

Bus cuts – Draft Response from the London Forum of Amenity & Civic Societies.

1. The London Forum is an umbrella group for over 100 Amenity & civic societies in London. Many of these societies have submitted detailed comments on the impact of the bus cuts in their locality. The Forum makes some general points of principle which we believe should apply if the financial position of Transport for London dictates that cuts must be made. The London Forum recognizes that the extent of the proposed cuts is greater as a result of the government's refusal to agree a long term funding settlement that reflects the need to subsidise public transport as is the case in every major world city. We welcome the news that following the resignation of the Prime Minister it has proved possible for the DfT to put its proposals to Transport for London, and we hope that as a result the more damaging cuts to bus services can be averted.
2. We also recognize that bus usage has fallen since the then Mayor removed bus lanes to accommodate cycle lanes, and Working from home became commonplace. The decline in use was made worse by the pandemic. We agree with London Travelwatch that this decline in use must be addressed by making buses more attractive, principally by reducing journey times.
3. The population of London is still expected to rise in the coming decades. The Mayor is committed to raising the proportion of journeys made by sustainable means to 80% (something FTL strongly supports) and the government also has targets to reduce carbon footprint which are dependent on modal shift and reducing the need to travel.
4. Once an upturn in bus use is achieved it is important that bus services are enhanced to meet rising demand. This is most speedily done by increasing frequency rather than revising routes. Although there is reference to the importance of high frequency routes in the consultation document, it is unclear what frequency and capacity is proposed, or the impact of changes to single deck buses. What would be the capacity on Tufnell Park Road, for example, if the 236 were to replace the 4? Are we to assume that the use of the route number 214 for what appears more like the 24 is intended to convey conversion to single deck, or could the route be operated by double-deckers as now?
5. The corollary of this is that it is easier to reduce frequencies than revise routes which have the disbenefit of taking away through journeys which can currently be made.
6. We note the evidence given to the GLA Transport Committee (May 24th) that for people with disabilities in particular, for whom the bus is the only available means of transport, the loss of a through journey may deter travel altogether, but that for others the provision of a high frequency (turn up and go) service is more important because of the difficulty of standing for long periods or uncertainty as to how much time to allow for a journey.
7. The proposals suggest a preference for a single high frequency route over a choice of less frequent routes. If the schedule can be maintained, a six minute headway is preferable to two buses every twelve minutes, but if there is serious disruption on one route and not the other it will result in very long gaps in service. Which is to be preferred depends on how well disruption can be avoided (see point 13 below).
8. Scant regard is given to the fact that bus stops are not an ultimate destination. Many people live between two bus routes and may well transfer from one to another as a result of the changes in ways which T/L modelling fails to address. Currently there are two routes from Finsbury Square to different parts of Highgate Village. One is being cut as a result of an earlier proposal, severing the other is now proposed. The consultation document does not address the cumulative effect of these changes. We know that enhancing bus services on Southgate Road had the effect of encouraging passengers to use a more direct route

from there, rather than Essex Road. It is likely that forthcoming cuts will reverse that trend, particularly as the service along St. Paul's Road has been severely curtailed as well. In other places, it is more difficult to anticipate changes in patterns of travel. If the obvious alternative involves rail or tube, the ability to pay or the mobility to use these modes will limit the proportion of travellers modifying their journey in this way.

