

## EMAIL TO TfL re proposed changes to buses in central London – 26<sup>th</sup> January 2017

See <https://consultations.tfl.gov.uk/buses/west-end-bus-changes> Closing date 29 January 2017

Thank you for the opportunity to respond to TfL's proposals for changes to bus routes in the West End. I am responding on behalf of London Living Streets. London Living Streets is a community group that seeks to represent those on foot across the Greater London area. We believe that there is a unique opportunity to remake London in favour of those on foot in order to make London's residents, workers, businesses and visitors safer, healthier, wealthier and happier. Overall we are extremely supportive of the role of buses in Central London and their importance in reducing reliance of private motorised traffic.

Our comments are as follows:

We emphasise that it is important to have a holistic view of transport and the public realm, when making changes to any element of London's transport system (such as buses).

We highlight the fact that, since most bus users are also pedestrians, pedestrians are in effect the life-blood of buses. It is therefore important not to overlook the needs of pedestrians, who comprise the main group of London Buses passengers.

In making any changes to London's buses, it is important to take into account the Mayor's 'Healthy Streets' agenda. This links to our point above about the need for officers involved in developing London's bus network to take a holistic perspective, which will necessitate early discussions with other parts of TfL, including the Surface Strategy and Planning Directorate. Local consultation is also needed on proposed changes to bus routes or bus priority systems, in order to best capture benefits, alongside potential unintended consequences and how these might be mitigated.

We have long advocated for and very much welcome the Mayor's commitment to pedestrianise Oxford Street. We think that the bus hopper ticket, by reducing/removing the financial penalty of changing buses, will help achieve this. In line with our comments above, we have a particular concern about the potential for detriment to pedestrians of services starting/ending at Oxford Circus. Specifically, we would not wish to see Cavendish Square used as a place for 'stacking' buses. We therefore call on TfL to make best use of technology to ensure that bus stacking is not needed as part of changes to any bus services. We also have a similar concern about the potential effects on the 'place' function of Berkeley Square resulting from the proposed routeing of more buses through Berkeley Square. In essence, our concerns are that TfL Bus Division may wish to stack buses in, or send more of them through, attractive places for pedestrians where there is clear scope for improvements, e.g. Cavendish and Berkeley Squares, and the proposed new square at Centre Point.

We propose that TfL should look at ways in which to decrease other motor traffic on bus routes in Central London, for example by creating 'mode filters' at junctions with side roads. Modal filters on side roads where they join bus routes could create a better environment for pedestrians and speed up buses by stopping other traffic entering and leaving the bus route. Alternatively, reduced motor traffic flow through side road junctions could enable re-timing of signals to give much more priority to pedestrians, thus improving access to bus stops.

We highlight recent developments which benefit buses and pedestrians, such as the far-sighted decision to close Bank Junction to all motor vehicles except buses. Could this be repeated elsewhere?

In considering the positioning of bus stops of realigned routes, it is important to maximise convenience for pedestrians. Connectivity needs to be maximised so that passengers are able to change from bus to or from rail, or from bus to bus, with minimal walking, dovetailing with the bus 'hopper' fare initiative. Bus stops form a key element of London's bus system, and their design, facilities and positioning are important determinants of the attractiveness of bus use.

We make these comments in the context of TfL's Business Plan which we note places heavy reliance on increasing bus ridership across London. We thank you for the opportunity to comment on these changes.

We would be grateful if you could confirm safe receipt of this consultation response.

Thanks & best wishes – Jeremy Leach Chair London Living Streets Group

## GLA Transport Committee: Call for evidence: bus services December 2016. Response from London Living Streets

We are concerned that the terms of reference of the inquiry are too narrowly focused on bus operation. It is vital that in considering bus services and safety, the inquiry also takes into account the needs of pedestrians and the quality of public spaces. Moreover, the questions posed in the consultation do not include any on bus stops. Bus stops are the point of entry to London's bus network. They need to be managed in the optimum way to provide the best possible service and thus attract customers and increase bus ridership and income. Congestion is a major obstacle to increased ridership. We see as key measures to reduce congestion the closure of key junctions to all traffic except buses as at Bank and the closure of a significant number of side roads to prevent other traffic accessing bus routes.

