

Central London Bus Services Consultation: SE5 Forum Response

Executive Summary

There has been a century of disinvestment in Camberwell's transport infrastructure since the railway station closed in 1916. Repeated failures over 80 years to invest in Tube, rail and tram services connecting Camberwell with central London, most recently in September 2018, means most residents are reliant on bus services to travel to employment, connect with national rail and other transport services, further and higher education and training, health services, and leisure activities.

Camberwell already has unemployment rates twice that of London. Extending travel times and making journeys more difficult would exacerbate this. Bus travel times, already 50-60 minutes to central London according to TfL's analysis in 2000, will be lengthened further despite Camberwell's close proximity to central London by the removal of direct cross-Thames bus services and the need for interchange. Women, particularly those with caring responsibilities, will be disproportionately affected due to the impact on childcare costs.

High levels of multiple deprivation, unemployment, physical and mental health problems and an ageing population speak to the need for enhanced, not deteriorating, public transport services in Camberwell. A switch to cycling is not feasible for many vulnerable residents. Access to car transport is very limited among residents. Impacts are not solely mobility between bus stops and the need for sheltered seating at bus stops, but also fears over personal safety, and availability of on-bus seating and wheelchair/pushchair facilities.

Since Camberwell has a majority BAME population, many of whom experience multiple deprivation factors, TfL's proposals impact disproportionately on Black, Asian, Latino and mixed race residents.

Collectively these factors show TfL is failing in its Public Sector Equality Duty in the way it has assessed its proposals and their impact on Camberwell residents.

Significant levels of housebuilding in Camberwell means the population is growing and bus passenger figures can be expected to rise by 15-30 percent by 2030. In addition, the bus usage figures utilised in assessing TfL's proposals cover periods of significant travel disruption during major roadworks and remodelling of Elephant & Castle.

SE5 Forum objects in the strongest terms to TfL's proposals to reduce and re-route direct cross-Thames bus services from Camberwell. They are based on flawed data and fail to recognise the significant socio-economic and equalities issues affecting Camberwell and its residents. TfL's persistent refusal to address Camberwell's transport needs risks precipitating this already fragile community into greater deprivation and marginalisation.

SE5 Forum

The SE5 Forum works to improve Camberwell for the benefit of all members of our diverse community. The Forum was set up to be the eyes, ears and voice of the community, to see and understand what is happening within the area, to listen to concerns and raise them with the relevant organisations.

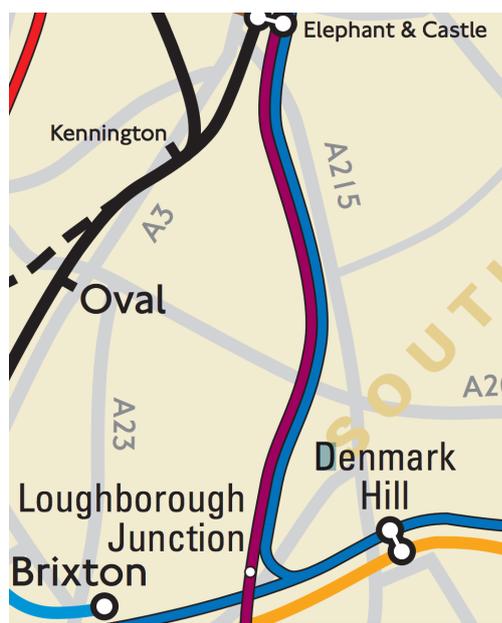
Camberwell's current transport services

Camberwell has been a transport hub since the opening of Vauxhall Bridge and toll road (Camberwell New Road) connecting to the Walworth Road/Denmark Hill route where Peckham Road joins it in the early 19th century. A bus garage opened in 1918 (now London Central) joining the tram garage which had operated services since the 1870s. Denmark Hill rail station opened in 1865, three years after Camberwell rail station in 1862 (closed 1916).

Pre-2016 cross-Thames direct bus services into central and north London available:

