

[REDACTED]

From: Joel Kosminsky [REDACTED]
Sent: 27 February 2018 11:54
To: Londonplan
Subject: Draft New London Plan

I am writing in an individual capacity, drawing on workplace experience in London's transport (*civil aviation, buses, Underground and main line rail*).

My roles included working in administrative and control functions, planning services and providing service capacity, managing road and rail operations day-to-day, and making them resilient for the future.

I am submitting comment mainly on the transport section, in particular for buses, bus operations and bus provision.

I also comment on the draft Plan's scarce consideration shown to older population in Greater London:

I have deep concerns that the draft Plan is not as integrated as it may read. There is only one specific mention of serving the needs of older people resident in greater London, under policy H15. The rest of the Plan appears to function only for people of actual and potential working age.

London has to function as an integrated community, or collection of communities. The layout of the draft Plan does not suggest this has been applied.

There are no overt transport considerations for older and disabled / infirm residents, visitors, retirees and workers. The Plan appears to have a silent reliance on legislation to drive facilities for the less ambulant, showing no ambition to exceed that, to make London a world-leader in several respects.

The draft Plan's expansive transport ideals are diametrically opposed to what TfL is currently doing to London's transport. The Plan talks of expansion and improvement while TfL (*for other considerations*) is reducing transport provision, on buses in particular. On what base does the Plan stand to develop its proposed improvements?

Restoration to previous, better transport levels is not mentioned - the Plan is completely divorced from current depressing London's transport reality.

Administrative boundaries are invisible to passengers until buses no longer cross them, or a fares / ticketing differential becomes obvious or an inconvenience.

A lack of affordable housing within Greater London means passengers commute further. The Plan appears to make no recognition of cross-boundary bus and train users.

Many bus routes do not parallel rail (main line or Underground) - those routes have no practical alternative, other than walking, cycling (which may be impractical) or car / taxi. Each of these have integrated costs and time implications. These routes should not be cut, as passengers use 'feeder' services far more than trunk radial routes.

The Plan contains no specific assurance that I can see that such routes will be retained and developed.

The housing-employment-transport triangle is inter-dependent - hit any one and the other two crumble. **London's population is rising** so cuts are self-defeating. The Plan is 'silo-thinking': its paucity of cross-referencing between issues, particularly in the transport segment of the Plan is of great concern.

TfL bus passenger numbers are apparently falling across London, despite the announcement when Sadiq came to power that numbers in the suburbs were growing. He said that for each bus taken from inner London, a balancing extra bus would be introduced in the suburbs. This has not happened.

Two points:

A - how have suburban passenger numbers fallen; is this pan-London?

B - TfL says passenger numbers have fallen 5% - why is a 7% bus cut being imposed?

Therefore, on what quantitative basis is the development of buses (*and other transport improvements*) based?

The current situation is diametrically opposed to the Plan's aspirations: the announced 7% cut takes 572 buses off the road since peak service at March 2017. In 2017, 176 daytime buses were withdrawn, meaning almost 400 are still to be taken away.

Allowing for integrated rosters and driver shortages, over 1100 actual and potential driving jobs will be cut. This will eventually cause engineering and back-office job losses.

With these cuts, the stability of employment in bus transport becomes questionable, and thus less desirable when alternative work is available.

Long-term transport employment stability is not addressed in the Plan, nor is the admittedly-difficult issue of housing for such workers, who are now commuting considerable distances to then drive buses, then drive home again, raising safety concerns over driver fatigue.

Bus frequency is critical - halving the service on, for example central London route **RV1** and some Night routes will make services undesirable, and repeat the destructive cycle of cuts of the 1970s. People will wait a few extra minutes, but when frequencies substantially widen, the perception of a worsening service is disproportionately larger.

The Plan does not clearly address qualitative transport issues, which is a glaring omission as reliability is the keymost factor in transport.

Most of the current bus cuts are to all-diesel routes, because they're easiest to reduce. All-electric buses are limited by where they can be based, and the routes they operate because of the need to recharge. The impression is hard to dislodge that the basis of cuts to routes is determined in at least part by their vehicle type.

Safeguarding current and future operational sites is crucial. Under Ken Livingstone, the GLA land-banked for future large garage sites, to cut the negative local effects of many little garages, and to supply sites with proper maintenance and staff facilities, such as **Ash Grove** Garage in South Hackney. However, LB Ealing refused planning consent for a mega-site at **Hayes** in west London. There has been no obvious addressing of this, and pressures on TfL imply these unused sites risk being sold to generate short-term income.

The London Plan needs to not just safeguard land for future transport operational need but to have a means of ensuring the land can be productively used for those purposes, with due regard for environmental need.

Cutting buses paralleling rail is unreasonable - this puts vulnerable people at risk. They live or work between stations, meaning a longer wait, more walking in poor weather and greater perceived threat. As bus fares are lower than rail fares, buses are more affordable to those in low-paid employment.

