

CENTRAL LONDON BUS SERVICES CONSULTATION

About us

Heart of London Business Alliance serves as the voice for 500 businesses and 100 property owners in the Piccadilly & St James's, Piccadilly Circus and Leicester Square areas. Our purpose is to support the commercial wellbeing of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work.

Our response

Connectivity and accessibility have been crucial components in making London's West End one of the world's foremost destinations for business, retail and tourism. The current concentration of public transport services reflects the volume and diversity of visitors who travel to Piccadilly & St James's, Piccadilly Circus and Leicester Square, whether to work, shop, visit or relax.

A consequence of the West End's continued popularity has been increased congestion, particularly along artery routes that connect popular tourist, retail and business areas like Leicester Square and Piccadilly. The average speed for a bus travelling in the district is now just 7.2 miles per hour, with lower average speeds recorded during peak hours, and the relative inefficiency of bus travel may, at least in part, account for the area's estimated 10 per cent decline in bus capacity utilisation since 2014/15.

Nonetheless, declining passenger numbers and inefficient services suggest that reform to the existing public transport provision should be considered. Heart of London welcomes TfL's consultation and is grateful for the opportunity to feed into the process of making these necessary changes. A good public transport network is vital to our members; enabling staff to travel to and from work, as well as bringing customers and visitors to the area. Reliable, accessible and affordable bus routes make up an important part of that network.

Our members support the principle of reducing the total number of buses completing journeys through central London, particularly in areas of high congestion. Reducing air pollution caused by idling traffic and underused services is a key priority for our members, ensuring central London's busiest retail, tourism and business districts are safe and healthy places to work and visit. Increasing the number of low-emission buses and curtailing the number of unnecessary and underused services will contribute to achieving improved air quality in central London.

However, in response to the proposed bus route changes, our members are particularly interested in routes that service the Piccadilly, St James's, Piccadilly Circus and Leicester Square areas. We would ask that TfL take the following issues into consideration:

- **Routes where declining passenger numbers correlate with the highest occurrences of service unreliability and delays.** It is important that passenger numbers are not the only determinant of a route's considered value. Where declining passenger numbers have been observed, it may be that a more efficiently

run service along the same route would be more popular. We would ask that TfL takes into consideration that any decline in central London bus usage may correlate with services that are unreliable or regularly delayed, and as such, may become more popular as part of a more efficient central London bus network.

- **Many passengers prefer travelling by bus to other forms of public transport.** This is particularly true of the millions of tourists, sightseers and other occasional visitors who travel to London's West End each year. World-famous retail and business districts combined with cultural landmarks and places of interest make travelling above ground a preferable choice for many public transport users, and should be considered when making any of TfL's proposed changes.
- **Routes in areas that are not serviced by alternative public transport links.** While Piccadilly & St James's, Piccadilly Circus and Leicester Square are serviced by several London Underground stations, shorter journeys between locations are often taken more easily and efficiently by bus. Consideration should be given to passengers travelling shorter distances around central London, particularly in regard to the proposed curtailment of thirteen routes that service the area.
 - **Number 19:** is the only direct bus service from Battersea Bridge to Piccadilly & St James's. Heart of London does not support the curtailment of this service. SW11 residents use this service for their daily commute to Piccadilly, St James's, Piccadilly Circus and Leicester Square areas, and would find it extremely difficult to use alternative forms of public transport.
- **Accessibility of alternative public transport links.** Full step-free access is not available at some of the West End's busiest Underground stations including Leicester Square and Piccadilly Circus. Passengers should not be restricted or unnecessarily delayed in their travel by any disability or mobility issue, and this should be an important consideration when making changes to existing routes.
- **Affordability of travel.** The introduction of the Hopper ticket – allowing passengers to make an unlimited number of bus journeys within an 1-hour window – has made travel in central London more affordable, particularly for commuters travelling to and from work. A single bus fare currently costs £1.50, while the same journey on the Underground at peak times can cost £3.30 or more. For many of our members, affordable transport links are important for staff travelling to and from work, and we would ask TfL to give careful consideration of the economic impact of curtailing existing bus routes for passengers who would be required to use more expensive forms of public transport. In particular, the economic impact on passengers – potentially in low and medium-wage employment - travelling into central London for work. Indeed, we would propose that a 30% discount on adult-rate travelcards be available to workers in all London boroughs and the City of London. This could be rolled out using a similar system to the 18+ Student Oyster photocard.
- **Night-time services.** Many of our members operate as part of central London's evening and night-time economy, with staff travelling to and from work late at night or early in the morning. As part of TfL's considerations, we would ask that proposals with any potential impact on evening and night-time bus services take into account the need of businesses, particularly in the areas surrounding Piccadilly & St James's, and Leicester Square, to remain well connected - for staff, customers and visitors.
- **Bus stops and passenger management.** Pedestrian congestion and pavement overcrowding are of particular concern to our members given the areas in which they do business. During peak hours, bus stop overcrowding and congestion can pose difficulties for other pedestrians moving through the area. Other congested cities have pedestrian marked waiting and queuing areas on the footpath which TfL should consider

to help avoid congestion when waiting for a bus. With the proposals to simplify central London bus routes, we would ask that TfL works collaboratively with Heart of London and our members to identify any changes that will impact on existing routes and bus stops in the Piccadilly & St James's, Piccadilly Circus and Leicester Square areas. Our members are able to offer insight into the effectiveness of the existing service provision, and help TfL to identify potential problems and benefits to restructuring them.

- **Number 9:** the proposed change moves this route off Pall Mall and St James's Street onto Haymarket, Regent Street St James's and Piccadilly. We oppose this change as it will put another route through the crowded pedestrian spaces at Piccadilly Circus and Haymarket.
- **Number 22:** Heart of London is strongly opposed to the routing along Piccadilly and the termination in Charles II Street. There is major crowding in the pedestrian spaces at Piccadilly Circus. Moreover, Charles II Street is an important avenue that links Haymarket to Regent Street St James's. In our Area Strategy we are working with key stakeholders in order to make best use of this space.
- The changes to these bus routes must consider the impact on the area of the Elizabeth Line. With footfall predicted to increase significantly in the area there is likely to be higher demand of buses when the line is open therefore removing bus routes now may not benefit longer term pedestrian congestion in central London. TfL and the GLA must consider the unrestricted provision of taxis, private-hire vehicles and other forms of private transport in the highly-congested central London areas. Heart of London disagrees with the exemptions of black cabs from the ULEZ, which would have had an impact on journeys in heavily congested areas.

Concluding remarks

Our members welcome the opportunity to comment on this consultation and support the principles of TfL's proposals to review Central London Bus Services to create a more efficient, reliable and accessible transport network. Heart of London would request that our considerations be taken into account during the consultation process, and look forward to hearing how TfL will seek to address and mitigate the challenges raised above.