Kidical Mass London: Submission to the Bus Services (No.2) Bill Committee Stage

Introduction

We are writing from Kidical Mass London. We are a grassroots group based in London and part of a global network called Kidical Mass. Our aim is to encourage uptake of cycling amongst children and families and to advocate for safe cycling infrastructure. We do this by running marshalled mass bike rides for children and families. These allow children and families to enjoy cycling in the city with the safety of a large marshalled group and in a fun carnival atmosphere. However the aim is also to demonstrate to policymakers that it is not children's ability or will that holds back cycling amongst children and families but rather other factors including the lack of safety and lack of dedicated infrastructure on the road network. We have run rides for up to 500 people at a time in conjunction with various other campaign groups including the Clean Cities Campaign, Wheels for Wellbeing, iBikeLondon and others. More information is available here: https://kidsonbike.org/

Reason for submitting evidence

Age is a protected characteristic under the Equality Act 2010. We wish to give evidence to this Committee specifically to highlight the risks that proposed amendments to ban floating bus stops pose to exclusion of children and young people from being able to cycle, and the impact this would have on children and the cities they live in.

The need for safe infrastructure to avoid exclusion from active travel

Our experience is that children as young as 5 years old can often comfortably cycle long distances unaided (for example rides of up to 6 miles) and enjoy doing so. Our rides are also popular with families using carrier-bikes to transport babies and younger children. Some of our riders are disabled and use cycles or adapted cycles as mobility aides, or as an inclusive means to travel which avoids difficulties associated with public transport.

Whilst we know children are easily capable of riding far longer distances than the average car journey in London, it is still common for our riders to express fears about using cycling as everyday transport and so they are excluded from active travel on the road.

We believe the main factor holding back access to active travel for children, families and young people is lack of dedicated infrastructure and safety on the roads and the perception of danger which affects travel choices. Parents fear travelling by bicycle with children on roads mixed with high volumes of motor traffic or with HGVs and buses. In many areas there is very limited or no safe cycling provision and it is understandably difficult to convince families to cycle in this situation or allow their children to do so.

Protected space (high quality cycle lanes fully separated from traffic) is critical to facilitate safe cycling for children and has been shown to reduce the chance of injury by 40-65%[1]. Furthermore a strategy of providing high quality protected cycle routes has seen significant growth in cycling in

[1] https://findingspress.org/article/18226-cycling-injury-risk-in-london-impacts-of-road-characteristics-and-infrastructure

London, with daily cycle journeys increasing by 26% from 2019-24[2]. Such growth is necessary to meet transport carbon reduction targets and to support public health.

To be safe and attractive it is crucial that protected space must be continuous and direct and feed into suitable low traffic routes. Partially protected routes that throw cyclists into traffic by bus stops can never be attractive or suitable for use by children, young people or vulnerable cyclists and so will continue to exclude young and vulnerable cyclists and fail to encourage uptake of active travel amongst these groups.

Proposals for a floating bus stop ban

We are extremely alarmed to see proposed amendments to the Bus Services (No.2) Bill which would have the effect of banning floating bus stops. There is no possible way to run a fully protected cycle track along a bus route without interaction between cyclists and pedestrians/bus users. Such interaction is a necessary feature of urban design to allow inclusive cycling. Banning floating bus stops can only resolve access tensions by completely excluding whole groups from safe cycling. This is not a viable or proportional policy and not one that would ever be considered for other transport modes.

To ban floating bus stops would reduce interactions between cyclists and pedestrians at the direct cost of increasing dangerous interactions between cyclists and motor vehicles. Without floating bus stops cyclists would have to pull out to overtake buses at stops, often into a live traffic lane with very high traffic flows including HGVs. It also means buses pulling across cyclists to get into the stop. Many routes in London have dozens of buses and hundreds of cyclists in peak hours. The risks and harms of these interactions are far higher than those associated with well-designed floating bus stops.

Such interactions are inherently dangerous and one of the key reasons for building protected cycle tracks. Banning floating bus stops would almost certainly result in cyclists being killed and seriously injured.

Critically, such a ban would make safe family cycling impossible on bus routes and have a strong wider deterrent effect on cycling through removing viable networks: Most parents will just not permit children to cycle in mixed traffic with buses and HGVs and inevitably many cycle routes involve bus routes and busy roads. This single change would be highly exclusionary for children and often entirely remove the possibility of them using cycling as a viable mode of transport.

