

Central London Bus Services Consultation 2022: 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 leaves Camberwell uniquely reliant on bus services. Over recent years these too have been reduced with the loss of 5 cross-river bus services and the reduction in frequency on remaining routes.

The proposals to withdraw completely two bus services connecting Camberwell with central London to the north, Lambeth to the west and reduces service along the corridor towards Lewisham in the east. These are key locations supporting Camberwell's economy and opening up employment and education opportunities across London for residents.

Overall TfL's proposes to withdraw 16 routes across London. It is completely disproportionate to target 2 of these on a single community reliant on its bus connections.

High levels of multiple deprivation, unemployment, low pay, child poverty, physical and mental health problems and an ageing population speak to the need for enhanced, not deteriorating, public transport services in Camberwell.

Access to car transport is limited among residents and TfL targets for Southwark look to reduce car ownership further.

Impacts resulting from the withdrawal of services and re-routing of others include increased and less predictable door to door journey times, loss of Hopper fares due to extended journey times, and fears over personal safety at interchange points affecting women, older and young people, disabled people and LGBTQ people. Camberwell has a majority BAME population, many of whom experience multiple deprivation factors.

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

Visitors to Camberwell and its businesses and services, notably including two major London hospitals, King's College Hospital and South London & Maudsley Hospital, will also face reduced services and access.

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.

SE5 Forum objects in the strongest terms to TfL's proposals to reduce and re-route bus services from **Camberwell.** They fail to recognise the significant socio-economic and equalities issues affecting Camberwell and its residents. We call on the Mayor of London to withdraw these flawed proposals and reverse other recent cuts.

SE5 Forum

July 2022

1. INTRODUCTION

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

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), Herne Hill & Loughbrough (Coldharbour pre-2022) and Myatt's Fields (Vassall pre-2022) (LB Lambeth) wards falling into the area residents identify as Camberwell, largely coincident with the SE5 postcode area. Much of the data in this submission is for Camberwell Green and St Giles wards only.

SE5 postal area



As well as the retail and hospitality sectors found in Camberwell's town centre and along main arteries, it is a centre for council services (library, leisure centre, register office), home to 2 universities (UAL Camberwell and King's College Medical), 3 secondary schools (Sacred Heart, ARK All Saints Academy, Saint Gabriel's), 3 special educational needs facilities (Highshore and Spa Schools, Orchard Hill College), 2 hospitals (King's College and Maudsley) and associated institutions, GP and other health services, a care home, 2 bus garages, a number of light industries and cultural venues.

The area is experiencing unprecedented development, with new homes built at or planned for Camberwell Fields, Elmington Green, The Wing, Peabody, 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 new developments contain 35-50 percent social and affordable housing.

Camberwell has a transient population with significant levels of turnover associated with certain housing tenures, for example polling districts CMG1, CMG3 and CMG4 have annual churn rates of 17.5 percent, 12.7 percent and 14.1 percent, respectively. Some of this mobility is from choice – young professionals seeking accommodation more convenient to their employment. For others it is driven by short-term leases forcing relocation while needing to retain links with Camberwell for schooling or employment.

This consultation response is structured as follows:

- Transport for London's proposals
- Disconnected Camberwell
- Disadvantaged Camberwell
- Conclusions

2. TRANSPORT FOR LONDON'S PROPOSALS

The Secretary of State for Transport is requiring the Mayor of London and Transport for London to make cuts to services in order to balance its budget which is heavily reliant on passenger revenues. The impact of the covid pandemic on public transport usage has been substantial and enduring, with behaviours still impacted in early 2022.

In developing its proposals, TfL argue that cuts must apply to central and inner London services as this is where bus network demand has fallen furthest. However, their own figures assess bus network demand in Southwark had, by March 2022, largely recovered to pre-covid levels, that is higher than or broadly similar recovery levels to outer London boroughs:

Richmond 66 percent,

Hackney 68 percent,

Bromley 73 percent, Kingston 73 percent,

Barnet 74 percent, Harrow 74 percent, Waltham Forest 74 percent,

Haringey 75 percent, Sutton 75 percent,

Brent 76 percent, Croydon 76 percent,

Ealing 77 percent, Havering 77 percent, Southwark 77 percent

Bexley 80 percent, Enfield 80 percent, Hounslow 80 percent,

Rebridge 81 percent.

