

## **Southwark Council's response to TfL's consultation**

### **Executive Summary**

Southwark is disproportionately impacted by these proposals. The proposals are not fairly distributed across 32 boroughs and the City of London.

The data and analysis provided is limited and flawed and not fit for purpose. They are not a sound basis for critical decision making in terms of accessibility, equality, jobs, the economy and the climate emergency. These proposals undermine the transport needs of all Londoners.

These cuts must be withdrawn in their entirety and TfL must now engage with Southwark and other London authorities to work in partnership to promote and support bus use, not erode it.

### **Our main concerns about the impact of these proposals:**

#### **1. Disproportionate impact on our borough**

Buses are the public transport of choice for Southwark residents. Some 58.4% of households in Southwark do not own a car, compared to the London average of 41.6% and the England average of 25.8%. We have little underground coverage and no trams. Our national rail stations are amongst the busiest in London and Peckham Rye is the country's busiest station without step-free access. Many other of our stations are inaccessible for those with mobility issues and require investment. The bus is the only accessible form of transport for many residents.

It is therefore no surprise that Southwark has the second highest bus usage rate in London with more than 116k bus trips per day and 365 bus journeys trips per 1000 residents. Buses make up 48% of all public transport journeys, with 21% train or overground and 31% tube. Buses also make up 16% mode share, third highest mode overall after walking (37%) & cars (21%).

Southwark has already suffered cuts to its bus services in recent years. TfL's last Central London Bus Review in 2018 resulted in many in Southwark being cut or reduced in frequency. Alternatives provided at that time to mitigate the impact, are now at risk of being cut if the new proposals go head, meaning double impact on Southwark residents in just four years.

Since 2018:

- The bus RV1 Connecting Waterloo, London Bridge and Guy's and St Thomas's hospitals and route 48 (between Walthamstow Central and London Bridge) were cut.
- Route 45 has been cut between E&C and King's Cross and route 388 no longer runs between E&C and Liverpool street and reduced frequency

- Routes 53 and 172 have been shortened and 53 has been reduced in frequency, with this now proposed to be cut despite the need of improvement of buses in Old Kent Road.
- 171 no longer runs between E&C and Holborn
- Route 343 was extended from Tower Bridge to Aldgate to provide an alternative to route 40 and currently the proposals are to cut it back again to Tower Bridge.
- Routes 35 and 149 have been reduced in frequency. Route 149 is now proposed as a substitute for losses between London Bridge and the other side of the river.
- Other capacity and frequency reductions in the 176, 185 and 12, all of which serve communities in the south of the borough and connect them to central London. Routes like the 63 still stop short of stations and key interchanges.

Our growing population needs more and better bus services, not more reductions compounding previous cuts, with reduced access to workplaces, and places of significance, healthcare, education, culture and faith north of the river.

The current proposals leave Southwark more isolated from its North London neighbours, with the loss of a direct connection across the river for routes 47, 133, 521 and 43 on London Bridge and for routes 78 and 343 on Tower Bridge.

TfL's own EQIA shows that the proposals will have a bigger impact on people on lower incomes and those from ethnic minority groups. With 65% of Southwark households earning less than £45k and 15% below 15k, and with ethnic minorities making up almost half of our population, this means that the impact on our residents of the proposals will be felt more deeply in Southwark. Those on lower incomes are also less likely be able to use alternative types of transport such as trains because of the higher cost, and cost will become even more of a barrier as the cost of living crisis hits this autumn.

The most vulnerable are dependent on buses: 58% of disabled people, 66% of children and young people, 65% of the elderly and 65% of Londoners from ethnic minority backgrounds use this form of transport.

In central and inner London, new rail services such as the Elizabeth Line are improving the travel options. However these improvements are not directly benefitting Southwark residents, and the improvements we have asked for, such as the Bakerloo Line extension, have been deferred.

Reductions in bus service provision will compound the impacts of delayed transport infrastructure investment within the borough where new public transport services and connectivity are and will be needed as the number of homes we continue to deliver are built.