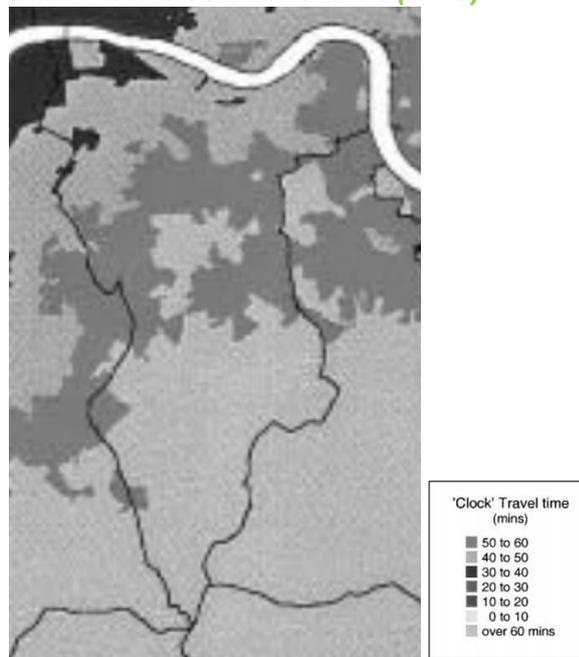
- Vauxhall Bridge: 36, 185, 436
- Westminster Bridge: 12, 148
- Waterloo Bridge: 171, 176
- Blackfriars Bridge: 45
- London Bridge: 35, 40
- Tower Bridge: 42

Camberwell: A Rail and Tube Desert



Source: TfL London Connections, May 2014

Southwark Clock Travel time (mins)

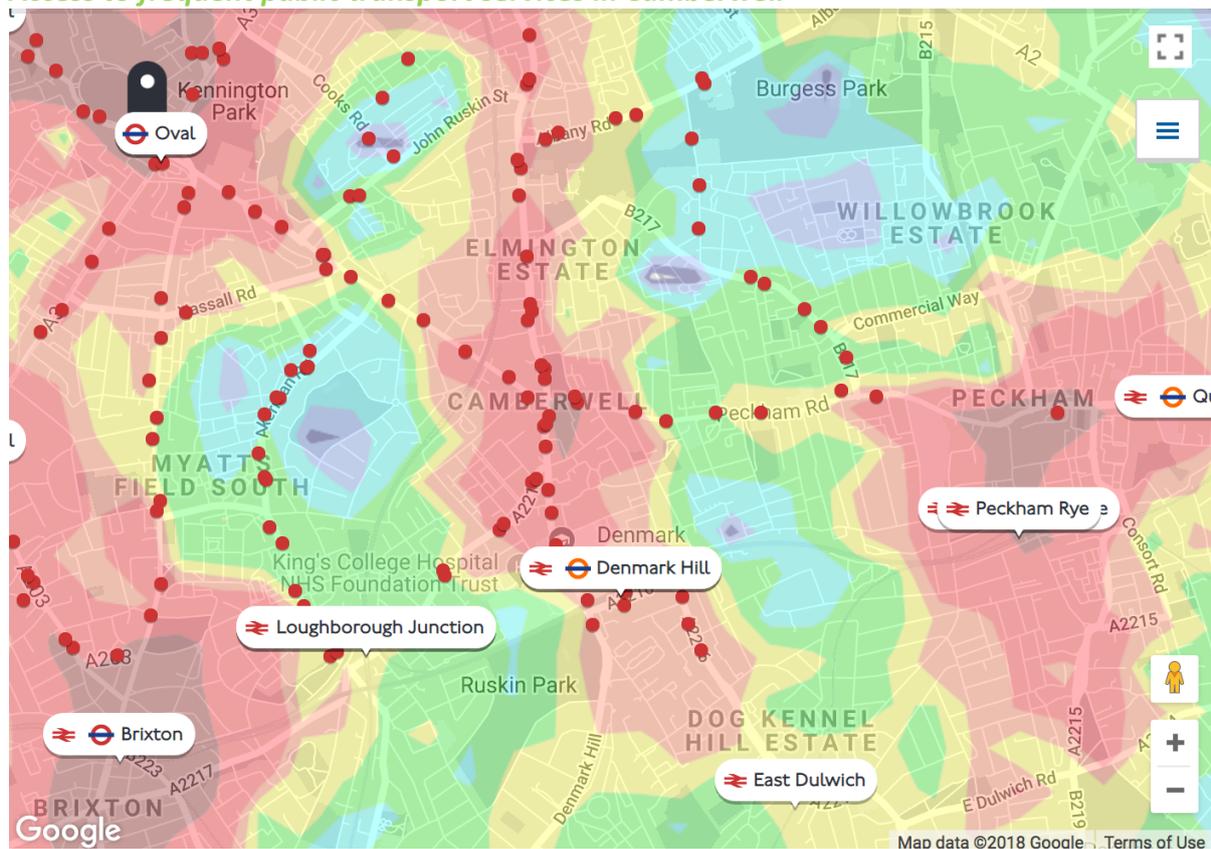


Source: TfL CAPITAL model, 2000

Camberwell remains unconnected to the Tube network. North and west Camberwell remain entirely reliant on bus transport for any connections to the rest of London. South Camberwell struggles with chronic congestion at Denmark Hill station, which also serves King's College and Maudsley Hospitals. Over-crowding at peak times makes this particularly intimidating for those with physical mobility issues or anxiety and other mental health conditions. It is impractical for those in wheel chairs or carers with pushchairs to use this station at these times, despite the relatively new lift access to platforms.