*London Living Streets statement of our general position in relation to buses in London:*

- We recognise that buses are a key part of London's transport mix, and an effective way to reduce use of private motor vehicles. It is important to have a **holistic view** of London's bus network in the context of other modes and the needs of Londoners – and to take into account the Mayor's 'Healthy Streets' agenda
- The synergy between walking and use of buses (almost by definition, most bus users are pedestrians) needs to be maximised. In effect, pedestrians are the 'life-blood' of buses; there should be **no detriment to pedestrians** arising from bus service alterations
- Recent falls in bus use and decreased bus journey reliability are related – the primary cause is congestion arising from over-dependence of London's transport system on car use ('excess traffic', see Fig 6.10 in 'Transport in London 9', TfL, 2016). This highlights the importance of **reducing other motor traffic** on existing and proposed bus routes, and also benefits pedestrians. Steps are urgently needed to stem the increase in PHVs and van usage, which is leading to the rise in motor vehicle numbers and hence congestion in London. In addition, we propose that TfL should look at ways in which to decrease other motor traffic on bus routes in Central London, for example by creating 'mode filters' at junctions with side roads. Modal filters on side roads where they join bus routes could create a better environment for pedestrians and speed up buses by stopping other traffic entering and leaving the bus route.
- Safety and perception of safety is crucial for pedestrians on, and on the approaches to, bus routes; it should fully take into account **Vision Zero**, and include a focus on pedestrian KSIs involving buses. We fully support the rapid introduction of ISA into the bus fleet and the commitment of London buses to adhere to the posted speed limits and in particular 20mph limits once ISA compliant buses are introduced and prior to that through the careful monitoring of ibus data on speed.
- We are keen to work with TfL to promote **common goals** for London's bus network, walking and the public realm; we think there is scope for improvement
- A **pedestrian-friendly bus system is a 'win' for buses**; we note that increasing bus ridership is a key element of TfL's Business Plan
- Our ultimate aims are for **efficient, safe and enjoyable movement of people** wherever they are in London, a **high quality public realm**, and **healthy streets** for all Londoners, with an emphasis on active travel and usage of public transport.

*Our approach in this response:*

We have taken a focused approach, responding only to questions most relevant to pedestrians and walking in London, and highlighting opportunities to improve bus transport holistically i.e. with co-benefits to pedestrians - hence to Londoners generally. We note the overlap between **bus network planning** and **bus safety**.

*Summary of London Living Streets comments:*

A pedestrian-friendly bus system is a 'win' for buses too. TfL's Business Plan makes clear that the plan is heavily dependent on growing use of buses in London. London Living Streets proposes:

1. That measures to pedestrianise Oxford Street (or, more generally, to improve bus operations across London), are not introduced at the expense of an improved public realm at nearby squares and public spaces, both existing and planned.
2. A review of opportunities across London to remove general motor traffic from busy junctions and other key locations, following the City of London's example at Bank junction. In addition, action should be taken to prevent motor traffic accessing bus routes from side roads.
3. A review of the locations of and seating at bus stops. Reviewing locations would be a major undertaking, but could yield substantial benefits to passengers and for TfL. In recent years, bus stop locations have been strongly influenced by the needs of general traffic flow. For instance, the most convenient locations for pedestrians are generally near junctions. Instead, many have been moved away from junctions, to aid other vehicles. We discuss this further in the Appendix.
4. A review of the feasibility of improving provision of Bus Countdown at bus stops, prioritising the busiest bus stops and new developments and opportunity areas.
5. A review of the feasibility of extending zebra crossings at floating bus stops, to improve pedestrian safety and access to bus stops on both sides of the road.
6. A review of the policy of allowing powered two-wheelers (PTWs) in bus lanes. The decision on this went against the evidence. It creates danger and intimidation for pedestrians and impairs bus reliability.
7. We stress the importance of the commitment by TfL and the GLA to introduce ISA backed buses after the success of the recent ISA trials and the importance of monitoring bus speeds to reduce casualty numbers and the intimidation that speeding buses can cause to pedestrians and other road users.