## **2. Climate impact**

We welcome the commitment made by the Mayor of London to make London carbon neutral by 2030. This is an ambition that we share as a borough and which is shared by the vast majority of boroughs across London. In Southwark our most recent emissions data shows that road transport makes up 18% of the borough's overall emissions – an estimated 194.7 kilotons of CO<sub>2</sub>. To reach our commitment to become carbon neutral by 2030, we need to cut these emissions and move them as close to zero as we can. Independent analysis of this shows we need a 12% year-on-year reduction to meet this goal. This will only be achieved by a comprehensive network of green public transport alternatives to private cars.

The council is already taking action. Our climate action plan is rated one of the best in the country and second best in London. We are taking action to make more roads around schools car-free. We are piloting incentives for residents to give up their cars altogether, such as increased bike and cargo bike storage within secure cycle hangars (aiming to have at least 1,000 by 2026). 63% of the borough already has controlled parking and we are looking at extending this further.

We are a leading London borough in promoting active travel, prioritising walking and cycling over car use, and working with TfL to invest in the transport infrastructure we need for the future, such as the extension of the Bakerloo Line. Making walking and cycling to key bus and train interchanges easier, cleaner and safer is an essential element of a sustainable transport network for London.

But this is all undermined by any decision which reduces the bus network in the borough. We need to be reducing private car usage now if we are to be carbon neutral by 2030. The removal of buses undermines this and makes it much harder for both the Mayor and the council to meet their commitments.

No one solution will reduce our carbon to zero, and it requires a combination of steps working together to change behaviours and move people away from cars to cleaner alternatives. A decision to cut buses would reduce the impact of the other steps that we are already taking and make it much more difficult for both the Mayor and the Council to deliver their commitment to net zero.

## **3. Stifling growth**

### **Meeting current and future needs**

Southwark is playing a major role in delivering the homes Londoners need, with ambitious plans in place to build thousands of new council homes, and to deliver major, resident-supported estate regeneration as well as the development of areas like Canada Water and the Old Kent Road. Increasing numbers of residents will need additional transport capacity, and our plans are based on this. Cuts to bus services may make some plans unviable, and add to overcrowding on tubes and

trains, plus the bus routes that remain. It may also lead to more congestion and pollution on our roads, as residents see no choice but to use a car to get around.

Along the Old Kent Road, we plan to build 20,000 new homes. Southwark has agreed with GLA/TfL that in advance of the BLE, enhanced bus services in OKR could support the first 9,500 homes by 2030. This was called the Phase 1 development. At present we have 1,586 homes either completed or under construction. This generates a population growth of 3,172 people on completion largely in 23/24 and between 15,000 and 19,000 people by 2030. The average start completion rate is running at between 1,000 and 1,500 homes pa.

The plans always assumed that existing bus services wouldn't be reduced. In order to get developer contributions for enhanced bus provision we collect money per every new home approved through s106 agreements. TfL will only benefit from these contributions for enhanced services and not to cover previously reduced services.

### **Access to services**

Our residents rely heavily on buses to access health, education and other local services. We know local hospitals are very concerned about the proposals, not just in terms of how their own staff will get to work, but also with regards to patient travel. I know that one local hospital trust, Guys and St Thomas', employs over 25,000 members of staff and attracts around 12,000 visitors per day on each of its hospital sites.

Many of these people travel by public transport, as we have all been encouraging over many years of trying to reduce car use. They and we fear that staff and patients will be severely impacted by these cuts. For example, the proposals in and around Camberwell will have a major impact on anyone trying to reach Kings College Hospital in Denmark Hill, particularly patients. This includes those accessing SLAM mental health services, those with chronic conditions that regularly attend clinics and pharmacy services, and significant numbers of pregnant women or parents accessing maternity and paediatric services.

The night bus services on these routes are often the only way many shift workers can get to or from work, and keep our hospitals operating a 24-hour service. If the proposals go through, staff and patients will face some difficult choices: Pay more to use less frequent trains; walk through dark streets late at night to change buses; or for those who have them, get in their car.

### **Economy**

Southwark is home to a large number of major employers, from big hospitals like Guys, to international hotels, consultancies and construction companies, some of whom have voiced their concerns to you directly. All of these depend upon staff to work 24/7, often in lower paid roles, to keep their organisations running.

The bus network is essential to ensure these staff members can get to work at all hours of the day, and keep Southwark and London's economy going.

