

<b>Committee(s):</b> Streets & Walkways Planning & Transportation Port Health and Environmental Services	<b>Dated:</b> 05/07/2022 19/07/2022 22/07/2022
<b>Subject:</b> Transport for London consultations: <ul style="list-style-type: none"> <li>• Bus Route Changes Central London</li> <li>• ULEZ expansion and road user charging</li> </ul>	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1,2,3,4; 9;11.
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	£N/A
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>NA</b>
<b>Report of:</b> Executive Director Environment	<b>For Decision</b>
<b>Report author:</b> Samantha Tharme Environment Department	

## Summary

Transport for London (TfL) are currently conducting two consultation exercises. The first relates to proposed changes to bus routes into central London. The proposed changes to the bus network in London are in response to the Government's conditions on providing emergency funding to enable TfL to keep operating. Passenger numbers and revenue has reduced dramatically during the Covid-19 period and not recovered significantly. This is understood to be an acceleration of a general downward trend in bus passenger numbers.

This report sets out the changes to routes in the City, and potential issues. While there are significant changes overall, the changes within the City do not result in a significant reduction in connections, for journeys starting or ending in the City. The City will still be served by a high number of bus services. The detail of the changes, including TfL's justification for them and where they see new or altered routes offering alternative links and routes for passengers, is set out in Appendix 1 and 2.

The second consultation covers the proposed expansion of the Ultra Low Emission Zone (ULEZ) and the future of road user charging. TfL's proposals to help improve air quality, tackle climate change and reduce congestion, include:

- expanding the Ultra Low Emission Zone (ULEZ) scheme London-wide;
- making changes to Auto Pay for the Congestion Charge, ULEZ and Low Emission Zone (LEZ); and
- making changes to the Penalty Charge Notice level for the Congestion Charge and ULEZ.

These changes would come into effect in August 2023 if approved.

Additionally, the Mayor is also proposing to revise his Transport Strategy (MTS) to consider the role of road user charging to address the challenges of air pollution, the need for significant carbon reduction (climate action strategy) and congestion that London is facing. No target date for introducing a new approach to road user charging has been set at this stage.

This report sets out the implications for the proposals in the context of the City's own Corporate priorities, Climate Action Strategy and Transport Strategy. The immediate changes proposed with the expansion of the ULEZ do not have direct impact on the City. Future road user charging designed to reduce motor vehicle traffic in the City and central London is in line with our own corporate priorities. Reducing motor traffic in the Square Mile enables more effective and efficient use of limited street space, reduces transport related carbon emissions, improves air quality and reduces road danger.

### **Recommendation(s)**

Members of the Streets & Walkways Sub Committee and the Planning & Transportation Committee are asked to:

- Approve the proposed response to the consultation on proposed changes to bus routes, set out in paragraph 17.
- Delegate the final wording of the response to the Director of City Operations in consultation with the Chairmen and Deputy Chairmen of the Streets & Walkways Sub Committee and the Planning & Transportation Committee.

Members of the Streets & Walkways Sub Committee, the Planning & Transportation Committee and the Port Health & Environmental Services Committee are asked to:

- Approve the proposed response to the consultation on proposed expansion of the ULEZ and future road user charging, set out in paragraphs 25 and 26.
- Delegate the final wording of the response to the Director of City Operations in consultation with the Chairmen and Deputy Chairmen of the Streets & Walkways Sub Committee and the Planning & Transportation Committee and the Port Health and Environmental Services Committee.

## **Main Report**

### **Background**

1. Transport for London (TfL) are currently conducting two consultation exercises. The first relates to proposed changes to bus routes into central London. The second to the proposed expansion of the Ultra Low Emission Zone (ULEZ) and to the future of road user charging.
2. This report sets out the potential impacts for the City of London and recommended response to the two consultations.