Southwark has the highest proportion of travel times over 40 minutes of any inner London borough, with Camberwell mapped at 50-60 minutes on the CAPITAL tool despite being within 3 miles of central London. TfL's own planning tool already demonstrates that many areas of Camberwell, particularly those with high densities of social housing, already have poor and declining access to public transport. Reducing the level of direct bus services along the Denmark Hill/Coldharbour Lane to Walworth Road corridor would erode the only areas in Camberwell currently with good services. Switching to Tube transport at Oval or Elephant & Castle is not only challenging and intimidating at peak times, due to heavy usage of the Northern line, but out of the reach, financially, of many Camberwell residents.

Access to frequent public transport services in Camberwell



Source: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

Map key - PTAL

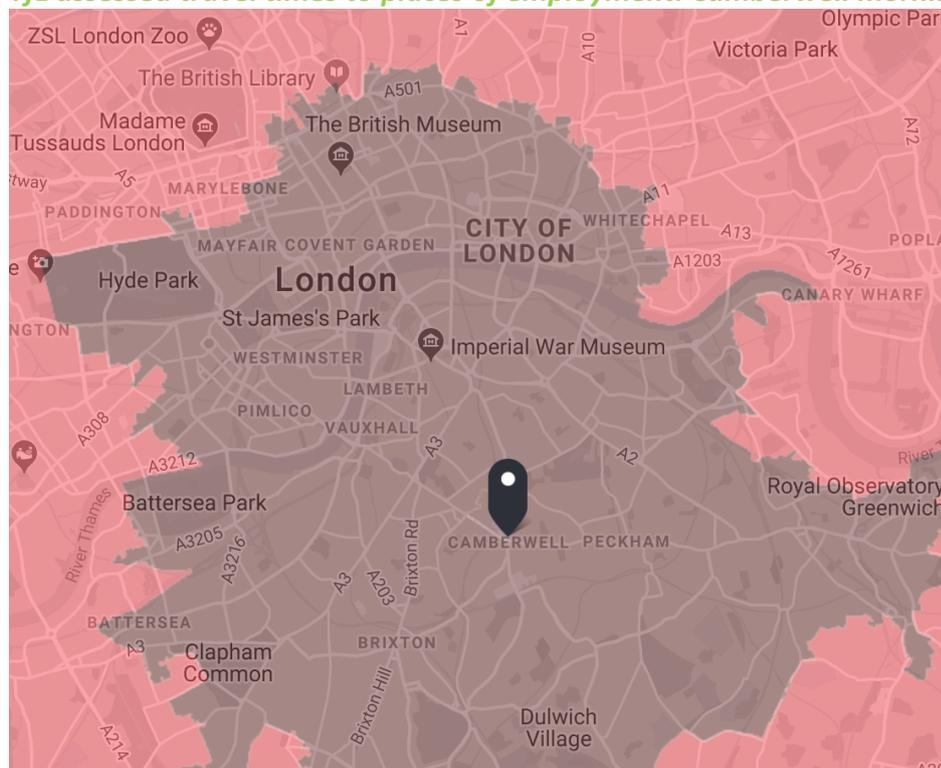
0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Part of TfL's justifications for these decisions were the good bus service connections enjoyed by Camberwell, but the speed of cross-river connections has declined over recent years due to the removal of bus lanes to accommodate cycle super highways, encroachment of anti-terrorism security barriers on Thames bridge bus lanes, and continuing multiple major roadworks to put in these and other changes such as the Elephant & Castle remodelling.

Improvements to transport links considered and rejected by TfL or its predecessors:

- Bakerloo line extension 1931
- Bakerloo line extension 1947
- Reopening Camberwell railway station 1980s
- Cross River tram 2008
- Bakerloo line extension 2014
- Reopening Camberwell railway station 2018

TfL assessed travel times to places of employment: Camberwell morning peak time by bus



