

Dear Sir or Madam

London TravelWatch response to the Central London Bus Review

I am writing on behalf of London TravelWatch, the statutory watchdog representing transport users in and around London.

1. Background

TfL have proposed changes to 78 day and night bus routes that primarily serve central and inner London. This includes the withdrawal of 16 day bus routes (3 of which also run 24 hours) and 6 night bus routes. The proposals would affect bus travel for passengers to, from and within 23 London boroughs.

TfL's rationale for proposing these changes is that one of the conditions of the Government's emergency funding support to TfL since 2020 required TfL to produce a plan to set out how they would achieve significant financial savings, which included reducing the extent of their bus network. The plan to achieve the savings required includes a 4% reduction in bus kilometres.

TfL explain that they are basing these changes on careful analysis of demand over recent years and projected future demand. Demand on many central and inner London bus routes has been declining since 2014 due to changing travel patterns, which have been accelerated by the pandemic, particularly with more home working.

TfL argue that their proposals aim to ensure there is still a strong bus service while simplifying the network to ensure buses operate frequently and reliably in the areas that need them most. They add that the proposed changes are intended to cause as little disruption to passengers as possible, while making the required savings.

TfL insist that they will keep the bus network under constant review, and the flexible nature of the network means that they can make further changes if required.

2. The importance of the bus

London TravelWatch knows how important the bus is to Londoners every day, as it is London's most accessible, affordable and city-wide form of public transport. More people use the bus than the Tube or train, and not just for getting to work but also for caring responsibilities, health purposes, shopping, and it often involves lots of stop-offs along the way – particularly for women and those with children.

a) Why we believe the bus is so important

We have been campaigning for the last year to save the bus from cuts and to #FreeTheBus by giving it more priority on London's roads. Slow journey times have

plagued London's buses for many years, which have made them less reliable. Given this, we will detail how TfL's proposals to significantly extend the length of some bus routes trouble us in how they may impact on bus passengers.

Our [Who uses the bus? research](#)¹ highlighted that bus passengers tend to be those on lower incomes, and are more likely to be people of colour, women or younger people. Whilst any cuts or reduction in service will affect passengers across London, it is those on lower incomes who will be most affected and hit hardest, because other modes of public transport are too expensive for many bus passengers to use as an alternative. As those on lower incomes are more reliant on the bus, we will explain how having to change buses would make their bus journeys more onerous and potentially exacerbate their time poverty (all in the midst of a cost of living crisis).

If the Mayor of London is to achieve his target of 80% of journeys in London being made by walking, cycling or public transport by 2041, bus use will need to increase by 40% from pre-Covid levels. There is unlikely to be much increase because of TfL's proposed changes. Indeed, for those that can afford to switch to private car use or whose journeys are discretionary, they may choose to no longer use the bus. This may end up ushering in a cycle of decline for the network far removed from the laudable aims of TfL's Bus action plan.

b) Our concerns about the proposed changes

At the core of this issue are our concerns about both the scale of the proposed changes to the bus network and that buses have been chosen at all. We acknowledge the financial constraints within which TfL have had to operate in recent years but we believe that the impact of these changes on Londoners is disproportionately large compared to the relatively small amount of money which will be saved by making them.

3. Timeliness and quality of consultation information

Before turning to the implications of the proposed changes, we think that it is important to reflect on the timeliness and quality of TfL's consultation information. In terms of scale, this may be TfL's largest ever bus consultation, certainly in the digital age. We hope that TfL will reflect on our comments when preparing and launching future consultations, whether they be for buses or any other of their modes.

a) Timeliness of the consultation

TfL launched their consultation on 1 June, immediately ahead of the Platinum Jubilee bank holiday. But not all of the information was immediately available on the consultation website. Instead, it was added in the subsequent days.

¹ Who uses the bus? research, London TravelWatch, 2022

It was not until 14 June, following our pressing, that a link to the consultation appeared on the home page of TfL's website. It did not last long, though. It was removed on two occasions to provide information about the Tram strikes and only restored after we urged TfL to keep open this key way to advertise the consultation.

We understand that contractual difficulties led to the delay in providing a British Sign Language video including audio. However, it was disappointing that this video did not become available until 20 days into the consultation.