We set out our comments in more detail in the **Appendix**.

## **APPENDIX – LONDON LIVING STREETS' FURTHER COMMENTS IN RESPONSE TO LONDON ASSEMBLY CALL FOR EVIDENCE: BUS SERVICES**

### **1. Bus network planning**

We think that a key principle in bus network planning should be to move away from one-mode-at-a-time thinking to a holistic approach, actively seeking and taking up opportunities to improve travel for different modes simultaneously (prioritising the most efficient, healthy and sustainable), as well as the public realm.

#### Use of bus lanes by taxis and powered two-wheelers (PTWs) (Bus priority: Question 6)

TfL Business Plan places heavy reliance on increased bus ridership. Achieving this will require bus lanes to be as uncongested as possible, in order to enhance bus priority. Keeping bus lanes clear of unnecessary motor vehicles has particular implications for pedestrian safety and we therefore discuss it further under 'Bus safety', below.

#### Bus hopper ticket (Question 7)

There is scope for capitalising on the flexibility introduced by the welcome introduction in September 2016 of the bus 'hopper' fare. This fare makes bus use more attractive and is a good way to encourage mode shift away from driving since it enables more convenient travel, as well as making better use of London's bus network.

We welcome the Mayor's commitment to pedestrianising Oxford Street. We think that the bus hopper ticket, by reducing/removing the financial penalty of changing buses, will help achieve this. However, we have a particular concern about the potential for detriment to pedestrians of services starting/ending at Oxford Circus. Specifically, we would not wish to see Cavendish Square used as a place for 'stacking' buses. We therefore call on TfL to make best use of technology to ensure that bus stacking is not needed as part of changes to any bus services. We also have a similar concern about the potential effects on the 'place' function of Berkeley Square resulting from the proposed routing of more buses through Berkeley Square. In essence, our concerns are that TfL Bus Division may wish to stack buses in, or send more of them through, attractive places for pedestrians where there is clear scope for improvements, e.g. Cavendish and Berkeley Squares, and the proposed new square at Centre Point. We believe that both these existing iconic London squares are ripe for improvement as places, given how much space is currently devoted to unused carriageway.

#### Alternative models and approaches (Question 10)

We highlight recent developments which benefit buses and pedestrians, such as the far-sighted decision to close Bank Junction to all motor vehicles except buses. Could this be repeated elsewhere? Similarly, modal filters on side roads where they join bus routes could create a better environment for pedestrians and speed up buses by stopping other traffic entering and leaving the bus route.

#### Possible improvements to the bus stop network – maximising convenience for passengers

Bus stops form a key element of London's bus system, and their design, facilities and positioning are important determinants of the attractiveness of bus use.

Factors to take into consideration in reviewing bus stop locations could include:

(1) Location in relation to road junctions. Many bus stops have been moved away from junctions. We understand that this has been to help the flow of general traffic. The Mayor's priorities appear to have changed, giving more weight to bus passengers. Locating bus stops near to junctions provides more convenient access to passengers, since the stops are then nearer for more people, both in the arm of the junction with the stop and on the other arms.

(2) Place bus stops as near as possible to rail and tube stations. This assists transport integration. Even moving stops a few metres nearer the station could benefit large numbers of people making the connection, in both directions.

As one of many possible examples, 'Earlsfield station' southbound bus stop is located past Earlsfield Station,

necessitating negotiation of a busy junction - usually entailing a long wait for pedestrians to back-track to the station. Bus stops serving stations and other interchanges and 'trip attractors' should ideally be located immediately outside such destinations.