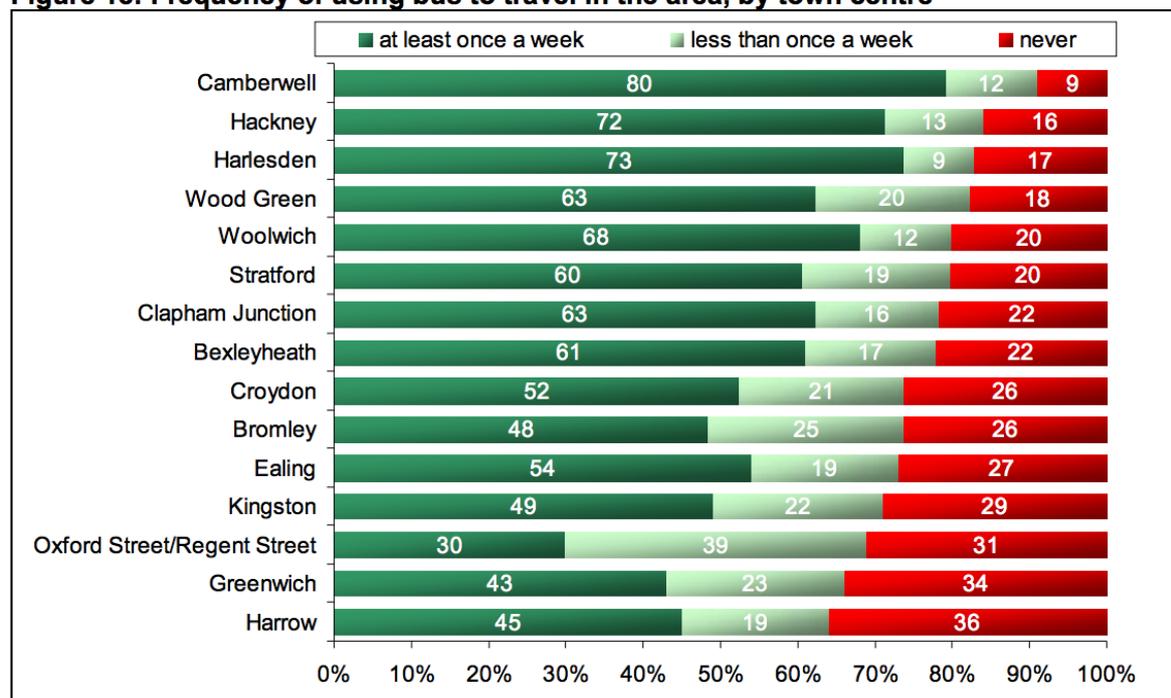
Source: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?lat=51.47419&lon=-0.09341&type=Tim&locationId=&input=&selectedCompareType=&selectedCompareValue=&travelTimeInterval=45&zoomLevel=14&place=s=Stations+stops+and+piers%7CTravel+times&places=Stations+stops+and+piers%7CTravel+times&scenario=Base+Year&mode=Bus&timeOfDay=AM&direction=From>

While TfL's current planning tool indicates travel times of under 45 minutes to access large parts of London by bus, this is far from the experience of residents. TfL's previous CAPITAL model gives a more recognisable picture, with travel times in excess of one hour common. TfL needs to update its planning tool to reflect realities given other changes to the division of road space between different transport modes, particularly the improvements in cycling provision at the expense of bus passenger services. Interchange at Elephant & Castle would substantially worsen this.

Two thirds of Camberwell Green households have no access to a car and so are entirely reliant on bus transport. A 2012 report by the RAC Foundation showed that Southwark has the 5th lowest number of cars per 1,000 head of population of all 348 local authority areas in England and Wales. Census data (2011) also showed a drop in the absolute number of cars in the borough by approximately 2,335 despite an 18 per cent increase in population.

This trend towards lower car ownership in Southwark is likely to continue¹. Analysis shows Camberwell is uniquely reliant on buses in London.

Figure 18: Frequency of using bus to travel in the area, by town centre



Source: TfL²

TfL bus route change proposals

TfL propose to:

- No longer run route 171 between Elephant & Castle and Holborn. The service will continue to run between Elephant & Castle and Bellingham
- Bring into use a spare 2-bus stand on Borough Road, South Side, accessed by Newington Causeway

This would realise net savings of £710,000 per annum, which appears to be the main driver for TfL. No calculations are given for the social costs of withdrawing these services. However, TfL assess that as a result 8 percent of customers, or 2,100 trips daily, would need to change bus, where previously their journey was direct.

TfL also propose to:

- Change route 45 so it no longer runs between Elephant & Castle and King's Cross
- Change route 40 so it no longer runs between Elephant & Castle and Aldgate but instead extend it to Clerkenwell Green
- Increase peak frequencies on route 35 to buses from every 10 minutes to every 7-8 minutes, as well as introducing an additional return journey

¹ Southwark's Draft Kerbside Strategy, Southwark Council 2017

² <http://content.tfl.gov.uk/town-centre-study-2011-report.pdf>

As a result of TfL's proposals some customers would need to change bus, where previously their journey was direct. This will affect 15 percent of passengers, or 2,500 trips daily on route 40, and; 13 percent, or 2,700 trips daily on route 45.