TfL does not have integrated fares, only ticketing - the same journey by Underground can cost twice as much. Not everyone can afford a season ticket.

Worst case is route **N8** along the Central Line (Liverpool Street - Bethnal Green - Mile End - Stratford), where stations are two or more miles apart. This route serves areas of inner east London where employment is often low-paid and unsocial hours, and the need for suitable public transport is being ignored.

The Plan needs to address socio-economic use of public transport - its availability and affordability are integral to its provision.

Extract from my 'PVR file' [Peak Vehicle Requirement]:
File data goes back to 18 Jun 1952

		Mon-Fri			Sun		
Date	Mayor	PVR/day	New	Total rise	PVR/day	New	Total Rise
31 DEC 2014	BJ	7835***	+156	2471	4890***	+83	1761
To 31DEC14 under Johnson's reign, bus provision <i>artificially</i> rose 39.3% Mon-Fri and 39.29% Sun, caused by (a) replacing articulated buses with many more conventional vehicles and (b) increasing vehicle numbers when NBfL buses replaced conventional buses. Total buses were CUT in 2012 only.							
05 SEP 2015	BJ	7953	+118	2289	4990	+100	1861
31 DEC 2015	BJ	8032****	+79	2368	5041****	+51	1912
Total bus rise under Johnson was Mon-Fri 594, Sun 650, inflated figures because many more smaller conventional vehicles replaced articulated buses to provide the same passenger-carrying capacity.							
On 05 May 2016, Sadiq Khan (Labour) became Greater London Mayor, promising that buses 'saved' from inner London service cuts would be used to improve outer London bus routes.							
09 JUL 2016	SK	8087	+55	2423	5080	+39	1951
NB – July 2016 data includes changes made under Johnson's regime.							
31 DEC 2016	SK	8145	+58	2481	5113	+33	1984
25-31 MAR 2017	SK	8174			Not given		
01 JUL 2017	SK	8122	-52 from Mar 2017	2429	5110	-3	1981
(-23 from 31 Dec)							
Despite London's rising population, 8.78 million+, these are the first big cuts since TfL began in 2001. During 2017, bus cuts were across Greater London, with few enhancements of suburban routes.							
31 DEC 2017	SK	7998	-176 from Mar 2017	2334	5074	-39 from Dec 2017	1941
(-147 from Dec 2017)							
Sat night / Sun morn buses have been cut during 2017 by 90 vehicles							

***= part due to greater number of 'NBfL' buses (which seat fewer passengers) replacing conventional buses.

****= 2015 PVR rise mainly extra buses for roadworks otherwise causing longer running times than planned.

Plan Objectives to be inserted / recognised - transport is "an instrument of derived demand"
- people use public transport to serve another purpose other than the travel (*excluding*

sightseeing/tourism operations).

London's population is growing and more jobs are coming on-stream. Land pressures for housing means 'brownfield' sites are being used for homes.

These locations may not be close to rail routes, requiring either a connecting journey to reach the station or use of buses to reach the destination.

With **dedicated bus routes to link new developments and destinations**, and even **localised incentive fares to encourage travel**, it's not just service provision that matters but also imagination to make the services attractive.

Recognition of London's geography, distribution and its route centres (*such as but not limited to Romford, Ilford, Walthamstow, Wood Green, Enfield, Barnet, Harrow, Wembley, Ealing Broadway, Uxbridge, Hounslow, Kingston, Sutton, Morden, Croydon, Lewisham*): these are typically only served by radial rail routes (*main line and Underground*) from central London, rarely in other directions. *All* of these centres have a comprehensive road network and hinterlands. Only buses can provide the public transport means to serve those non-rail locations.

'London Transport' recognised this in the late 1960s when it introduced feeder networks and restructured fares in most of those locations - London Transport's "Reshaping Plan" set out the principles, which included a Red Arrow express routes network in central London. This came into being but was crippled by (a) traffic congestion, and (b) the 6d flat fare being too high compared to the graduated fares on conventional buses.

Many of those feeder routes introduced on and from 1966 still exist [some renumbered] fifty years later (*eg W3 and W7*), proving the concept.

A two-tier fare structure, one for main routes as now, and a lower-cost regime for connecting services would be a net generator of revenue. The Plan does not address the issue of fares in any realistic way, nor does it look at incentive levels of charging.

Buses are key to employment - not just taking workers to and from their destinations, but also taking other people to those places to deal with those workers. There is a direct correlation between bus use and government VAT receipts.

I intend these comments as constructive, based on decades of professional experience in London's passenger transport service. I find the Plan a demonstrable example of addressing

individual aspects in great clarity but lacking cross-referencing to make the final Plan viable and sustainable. Please accept these comments on that basis. I welcome any response.

Joel Kosminsky



This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.
