London TravelWatch scheme of policy delegation

Background

The Board of London TravelWatch is appointed by the London Assembly to give strategic direction to the organisation in its work speaking up for London Transport Users. In particular, it is the Board which agrees what stance should be taken in respect of key transport policy and operational matters. The Board makes these decisions in public.

The Board's agreed perspectives are consolidated into a scheme of delegation which is used to guide the day to day work of the Secretariat.

During 2014, a systematic review took place of the scheme of delegation from the Board to officers of London TravelWatch and a revised scheme was developed in accordance with members' wishes. The scheme is set out overleaf under the following headings:

Purpose of scheme of policy delegation

General principles officers use to decide when and if a matter is referred to the Board

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2. Buses

3. Rail and Underground issues

4. Fares and ticketing issues

Purpose of scheme of policy delegation

Members have delegated to officers principles that follow delegation of a task to carry out London TravelWatch policy on a day to day basis:-

- To enable the Board and its committees to operate at a strategic level, by delegating authority to act on routine matters.
- To help prioritise the workload and issues for London TravelWatch
- To enable officers to engage and influence transport industry operators, authorities, users and other stakeholders.
- To ensure a consistency of approach and application to issues as they arise across the London area.
- To deliver the Business Plan objectives for an efficient and responsive organisation.
- To ensure that London TravelWatch carries out its statutory responsibilities in a timely and consistent manner, particularly where we are required to respond to consultations within a specified time limit.
- To make a timely and effective difference for users of the transport system.

The structure of the current four areas of delegation (Street and Surface Transport, Buses, Rail and Underground and Fares & Ticketing) is designed to distinguish between areas of general strategic level interest that are determined by reference to the Board of London TravelWatch, and those which are particular to a specific route, station or street that can be interpreted by officers in the light of previously agreed policy.

General principles officers use to decide when and if a matter is referred to the board

Officers normally refer matters to the board where these involve an element of something which:-

- Is novel or new in some way (e.g. Thames cable car)
- is controversial on a wider scale (e.g. ticket office closures or hours reductions)
- Sets a wider precedent (e.g. Wandsworth Road to Ealing Broadway rail closure)

- Is not covered by existing London TravelWatch policy (e.g. a new system of ticketing).
- Is of major consumer interest (e.g. incomplete journeys on Oyster / contactless.
- Involves a decision on significant trade-offs are made between different groups of users (e.g. long distance travellers vs short distance local journeys)
- Poses a significant risk to the organisation (e.g. proposals to remove consumer rights).Takes account of London TravelWatch's work prioritisation criteria.

Urgent matters that have a time constraint on responses or issues that would not normally go to the Board or its' committees but in which officers know that members have an interest in, are normally dealt with by email consultations to give members the opportunity to comment.

In addition the process for agenda setting for meetings (which is constantly updated) of the Board or policy committee give the opportunity for the Chair(s) of these to discuss with officers whether an item needs to be put to these bodies or can be dealt with directly by officers.

Officers will form responses to consultations and enquiries based on previously agreed policy and research carried out for and accepted by the organisation.
In general, issues can be categorised either as 'high level' or strategic issues or as "low level" (local) matters affecting individual services and items of infrastructure

1. Streets and surface transport policy

As part of the development of proposals for highway schemes Transport for London (TfL) and the London boroughs will consult those who they consider may be affected by a scheme or who represent those who may be affected by a scheme. This can take the form of informal public consultations or statutory consultations regarding the traffic orders (the legal device for regulating what traffic can do on a road).
London TravelWatch is routinely consulted by TfL as part of the statutory process, but unfortunately not as often as we would like as part of the informal process. The informal stage is often more general and at an earlier stage where we might have more chance of influencing a scheme's outcome.

Some London boroughs consult us at various stages, others do not. We periodically write to them and remind them that we believe that they should, and raise the issue at the liaison meetings we attend, but there is no explicit statutory requirement for this.

There are many types of scheme that we could be consulted on, ranging from major changes to the road network to (say) the designation of a disabled bay outside a resident's home in a residential street. We do not comment on all of these, and concentrate mainly on TfL schemes or borough schemes that affect a bus route, since it is these which fall directly within our remit. We try always to comment on bus priority schemes.