Impact on Camberwell's cross-Thames direct bus services into central and north London:

Vauxhall Bridge, Victoria station and the West End: 36, 185 *i.e. one less service than 2016*

Westminster Bridge and on to Charing Cross/West End or Victoria: 12, 148

Waterloo Bridge and Waterloo station: 68, 176 *i.e. one less service than 2016*

Blackfriars Bridge, the City and Blackfriars station: 40

King's Cross and St Pancras stations: zero *i.e. one less service than 2016*

London Bridge, the City and London Bridge station: 35 *i.e. one less service than 2016*

Tower Bridge: 42

As a result of the proposed changes Camberwell will have lost 3 direct cross-Thames connections, with only a single service on three of the four bridges served east of Westminster Bridge. The direct service to King's Cross and St Pancras rail services is lost completely, the direct services to Waterloo and London Bridge reduced by one-third to a half. Services to Victoria and on to Paddington have already been reduced with the loss of the 436 connection.

In addition, by TfL's own assessments, thousands of commuter journeys each week from Camberwell would face bus changes at Elephant & Castle, adding further journey times. Given crowding on buses at this busy interchange it is likely that passengers will be unable to get on their first possible bus and/or will be unable to sit down, with significant impacts on vulnerable passengers. (See socio-economic analysis below).

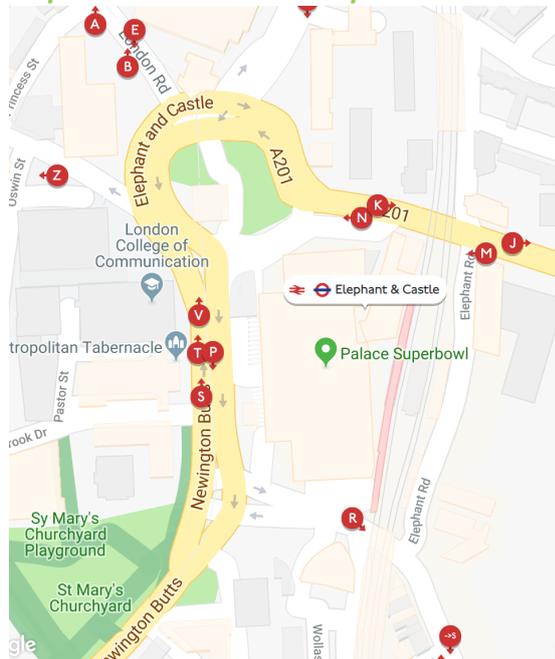
Direct cross-Thames bus services before and after TfL's proposed changes

Route	Peak Hours			Daytime			Evenings + Weekends		
	Current	Proposed	Change	Current	Proposed	Change	Current	Proposed	Change
Waterloo Bridge									
68	8	8	0	7	7	0	5	5	0
171	7	0	-7	7	0	-7	5	0	-5
176	7	7	0	6	6	0	5	5	0
Total	22	15	-7	20	13	-7	15	10	-5
Change	-32%			-35%			-33%		
Blackfriars Bridge									
40	0	8	+8	0	7.5	+7.5	0	4	+4
45	6	0	-6	6	0	-6	4	0	-4
Total	6	8	+2	6	7.5	+1.5	4	4	0
Change	+33%			+25%			0%		
London Bridge									
35	6	8	+2	6	6	0	4	4	0
40	8	0	-8	7.5	0	-7.5	4	0	-4
Total	14	8	-6	13.5	6	-7.5	8	4	-4
Change	-43%			-56%			-50%		

Source: <http://www.londonbusroutes.net>

As an interchange hub, facilities at Elephant & Castle are poor. Some of the bus stops at Elephant & Castle are separated from each other, or from the Underground and rail stations, by busy roads. Although most if not all the stops are equipped with a shelter, seating and a Countdown display, there are no covered routes between the bus stops, nor are there toilets or baby-changing facilities. In terms of convenience and passenger amenities, Elephant & Castle compares poorly against other interchange hubs such as Vauxhall, Canada Water or North Greenwich.

Elephant & Castle Bus Stops



Source: <https://tfl.gov.uk/maps/bus?Input=Elephant+%26+Castle+Station&InputGeolocation=51.494505%2C-0.099185>

