UK would be happy to work with London

Travelwatch, DPTAC and Transport for All to discuss how to take this forward so that TfL ends up with a useful and user-friendly design for its bus routes.

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