For a large scheme, or a significant scheme where the secretariat requires guidance from members, we will either ask members for their views or arrange for the proposal to be considered as an item at a Board meeting.

For more routine scheme proposals officers will respond on behalf of the Board in line with established policy. Members' views will be sought if the proposal appears particularly sensitive or if one or more members are likely to have local knowledge.

The background for responses

London TravelWatch is charged with representing all non-freight users of the Transport for London Road Network (TLRN). But in the spirit of integrated transport we look more widely at matters relating to borough roads, particularly where these affect bus routes and cyclists

Almost all the schemes that we consider will inevitably involve considering how road and kerb space is allocated. Putting aside the interests of frontagers, there will still be conflicts: between moving and stationary vehicles; between the use of road space for buses and for general traffic; between the capacity of the road system for motor vehicles and the safety and convenience of pedestrians and other vulnerable users, etc.

Responses to proposals have been based on the following principles:-

(a) London TravelWatch represents transport users of all modes.

(b) London TravelWatch has consistently prioritised movement of people over movement of vehicles, and the effective use of road space (where capacity is limited) by encouraging bus/rail journeys, cycling and walking.

(c) London TravelWatch recognises the role of both soft and hard measures for demand management as tools to change travel behaviour. We therefore support, road user charging, parking management, the reallocation of road space, and "carrots" such as travel plans and car clubs.

(d) London TravelWatch wishes to see major improvements in the pedestrian environment, not only to facilitate walking (and cycling) but also to make access to public transport more attractive and thus encourage its use.

(e) London TravelWatch supports land use policies designed to reduce the need to travel.

(f) London TravelWatch always promotes equality of travel opportunity, particularly for disabled users and for potentially socially excluded people who have a restricted choice of travel modes.

(g) London TravelWatch recognises that there will always be private car use, particularly in outer London where currently public transport does not adequately meet all demands for travel. And where practicable will seek to ensure car users interests are protected and enhanced. However, its general policy is to encourage modal shift away from the private car to public transport, cycling and walking. London TravelWatch believes this benefits everyone, not least by freeing up the

limited available road space for use by essential road users – both public and private.

General responses to streets consultations

The following section sets out most streets issues on which London TravelWatch is consulted about, and the standard policy position. But each is considered on its own merits and a tailored response is given. It should be emphasised that the importance of an adequate enforcement regime is always stressed, so that the benefits of waiting restrictions, clearways, etc., are not diminished by persistent violations.

Bus priority

We support maximising bus priority as the most effective use of road space, even where it takes capacity away from other modes.

Responses always support bus lanes, selective vehicle detection and contraflow bus lanes. We ask that bus lanes are as wide as practicable and extend as close to a junction as possible if this is appropriate. This is in line with TfL's bus priority team's policy which aims to give maximum priority to buses whilst maintaining the safe and efficient movement of other traffic.

Generally the response will be along the lines of:-

London TravelWatch supports the use of bus lanes as an effective method of ameliorating the effect of traffic congestion on bus services and their passengers. I am sure that this will be applauded by all of the passengers on services using these roads.

Bus stop clearways

All buses in London are now fully accessible (except for the two limited heritage routes of which one is proposed for withdrawal) and require to be able to pull in parallel to the kerb so that their ramps can be properly deployed.

London TravelWatch has always supported the implementation of bus stop clearways. We ask that they be of London Bus Initiative (LBI) standard length so that buses can easily pull in and leave the kerb. We ask that all bus stop clearways operate 'at-any-time', as this appears the most practicable way of conveying to other drivers that they should not park in them, even where buses are not operating in the early hours of the morning.

Where there is resistance to the loss of kerb space parking for bus stop clearways we will promote the use of bus boarders – an extension of the footway out from the line of the kerb. This allows access to the kerb with minimum loss of parking, particularly where single door buses operate and boarders can be very short.

Generally the response will be along the lines of:

London TravelWatch supports the introduction of bus stop clearways, especially 'at-any-time' provision. Members consider it vital that buses should always be able to pull alongside the kerb without being impeded by parked vehicles, so as to make boarding and alighting easier for passengers, especially those with restricted mobility. This is particularly important with the near universal use of low-floor buses, which require close 'docking' at bus stops if their accessible design is to be useful. The clearway should be of LBI standard length.