TfL launched the consultation with their standard six-week consultation period. Following pressure from the London Assembly, on 28 June TfL decided to extend the deadline for the consultation from 12 July to 7 August. Given the scale of the proposals and all the associated information about them, TfL should have anticipated that their standard six-week consultation period was not necessarily long enough.

TfL should in future ensure that any large-scale consultation run for an extended period.

b) Provision of information on the TfL website

It was disappointing that it wasn't until two weeks into the consultation period that a summary of the route changes (with links to the detailed proposals and maps) appeared at the top of the consultation page. This followed our feedback that the proposals and maps needed to be accessible from the same location and not in separate sections, as they were when the consultation launched. It would have been better to have had that summary document available from the start to help people accessing the consultation, who should only be expected to go to the website once.

TfL's North, East, South and West area maps did not show the overall effect of the proposed changes on the bus network if they proceeded with all the changes because they excluded the routes not in scope of the consultation. Nor did TfL produce a central London bus map showing the overall impact. We are therefore grateful that Mike Harris produced such a [map](#),² in a similar way that he has been producing a London-wide bus map for several years because TfL have been unwilling to do so.

There was an inconsistency in the way that some parts of the route proposals were written. There were examples of it not being stated if suggested interchange bus stops had Countdown; saying that there was Countdown but not saying at which bus stops; or saying that there was no Countdown when we saw in person that there was. However, in general, and compared to previous consultations, we were pleased to see an improvement in the information provided about the stops where

² TfL Proposals for Route Reductions in the Central Area, June 2022

passengers could change bus and that it was included within the proposals and not tucked away in the Equality Impact Assessments (EqIA).

Some of the language used in the consultation was not helpful, such as stating that the proposals would 'rationalise and simplify the network.' It may be simplifying the network for TfL but for those passengers who would need to change bus to complete their journey in future, the network will become more complicated not simpler.

c) Provision of consultation information at bus stops

The small 'poster' announcing the consultation (below) was placed in bus stop casings. TfL have confirmed that these posters 'act as a call to action and to clearly sign-post how to find out more' about the consultation.



However, crucially, the poster does not say which routes are affected. There are, of course, a large number of buses in the scope of these proposals. But the onus must always be on TfL to tell passengers in publicity such as this if their route is being changed or withdrawn, not for passengers to have to use a QR code or go on the TfL website to see if their route is affected. It is wasteful that TfL gave so much space to highlighting their brand with a streetscene image when it would have been much more helpful to tell passengers which routes are in the consultation.

Further, where there are bus shelters, especially at key locations, consideration should be given to placing a larger version of a poster advertising the changes with a list of all the affected routes. Consideration should also be given to providing information on buses, whether leaflets or posters.

The Programme-wide EqIA states that TfL will 'aim to ensure that information on the planned changes is available at bus stops on affected routes.' And we saw many bus stops containing the poster. But at a bus stop and shelter in Canary Wharf, where all five day bus routes are in TfL's proposals, there was no poster even though there was spare space in the bus stop casing. This was both surprising and disappointing. We wonder how many times this was replicated at other key locations.

4. Feedback from our digital community

We alerted our digital community of transport users to TfL's consultation and encouraged them to look through the proposals and tell TfL what they thought. We were also keen to hear how the members of the digital community and their friends and family would be affected by the changes. We received 28 responses to our call for feedback. This included specific comments on 25 day and 2 night bus routes in the proposals, with the most common responses on the proposed changes to routes 14, 74 and C3.

The main issues raised were:

- Reliance on the bus as the only affordable way to travel
- Reliance on the bus as the only accessible way to travel
- Not wanting to make changes from one bus to another during their journey, which they can find it difficult to do.

We will talk more about these issues below.

5. Key issues arising from the proposals

a) Changing between bus routes

i) The numbers affected

TfL say that they expect the proposals will mean the number of bus journeys made on central London bus routes that would involve a change of bus would increase from the current 19% to 24%.

This is a significant and worrying increase. But it is only when you dig into the detail of what TfL call 'broken links' (the number of journeys where a change of bus will be required) that the scale of the impact becomes clear. This information is in the EqIA for each set of route proposals but, in the interests of transparency, it should have been included within the route proposals.