### **Proposed changes to bus routes**

3. The proposed changes to bus routes have been developed in response to conditions set by Government before it would provide emergency funding to enable TfL to keep operating. These included requiring a plan to set out how TfL would achieve significant financial savings. TfL's response to achieve the savings required by the Government includes a 4% reduction in bus kilometres. Note that at present TfL are not consulting or suggestion any changes to the London Underground network.
4. TfL note the importance of the bus network for London, and that at times it has been changed to reflect changing demand and pressure. TfL acknowledge that this review is further reaching than any changes in the recent pre-pandemic period. Passenger numbers and therefore revenue has reduced dramatically during the Covid-19 period and not recovered significantly. This is understood to be an acceleration of a general downward trend in bus passenger numbers which was evident before the pandemic impact.
5. The importance of a comprehensive bus network for London is clear. Buses provide a flexible, affordable and accessible travel option. Buses are a space efficient means of moving people, particularly at higher levels of occupancy. TfL are committed to investing in zero emission buses and all buses operating within the current ULEZ zone are ULEZ compliant.
6. The headline proposals are that across London 70 routes are affected by changes. 21 routes are proposed to be with-drawn completely and the remainder are affected by route alteration. TfL have stated that the changes still ensure that no large areas of London will be left without a bus service.
7. The impact on routes which run through the City are set out in the maps and table provided in Appendix 1 and 2. Five routes and two night routes that currently run through the City are proposed to be withdrawn (Map 1, Appendix 1). The routes affected are:
  - 4 Archway to Blackfriars Station
  - 11 Fulham to Liverpool Street
  - 78 Shoreditch High Street Station to St Mary's Road
  - 242 Homerton Hospital to Aldgate Station

- 521 Waterloo Station to London Bridge Station
  - N11 Ealing Broadway to Liverpool Street
  - N242 Homerton Hospital to Tottenham Court Road
8. Route changes within the City are proposed for a further 9 services (Map 2, Appendix 1) and 4 night services (Map 3, Appendix 1). The routes affected are:
- 15 Trafalgar Square to Blackwall
  - 26 Waterloo to Hackney Wick
  - 43 London Bridge to Friern Barnet
  - 47 Shoreditch High Street to Bellingham
  - 56 St Bartholomew's Hospital to Whipps Cross
  - 59 Euston to Clapham Park
  - 133 Liverpool Street to Streatham
  - 135 Crossharbour Asda to Moorfields Eye Hospital
  - 343 Aldgate to New Cross Gate
  - N133 Liverpool Street to Morden
9. Map 2 and Map 3 for night services, include some changes outside the City as they serve major interchange/connection points for journeys starting in the City, the details on these are noted below in paragraph 15.
10. On some streets there could be a benefit for other streets users from reducing bus numbers, particularly people walking and cycling. For example, on Fleet Street, St Paul's gyratory, Cannon Street, Bank and Bishopsgate there will be reductions of between 10 and 24 buses per hour. However, none of these streets will see the complete removal of bus services and given the high numbers of remaining services the impacts on bus passengers and other street users may be limited. A reduction in the number of buses may also improve efficiency if remaining services carry more people on each bus.
11. Details of the proposed changes and TfL's reasons for the changes are provided in Appendix 2. Note that this does not include any changes which may be agreed as a result of specific schemes which are part of detailed discussions between City and TfL officers (such as Bank junction and St Paul's gyratory). The implications of the changes to the routing are less easy for City officers to understand at this stage as we don't have access to detailed data on travel patterns. This also applies to areas and communities outside the City.
12. We have some general issues of concern:
- Access issues for public transport – not all tube/rail stations are accessible / step-free to provide an alternative where bus services are removed.
  - Some bus services and night bus services offer public transport 24 hours a day, where Tube/rail does not.
  - Some impacts may be greater on lower income groups and some ethnic groups who have a greater reliance on bus.
13. We trust that TfL are using data appropriately to make decisions based on minimising negative impacts on passengers and communities. TfL have

undertaken a full Equalities Impact assessment which should address these points (see Background Papers for link).

14. Although there are significant changes beyond the Square Mile, the City will continue to have a good level of bus services, including services to all main line rail stations and central London hospitals, with relatively good frequency. The maps in Appendix 1 show the City's bus network after the proposed changes are made (see map 4 and map 5 for night services). Just beyond the City boundary, the amended route for service 26 would no longer serve Waterloo Rail Station, however an alternative connection to the City is provided by the 59 which will run via Waterloo to St. Paul's.
15. Map 2 includes some changes that are just outside the City but serve major connection points, including Waterloo Rail Station (where route 59 replaces route 26 to connect the City to Waterloo). Map 3 (night services) also illustrates changes just outside the City boundary to major connection/interchange points, including Victoria Station (where route N26 is extended to the bus/rail interchange at Victoria); Euston and Kings Cross (where the N205 still serves Kings Cross but no longer extends to Paddington).
16. It is noted that that more interchange between services might be needed due to some of the proposed changes. The table in Appendix 2 includes proposed alternative options for passengers.