Only Hillingdon has appreciably higher recovery at 88 percent.

Southwark is facing cuts to four services, that is one quarter of all the cuts across London, with two of these affecting Camberwell. **This level of cuts is disproportionate and the relevance of data collected to support them is unclear.** Passenger behaviours continue to return to normal as more people return to office working most days.

Impact of previous and current cuts on cross-Thames direct bus services into central London

Destination	Services	Impact from 2016 levels
Vauxhall Bridge, Victoria station and the West End	36, 185	One less service
Westminster Bridge and on to Charing Cross/West End or	148	One less service
Victoria		
Waterloo Bridge and Waterloo station	68, 176	One less service
Blackfriars Bridge, the City and Blackfriars station	40	Replacing truncated 45
King's Cross and St Pancras stations	zero	One less service
London Bridge, the City and London Bridge station	35	One less service
Tower Bridge	42	Unchanged

As a result of the implemented and proposed changes Camberwell will have lost 5 direct cross—Thames connections, with only a single service on four of the five bridges from Westminster Bridge eastwards. The direct service to King's Cross and St Pancras rail services has been lost completely, the direct services to Waterloo and London Bridge reduced by one-third to a half. Services to Victoria and on to Paddington were reduced with the loss of the 436 connection which is now diverted to Wandsworth.

The routes proposed to be cut which affect Camberwell are the 12¹ and the 45², both of which run northward along Camberwell Road/Walworth Road to Elephant & Castle, linking to the rail and Underground (Bakerloo and Northern line) services there. Since other services also running up this

¹ https://haveyoursay.tfl.gov.uk/15359/widgets/47800/documents/27585

² https://haveyoursay.tfl.gov.uk/15359/widgets/47800/documents/27569

road (35, 40, 68, 148, 171, 176) have been reduced in frequency since the covid pandemic, this represents a substantial reduction in the transport links along this important artery.

Current bus routes (affected routes only)



Proposed changes



Route 12

TfL claims the withdrawal of route 12 will be partially mitigated by re-routing the 148 from Denmark Hill to Dulwich, thus removing the service to Kings College Hospital at its southern end. At the northern end the 148 would no longer serve White City, terminating at Shepherd's Bush Green. It departs from the 12 route at Parliament Square, so this mitigation measure severs the direct link along Whitehall to Trafalgar Square, Regents Street and Oxford Circus.

TfL estimate 6,860 trips daily, or 36 percent of current route 12 users, would need to change bus in order to complete this journey, changing at Elephant & Castle going northwards and the south side

of Westminster Bridge going southwards in order to achieve same stop interchange. Of these passengers 13 percent are aged 65 or over, 8 percent under 25 and 3 percent disabled. TfL have no data for passengers with other protected characteristics affected by these changes.

All of the single stop interchange points proposed by TfL are ordinary bus stops without any facilities beyond a standard shelter, perch seats and indicator boards for bus arrival times.

TfL recognise that passengers needing to change service may not benefit from the Hopper fares as journey times may exceed the 60 minute window from boarding the first bus. The highest risk of this affects those with mobility issues, including disabled and older passengers and carers with pushchairs.

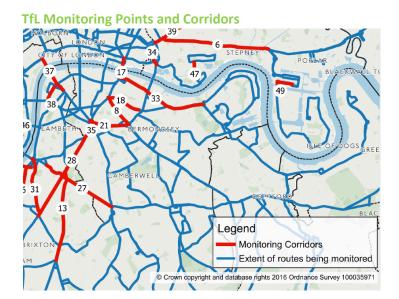
Route 45

The withdrawal of route 45 would halve the service up Denmark Hill to the Coldharbour Lane junction, close to the Camberwell Sexual Health Clinic at the start of the King's College Hospital campus. Only route 35 remains. The proposed mitigating changes to route 59 would restore the link to Clapham Park via interchange at Brixton, but will reduce links from Camberwell to Brixton and extend journey times. This will be of particular importance to those living in the Lambeth part of Camberwell given Lambeth council and police services are located there.