Alternatively, improving access between bus stops and nearby major destinations could be achieved by introducing, as suggested above, a mode filter; even reduced motor traffic flow through side road junctions could enable re-timing of signals to give more priority to pedestrians.

We believe that a strong case can be made for TfL to carry out a review of the positioning of bus stops in relation to destinations such as stations and junctions, with a view to (a) simultaneously improving bus services, (b) increasing income to TfL from bus use (in line with TfL's Business Plan), and (c) reducing motor traffic flow. As part of such a review, we suggest that TfL would wish to quantify the benefits of moving bus stops nearer junctions, noting that such repositioning would have the effects of changing traffic flow and reducing the distance that most pedestrians have to walk to the bus stop. The end result for people wishing to walk to a bus stop would be reduced time and increased convenience, hence increasing the attractiveness of bus services. Further suggestions for bus stop network improvement are to:

2. Combine stops catering for several routes. Split stops mean that passengers with a choice of route need to hop between stops to catch the next bus. As with the other suggestions, a balance of factors needs to be taken into consideration. We suggest that, in weighing up this balance, customer convenience should be the most important consideration. We note that this factor is not always given sufficient weight; for example, recent changes made at Archway have resulted in bus stops now being scattered widely.

3. Put seats and shelters at almost all bus stops. These are particularly important for elderly passengers. Time spent standing at a stop, particularly without shelter, seems to pass more slowly than when sitting, so seats and shelters improve the attractiveness of bus travel.

#### Information for passengers and potential passenger/pedestrians while on the move

As noted earlier, bus passengers almost by definition are also pedestrians. With respect to bus 'Countdown', TfL cannot assume near-universal possession of smart phones and knowledge of relevant apps; further, the distribution of smart phones ownership is unevenly distributed across London's population. We would therefore like to see a resumption in roll-out of Countdown perhaps prioritising the busiest bus stops which are not currently provided with Countdown. Providing public information about bus destinations and timings at bus stops is also a way of advertising the range of destinations and frequency of London Bus services to passers-by and thus growing bus ridership – and so, new developments may also be targets for roll-out of bus Countdown.

## **2. Bus safety**

We commend Tom Kearney's and Sarah Hope's campaigning, which have highlighted weaknesses in TfL governance of bus operations which it commissions (especially relevant to Qs 1-9) and ask we ask TfL to continue to press for reducing the number of pedestrian casualties from buses. We also bring to the Committee's attention the briefing by 20splentyforus which highlights the many benefits to bus operators of 20mph speed limits on bus routes (available at [http://www.20splentyforus.org.uk/BriefingSheets/20s\\_plentyfor\\_buses.pdf](http://www.20splentyforus.org.uk/BriefingSheets/20s_plentyfor_buses.pdf)).

#### Intelligent speed adaptation (Questions 10, 13)

We call on TfL to move quickly to maximise use of technology to reduce road danger at source e.g. by improving speed limit compliance and reducing the top speed of buses themselves. We welcome the introduction of speed limiters on all new buses from 2018; this could be a game-changer in enhancing enforcement of speed limits, including 20mph limits, and encouraging further roll-out of 20mph speed limits. Prior to the implementation of ISA across the fleet we would continue to press for TfL to use ibus data to ensure that operators comply with posted speed limits and that their schedules do not impose the requirement on driver to exceed the speed limit.

## Infrastructure and design

### Floating bus stops (Question 12)

London Living Streets' general stance is that no infrastructure measure should introduce disadvantage to pedestrians. We note that the response to Caroline Russell's Mayoral Question on this topic, tabled on 14 December 2016 (Question 2016/4556), indicated no reported collisions between cyclists and pedestrians at 'floating bus stops' AKA bus stop bypasses. We welcome TfL's trial of zebras at central London (busy) floating bus stops in order to learn from and optimise the design of these bus stops for pedestrians and cyclists.