## **Response to Consultation**

17. It is proposed to respond to TfL along the following lines:
  - a. We recognise that the bus network should continue to be a vital part of the transport network and that good access to bus services to the City supports the return to office and the Square Mile's recovery.
  - b. We are concerned that the general reduction in bus services could have a negative impact on the availability of accessible public transport as not all tube and rail stations are step free. We urge TfL to ensure that bus services remain where accessible alternatives are lacking.
  - c. We are concerned that the general reduction may impact low-income workers who are more dependent on night services for early morning and late-night shifts. We urge TfL to ensure that no areas of London are without early/late services.
  - d. Passengers often rely on publicity and information to make journeys on the bus network. Many will be more reliant on high quality and timely information to plan journeys if the bus network is restructured. We recommend TfL ensure that access to up-to-date high quality information is available and accessible to all users
  - e. We would welcome the opportunity to explore how reductions in the number of buses on City streets can help achieve our Transport Strategy objectives to provide more space for people walking and improve the experience of cycling, for example at Bank junction and on Fleet Street. We are already in contact on St Paul's Gyrotory stops and welcome continued discussion before final details are agreed.

- f. We ask that TfL monitor bus patronage and demand and ensure frequency and capacity is increased as required when bus patronage increases and in anticipation of future demand.

## **ULEZ expansion and road user charging**

18. The consultation on the proposed expansion of the ULEZ and future road user charging covers:

- An extension of the ULEZ London-wide from 29 August 2023 with charge levels for vehicles not meeting minimum emission standards (ULEZ Charges), hours, days and emission standards set at the same level as the current scheme. Certain vehicles in the 'disabled' and 'disabled' passenger tax class, wheelchair accessible private hire vehicles and minibuses used for community transport will benefit from an extended 'grace period'.
- Removal of annual £10 per vehicle Auto Pay registration fee for the ULEZ, Congestion Charge and LEZ in January 2023 (Auto Pay allows owners to set up an account so they automatically pay the relevant charge and so will not incur a penalty for non-payment).
  - Increase the Penalty Charge Notice (PCN) level from £160 to £180 for non-payment of the ULEZ and Congestion Charge from January 2023. This charge is reduced by 50 per cent if paid in 14 days.
- A revision to the current 2018 Mayor's Transport Strategy (MTS), which would support the proposed London-wide extension of the ULEZ. This could include further options for how road user charging is applied, beyond the current Congestion Charge and ULEZ charge.

19. Links to information about why the proposals have been developed, the expected impacts on traffic and emissions as well as a summary of the potential wider impacts, including impacts on public health as identified in the Integrated Impact Assessment (IIA) are provided under Background Papers.

20. The changes aim to address:

- Health, through air quality improvements, noise reduction and increasing walking and cycling;
- Climate, through reducing carbon, working to a net zero transport network;
- Congestion, through traffic reduction and management.

## **Impact on the City - ULEZ**

21. The ULEZ expansion has no direct impact on the City of London, as noted in the detailed figures in the TfL consultation documents and supporting Integrated Impact Assessment. The City benefits from existing ULEZ restrictions which have helped deliver improved air quality.

## **Impact on the City - The future of road user charging**

22. The City of London Transport Strategy aims to achieve at least a 25% reduction in motor traffic by 2030, and a 50% reduction by 2044. Reductions in all types of motor traffic will be required to achieve this, with the most significant reductions being in the number of private cars and private hire vehicles using the City's streets.
23. The main proposal to achieve this aim is championing and supporting the development of the next generation of road user charging for London; and encouraging the Mayor of London and TfL to accelerate the development of new charging mechanisms. This smarter approach to charging could, for example, be varied according to patterns of demand, vehicle type or by distance travelled.
24. Traffic reduction will help the City Corporation deliver:
  - Climate Action targets
  - local air quality improvements, which are a corporate risk and breaching some national health-based targets and guidelines
  - more space and priority for people walking, improved cycling experience and better quality public realm
  - road danger reduction and Vision Zero
  - improved network efficiency for remaining essential vehicles including buses, freight and servicing and vehicles being used by people with access need.

## **Proposed response to consultation**

25. It is proposed to respond to the ULEZ expansion consultation along the following lines:
  - g. We are committed to supporting the Mayor of London efforts to improve air quality across the Capital
  - h. We welcome exemptions ('sunset periods' and permanent reductions/exemptions), as appropriate for those people with a greater need for a special/adapted vehicle (disabled drivers/passengers), to allow reasonable time to replace without an unreasonable cost burden.
  - i. We welcome a scrappage scheme as this can assist small business and residents who have financial constraints.
  - j. We welcome the proposal to make autopay free as this simplifies the system for users.
  - k. We would like to understand the status of the MTS proposals for a central London Zero Emission Zone.
26. It is proposed to respond to the consultation on the future of road user charging along the following lines:
  - a. The City Corporation continues to support efforts to avoid a car led recovery and to reduce motor traffic in central London, in line with our Transport Strategy (TS) and Climate Action Strategy (CAS).
  - b. We welcome the potential of a broader approach to road user charges which can be more flexible and specific to achieve the ambitions of the MTS and our own TS and CAS. All these strategies require changes which go beyond reducing vehicle emissions. A net reduction in traffic is also necessary to achieve objectives around health, road danger reduction and quality of life.