Wait times will rise and only half the current service will be available beyond Camberwell Green towards Brixton, including to King's College Hospital. The interchange at Brixton is not a single stop facility but involves a 40m walk between stops northbound and 50m southbound. TfL estimate 1,160 trips daily, or 14 percent of journeys would be affected. Of the passengers affected, 12 percent are aged 65 or over, 9 percent under 25 and 3 percent disabled people. These passengers have already lost the direct link to Clerkenwell on this service since the decision to truncate it at Elephant & Castle, so this represents a further erosion of public transport services.

Older people, women, disabled, LGBTQ and young people travelling after dark would need to change in central Brixton with its lively nightlife and, as more vulnerable passengers, may be reluctant to travel or feel threatened as a result.

TfL estimate that, despite the more difficult interchanges involving 40-50m walks, Hopper fares would not be affected, but this will depend on the final destination of the passenger and whether they are going on to a further connecting bus service.



It should be noted that TfL's proposals are not based on any direct monitoring of buses on Walworth Road or through Camberwell. It is difficult to see how TfL can conclude that there is over-provision of services on Walworth/Camberwell Road or Camberwell Church Street through to Peckham and Dulwich warranting the withdrawal of the 12 and 45 routes based on these monitoring points.

Impacts

TfL's own assessments show thousands of commuter journeys each week from Camberwell would face bus changes at Elephant & Castle or Brixton, adding further journey times. Given crowding on buses at these busy interchanges 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.

As interchange hubs, facilities at Elephant & Castle and Brixton are poor. Bus stops 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, perch seating and a Countdown display, there are no covered routes between the bus stops, nor are there toilets or baby-changing facilities.

In their October 2018 report on London's bus stations³, the independent, statutory body London Travelwatch said "Thousands of passengers interchange at Brixton and Elephant & Castle each day for example. But the only facilities they have are the roadside shelter and a small amount of information. Because of the numbers of passengers, many cannot be accommodated by the shelters available. There should be consideration of these and similar locations to provide an improved waiting and interchange environment." Facilities have not been improved since then.

With climate change impacts now becoming increasingly prevalent, the lack of adequate shelter from severe heat and rainfall events at Elephant & Castle and Brixton currently make them unsuitable as interchange points. During events such as those on 18-19 July 2022, with temperatures in the high 30s⁰C, passengers' health would be put at risk while waiting for connections. Increasing severe rain events would also result in exposure with nowhere available for temporary evacuation, particularly at Elephant & Castle.

Facilities at Elephant & Castle and Brixton require significant investment to meet their current interchange functions adequately before any extension and additional exposure of bus users, especially the frail and vulnerable, as a result of these proposed bus cuts.

3. DISCONNECTED CAMBERWELL

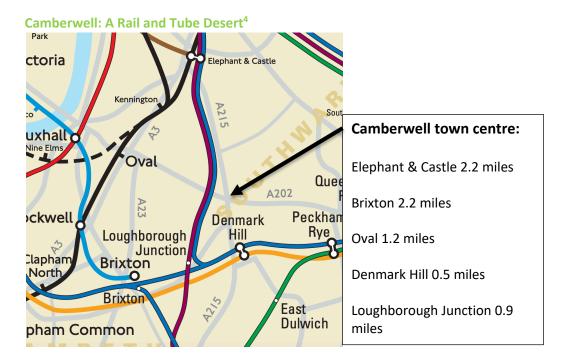
Camberwell has been a transport hub since the opening of Vauxhall Bridge and toll road (Camberwell New Road) connecting to the Walworth Road/Denmark Hill route where Peckham Road joins it in the early 19th century. A bus garage opened in 1918 (now Go Ahead) joining the tram garage (now the Abellio bus garage) which had operated services since the 1870s. The 12 bus service has been operating for more than 150 years. Denmark Hill rail station opened in 1865, three years after Camberwell rail station (closed 1916 and re-opening proposal rejected in September 2018).