Bus bays (bus lay-bys)

We usually take the line that bus bays offer no advantage to bus users and should be filled in on the grounds that lay-bys:

- encourage motorists to park in the clearway;
- lead to buses being trapped in the lay-by by queuing vehicles when they are ready to move off;
- increase the difficulty for the driver in pulling in correctly parallel with the kerb.

Exceptionally, on fast roads (such as the North Circular Road (A406)), we accept that it may be necessary for buses to pull off of the carriageway to serve stops safely.

Junction capacity or safety issues should be addressed by the designers and TfL's network assurance process.

Generally the response will be along the lines of:

London TravelWatch believes that wherever possible bus lay-bys should be filled in as they offer no advantage to bus passengers. They are problematical insofar as they may encourage parking on the bus stop clearway; can mean buses are delayed trying to rejoin the carriageway by queuing vehicles on their off side; make it more difficult for drivers to pull alongside the kerb when stopping.

Waiting and loading restrictions on a bus route

London TravelWatch supports a presumption in favour of buses on bus routes, but recognises the need for the legitimate servicing of frontages.

Where loading can take place out-of-hours, as was demonstrated during the Olympic Games this will be encouraged.

Generally the response will be along the lines of:

London TravelWatch believes that there should be a presumption in favour of buses along bus routes and that loading and waiting restrictions should apply where and when congestion occurs so as to minimise inconvenience to passengers and in support of policies to make bus travel more attractive, even where it takes capacity away from other users. Legitimate loading requirements of businesses on these roads should be accommodated either in adjacent side streets or at hours when buses are least delayed by congestion.

Bus stands

London TravelWatch supports proposals to provide bus stands and to restrict other vehicles from parking, waiting or loading or stopping in them.

Generally the response will be along the lines of:

London TravelWatch regards the availability of bus stands as vital to the operation of the bus network and so supports the provision of these stands and the restrictions required to prohibit other vehicles from parking, waiting, loading or stopping in them.

Gyratory systems

London TravelWatch has supported the removal of gyratory systems for several reasons:

- they are problematic for bus passengers insofar as it is not intuitive where passengers should wait for a bus travelling in a particular direction;
- they often mean buses do not pass by passengers' travel objectives;
- they tend to increase road speed and as such are more problematic for pedestrians and cyclists;
- they often result in longer cycle and bus journeys;
- there is often a poor local environment associated with gyratories.

Generally the response will be along the lines of:

Generally gyratory systems are problematic, for all users. They are confusing for bus passengers looking for the correct stop and mean buses are diverted away from travel objectives. They often lead to higher road speeds and so are problematical for both pedestrians and cyclists. They increase journey distances for buses and cyclists and are often associated with a poor pedestrian environment.
Accordingly, London TravelWatch supports the reversion of gyratory systems to two-way operation, and where this is not possible the implementation of contraflow bus and cycle lanes.

One-way roads

One-way roads offer cyclists and bus users no advantage. Indeed, they are a deterrent to cycling and bus use. It is very rare that new one-way roads are proposed that affect bus routes, but cyclists' needs for permeability over relatively short distances are often ignored by highway authorities.

One-way roads often lead to higher road speeds and so are problematical for both pedestrians and cyclists. Often there is local pressure to install one-way working to reduce 'rat running' and accommodate more on-street parking.

Generally the response will be along the lines of:

One-way roads offer cyclists and bus users no advantage. Indeed, they are a deterrent to cycling and bus use. *London TravelWatch supports measures to*

promote cycling. Where it is decided to install one-way working the Committee promotes the provision of contra-flow cycle lanes so that cyclists are allowed to use as direct a route as possible to facilitate cycling around London and to minimise pavement cycling where this is illegal.

Cycle infrastructure

Advanced cycle stop lines. The routine inclusion of advanced stop lines came about as a result of London TravelWatch lobbying of TfL several years ago. Prior to that considerations of motor vehicle capacity often excluded their provision.

We ask for advanced cycle stop lines at all signalised junctions for the following reasons:

- they protect cyclists from left turning traffic;
- they allow cyclists to position themselves safely ahead of traffic in order to turn right;
- if they are consistently installed motorists will recognise them and comply with them routinely; and
- they allow cyclists to position themselves in front of other vehicles and so avoid exhaust fumes.