- Traffic reduction and congestion management should also enable remaining essential traffic to travel more efficiently to support the economy of London.
- c. The current congestion charge has limitations and the success of traffic reduction in the early years has been eroded, with vehicle numbers no longer reducing as a result.
  - d. We welcome the potential for a mileage / use-based charge as this more accurately reflects the impact of vehicle usage on people and the environment. This must be designed to reduce the disproportionate negative impact on low-income/SME drivers of a flat rate charge, as at present. We assume that a full Equalities Impact Assessment would be undertaken on detailed changes when developed in the future.
  - e. We welcome the opportunity for charges to vary by time of day to apply a more sensitive approach to managing traffic at peak times, including peak times for people walking. This also allows opportunity to support specific sectors of the economy in central London, such as weekend and evening leisure and culture if appropriate in the future.
  - f. We welcome the opportunity for charges to vary by location or route. This will allow more sensitive traffic management at congested locations and areas we wish to have a greater impact on traffic.
  - g. We would caution that it is important to ensure the information about charges especially where they vary by time or location is sufficient to influence choice, when the aim is to reduce the amount of traffic. If charges are incrementally small by auto charging it may be perceived as a 'general' tax on driving and have limited influence on travel choices. For example, commercial drivers might pass on costs to customers or absorb an additional cost if it is marginal. A system of charging which includes a rate/price increase at a threshold of miles, or number of trips could be useful to influence choice. We recognise there is a balance to facilitating the economy and managing traffic levels and congestion, and this broader more tailored approach, varying around time of day, type of vehicle, and location, offers the opportunity to do this better than the current flat rate congestion charge. The opportunity to look at the detail and impact of how the system might work should be considered in drafting the detailed proposals.
  - h. The direction of income from road user charging for improvements to the transport network in future is welcome. Support for better quality infrastructure for walking, cycling and public transport is recommended as key to support joint policy aims of the City Corporation and the Mayor.
  - i. We note that in any future scheme there may still be appropriate reductions or exemptions for some categories of driver or vehicles, particularly for disabled drivers and passengers.

## **Corporate & Strategic Implications**

27. Strategic implications – Reducing motor traffic in the Square Mile enables more effective and efficient use of limited street space, reduces transport related carbon emissions, improves air quality and reduces road danger. Traffic reduction supports delivery of Corporate Plan Outcome 9: We are digitally and physically well-connected and responsive; the Transport Strategy; Climate Action Strategy and the Air Quality Strategy.



28. Financial implications – None
29. Resource implications – None
30. Legal implications – None
31. Risk implications – Reducing motor traffic in the Square Mile helps mitigate Corporate Risks CR21 – Air Quality, CR30 – Climate Action, and Departmental risk ENV-CO-TR 001 – Road Safety.
32. Equalities implications – TfL have undertaken an Integrated Impact Assessment (IIA) on the proposed changes Bus Network Review and the ULEZ expansion. This incorporates an Equalities Impact Assessment. The two IIA documents are available online and links are provided under Background Papers.
33. Climate implications – Reducing motor traffic supports delivery of the Climate Action Strategy by reducing carbon emissions and potentially enabling street space to be reallocated to walking, cycling and climate resilience measures.
34. Security implications - None

## Conclusion

35. We welcome the opportunity to comment on the changes to the bus route network and note the financial constraints that require TfL to undertake these changes. The City of London will still benefit from good bus service if the proposed changes are made. We will urge TfL to monitor patronage and increase capacity in the future to ensure movement and growth is not limited by bus network capacity.
36. We welcome the potential of a broader approach to road user charges which can be more flexible and specific to achieve the ambitions of the MTS and our own TS and CAS. Meaningful traffic reduction will help the City deliver climate action targets, local air quality improvements, provide more space to walk and cycle, and reduce road danger.

## Appendices

- Appendix 1: Bus network alterations – maps of route changes
- Appendix 2: Tables of bus network alterations.

## Background Papers

- TfL Central London Bus Review (<https://haveyoursay.tfl.gov.uk/busreview>)
- Central London Bus Review 2022 Equality Impact Assessment Programme-wide assessment ([EqIA PDF](#))
- TfL ULEZ expansion and Possible new Road User Charges (<https://haveyoursay.tfl.gov.uk/cleanair>)

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