Looking at the day routes, on route 205, for example, the percentage of broken links will be 26% of daily trips. This rises to 36% on current routes 12 and 78. These percentages equate to thousands of daily journeys. The table below shows those routes which are worst affected by TfL's proposals:

Current route	Proposal	Percentage of daily journeys requiring a change of bus in future	Number of daily journeys requiring a change of bus in future
12	Would no longer run	36%	6,830
78	Would no longer run	36%	4,697
205	Route would change	26%	6,438
135	Route would change	23%	2,839
49	Route would change	22%	4,331
521	Would no longer run	20%	2,488
D3	Route would change	20%	1,231
259	Route would change	19%	4,145

In over half of the routes contained within the proposals, more than 1,000 people will in future need to change bus every day to complete their journey.

It's important to note too that it may be necessary to changes buses more than once. For example, passengers travelling from one end of route 4 to the other would need to change buses twice in future. Some unlucky passengers on the 205 may need to change buses three times to complete their journey, which even TfL admit 'may increase journey times by up to 36 minutes for some passengers who are unable to make the same journey by rail.'

In total, we estimate that if these proposals go ahead in their entirety, **93,000** daily journeys on day bus routes will involve a change of bus where it doesn't currently. This is almost 10% of the total of all journeys currently made on the routes in the consultation.

The impact of this cannot be overstated and will have a significant impact on journeys, whether for employment, medical appointments, caring duties or leisure.

ii) The problems with having to change buses

TfL state that there are 653 locations where in future passengers may need to change between routes at a single stop.

We know that passengers don't like changing buses. Time spent doing this is involuntary because having to change will always be second best to using a direct service, so the more convenient the change the better. TfL's proposed changes will deter passengers from making journeys, especially when these journeys are discretionary ones.

We are especially concerned that older people, younger people and children, disabled people and women and girls might be disproportionately impacted by these proposals where they might need to change buses to complete their journey.

Some of these groups of people will be disproportionately impacted by the fact that many of the proposals affect bus routes serving hospitals. This includes Bart's, Homerton, King's College, Royal Brompton and the Whittington. Removing direct buses to hospitals, as well as other medical facilities and key locations such as schools and colleges, will disadvantage large numbers of passengers every day.

iii) The quality of change locations

The EqlAs mention that TfL will aim to improve bus stop facilities (bus shelters with seating and Countdown signs displaying expected bus arrivals) at locations where changes of bus will be needed. This would, of course, benefit all bus passengers with a more comfortable waiting environment whether they are changing between buses or not.

We believe that it is especially important that as many bus stops as possible contain bus shelters, with seating and information (including how people can get help should they need it) and are in a well-lit environment and properly maintained. This should help to improve safety, especially for those groups that would be disproportionately impacted by having to change buses such as women, girls and people who are LGBTQ+.

We therefore urge TfL to prioritise making improvements to facilities at bus stop locations where changes will be required, to mitigate as much as possible for the additional changes that passengers will need to make in future.

This includes providing Countdown screens at bus stops at key interchange locations, as TfL's proposals list many interchange locations with no Countdown. Many people do not have a mobile phone to check bus arrival times and, even if they do, they may not want to use it so publicly, particularly at night. Countdown information is especially important if passengers will need to take alternative routes which are lower frequency than the route they currently take.

The problems with interchange are exacerbated where it will not be possible to change buses at the same stop. Under TfL's proposals, there are 88 locations where passengers may need to access a different stop in future to complete their journey.

b) Accessibility

For many disabled people, the bus is the only way to get from A to B because it is the only step free, affordable public transport route available. At the London Assembly Transport Committee's recent investigation into the bus, the Royal National Institute of Blind People and the pan-impairment organisation Transport for All expressed their concerns that bus service reductions will disproportionately affect disabled Londoners. We share this concern.

i) Impacts on passengers

More crowded buses are a barrier to people who are less mobile, blind or visually impaired. TfL admit in their Programme-wide EqlA that 'a reduction in capacity may reduce access to priority seating, wheelchair and pushchair space: Passenger numbers per bus may increase which might affect access to priority seats, wheelchair spaces, space for pushchairs and buggies.' Most bus vehicles only have one priority space and even that is multi-purpose, which can cause disabled people to have to battle with the driver or other passengers if the space is already filled when they get on the bus.