In 2009 members undertook a review of London TravelWatch's approach to cycling. This resulted in Cycling in London (May 2009) and a subsequent submission to the London Assembly scrutiny in August 2012. The report was member led by two members. One was particularly interested in cycling issues, the second pedestrian issues. A particular theme in our approach to cycling has been to take account of all modes. As part of the work to produce Cycling in London we consulted many stakeholders, not just cycling groups. We had a good response, particularly from council cycle and transport officers.

It should be noted that London's streets will remain largely as they are now. With this in mind London TravelWatch's priority is training, education and enforcement. We want to see 'respect' and 'share the road' campaigns along with greater traffic police enforcement so that all modes and users obey the rules.

[Note: the operation SAFEWAY over the winter of 2013 / 14 is exactly the sort of activity London TravelWatch has been advocating for a number of years.]

London TravelWatch policy has taken account of the concerns of pedestrians and the poor quality provision that inevitably results in implementing cycle facilities on the pavement. London TravelWatch believes that the place for cyclists is on the carriageway and that the conversion of pavements for cycling should be the very last resort. Where pedestrians and cyclists do mix we support shared, not segregated, cycle only space. The use of these shares spaces should be a privilege and not a right. Cyclists should <u>always</u> give way to pedestrians.

Generally a response to implementing cycling on the pavement will be along the lines of:

London TravelWatch believes that cycling should take place on the carriageway. The introduction of cycling onto the pavement provides a poor facility for cyclists and is

problematic for pedestrians, particularly older people and those with disabilities. Please provide better facilities for cycling on the carriageway. This can usually be provided by the introduction of bus lanes, wide inside lanes and where practical the redesign of junctions to make them safer for cyclists. Slower speeds and reductions in traffic volumes improve safety for cyclists.

London TravelWatch is supportive of the London Cycle Network in principle, but caveated by the above concerns about mixing pedestrians and cyclists.

Bus passengers and pedestrians will not be expecting cyclists to be routed behind bus stops or through them as they queue for the bus or board and alight from the bus. It is therefore of concern to London TravelWatch that highway authorities are implementing such schemes. These concerns are shared by those representing disabled pedestrians and passengers. There is also an issue of comfort for passengers catching and waiting for the bus.

London TravelWatch will oppose such designs until a proper study has been undertaken and it can be demonstrated that the designs are inclusive for all and that they do not discomfort bus passengers. We will say:

Bus passengers and pedestrians will not be expecting cyclists to be routed through the pavement and behind bus stops / through the queue of passengers waiting to board or alight. It has not yet been demonstrated that this is an inclusive design that can cater for all users and is comfortable for all users. London TravelWatch therefore opposes the implementation of this design of bus stopping arrangement. We prefer a solution that locally increases the carriageway width to allow cycles to pass stopped buses in a safe manner.

The Cycling in London report considered cycling on the main road network and noted that the majority of casualties occur at busy junctions. London TravelWatch is supportive of wide inside lanes where possible, particularly at the approach to junctions. We are supportive of the use of bus lanes by cycles. It is important that lanes do not narrow as the junction is approached. London TravelWatch supports permeability through road closures for cycle and the removal of gyratory systems.

London TravelWatch believes that junction designs based solely on the need for high motor vehicle capacity are not acceptable.

Generally a response to a junction design that is likely to create problems for cyclists will be along the lines of:

The design of this junction will be problematical for cyclists for the following reasons…….. Can you please consider developing the design further so that cyclists can be more safely accommodated?

Where cycling is allowed in parks and canals etc. London TravelWatch believes that cyclists should respect the fact that they are in a leisure area and cycle with respect for others.

We support the provision of cycle parking. At stations it should lead demand. Cycle parking should be implemented on the carriageway rather than on the footway where it can be provided in clusters rather than spread out along the edge of busy high street pavements.

Our top priority for investment in cycling is:

i) to review those main road junctions which are problematic for cyclists (and probably pedestrians too). This is data led intervention.
ii) slower speeds
iii) cycle training
iv) permeability for cyclists

We have considered the introduction of motorcyclists into bus lanes. The evidence was that the initiative made motorcyclists less safe and cyclists less safe in the locations that were studied.