The bus cuts themselves will result in local job losses. We believe that several hundred local people will lose their jobs as drivers and support staff as a result of these cuts. Apprentices will also be at risk at academies like The Go-Ahead Camberwell Garage, which educates, trains and upskills 700 apprentices a year. These are all full-time permanent jobs, with HGV qualifications and additional literacy and numeracy education as core components. This supplies drivers across the whole of South London bus network, serving many routes and communities. These are good quality jobs, providing skills and HGV licences that are in short supply to the London economy, both in the private and public sectors. Camberwell is best placed to attract new drivers but if the 12 and other routes are cut, we understand there will be a loss of up to 350 apprenticeship places. Many existing drivers will also find their jobs are unsustainable if their routes are no longer based at the Camberwell garage.

The drivers are reflective of the local communities that they serve, and Black, Asian and other minority ethnic groups have high levels of workforce representation, which is not seen in the wider jobs market. The cuts will disproportionately hit Black, Asian and other minority workers and their families, who will struggle to find jobs that provide such security and wage levels and pension benefits.

Local people and families are facing a cost of living crisis this autumn, and simply cannot afford to lose the valuable jobs they do, providing essential services for our communities. We believe the Department for Transport must address TfL's funding gap, in line with transport investment in other global capital cities.

Our town centres are the central meeting places for our residents and visitors to socialise, spend their leisure time, go shopping, and travel to school or places of work. It is important to ensure that good public transport connectivity is maintained to and from our centres to enable these important activities. Any reduction in bus services may impact the economic performance of our town centres by disincentivising travel to them as a result of a poorer service or access. It may also encourage higher residential and retail car parking provision in new developments.

#### **4. Deepening inequalities**

##### **Safety of protected groups**

Despite a concerted effort across all agencies to improve the safety of women, girls, young people, and members of the LGBTQ+ community in recent years, the stark truth is that in many parts of inner London, they remain at risk of violence and attack.

Many of the proposed changes require a significant additional walk to interchange between buses, or from bus to train, especially late at night. We believe this risk will only increase by asking passengers to walk alone through dark streets late at night – the proposals will mean an additional eight or ten minute walk on some routes, and then an additional wait for an infrequent service like a night bus.

Our concerns are supported by the EqIA published with the consultation documents which demonstrates that the proposals will have a larger impact on:

- Those with protected characteristics;
- Key workers;
- Shift workers on unsociable hours;
- People on low income.

Key workers and night/early morning workers only have buses as an option to travel to work when other services stop running. This is especially the case in Southwark, where even during the day the rail and underground network is less developed compared to other parts of London.

### **Accessibility**

The impact of the proposed changes is expected to reduce public transport accessibility (PTAL) levels within the borough, as bus services are removed or modified, and many alternatives do not offer step free access. A reduction in available bus services will increase walking times to bus stops for new and existing residents, lengthening journey times and reducing accessibility to services.

This will not only impact upon the elderly and those with limited mobility and disabilities, but also upon families with children in buggies, who share limited space on buses with wheelchair users, and are often unable to access other forms of transport due to the lack of step-free access.

## **5. Impact on our children's education and wellbeing**

Southwark has almost 24,000 students attending secondary schools, around 1,500 of these students travel more than three miles to and from school each day and rely on TfL bus services to get them there. Safe and reliable travel helps to protect and safeguard our children and young people. Without access to direct bus routes, journey times will be increased and many children will be faced with a more complicated and longer journey. This will be particularly challenging for younger children starting secondary school who are learning to travel unaccompanied for the first time.

A reduction in bus routes would inordinately impact on children and young people with special educational needs and their ability to travel independently, securely and safely.

Many families with younger children of nursery and primary school age also rely on local bus services to get their children to school. The reduction of bus routes would have a greater effect on families with lower incomes who rely on buses, and even more so during the current economic crisis.

Approximately 70% of young people aged 16-18 travel beyond the borough to access education and employment opportunities. Reduction in mobility for these young people will have a detrimental impact on their life chances, mental and social health. Young males in the 14-18 age range are most susceptible to criminal or unsocial behaviour.