9. The proposals continue to reflect an over-emphasis on the availability of turning points. For instance, it now seems that the diversion of the 21 may have been inspired by a desire to turn the 476 at Newington Green instead. Most people boarding at Newington Green are travelling south. Empty buses southbound in the morning peak quickly fill; northbound buses starting from there can expect to be lightly loaded. It would be more cost effective to use existing bus stands for buses travelling in the direction of greatest need, and to pay attention to the need for bus stands whenever a revision of the road network is proposed. Low Traffic Neighbourhoods should be bus friendly neighbourhoods. We would have expected the 476 to be abandoned altogether and some enhanced frequency on the 73 restored to something approaching its former self.
10. Since T/L has determined on revising routes rather than reducing frequencies, we instead put forward the principles which we believe should be followed in making these changes.
11. First, there should be same stop interchange when a through route is no longer available. The consultation document highlights whenever this applies, thereby acknowledging its importance. If this is not possible, there should be a limit of no more than 70 yards on the walking distance between interchange stops. This is or used to be the trigger for eligibility for Mobility Allowance. In one example, journeys on the current 259, it is suggested that users would have to walk 140 yards – this is completely unacceptable for elderly people with limited mobility, who will already have walked to their initial boarding stop and will have to walk from the final alighting point.
12. Second, provision of Countdown and seating at all interchange stops. This is a relatively low cost measure. Countdown is more necessary on the buses than the tubes, where every station has the relevant information.
13. Third, restoration of bus lanes and introduction of other measures to reduce journey times. If the Mayor's plan is to be implemented, it is imperative that people are encouraged to use buses. Cuts in services will inevitably reduce bus usage, it is essential that steps are taken to win back passengers, and making services more reliable is the most likely way. We are pleased to note that, for example, modifications have been made to Cycle Route 9 (notably at junctions) which have reversed the increase in bus journey times previously incurred. We hope this can be replicated elsewhere.
14. Fourthly, there needs to be a careful review of the impact of any changes, and an openness to admit when T/L got it wrong.
15. Fifth, there needs to be a clear policy on bus access to hospitals. The Mayor has previously suggested this should be a priority, and (for example) a proposed deletion of the N271 was dropped because of the need to access Whittington Hospital.
16. Finally, a safe environment for pedestrians around bus stops needs to be created, eliminating conflict with cycles and e-scooters.
17. We would also like to raise concerns about **tourism**. It seems to us that consultation process does not afford an opportunity for those concerned with tourism to reflect their interests. Tourists are less likely to be time constrained and more likely to wish to see the areas through which they travel rather than doing so in tunnels underground.

18. In recent years tourists have lost a direct bus route from the Strand to Oxford Street and Madame Tussauds (the 176); the RV1, killed off by excessive parking which made the route unreliable, and a bewildering series of changes to the bus passing the British Museum. Given that tourism is marketed by a wide range of organisations, most without a transport expert, it is doubtful that information given to visitors kept up with the change from the 7, the 98, the 10, no bus, the 14. It is now proposed to take the route away again, one of few proposals which remove buses from a street currently served by them. It is also proposed to extinguish the 11, a route with a long history and a far better sight-seeing route than those marketed as such. Many visitors from elsewhere in England have a knowledge of routes like the 4, 11, 12, 14, 16 and 24 and will struggle to find their replacements even when a direct service that meets their needs is still being offered.
19. Familiar route numbers following unfamiliar routes are confusing not just to tourists but to irregular users living in London. The 23 cannot be considered a success. We are surprised it has escaped consideration in these proposals.
20. Our last concern relates to the **consultation** itself. The route numbers that will disappear have hit the headlines and many public comments have failed to reflect the fact that for many users the existing journey would be made by a bus with a different number. The plans might have been clearer if the proposed 214 had retained the number 24 instead. The split into regions was well intentioned but, for example, changes to the 19 impact on Islington residents and not all of them will have seen these proposals buried in the West London section. The consultation period is much shorter than has been allowed for ULEZ proposals, even with the extension to August 7th, but the bus proposals are more detailed and require more time not less.
21. It is only fair to acknowledge some positive points. Although many existing journeys will require a change of buses, there are journeys which will be possible on a single bus for the first time. As far as we can ascertain, and unlike other cuts, no route apart from Russell Street noted above will see a severe reduction of around 50% of the current level. We understand that it is easier to cut bus routes than tube services in terms of gaining a short term reduction in costs. However, the bus is for many the only accessible means of transport; it is the mode of choice for many confronting the cost of living crisis that we now face.