We have expressed concern over this initiative and would do so in the future.

We have written to TfL regarding concerns about the provision of cycling infrastructure, particularly the introduction of cycle lanes and separated cycle tracks.

The provision of cycle lanes on the approach to junctions and through them is a novel design feature. Previously cycle lanes stopped short of junctions so as not to encourage poor cycle positioning. Cycle trainers (often funded by TfL) suggest cyclists take up a central position in a lane to minimise the opportunity of motor vehicles cutting across them as they turn left. The introduction of cycle lanes up to and through junctions encourages poor cycle position. This is the issue at Bow roundabout and has not yet been resolved, indeed it has been replicated on Stratford High Street. Cycle lanes also give a false sense of security and lead to motorists hooting at cyclists who cycle correctly.

We have expressed our concerns about the introduction of cycle lanes to TfL.

Generally a response to the introduction of cycle lanes will be along the lines of:

Cycle lanes are problematic insofar as they encourage a cycling position too close to the kerb rather than a more assertive central position as advocated by cycle training where appropriate. This is particularly problematic on the approach to a junction.

Cycle lanes also give a false sense of security and encourage drivers to intimidate cyclists to move towards the kerb, again the wrong cycling position.

Segregated cycle tracks give a sense of safety to cyclists, but at the approach to junctions, where they are truncated, again motor vehicles will be cutting across cyclists to turn left. Additionally cycle tracks and associated ‘bus stop by-passes are problematic for the operation of bus services and their passengers. They will be problematical for deliveries and for pedestrians who generally dislike additional steps and kerbs. TfL are experimenting with segregated cycle designs that hold left turning traffic in order to eliminate the turning collision issue. We await their implementation and trialling

We have expressed our concerns about additional kerbs, cycle tracks, the loss of bus priority and bus stop by-passes to TfL, but as these initiatives are novel there is little to be said until more experience of them is gained.

Controlled parking [zones]

London TravelWatch does not comment on controlled parking zone proposals except where they include a bus route, or where a nearby bus route may be affected by parking that is displaced by the implementation of controlled parking.

Generally the response will be along the lines of:

London TravelWatch supports the rational management of parking. However, it would want to be assured that where there is the possibility that parking could be displaced onto a nearby road carrying a bus route, consideration is given to upgrading waiting and loading restrictions on the bus route.

Banned turns

London TravelWatch always asks that buses and cyclists be exempted from banned turns to promote these modes by giving them privileged access.

Generally the response will be along the lines of:

Where it is decided to ban turns into two-way streets in order to control general traffic we ask that buses and cycles be exempted from these bans. This allows buses and their passengers and cyclists to use the most direct routes possible and therefore encourages bus use and cycling. This will help to lessen illegal pavement cycling.

Traffic calming

London TravelWatch asks that any traffic calming on bus routes is both bus- and cycle-friendly. We make the point that per kilometre travelled public transport is always safer than other modes.

Generally the response will be along the lines of:

Whilst London TravelWatch welcomes traffic calmed zones it is important that particular attention is paid to ensure that any physical enforcement measures, road humps etc., are as bus-friendly as possible. Your attention is drawn to the London Transport Bus Priority Unit Publication 'Traffic Calming for Buses'. London TravelWatch would wish that you liaise with London Buses in order that bus use is made as safe and comfortable as possible. Encouraging the use of public transport is also important in your council's efforts to make its streets safer for pedestrians. We wish to be assured that the needs of cyclists have been taken into account in the design of these measures.

Road closures

When a road closure is proposed, i.e. one end is stopped up to vehicles; London TravelWatch asks that buses and cycles are exempted from the closure where practical.

Generally the response will be along the lines of:

When it is proposed to close a road in order to manage general traffic we ask that buses and cycles are exempted to allow as direct a route as possible, in order to encourage bus and cycle use and to minimise pavement cycling where this is illegal.

Pedestrian crossings

We support better provision for pedestrians and ask for direct, single stage crossings rather than staggered two-stage crossings. We want to see them located on pedestrian desire lines.