Camberwell's current transport services

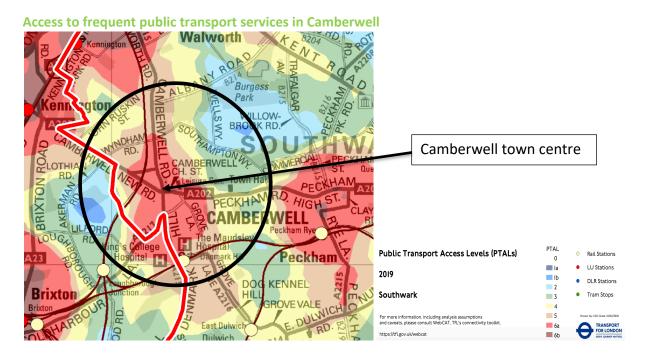
Camberwell remains unconnected to the Tube network. North and west Camberwell remain entirely reliant on bus transport for any connections to the rest of London. South Camberwell struggles with chronic congestion at Denmark Hill station, which also serves King's College and Maudsley Hospitals. Over-crowding 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

³ https://londontravelwatch.s3.eu-west-1.amazonaws.com/wp-content/uploads/2021/02/11105731/Bus-station-standards-final-version-5.10.18.pdf

wheelchairs or carers with pushchairs to use this station at these times, despite lift access to platforms.



Significant areas of Camberwell, particularly those with high densities of social housing, are assessed by TfL as having moderate access to bus services at pre-Covid service levels and are distant from rail and Underground stations. Reducing further 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 reach financially for many Camberwell residents.



⁴ TfL London Connections, May 2014

Household car access in Southwark was assessed at 40 percent by TfL in 2011/12, the 8th lowest borough in London (excluding City of London)⁵. The study shows BAME and low income households have lower car ownership than London averages, indicating that car access in Camberwell will be well below this Southwark average, making Camberwell residents especially dependent on public transport.

TfL set a car ownership reduction target of 57,100 in Southwark by 2021, from 58,396 in 2019, as part of the Local Implementation Plan for the borough, contributing to the Mayor's Transport Strategy⁶. To achieve this reduction without negative impacts on access to jobs, health and education services, public transport needs to be maintained.

The speed and availability of cross-river connections has declined over recent years due to the removal of bus lanes to accommodate cycle superhighways and the encroachment of anti-terrorism security barriers on Thames bridge bus lanes. In addition, bus frequencies have fallen significantly on all routes. As a result, travel to work times for jobs north of the river are 45 minutes. Further reductions in bus services will exacerbate Camberwell's isolation and the economic, social and health impacts consequent upon this lack of connectivity.



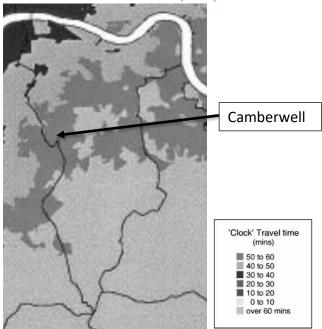
While TfL's current planning tool indicates travel times of under 45 minutes to access large parts of London by bus, this is often not the experience of residents. TfL's previous CAPITAL model gives a more recognisable picture, with travel times in excess of one hour common. Southwark has the highest 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.

⁵ https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf

 $^{^6\} https://tfl.gov.uk/info-for/boroughs-and-communities/southwark\#on-this-page-6$

⁷ https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat?Input=SE5+7AF&PlaceHolderText=eg.+NW1+6XE+or+530273%2C+179613&scenario=Base+Year&mode=All&timeOfDay=A M&direction=From&type=Tim&zoomLevel=14&searchTravelTimeInterval=15

Southwark Clock Travel time (mins)⁸



While TfL consider cutting route 45 would not put the availability of the Hopper fare at risk, passengers with limited mobility (elderly, disabled, carers with pushchairs and children, patients with chronic and acute conditions travelling between KCH and St Thomas' hospitals) who may take longer to transfer between services may exceed the 60 minute limit timed from boarding the first bus used. This would mean a second fare would be charged, although passengers with Freedom Passes (Older Persons or Disabled Persons) would not bear the costs themselves.