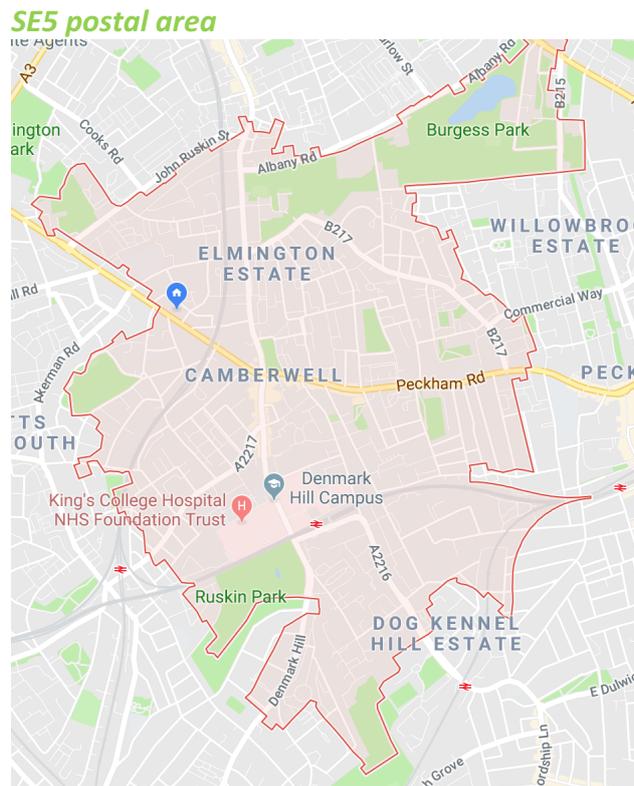
Data recently released by City Hall lists Elephant & Castle as one of the most popular interchanges from one bus to another using the Mayor's "Hopper" fare. Bus stops "E" and "R" and "A" account for more than 20,000 "hops" per week. Interchange adds pressure on heavily-used stops, due to the time successive buses are unloading and loading passengers. This can and does result in congestion as buses queue to serve the stop.

Bus stop "R" in particular, outside the shopping centre at the top of Walworth Road, is already heavily congested, often with a line of several buses at the stop at once. Increasing the need to interchange will mean buses spending longer loading up, worsening the pressure and congestion at the stop. Interchange at bus stops S, T and V is particularly intimidating for those with mobility issues, or suffering anxiety or prone to confusion with the close proximity of the cycle lanes within what was pedestrian space, and with no physical barrier between the two mode areas. Passenger facilities are poor (bus stops with just a single shelter and limited seating).

Camberwell

Camberwell straddles the border of Southwark and Lambeth, with Camberwell Green and St Giles (Brunswick Park pre-2018) wards entirely in Camberwell together with parts of Champion Hill (South Camberwell pre-2018) (LB Southwark), Coldharbour and Vassall

(LB Lambeth) wards falling into the area residents identify as Camberwell, largely coincident with the SE5 postcode area.



The area is experiencing unprecedented development, with new homes being built at or planned for Camberwell Fields, Elmington Green, The Wing, Peabody (Camberwell Road), Camberwell on the Green, Triangle Court, Sultan Street, Redcar Street/Wyndham Road, Comber Grove, the re-developed Magistrates Court, and Southampton Way, amongst others. Typically these developments contain 35-50 percent social and affordable housing.

According to the Trust for London³ both LB Southwark and LB Lambeth have higher than London average rates of poverty 31 percent and 30 percent, respectively (London 27 percent). 20.5 percent of workers in Southwark and 19.5 percent in Lambeth are low paid (0.5 percent and 1 percent less than the London average). Southwark's unemployment rate is 6.5 percent - the 4th highest rate in London. Infant mortality and premature mortality in both boroughs are also above the London average.

Mapping of Camberwell households shows higher than average levels of multiple deprivation than LB Southwark generally, already a poor borough. Many households in Camberwell Green and St Giles (Brunswick Park) wards fall into the two most deprived quintiles.

TfL's Equalities Impact Assessment of their proposals takes no account of these socio-economic factors, despite a study of TfL's own modelling concluding

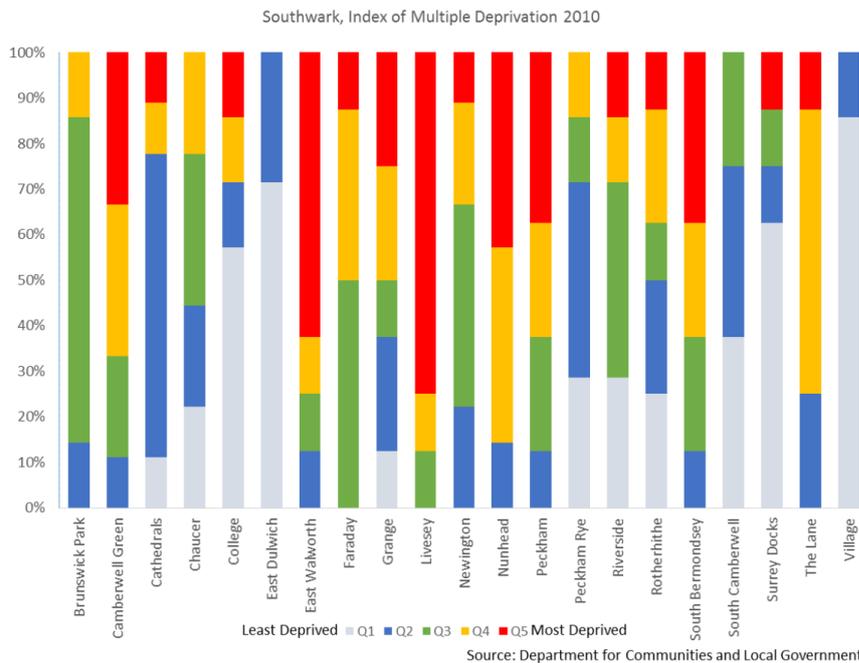
³ <https://www.trustforlondon.org.uk/data/boroughs/southwark-poverty-and-inequality-indicators/> and <https://www.trustforlondon.org.uk/data/boroughs/lambeth-poverty-and-inequality-indicators/>