Generally the response will be along the lines of:

Where pedestrian crossings are installed London TravelWatch wishes to see single stage, direct crossings. We would want these to be located on pedestrian desire lines unless there is a specific safety issue preventing this.

Guard railing

We support the removal of guard railing unless there is specific safety reason for its installation, for example near a school exit or a site with limited visibility.

Generally the response will be along the lines of:

London TravelWatch believes that the use of guard railing on London's streets should be restricted to locations where there is a specific road safety justification, and that it should generally be removed.

Clutter

London TravelWatch supports the removal of pavement clutter and the repositioning of poorly sited essential street furniture. We will encourage the use of new legislation that allows signs and streetlamps to be located on buildings.

Footway parking / inset parking and loading bays

We support the improvement of the pedestrian environment, for example by widening footways, but also recognised that there will sometimes be particular loading requirements for frontagers. Generally, London TravelWatch has resisted the loss of footway to motor vehicle parking but has required the secretariat to make a judgement on the basis of the individual merits of each case.

We acknowledge that loading bays may be acceptable if the residual footway remains wider than 2 metres, as per the DfT's guidance on *Inclusive mobility,* but not accepting that parking on the pavement, or the removal of pavement to allow extra parking, should be permitted.

Generally the response will be along the lines of:

London TravelWatch wants to see improvements to the pedestrian environment and believes that the taking of footway for loading is acceptable only as a last resort if the residual footway width is greater than 2 metres (the minimum specified in the DfT guidance 'Inclusive Mobility').

Car free areas

We welcome car free areas, but ask that buses and cyclists should have privileged access.

Generally the response will be along the lines of:

London TravelWatch welcomes car free areas, but asks that consideration is given to the provision of facilities for cyclists in the form both of a cycle lane through the pedestrianised area and of cycle parking facilities. Cyclists will use this area in any case, and it would be better to direct them along a demarcated route, i.e. a cycle lane. Where an area has been pedestrianised to control general traffic and improve its environment, we ask that buses be allowed privileged access to encourage public transport use - which will have a generally positive impact on the environment of the area and support the council's efforts to reduce car dependency. We ask that the route of any buses using the area is marked out in a suitable way so that others can understand that buses do traverse the area.

2. Buses

High level issues

These are dealt with by the Policy committee or the Board as appropriate.

Bus design, including design for people with disabilities, covers the physical design and layout of vehicles used on the network. It would also include signage within and on the exterior of buses, such as destination blinds/displays and on board information.

Staff training, attitudes and customer service; TfL has a number of standards which are set for its contractors' and for its own employees.

Integration with other modes of transport (generic), bus priority measures, and bus related infrastructure (including bus stations): This covers the provision of infrastructure associated with bus service operation, including the generic design of bus stops and shelters.

Legal framework and 'modus operandi' for bus services: From time to time the Board may be invited to consider changes to the legal framework in which bus services operate.

Responses to all of these issues will also be informed by our research reports where they cover issues related to buses. These have included Bus Passenger Priorities for Improvement (2010), and recent reports on passenger journey experiences, value for money, and the travelling environment.

General principles of service planning, and consultation at pre-tendering stage. TfL has a set of guidelines to which service planners work in making decisions on the pattern and level of services to be provided. These can be found at http://www.tfl.gov.uk/assets/downloads/businessandpartners/tfl-bus-service-planning-guidelines.pdf . London TravelWatch has endorses this approach.

TfL currently consults on proposed changes to the bus network by means of a three stage process. This is now a much more informal process with on going dialogue between TfL and various stakeholders including London TravelWatch.

Generally a response at the first stage of this process will take into consideration:-

- *Are there particular problems such as overcrowding or poor reliability on a route?*
- *Is there an identified gap in the transport network either now or in the future that could be filled by diversion or enhancement of an existing bus route, or the addition of a new service?*
- *What is the cost or effect of no action being taken?*
- *How strong is the evidence for supporting any proposal by a local authority or a user group in terms of passenger benefit? e.g. potential passenger numbers.*
- *If a proposal is put forward for other reasons than passenger benefit, how strong are the potential disbenefits to passengers?*
- *Does the proposal have any implications for other modes of transport?*
- *Is there a potential impact either positive or negative on vulnerable transport users?*
- *Does the proposal have widespread support?*

Our responses at later stages will have been informed by our initial response, but the issues raised at these stages are generally local rather than strategic in nature (see below).