There are physical barriers at bus stops too which will be experienced more frequently by disabled passengers because the proposals require more people to change buses. For example, street clutter may obstruct clear operation of the bus ramp and there may be a lack of seats and shelter at the bus stop.

These issues will be worsened when passengers need to make their way to a different bus stop to complete their journey. Barriers which disabled passengers will be forced to overcome include street clutter, a lack of dropped kerbs, a lack of tactile paving, and having to cross cycle lanes (the design of which may have led to hard to navigate bus stop bypasses). We saw these issues for ourselves when visiting sites covered in the proposals.

The route proposals detail that passengers may need to make an interchange of anything up to 500 metres (the figure for current passengers of route D3 where the proposal will leave nine bus stops without any bus service in future). It should be remembered that even with shorter distances, what may be a reasonable - if inconvenient - journey between bus stops for non-disabled passengers may be an insurmountable distance for a visually impaired person or wheelchair user and may be a barrier to them travelling at all.

Other passengers will also be impacted by the proposals. For example, those with learning difficulties take time to learn a bus route and can need a lot of support. Confidence in travel has also only started to recover post-Covid. And so altering bus services can be a real barrier to people. TfL should consider expanding their travel

mentoring scheme to assist passengers in the period after changes to bus routes are made.

It is worth reiterating that because those on lower incomes are more reliant on bus services, having to change buses would make their bus journeys more onerous and potentially exacerbate their time poverty.

We call for TfL to ensure that if a change must be required between buses, it can be made at the same bus stop.

c) Safety and the night bus

Increasing the number of journeys which will require a change of bus and reducing the frequency of buses is not just an inconvenience and a cause of longer journey times. It is also a critical safety issue.

i) The views of passengers

We have spoken above about the impacts of having to change buses. Concern about safety whilst waiting at bus stops, particularly in unfamiliar locations, is even more acute at night.

This was confirmed in our [research about personal security when travelling on London's transport network](#)³ in which 73% of people said that night-time (10pm to early morning) is the least safe time to travel. It is at night that perpetrators of crime have the benefit of dark streets and fewer bystanders.

The efficiency and reliability of the network has a significant impact on how safe passengers feel. People don't want to be alone for an extended period as it can feel as if it invites opportunities for people to take advantage when no one else is around and there are no bystanders or witnesses. This is particularly important for journeys that are made on the street and in places where there are no 'eyes on the street'.

Especially when travelling at night, there is something reassuring about being able to board a bus and stay on it all the way to your destination, particularly if you are boarding at a well-lit, well populated location. In future, though, you may be required to change to another bus stop some distance away. We are especially concerned about the number of locations where TfL suggest changing between night buses that do not have Countdown screens. Even when waiting at the same bus stop, there may be no Countdown and passengers with mobile phones may be reluctant to get out their phones at night in such an exposed location.

³ Personal security on London's transport network – recommendations for safer travel, London TravelWatch, 2022

ii) The proposal's impacts on night bus passengers

We estimate that under TfL's proposed changes to night buses, one in five night bus passengers (21%) who can currently take a direct bus to their destination will in future need to change routes to complete their journey. This is a worryingly high number but it is of course only an average. The consultation provides several examples where the percentage of broken links is higher. For example, more than one-third of passengers on each of routes 6(N), 72(N), N98 and N205 would need to change buses. In total, across all routes where changes are proposed, every night 2,945 passengers will need to change buses to complete their journeys.

Half of people who travel on the night bus use it to travel to work including hospital staff and hospitality workers. These passengers are less likely to have a choice about whether they travel on public transport at night and are more likely to be in low-wage and/or precarious work. Night-time shift work has been demonstrated to have negative health impacts, so complicating those journeys with longer travel times to and from work will only compound this. And given that London's night-time economy took a huge hit during the pandemic, supporting the recovery should entail supporting the journeys of workers in the night-time economy.