We ask further that TfL carry out a review of the feasibility of extending zebra crossings which serve floating bus stops across roads i.e. installing a zebra crossing on the whole of the carriageway, not just on the cycle track part of the highway at these locations. This would both enhance pedestrian access to bus stops from both sides of the road, and improve pedestrian safety at and on the approaches to bus stops.

### 20mph zones and speed limits (Question 13)

We note the clear link between vehicle speed and the frequency of severity of road casualties and in our forthcoming submissions on Vision Zero we will be pressing for a default speed limit of 20mph to be created within the North and South Circular roads. We understand that the ISA trials were particularly successful in relation to ensuring compliance with 20mph limits and we believe that a wider use of 20mph zones and the capacity of buses to adhere to them will not only reduce casualty numbers but create an environment where more people will wish to make use of buses and public transport in general as active forms of travel become more attractive as the general environment of frequently speeding vehicles is reduced.

### Further investment in bus priority measures (Question 14)

London Living Streets strongly supports further investment in bus priority measures such as bus lanes. Effective bus priority measures have the effects of (a) making bus use more attractive by improving journey time reliability, (b) reducing kerbside traffic thus improving the public realm, and (c) reducing pressure on bus operators to compromise pedestrian and other road user (and passengers') safety by unsafe driving, including exceeding the speed limit, in an attempt to meet operating schedules.

In addition, we recommend that TfL should look at ways in which to decrease other motor traffic on bus routes in Central London, for example by creating 'mode filters' at junctions with side roads. Modal filters on side roads where they join bus routes could create a better environment for pedestrians and speed up buses by stopping other traffic entering and leaving the bus route.

### Use of bus lanes by taxis and powered two-wheelers (PTWs)

We note the 2013 TfL report on patterns of KSIs to PTW-users and TfL's statement in recent Mayoral Question 2016/4915 concerning motorcycle safety, tabled by Florence Eshalomi AM that no change in this pattern is expected to have happened since publication. We refer the Committee to evidence of PTWs being an increasing threat to pedestrians, as indicated by KSI trends of vehicles involved in pedestrian deaths and serious injuries on London's roads:

**Pedestrian KSI casualties for which PTW was vehicle in direct conflict in Greater London - 2010 to 2015**

Year	2010	2011	2012	2013	2014	2015
PTW Category 02+03+04+05 (totals)	71	80	105	80	73	75
PTW Category 02+03+04+05 (as a percentage of total pedestrian KSIs)	7.78%	8.16%	9.35%	9.55%	9.37%	10.27%
Total no. of pedestrian KSIs (all vehicles)	913	980	1123	838	779	730

We think it timely for TfL to review the policy of allowing PTWs in bus lanes. The decision on this went against the evidence. It creates danger and intimidation for pedestrians (as well as not delivering clear safety benefits for motorcyclists), complicates the driving environment for bus drivers, and impairs bus reliability.

*Summary of London Living Streets comments:* A pedestrian-friendly bus system is a 'win' for buses too. TfL's Business Plan makes clear that the plan is heavily dependent on growing use of buses in London. London Living Streets proposes:

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2. A review of opportunities across London to remove general motor traffic from busy junctions and other key locations, following the City of London's example at Bank junction. In addition, action should be taken to prevent motor traffic accessing bus routes from side roads.
3. A review of the locations of and seating at bus stops. Reviewing locations would be a major undertaking, but could yield substantial benefits to passengers and for TfL. In recent years, bus stop locations have been strongly influenced by the needs of general traffic flow. For instance, the most convenient locations for pedestrians are generally near junctions. Instead, many have been moved away from junctions, to aid other vehicles.
4. A review of the feasibility of improving provision of Bus Countdown at bus stops, prioritising the busiest bus stops and new developments and opportunity areas.
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7. We stress the importance of the commitment by TfL and the GLA to introduce ISA backed buses after the success of the recent ISA trials and the importance of monitoring bus speeds to reduce casualty numbers and the intimidation that speeding buses can cause to pedestrians and other road users.