“The lack of ‘connection’ between somewhere around a quarter of the capital’s residents and many of the activities and opportunities that are required to participate fully in society cause social exclusion in London. There are many reasons why this ‘disconnection’ occurs, one of which is the inability of people to physically access opportunities because of travel difficulties.”⁴

Index of Multiple Deprivation



Source: Southwark Demographic Factsheet, May 2015, Southwark Council



TfL does assess age, disability, ethnicity, religious and pregnancy/maternity factors in its Equalities Impact Assessment, but does not map these to see whether they fall in particular locations, nor give any detail as to how it quantifies the impact beyond considering how

⁴ Church, A., M. Frost and K. Sullivan, Transport and social exclusion in London, Transport Policy 7 (2000) pp195-205

easy it is to access the connecting service, and whether bus shelters and seating are available. This is a superficial understanding of physical impacts and ignores the psychological effects. Nor does it consider whether BAME residents receive equal treatment compared to White rail and Tube users.

Camberwell Green ward, at the heart of Camberwell, has the following characteristics that demonstrate the need for fuller and more careful analysis in understanding the impact of the changes on vulnerable and disadvantaged groups:

- i. 61 percent of the population is BAME
- ii. 12 percent of all working age adults claimed benefits in 2016
- iii. 7 percent of the population is over 65 years of age; Southwark-wide this age group is projected to grow 32 percent, twice the rate of total population growth, by 2030

Health

- iv. male life expectancy of 75 years of age, over 5 years younger than London average
- v. female life expectancy of 83 years of age, over 1 year younger than London average
- vi. 70 percent more hospital admissions for chronic obstructive pulmonary disease than England
- vii. 33 percent higher incidence for lung cancer than England
- viii. 27 percent higher incidence of admissions for prostate cancer than England
- ix. 7 percent more hospital admissions for coronary heart disease than England

The location of the Maudsley Hospital in Camberwell means a higher than average proportion of people settling in the area do so for easy access to community mental health services. TfL acknowledge that people with mental health conditions find it more difficult to access public transport.

Camberwell & Peckham constituency currently has an unemployment rate of 8.7 percent, compared to 5.1 percent across London⁵, with only limited employment opportunities in Camberwell. This makes access to affordable and reliable bus services crucial to access jobs across the capital. Women, particularly lone parents and carers, find it difficult to access employment where transport links are unreliable or long travel times increase childcare costs, especially those on low wage rates⁶.

On average, male Camberwell & Peckham residents in work earn £629.30 per week, 13 percent less than the London average; and women £588.00, 6.5 percent less than the London average.

This marginalisation of many Camberwell residents, particularly those experiencing multiple deprivation, has undoubtedly contributed to the recent rise in gang violence which resulted in 2 tragic deaths and 5 other stabbings this summer. While there are complex factors involved here, the feeling of being 'left out' and of having few opportunities in life leads to disengagement and anti-social behaviour, particularly amongst young people with little social resilience.

⁵ ONS via <http://www.nomisweb.co.uk/reports/lmp/wpca/1929379926/report.aspx#tabempunemp>

⁶ <https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/jrf-addressing-transport-barriers.pdf>

Research shows that poverty, employment and social exclusion are intrinsically linked with access to frequent, reliable and direct transport services:

“There is also evidence that those who are out of work are particularly reliant on bus services. Raikes (2016) cites studies showing that jobseekers are more than twice as likely to use buses as anyone else (see also PTEG 2015). Moreover, poor services can constrain the ability to find and sustain work. One study found that that 19 per cent of workers have turned down a job because of poor-quality bus services (Mackie et al. 2012 cited from Rowney and Straw, 2014). Reliance on buses is even greater for certain groups such as women, young people and those with lower skills (Johnson et al., 2014). Their survey also found that a third of unemployed respondents thought finding a job would be easier if bus services were improved (in terms of lower fares, higher average speeds and more early morning/late evening provision) (ibid.).