TfL acknowledge the issues of travelling by bus at night but must improve the quality of facilities at bus stops, by making bus stops and bus shelters well-lit, free of graffiti and ensuring that Countdown information is placed at stops at all key locations and as many other stops as possible.

Frequent and direct services reduce the risk of passengers being left stranded or waiting for a long time in dark, unfamiliar or unsafe locations. This is particularly important as some night bus services are now as infrequent as one every 30 minutes. We ask whether the frequency and alignment on arrival time and departure time for connecting buses has been thought through so passengers aren't kept waiting for an extended period.

Given the additional issues of travelling at night, TfL should not propose increasing the number of passengers who will have to change buses to complete their journeys. We therefore urge TfL to abandon their night bus proposals.

d) Crowding

TfL say in the consultation that they do not expect crowding to arise because of the proposals and that peak demand could be accommodated by the proposed revised network. They add that the flexible nature of the bus network means they can make further changes if required.

However, we have compared TfL's May bus passenger demand figures with those from March. This showed a widespread growth in demand across central and inner London boroughs where the routes proposed for change run. This includes rises in Camden (from 65% to 69%), Hackney (68% to 72%), Wandsworth (69% to 72%), Kensington and Chelsea (69% to 72%) and Tower Hamlets (72% to 77%).

In response to these updated figures, TfL said they will use the May data as part of their assessment and insist that the proposals are robust to a faster rate of recovery, where they can increase frequencies and therefore capacity. But we remain troubled about the scale of the proposed changes in that TfL may be attempting to do too much too soon.

It should also be noted when talking about capacity that TfL judge this as all seats taken and some standing, such as 87 people on a double decker bus.⁴ Whilst having to stand is possible, albeit annoying, for some passengers, for many others it will be impossible to do so, even for a short time.

e) Current and future frequency levels

The individual area proposals state those routes that 'would form part of a core bus network on which a high frequency service (a minimum 12-minute scheduled wait time between buses) would be provided on all days of the week from early in the morning to late at night.'

However, TfL also state that this 'would also result in a lower frequency of service for a small number of routes' and that 'some customers may also have to wait longer at stops as the proposals result in a lower frequency of service at some locations.' But we can't find details of which routes these are.

London Assembly Member Siân Berry, Chair of the Transport Committee, has published details of the impact of the frequency changes for the day routes in the proposals, as well as routes not directly in the proposals but which would need to be used as alternatives in future, such as the 13, 17 and 139. She has calculated that there will be a decreased frequency on 22 routes, with 100 fewer buses per hour in the peak compared to the current figure, a 23% reduction.⁵ This is a significant, worrying reduction.

⁴ TfL appearance at the London Assembly Transport Committee's 'The Bus Network in London' session, 29 June 2022

⁵ <https://twitter.com/sianberry/status/1540819624920584192>, 25 June 2022

f) Hopper fare

Throughout the consultation proposals, TfL highlight that the Hopper fare provides passengers with the ability to make a second journey within 60 minutes of boarding the first bus. They say that most journeys that may require interchange would be able to take advantage of the Hopper fare.

However, at night, where the proposals state that more passengers would be required to change bus in future, they may have to pay again because bus frequencies are generally much lower at night.

TfL concede that 'some customers (including those with protected characteristics) may, in some circumstances, need to pay a second time for their journey' but we can find no data in the consultation explaining how many passengers may be affected. Since launching the consultation, TfL have committed to sharing this data,⁶ but we are yet to see it.

TfL should abolish the 60 minute Hopper Fare time limit at night and consider extending the time limit during the day.

6. Route specific comments (routes for which we have a particular view)

a) North London area

Baker Street

Route 31 - It appears that the 31 is being withdrawn, to be replaced by the 113 and 189, just to take account of excess capacity on the southern sections of the 113 and 189. We object to this proposal and offer suggestions below in which the 31 could be retained.

Route N31 - Withdrawing the N31 will mean that some passengers travelling south of Kensington High Street will have to change once or even twice to complete their journey, which we don't think can be justified.