The bus routes threatened with closure that would significantly impact on Southwark students are routes 12, 45 and 78:

12 - Dulwich to Oxford Circus - route passes close to Harris Boys East Dulwich, Harris Academy Peckham, Sacred Heart, UAE South Bank and Notre Dame. This route is also used by Southwark children who travel out of borough to schools such as Oasis South Bank (Lambeth) and Grey Coats (Westminster);

78 - Nunhead to Shoreditch via Tower Bridge - route passes close to St Thomas the Apostle, schools on Peckham Rye (Harris Boys and Harris Girls), Harris Academy Peckham and Harris Bermondsey;

45 - from Elephant and Castle to Clapham Park via Brixton - this route serves pupils travelling to/from Notre Dame school (near Elephant and Castle), UAE South Bank and Ark Walworth Academy;

The safety of pupils will be impacted as they will lose a direct bus route: This means large numbers of young people will need to interchange with other school communities in different neighbourhoods to access a reduced number of buses. This will in turn lead to delays to their school days and impact their access to afterschool activities and services, as well as their ability to get home safely. This puts them at risk of harm.

## **6. TfL's consultation approach**

### **Lack of promotion**

The consultation is difficult to navigate, and whilst non-digital response options are provided, they only appear to be accessible from the website. Proactive promotion or publicity carried out by TfL to promote the consultation to Londoners appears to have been very limited, with no mention on its social media feeds prior to the 7<sup>th</sup> August deadline. The ULEZ consultation has been shared far more widely using TfL channels, as have hyperlocal schemes like walking and cycling changes in the London Bridge area, and therefore it is unclear why the bus consultation has not been promoted in the same way, given its far-reaching potential impact.

### **Complexity of consultation**

The consultation is difficult for individuals to understand, in terms of what it means for them and their journeys. It requires the user to register, and is complex. It would be particularly challenging to follow for anyone who does not speak English as a first language, as well as those with lower literacy levels. Analysis of impact has been presented in sections and maps and materials provided only about the routes affected without explaining existing alternative routes. This is especially important for night services.

### **Other issues**

Frequency and timetables of services at new interchanges have not been taken into account in the analysis.

Capacity is the scheduled capacity (passenger spaces) and it has been calculated in specific monitoring locations considering the sum of services at that location.

This only takes into account the capacity at that particular location and not the capacity of the entire route from start to finish. It isn't clear what the capacity is for people using the route at an earlier stage of that route. It is unlikely that people already on a bus at that location would get off and change to a bus with more capacity.

Demand is intended as the total number of passengers travelling through the point for the busiest hour. This should be considered as usage rather than demand. Demand should also include potential demand from people that currently do not use the routes because of low reliability or low connection and people that could switch from private transport to buses if the service was improved. Capacity and demand are also calculated within one hour without consideration of the frequency of specific routes.

While TfL has acknowledged that some people may have to pay two bus fares rather than one previously, they have not addressed how likely this is to happen in the individual route closures. This is important given many of their proposed interchanges are in central London, and people travelling the longest distances (i.e. end to end) are most likely to be the worst-off financially and therefore unable to afford rail and tube for longer journeys.

The same happens for all the other possible impacts stated in the EqIA: The impact has been highlighted but it has not been addressed how likely they are to happen.

### **Our concerns regarding the routes proposed to be cut**

We are concerned about all the proposals, but the loss of the following routes would have a particularly devastating impact on our residents:

**The 12** – currently runs 24 hours from Dulwich through Peckham, Camberwell, Walworth and Elephant and Castle into Westminster

This historic bus route has served our borough well for over 130 years. Route 12 (24h) would be substituted by route 148 from Dulwich Library to Shepherd's Bush. This means that the route would not go to Oxford Circus and so remove this direct connection for people who work in central London or want to access its shops, sights and nightlife.

People wishing to travel to Oxford Circus during the day would need to change between buses 185 and 159 or 185 and 390 at Oval or Victoria station with a two-minute walk between stops, or take the 176 and then walk 11 minutes from Tottenham Court Road. Alternatively, people would need to take the newly extended 148 and change at Elephant and Castle with route 453 at the same stop for northbound journeys, and a further one-minute walk for southbound journeys.



People wishing to travel during the night to Oxford Circus would need to take the newly-extended 148 and change at Elephant & Castle for the N53 or 453 at the same stop for northbound or a one-minute walk for southbound journeys. Alternatively, they would need to take the 176 and walk 11 minutes from Tottenham Court Road or change from the 176 to other buses running on Oxford Street with a four-minute walk between stops. We are concerned for the safety of people travelling home late at night, having to make changes.