There have been a number of attempts to improve Camberwell's connectivity with central and north London using other transport modes, but all have fallen through.

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

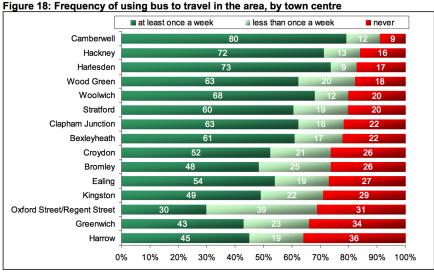
This underlines the importance of buses to Camberwell as the only TfL service available to most residents and the serious impact the loss of two bus routes would have.

The Camberwell Economy

Businesses and public sector employers in Camberwell town centre rely on public transport for workers to commute and visitors to travel from other areas. A TfL study a decade ago showed bus usage in Camberwell town centre was uniquely high.

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⁸ TfL CAPITAL model, 2000



Source: TfL9

More recent data for Southwark overall shows that workers travelling into the borough come predominately from Lambeth, Lewisham, Tower Hamlets and the City of London¹⁰. These incoming travellers are vital to the economy of Camberwell in providing the workforce and consumers of businesses and services in the town centre, hospitals and related science and medical establishments.

Main starting points for people travelling to Southwark

Origin	Workers	Visitors
Lambeth	28.6%	30.7%
Lewisham	25.1%	27.7%
City of London	8.3%	9.6%
Tower Hamlets	8.3%	9.2%

With Camberwell straddling the Southwark/Lambeth border there are likely to be more visitors from Lambeth than Southwark as a whole. However, the 36, 436, 176 and 185 buses link directly to Lewisham so Camberwell is also draw workers and visitors from the east. TfL mapping indicates similar travel times from Brixton and New Cross to Camberwell.

Reducing the bus connections southwest to Brixton and eastwards along the Peckham to New Cross corridor could have a significant impact on Camberwell businesses and employers, both workforce and customers/service users.

4. DISADVANTAGED CAMBERWELL

Southwark is ranked 40th out of 326 local authorities for high deprivation¹¹. Camberwell Green (6th most deprived ward in Southwark) and St Giles, formerly Brunswick Park, (10th most deprived ward in Southwark) wards have a combined population of 27,890¹². Many households in Camberwell Green and St Giles (Brunswick Park) wards are in the two most deprived quintiles.

⁹ http://content.tfl.gov.uk/town-centre-study-2011-report.pdf

 $^{^{\}rm 10}$ Communication from the Chief Executive's Department, Southwark Council

¹¹ Community Southwark

¹² Multi-Ward Profiles 2019, West Central Southwark, Southwark Council, Summer 2019

Camberwell's population has multiple deprivation indicators, making residents both more reliant on public transport services, and less able to access them effectively. Even where rail and Underground services are physically accessible, cost factors exclude those on the lowest incomes.

*Index of Multiple Deprivation*¹³



Social characteristics

Specifically, Camberwell residents have the following characteristics¹⁴ that demonstrate the need for fuller and more careful analysis in understanding the impact of the changes on vulnerable and disadvantaged groups (figures are for Camberwell Green and St Giles, respectively unless stated otherwise):

- i. 67 percent of Camberwell Green's population is in the most deprived quintile nationally, with most of the remainder in the next most deprived quintile
- ii. 12 percent of all working age adults in Camberwell Green claimed benefits in 2016
- iii. 28 percent of dependent children under 20 years of age in Camberwell live in low income households compared with 24 percent London-wide
- iv. 18 percent and 19 percent of children 0-15 years are living in households claiming out of work benefits
- v. 7.9 percent and 8.4 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
- vi. 22.6 percent and 20.5 percent of the population under 18 years old
- vii. 61 percent and 52 percent of the population is BAME compared with 40 percent Londonwide
- viii. 630 per 100,000 and 574 per 100,000 population made new requests for adult social care support in 2018/19

No ONS data is available specifically for Camberwell, but Camberwell & Peckham constituency currently has an out of work benefits claimant rate of 6.3 percent, compared to 4.9 percent across London¹⁵, with only limited employment opportunities in Camberwell. On average, Camberwell & Peckham residents in work earn 5.5 percent less than the London average.