We have worked with Wheels for Wellbeing, a disabled cycling advocacy group, and we agree with their stated view that a ban on floating bus stops would be exclusionary for many disabled people:

> *'Bus stop bypasses are presently an essential part of inclusive active travel networks that enable (pan-impairment) Disabled people to make journeys. Bans or excessive restrictions on bus stop bypass creation would prevent development of safe, accessible active travel networks and result in formal or de facto shared space between cyclists and pedestrians at*

[2] https://tfl.gov.uk/info-for/media/press-releases/2024/november/new-tfl-data-shows-cycling-journeys-in-london-are-up-by-26-per-cent-compared-to-2019-levels

bus stops. Banning bus stop bypasses would cause ongoing exclusion of Disabled people from active travel and bus use, and additional deaths/injuries in motor vehicle collisions.[3]'

Evidence of risks of floating bus stops

As an inclusive group we are extremely mindful of the accessibility requirements of visually impaired people at bus stops and the fact that some floating bus stops are causing concern. We accept the design of some floating bus stops has been substandard. However, we believe policy should be based on evidence of real impacts and aim to accommodate the needs of all groups. The available evidence does not support banning floating bus stops. The answer to ensuring accessibility is to ensure consistent high quality design standards. Living Streets have published detailed research on this which states:

> '*whilst there is some concern about bus stop bypasses, our observational data suggested the level of discomfort or difficulty most people experience in using these bus stops,* ***when well designed****, is very low*'…and…'*If levels of cycling are to be significantly increased, and this is to become an ordinary, inclusive means of transport, then entirely ruling out the use of bus stop bypasses is not a viable option*'[4].

TfL have also conducted research into this issue which stated:

> '*This review has shown that the risk of pedestrians being injured at bus stop bypasses is very low*'…and…'*The analysis of bus boarding patterns for older and disabled people found that the construction of a bus stop bypass did not subsequently affect overall numbers using that same bus stop. However, some disabled people were concerned about inconsistent bus stop bypass designs*'[5].

This evidence further reinforces the fact that it is poor design features at a small minority of existing floating bus stops and inconsistency that cause issues.

Wider impacts of excluding children and families from cycling

Peak congestion on London's roads coincides with the 'school run', which accounts for around 25% of morning peak traffic in London[6]. In a vicious circle, lack of safety increases the number of families choosing to drive which then further erodes conditions and confidence to cycle on local roads.

The Mayor of London has a stated aim to achieve 'Net Zero' by 2030. This is predicated on a 27% reduction in car kilometres travelled relative to 2018[7]. Such a target is already challenging and will be completely impossible with a ban of floating bus stops ruling out significant mode shift on main

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[3] https://wheelsforwellbeing.org.uk/disabled-peoples-mobility-why-bus-stop-bypasses-are-sometimes-essential-briefing/

[4] https://www.livingstreets.org.uk/media/hdlfxpio/ls_inclusivedesign_busstopscycletracks_main.pdf

[5] https://content.tfl.gov.uk/bus-stop-bypass-safety-review-2024.pdf

[6] https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/car-journeys-during-school-drop-offs#:~:text=The%20Walking%20Action%20Plan%2C%20a,attributed%20to%20school%20drop%2Doffs.

[7] https://www.london.gov.uk/sites/default/files/london_net_zero_2030_-_an_updated_pathway_-_gla_response_1.pdf

roads.

Road conditions and motor traffic volumes have led to a huge loss of child freedom as older children have lost the ability to travel independently, visit friends etc. This imposes financial costs on families who pay high costs of car ownership or public transport use for journeys which could easily be made at very low cost by bicycle if only safe infrastructure were provided. It affects the health and mental wellbeing of children who lack agency, miss out on social and play opportunities, lose opportunities for exercise and physical activity and end up with limited freedom to travel and reliant on parents for even local journeys[8]. The subsequent inactivity from children has negative impacts on the NHS.

It is no coincidence that England is suffering from significant problems with childhood inactivity and obesity, poor child mental health and the lowest child life satisfaction in Europe[9]. By contrast in the Netherlands where most children access comprehensive networks of safe protected cycling infrastructure, children are healthier and have been assessed by UNICEF as the happiest in the world[10].

We urge our representatives to consider all the impacts of the proposed amendments and to avoid simplistic bans that would have wide-ranging negative implications and be highly exclusionary for many road users.

[8] https://www.nuffieldfoundation.org/sites/default/files/files/7350_PSI_Report_CIM_final.pdf

[9] https://www.childrenssociety.org.uk/information/professionals/resources/good-childhood-report-2024

[10] https://www.unicef.org.uk/wp-content/uploads/2013/04/Report-card-briefing2b.pdf