**The 78** - currently runs from Nunhead and Peckham through Bermondsey, over Tower Bridge to Liverpool Street

Residents of Nunhead rely heavily on this bus route. With few other public transport options available to them, and no other northbound bus route, this cut would risk making it impossible for local people on lower incomes, with mobility challenges, and older people to access local services and shops, or travel into central London. For workers in lower paid jobs who service the city, this is a key route into Liverpool Street and elsewhere in central London, with no alternative.

This loss will also affect residents in the Old Kent Road as it is one of the main services joining the area with central Peckham, and will be increasingly important as the area develops and its population grows

**The 45** which runs from Streatham through Camberwell and Walworth to Elephant and Castle

Withdrawal of route 45 would mean passengers making journeys between Walworth Road / Coldharbour Lane and Brixton Hill / Clapham Park would need to interchange at Brixton Station between routes 35 and 59. There would be no more direct links between Camberwell and Clapham Park.

**The 521** which runs from Waterloo to London Bridge, via Holborn and the City of London

The 521 route replaced with a combination of 133 and 59 routes, resulting in a five-minute walk from each other for interchange.

**The N133** currently runs to Liverpool Street.

Residents of the Kennington area have just one alternative night bus route (N155) which goes to Aldwych rather than Liverpool Street.

The loss of the N133 would mean people needing to go to Liverpool Street at night need to change between stops that are 4 to 15 minutes apart. For workers on low incomes travelling to and from the city out of hours, this prolongs their journeys at unsociable hours, and increases the risk to their safety. Many people travel onwards from Liverpool Street on trains and coaches, and to airports and there is a significant night time economy and workplaces with early start and late finish.

Please see below for more detail on local impact.

## **Demographics and expected impact by neighbourhood**

Some of the routes affected by cuts or changes run through areas defined as high priority in our Equity Framework. Most of the routes travel through areas of the borough that have a higher population of ethnic minorities, of high deprivation and with a high affordability priority score which means these are areas where people might struggle financially and the buses are the cheapest option to travel and access employment and services.

### **Nunhead and Peckham**

These areas have a high proportion of residents with a low income. Sixty percent of the local population is from a Black, Asian or minority ethnic background. The proposed interchanges in Peckham fall into areas with a high crime deprivation index

#### **Impacts:**

- Nunhead is the worst affected area and already has low levels of public transport accessibility
- The loss of the 78 would impact journeys south of Rye Lane as the 388 will terminate at Peckham Bus Station
- The loss of the 78, would mean no direct routes into the city and no frequent bus serving Nunhead Station
- Passengers would face a 5 minute plus walk to pick up a 343 or 381 with different routes instead
- Residents would have to rely on the infrequent single decker P12 and then change again to head into town
- The loss of the 12 would mean no direct route from Oxford Circus to Peckham (and vice versa) with impact especially at night
- No step free access at Peckham Rye or Nunhead Stations means the loss of bus routes would have a significant impact on people with disabilities and families with young children
- Shift workers and key workers will have reduced out of hours bus services
- Many schools are served by both the 12 and 78 routes for pupils living or attending school in Peckham and elsewhere

### **Rotherhithe, Bermondsey and London Bridge**

These areas have populations with variable income, with patches of high deprivation. Interchanges at London Bridge Station fall into an area of high crime deprivation index. The Rotherhithe peninsula has low level of public transport connectivity. The Canada Water Masterplan and its 3,000 new homes and 20,000 jobs will increase the demand for buses.

#### **Impacts:**

- Loss of 50% of routes from London Bridge to Liverpool Street – a key commuting route.
- No direct connection between Rotherhithe and the north of the river (change at LB required) with route 47 stopping at London Bridge, despite increasing population and jobs in Canada Water and Deptford.
- There would be no direct route from London Bridge to Holborn

- 521 route replaced with a combination of 133 and 59 routes, resulting a five-minute walk from each other for interchange

### **Old Kent Road**

This area is characterised by significant growth, including plans for 20,000 new homes, requiring additional public transport capacity, especially since plans for the Bakerloo Line extension have been paused. This is an area of low income, with high deprivation in parts, and more than 60% of the population from Black, Asian and minority ethnic groups.