¹³ Southwark Demographic Factsheet, May 2015, Southwark Council

¹⁴ Southwark Council Ward Profiles, October 2017 and Multi-Ward Profiles 2019, West Central Southwark, Southwark Council, Summer 2019

¹⁵ ONS via

Characteristic	Camberwell & Peckham	London
Adults with no qualifications or qualifications	17.1%	12.8%
lower than NVQ1		
Caring, Leisure and other Service occupations	16.6%	7.1%
Elementary occupations	12.8%	6.8%

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 rates¹⁶.

Health

Camberwell residents have lower life expectancies and more fragile health than London and England averages (figures for Camberwell Green and Brunswick Park/St Giles, respectively, unless otherwise stated):

- ix. Male life expectancies of 77.4 and 78.8 years of age, compared to 80.5 London average
- x. Female life expectancies of 82.2 and 87.2 years of age, compared to 84.3 London average
- xi. 752 per 1000 and 680 per 1000 children under 5 admitted to hospital each year, compared with 701 per 1000 Southwark-wide
- xii. Camberwell Green's emergency hospital admission level is statistically significantly above England average
- xiii. Camberwell Green has 70 percent more hospital admissions for chronic obstructive pulmonary disease than England average
- xiv. Camberwell Green's cancer incidence is 12 percent above England average and 16 percent above London-wide average
- xv. Camberwell Green has 7 percent more hospital admissions for coronary heart disease than England

Access to hospital services at Guy's has already been reduced with the truncation of route 45 at Elephant & Castle and re-routing of the 40 in the last round of cuts. The loss of route 12 will remove a direct service to St Thomas' from Camberwell, with both affecting patients moving from King's College Hospital to these partner hospitals providing complementing services on eg cancer care. The proposals to mitigate the loss of these routes by changing the 148 and 59 routes do not address the lost services connecting Camberwell with these hospitals.

The location of the Maudsley Hospital in Camberwell means a higher 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.

Equalities impact

TfL's own research shows "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." ¹⁷

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

¹⁶ https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/jrf-addressing-transport-barriers.pdf

¹⁷ Church, A., M. Frost and K. Sullivan, Transport and social exclusion in London, Transport Policy 7 (2000) pp195-205

"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."¹⁸

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 blow to Camberwell's community and its vulnerable residents. This is at a time when the cost of living crisis and rapidly escalating energy bills will add further pressures to already over-stretched household budgets and businesses still recovering from the impacts of the covid pandemic.

5. Conclusions

Camberwell's economy relies on both workforce and customers/service users travelling into the area to use businesses and public services located here, and residents sustaining stable and well paid employment across London. Transport services are critical enablers, but with poor rail connection and no Underground connection Camberwell is uniquely dependent on bus services.

The population is characterised by multiple sources of deprivation and disadvantage, with low life expectancy, high levels of ill health, low skills levels and high dependency on state benefits. Child poverty, unemployment and the prevalence of low pay are all higher than London averages. Camberwell's diverse population includes a majority BAME community in Camberwell Green ward.

All these indicators point to the need for rapid, frequent and direct bus services to support improved economic prospects and life chances for Camberwell residents.

TfL's persistent is failing to meet its Public Sector Equality Duty by only looking at a small number of factors and assessing impact on journey times. The current proposals come on top of numerous cuts

¹⁸ https://www4.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/jrf-addressing-transport-barriers.pdf

to cross-river bus services and frequency of the remaining services. The withdrawal of 2 bus routes affecting Camberwell disproportionately affects our community.

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

July 2022

