

Introduction

Residents and businesses in Westminster are trying to get back on their feet following the pandemic, and one of the foundations of that recovery is mobility across the city and back into the centre – especially for those with accessibility requirements. However, of the 21 bus routes proposed for withdrawal or curtailment, 12 – more than half of the routes – pass through Westminster.

Our residents need confidence that public transport will be there for them – and buses are a lifeline particularly for our poorer and more vulnerable residents. Furthermore, some 1.1m commuters and visitors entered Westminster each weekday before the pandemic and the vast majority of these live some distance away and depend on the London Bus network. Not all can cycle.

We strongly oppose the proposed changes to bus routes because:

1. We believe the proposed changes of route are not supported by evidence; and
2. The proposed changes will hit our most vulnerable residents hardest.

We are aware that this is as a result of HMG not bringing forward a long-term, fair funding settlement for TfL and are calling on them to resolve this – but would ask that these cuts are resisted for as long as possible to allow that process to unfold.

1. Proposed changes are not supported by evidence

It is unclear how the evidence available has led to the decision being made to propose withdrawing the routes currently under threat of being axed.

Across the 12 Westminster routes proposed for withdrawal, total combined demand in May 2022 fell by only 4% compared to November 2019. This is compared to an average reduction in demand of 13% across all routes in Westminster.

Other routes that have seen a huge decrease in bus usage, such as route 28 which saw demand fall by 60% between November 2019 and May 2022, are not in the running to be axed. This begs the question why routes such as route 12, which has seen an overall increase in usage of 78% within that time frame, are facing being axed, whilst route 28 is not. The basis of the decisions made is unclear and seemingly not evidence-based.

2. Proposed changes will hit our most vulnerable residents hardest

We know that buses are overwhelmingly used by our most vulnerable residents:

- The highest percentage of adults who commute via bus correlates strongly with the most deprived wards and the wards with the highest unemployment rates in Westminster: Harrow Road (15%), Queen's Park (15%), Churchill (13%), and Westbourne (13%);
- 29% of Black workers – the group with the highest rate of unemployment in London – commute via bus;
- 56% of residents using the bus are women – a group that particularly needs safe transport to and from work.

It's also clear from our analysis that the routes that have been proposed to be cut specifically serve the most vulnerable in our communities, such as the fact that route 12 has seen a 114% increase in usage amongst freedom pass holders from November 2019 to May 2022 and that route 31 passes through the most deprived wards in the borough.

It is unclear how TfL can be confident that the proposed changes will have the smallest impact possible on communities, given TfL have not produced any data to evidence this, outside of some broad-brush equality impact assessments.

Further Comments on Specific Routes

Given the current usage data, as referenced above, it is our view that cutting any of the routes through Westminster is both unnecessary and will negatively impact our most vulnerable residents. This is highlighted by the case studies below on the 24, 31 and 12 which are particularly stark cases, and demonstrate why these cuts must not go ahead.

Route 24

- Route 24 serves a higher-than-average proportion of freedom pass users who are more likely to be excluded from travel by extended journeys and broken journey links.
- User demand on route 24 was 4% greater in May 2022 than in November 2019, representing an increase of more than 7,500 journeys. The justification for withdrawal is unclear.
- Route 24 serves bus stops located in Pimlico South which represents one of the most deprived wards in the borough.
- The 214 is intended to be a like-for-like replacement: we urge TfL to implement this with the current frequency of the 24 to ensure that Pimlico residents do not see a retraction of service.

Route 31

- Of all the services proposed to be divided and reduced overall, route 31 has the highest proportion of freedom pass users who are more likely to be excluded from travel by extended journeys and broken journey links.
- Route 31 also passes through the most deprived wards in the borough (IMD 2019) which are Westbourne and Harrow Road. The withdrawal of bus services in this area could worsen social isolation and deprivation.
- Public transport accessibility levels are also relatively lower in the Northwest of the borough, graded 3 or 4 out of 6, which means passengers boarding from these stations will generally only have 'moderate or good' access to other services.

Route 12

- We understand that use on the 12 from Oxford Circus down to Trafalgar Square and onto Westminster Bridge is high especially during peak hours. Removing this service for the thousands of commuters who work in the West End and live south of the river and beyond would drive great congestion on the alternative route 453 from the West End. This would also drive a spike at Bridge Street for workers to move across to the 148 for journeys south. We already regularly see 148s with standing loads downstairs on Victoria Street at evening peak times, so would question how the removal of the 12 would not lead to a high proportion of standing loads for hard-working commuters heading home via Westminster Bridge.
- This route has seen a massive uptick in usage, increasing by 78% overall between November 2019 and May 2022 and amongst freedom pass holders by 114%. The causes of this rise are unknown but should be of significant interest given the increased likelihood of vulnerability in this demographic.

Conclusion

We urge the Mayor to urgently review these proposals and protect the bus network, which serves some of our poorest and most vulnerable residents. As outlined above, we believe that the proposed changes are not supported by the evidence and that you need to reconsider all routes under threat.

We recognise that your hand has been forced by cuts imposed on you by central government, and we stand ready to support you to continue to make the case to government to secure a long-term financial settlement for TfL. Cutting these bus routes now, however, is not the way to mitigate current pressures.

You will note that there is a response from Paddington Residents' Active Concern on Transport (PRACT) amongst the responses you have received. We support their asks wholeheartedly, particularly the need for an overarching bus strategy that situates proposals for change in a wider context. We also support the Cross River Partnership (CRP) and Transport for All (TfA) response.