

Transport for London consultation on the Demand Responsive Bus Trial ~ response from Campaign for Better Transport

March 2019

Campaign for Better Transport is the leading charity that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to respond to Transport for London's consultation on the proposed Demand Responsive Bus Trial in Sutton and Croydon.

While the main consultation is seeking views from the local community and potential service users, we are sharing general views on the potential benefits and risks from implementing a demand responsive bus service in this area.

Our approach

We value the role of bus services in connecting communities. Modern buses are essential to free up congested road space; to help reduce air pollution and carbon emissions from road transport; and to connect people to jobs, friends and life opportunities.

We recognise the challenge of providing regular scheduled buses at a time of changing demand and the risks of introducing new routes to areas not currently well-served. Over the last ten years, increases in average bus operating costs have outstripped changes in average revenue, leading to reduced margins and contributing to the withdrawal of both commercial and supported services.

We welcome the opportunity to explore and test the potential for demand responsive services to fill gaps in existing provision or to help make services sustainable for the future.

We believe that such services should seek to complement, rather than compete with, existing public transport, and that they should be part of a co-ordinated network. We therefore welcome the leading role that Transport for London is playing in this trial.

The Sutton trial

Our response to the Sutton trial looks at four broad issues:

- Location – is this the right place for a demand-responsive service?
- Integration – is this provision part of a joined-up approach that supports end to end journeys?
- Regulation – what is the appropriate regulatory framework for such services?
- Information – what issues should the trial explore and what lessons might be learned?

Location

Demand responsive services are particularly appropriate for areas and user groups that are not well-served by existing provision. We welcome this trial taking place in the London Borough of Sutton.

The borough is largely not served by the London Underground network, and while it has good rail links to central London on linear routes, it has only limited orbital rail services. The trial area includes two hospitals and a college as well as large housing estates at Roundshaw, St Helier and Rose Hill.

We are particularly keen to see how viable such services would be in providing an alternative to private car use in areas of lower density housing and higher car use, such as Carshalton Beeches, and employment areas such as the business parks at Beddington and Hackbridge.

Integration

We are keen to see demand responsive services as part of an integrated public transport network.

The service should have agreed access to designated drop off points at bus stations, railway stations and other interchanges, to facilitate onward journeys and boost patronage of existing public transport services.

The service should be accessible through shared ticketing such as Oyster or through PlusBus tickets purchased with rail tickets as well as through the Freedom Pass. It is important that online and offline systems for booking are thoroughly tested before the trial goes live.

We would also like to see the trial explore shared travel information and booking systems and be featured in travel planning applications, both to maximise its chances of success and to encourage integration with other public transport modes. Transport for London is uniquely well-placed to make this happen.

We would encourage the trial to anticipate and plan for dealing with higher than expected demand for some trips which could reduce the flexibility of the service. We look to the trial to identify areas and times of high demand which could be served in future by a scheduled bus service or additional on demand services where appropriate.

We also commend the Total Transport approach, which maximises the use of other public service vehicles, such as school and hospital transport, for community use. The trial will have added value if it explores integration with such provision.

Regulation

It is important that demand responsive services comply with the latest standards of vehicles in terms of safety, accessibility and emissions. We note that the vehicles proposed for the trial will be Euro VI compliant, bringing them in line with the Ultra-Low Emission Zone vehicle standards, and that they will be fully wheelchair accessible. We hope that future trials will explore the potential for use of electric or other zero emission vehicles.

There are unanswered questions which this trial should explore on where such services sit in the current regulatory framework. Private hire vehicle licensing sets minimum standards for vehicles and drivers but does not specify a level of service. Regulations for scheduled bus services are likely to be overly prescriptive for a demand responsive service.

A useful model may be the experience of Dial a Ride. Dial a Ride provides demand responsive transport for Londoners with disabilities, linked to a personal mobility budget, funded by Transport for London. A GLA report into Dial a Ride made the following recommendations which could usefully be applied to any demand responsive bus service:

- Develop a customer charter, with a clear statement of the service offered
- Manage the service to avoid duplication of vehicle trips
- Co-ordinate with community transport provision

- Monitor performance of online and telephone booking systems
- Set up customer satisfaction surveys and other independent channels for user feedback.

It is likely that TfL will need to develop a new area of regulation, and a new category of operating licence, that would ideally set minimum public service requirements, such as commitments to serve particular areas, the number of requests to trigger a service, and compliance with standards on vehicle safety, emissions, and disabled access. This would be in line with the Department for Transport's announcement ('Future of Mobility: Urban Strategy' March 2019) of planned legislation covering flexible bus services, with a view to ensuring that they can operate at the maximum of their potential.

Information

We welcome the trial as having the potential to bring benefits beyond the immediate service area. The information derived from a well-run trial could be invaluable in developing other demand-responsive services.

We recommend that extensive data collection takes place during the trial including for example: digital scanning of passes such as the Freedom Pass that are normally checked visually; on board collection of quantitative and qualitative data through user surveys; GPS tracking of vehicles to verify number, distance and speed of trips; anonymised logging of trip requests to identify the most and least popular routes and times.

Among the issues we believe this trial should explore are:

- Cost: how does the operating cost compare to standard buses. Using smaller vehicles may reduce running costs but will also restrict passenger revenues. How do driver costs compare and what is the driver employment status?
- Technology: how does the service integrate with the rest of the TfL family in terms of ticketing, journey planning and ridership data?
- Usage: what is the take-up and how does this impact on car usage and usage of other transport modes? Does it contribute to an overall shift to sustainable transport, or does it take ridership from public transport, walking and cycling? What is the quality of the user experience?
- Integration: to what extent is the usage standalone and to what extent does it form part of a longer end to end journey?
- Regulation: as noted above, there may be the need to develop a new regulatory framework. What is the experience from this trial that could help define that?
- Wider impact: what are the impacts on other policy goals such as access to work; reducing loneliness; promoting active lifestyles; cutting pollution and congestion?
- Future proofing: what are the lessons in terms of making this and other demand responsive services operationally efficient and financially sustainable in future?
- Sharing lessons: how will the lessons be shared? Will the data from the trial be made available through TfL's open source platform?

We look forward to seeing the trial develop and to sharing the learning from it.

March 2019 Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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