While a small number of low income areas are connected to rail or tram networks, the vast majority are served exclusively by buses. Although clearly there will be marked variations between such neighbourhoods, a report by the Social Exclusion Unit (2003) noted a number of key reservations concerning the quality of these services:

- The frequency and timing of services is often seen to be inadequate to meet all needs, particularly with regard to early morning and late evening departures that fit with the growing trend in flexible working, whether this be standard shift patterns or more changeable rotas.*
- There are major concerns about reliability, with cancellation or late running of services potentially causing arrival at workplaces after the contracted start time, and the penalties that this might incur.*
- These problems are compounded where the distances from homes to workplaces are prolonged, especially if they entail interchange between different services and the consequent reliance on making connections as scheduled.”⁷*

This evidences that the reduction in easy to access, reliable and frequent bus services to the main areas of employment in central London would be a further crippling blow to Camberwell’s fragile community, particularly coming fast behind the decision in September 2018 refusing the re-opening of Camberwell station, which was TfL’s own suggestion as an alternative to an extension of the Bakerloo line to Camberwell.

TfL’s persistent refusal to acknowledge the needs of Camberwell, with its high levels of social deprivation, substantial BAME community, and ageing population with poor health and high dependency on access to service, is a clear failing in meeting its Public Sector Equality Duty. SE5 Forum objects in the strongest terms to these proposals and calls for them to be dropped.

SE5 Forum for Camberwell

www.se5forum.org.uk

8 November 2018

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⁷ <https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/jrf-addressing-transport-barriers.pdf>

TfL Proposals - excerpt

“Blackfriars and London Bridge – Routes 35, 40, 45, 46, 343, 388 and RV1 Routes 35, 40, 45, 388 and RV1, all cross the Thames via either Blackfriars Bridge, Waterloo Bridge or London Bridge:

- Route 35, a 24-hour service, runs between Clapham Junction and Shoreditch High Street
- Route 40 runs between Dulwich Library and Aldgate
- Route 45 runs between King’s Cross and Clapham Park
- Route RV1 runs between Covent Garden and Tower Gateway Station Through our review we identified excess capacity across routes 17, 45, 46, and 63 at King’s Cross, where at the busiest time nine buses per hour are required to meet customer demand, and 18 buses per hour are scheduled.
- Routes 45 and 46 provide a southbound link from bus stop D at King’s Cross station to Gray’s Inn Road/Chancery Lane station. Approximately 335 customers depart from this stop on this corridor in the busiest hour. Our data shows us that an additional journey on route 46 would provide sufficient capacity without route 45.
- Approximately 710 customers arrive at King’s Cross on routes 17, 45 and 46 from the Chancery Lane/Gray’s Inn Road corridor at the busiest hour. Our data shows that the existing frequency on route 46 - of six buses per hour - and on route 17 - of seven buses per hour - would provide sufficient capacity to meet demand if route 45 did not serve this section.
- Routes 45 and 63 run in parallel between Elephant & Castle and Charterhouse Street; providing links between this section and King’s Cross. Approximately 325 customers arrive, and 470 depart from King’s Cross on routes 45 and 63 during the busiest hour.

Our data shows that existing frequency on route 63, of eight buses per hour, provides sufficient capacity to meet demand without route 45.

In the morning peak hour approximately 670 customers travel northbound on routes 35 and 40 between Walworth Road and Newington Causeway/Borough High Street. In the evening peak hour approximately 620 customers travel southbound. We have identified surplus capacity between Newington Causeway and Borough High Street, where a combined frequency of 33.5 buses per hour is provided by routes 35, 40, 133 and 343 in the busiest hour and a frequency of 18 buses per hour are required to meet demand.

Approximately 1,250 customers travel on routes 45, 63 and 388 on the Elephant & Castle to Blackfriars Road in the busiest hour. Our data has shown us that we have surplus capacity currently provided on the Blackfriars Road – Farringdon Street corridor. A maximum of 17 buses per hour during the peak are required, while 22 are currently scheduled across routes 45, 63 and 388.

Surplus capacity is currently provided on the Blackfriars Road – Farringdon Street corridor, where a combined frequency of 22 buses per hour is provided on routes 45, 63 and 388 and a frequency of 17 buses per hour is required to meet demand.

Surplus capacity is currently provided on the Newington Causeway – Borough High Street corridor, where a combined frequency of 33.5 buses per hour is provided on routes 35, 40, 133 and 343 in the busiest hour and a frequency of 18 buses per hour is required to meet demand.”