#### Impacts:

- The significant regeneration of the area means more buses are needed to increase to serve future populations, not reduce as per proposals
- Loss of the 78 along key section of OKR would mean loss of direct route that serves residents accessing Peckham
- Key services, shops and places of worship would be impacted by loss of direct services
- The loss of route 53, despite leaving alternatives at present, might create capacity issues for future residents of developments

### **Elephant & Castle and Borough**

This area is characterised by a low income population with areas of high deprivation, with more than 60% of the population from Black, Asian and minority ethnic groups. Interchanges in E&C fall into areas with a high crime deprivation index.

#### Impacts:

- Passengers between Canada Water - Newington Causeway and Westminster Bridge Road, need to use C10 with an interchange with 148 or 453
- The loss of 45 would mean no direct route to Clapham Town via Brixton
- The loss of the N133 means people wanting to go to Liverpool Street at night need to change between stops that are a 4 to 15 minute walk apart

### **Dulwich**

This area is characterised by a medium to high income population, but with some spots of higher deprivation. It has large populations aged over 65 years old and under 15 years old. It has very low levels of public transport connectivity and low frequency of services and some of the highest car ownership.

#### Impacts:

- Dulwich is an area of low public transport accessibility, with no tube or overground as an alternative
- There is no step free access at local train stations, impacting those with mobility issues
- Removal of the 12 means no direct route from Oxford Circus to Dulwich (and vice versa) with impact especially at night

### **Camberwell**

This area is characterised by a by a low income population with areas of high deprivation, with 40% of residents from Black, Asian and minority ethnic groups.

Interchanges in Camberwell and Kennington fall into areas of high crime deprivation index.

**Impacts:**

- The 148 would no longer go to Camberwell Green but would be diverted towards Peckham and Dulwich
- The 12 would be cut, with the loss of this route through Camberwell, that links to Dulwich and Oxford Circus
- No more direct routes from Camberwell to Clapham Park with loss of route 45
- Reduction in night bus provision, resulting in significant walks for interchanging at different stops
- Impact on anyone trying to access Kings College Hospital and other health services at Denmark Hill, especially at night

**Impact on travel east-west**

- There are some routes that go to the City or the West End from the south of the borough, but only two that run East-West (P4 and P13).
- The buses directed towards central London are all double-deckers that run at frequencies of every 5–10 minutes, whereas the east west routes are single-deckers running every 15–30 minutes. They also tend to be longer routes, trying to serve more residential areas at the cost of directness, adding to journey times and discouraging users that can use the car as an alternative.
- Two of the central-London routes are 24-hour, whereas neither of the east-west routes are. Neither of them starts running until around 7am.
- The quality of bus stops also tend to be worse, with orbital stops lacking shelters, seats and dot matrices.
- The highest quality east-west route is the 37. This runs 24-hours and serves Peckham, East Dulwich, Herne Hill, Brixton, Clapham, Battersea and beyond. However, it is still significantly less frequent than other central London routes and is only really practical to take if you know when the next bus is coming. It is not frequent enough for turn-up-and-go.
- Many local journeys are difficult outside of central areas and would be made even more so by these service revisions.

**Southwark's asks of Transport for London**

We recognise that the proposed cuts are not something TfL or the GLA wants to implement, but are one way of helping to address cuts to government funding for TfL and the lack of a long term settlement from government. However, we believe that the bus network, that serves the communities we most need to support and protect, should not be looked at in a vacuum and we would like to support to TfL to do the following instead:

- Plan a more holistic transport review, considering potential savings across the whole TfL network, and not just buses.
- Work with London boroughs to promote bus use, increasing usage and helping to bring in more income for TfL to help manage its financial challenges. We are happy to support this work, especially in prioritising routes

that need to increase numbers (we believe some routes are now back to capacity or are even overcrowded since the data that fed into the proposals was collected).

- Focus on providing improved services in areas of low income and high deprivation, high car ownership and low connectivity to contribute to the aims of the Mayor's Transport Strategy to reduce traffic and car ownership by providing reliable and frequent alternatives to private vehicles. Analysis of other opportunities to improve services locally (where most needed) could help increase patronage and revenue rather than only cutting costs.

**Ends**