Low level issues

These are normally dealt with by officers.

The routeing and frequency of services including community involvement and design of service, forms the basis of much detailed discussion and consultation about specific proposals in a local context. In the past these were dealt with by consulting members, but members have found that to be able to comment meaningfully on the proposals a substantial degree of local knowledge is required.

Generally our response to such issues will be in a similar vein to that applied for initial consultations.

Similarly, commenting on the siting and design of individual bus stops, issues of integration with other modes of transport, and the choice of particular vehicle types, also requires a substantial degree of local knowledge.

Generally our response is not to comment on the location of individual bus stops and shelters except where this has a more strategic implication such as at a major interchange.

3. Rail and Underground issues

High level issues

These are dealt with by the Policy committee or Board as approriate

Train and tram design, including design for people with disabilities, covers the physical design and layout of vehicles used on the network. It would also include signage within and on the exterior, such as destination blinds/displays and on board information.

Staff training, attitudes and customer service.

TfL and the train operators each have a number of standards which are set for their contractors' and own employees. Train operators also need to adhere to industry wide standards.

Integration with other modes of transport (generic), and related infrastructure (including stations and tram stops).

This covers the provision of infrastructure associated with operation, including the generic design of stations and tram stops.

Legal framework and 'modus operandi' for services.

From time to time the Board may be invited to consider changes to the legal framework in which rail and underground services operate.

Responses to all of these issues will also be informed by our research reports

General principles of service planning, and consultation at pre-tendering stage.

TfL will normally consult on proposals to change London Underground, London Overground, Crossrail DLR and London Tramlink services. Our responses to proposals will be determined by research and previously agreed policy.

The DfT normally consults on proposed changes to franchised rail services. London TravelWatch will provide detailed commentary on these both to the DfT, operators and bidders. These will be informed by our research and previously agreed policy.

The ORR consults with London TravelWatch on its' regulatory and enforcement functions. London TravelWatch will provide appropriate responses based on our agreed policies and previous research.

Generally our responses to consultations will take into consideration:-

- *Are there particular problems such as overcrowding or poor reliability on a route?*
- *Is there an identified gap in the transport network either now or in the future that could be filled by diversion or enhancement of an existing service, or the addition of a new service?*
- *What is the cost or effect of no action being taken?*
- *How strong is the evidence for supporting any proposal by a local authority or a user group in terms of passenger benefit? e.g. potential passenger numbers.*
- *If a proposal is put forward for other reasons than passenger benefit, how strong are the potential disbenefits to passengers?*
- *Does the proposal have any implications for other modes of transport?*
- *Is there a potential impact either positive or negative on vulnerable transport users?*
- *Does the proposal have widespread support?*

Proposals for closure of either TfL or DfT sponsored rail services are dealt with in accordance with the legal framework for closure procedures.

Low level issues

These are dealt with by officers.

The routeing and frequency of services including community involvement and design of service, forms the basis of much detailed discussion and consultation about specific proposals in a local context. In the past these were dealt with by consulting members, but members have found that to be able to comment meaningfully on the proposals a substantial degree of local knowledge is required.

Generally our response to such issues will be in a similar vein to that applied for initial consultations.

Similarly, commenting on the siting and design of individual stations and tram stops, issues of integration with other modes of transport, and the choice of particular vehicle types, also requires a substantial degree of local knowledge.

Generally our response is not to comment except where this has a more strategic implication such as at a major interchange.

4. Fares and Ticketing issues

High Level issues

In general, issues affecting fares and ticketing will be dealt with by the Policy Committee or Board as appropriate, where there is a long term or system wide impact. TfL operates a system wide fares and tickets system, with all decisions taken at this level rather than for individual services or journeys, this is also applied to National Rail fares within London. However, other national rail fares are set on an individual basis from one to station to another. Our responses to consultations will be informed by our previous research and policy decisions.

Low level issues

These are dealt with by officers.

London TravelWatch is consulted by train operators from time to time about changes to individual fares and tickets. These will normally be dealt with at officer level in accordance with previously agreed policy and the outcome of our research.

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