Route 113 - The proposed diversion of route 113 to White City to cover the withdrawn section of route 31 between Swiss Cottage and White City will make this already long route even longer. We are concerned that adding approximately 20 minutes onto the off-peak running time (no doubt much higher in peak time) will risk journeys being curtailed to maintain reliability, with a particular impact on passengers at either ends of the route. TfL state that there is excess capacity south of Swiss

⁶ TfL appearance at the London Assembly Transport Committee's 'The Bus Network in London' session, 29 June 2022

Cottage on the Finchley Road so, alternatively, terminate the 113 at Swiss Cottage rather than allow the impact of excess capacity on the 113 to affect the 31.

Route 189 - TfL say that there is excess capacity south of Abbey Road. The section from south of Abbey Road to Baker Street station is a relatively short one so TfL should consider still running the 189 as far as Baker Street, and then perhaps create a new link from the north by running it along Marylebone Road and terminating it opposite Marylebone station using stand space where the 453 terminates.

Caledonian Road

Route 254 - Providing that there is sufficient capacity on other bus routes, it is sensible to withdraw route 254 between Finsbury Park and Holloway, Nag's Head. We note the long parallel section between Hackney town centre and Finsbury Park where passengers may change buses, with all bus stops having seats and shelters and most stops also having a Countdown screen.

Route 259 - Given the related proposal to withdraw route 349, the plan to re-route and increase the frequency on the 259 will give welcome additional capacity between Edmonton Green and Ponders End. But we are concerned about the knock-on effect that change will have at the southern end of the 259. The extra capacity on the 259 may be insufficient to compensate for the related proposal to divert the high frequency 279 away from Seven Sisters Road, leaving the 259 as the only route running between Seven Sisters and Manor House, with a much lower frequency between those locations than currently.

We are also concerned about passengers travelling to the southern end of the 259 who will find their route somewhat stranded by terminating in Holloway - close to central London but not close enough to avoid inconveniencing many passengers into having to change buses to reach Caledonian Road and King's Cross. We therefore object to TfL's proposal for the 259.

Edgware Road

Route 16 - The proposed withdrawal of the 16, along with the 189 south of Swiss Cottage, means that Cricklewood's two direct bus links with central London will be lost. Whilst just east of Cricklewood on the Hendon Way corridor, the 113 will also go no further south than Swiss Cottage. This does not show joined-up thinking for a wider geographical area and TfL should look again at their proposals, taking account of their cumulative impact.

Route 23 - We are pleased to see the proposal to restore the 23 back to much of its pre-2018 routing into the West End, thus righting the wrong of its current illogical routing between Westbourne Park and Hammersmith.

Euston Road

TfL's rationale for the proposals to withdraw route 24 and restructure routes 88, 205 and 214 is that it 'would help to better match capacity to demand.' However, specifics about capacity and demand are only provided for the 205, which is being rerouted to 'help to better match capacity to demand...[and]... rationalise and simplify the network on the Euston Road corridor.' Without any other information available, it gives the impression that routes 24, 88 and 214 are being altered just to accommodate the need to change the 205.

Route 205 - This route was introduced specifically to replace a step free, change free route between the major rail terminals of Liverpool Street, Kings Cross, St. Pancras, Euston, Marylebone and Paddington. In 2018, the 205 was diverted away from Marylebone station. The proposed change will now remove it from Euston and Paddington too. If TfL were to commit to better promotion of the 205's links to rail terminals, we are confident that more people will use this route. Also, as noted in section 5a above, we have concerns about the high number of daily passengers currently using the 205 who would need to change bus in future (and not necessarily just once) if it is rerouted. We therefore object to TfL's proposal for the 205.

Route 214 – Should TfL proceed with this group of proposals, it appears that the double deck vehicles on the 24 will be replaced with the single deck vehicles on the new 214 between Camden Town and Pimlico (the consultation does not state otherwise). The current 24 is a popular route and single deck vehicles would not be an adequate replacement.

Routes 24(N), 88(N), N205 and 214(N) - We share the same issues with these night routes as detailed above with the equivalent day routes.

b) South London area

Coldharbour Lane

Route 45 - The proposed withdrawal of the 45 will remove the direct bus connection between Clapham Park/Brixton Hill and King's College Hospital. Even as a shorter route since its withdrawal north of Elephant & Castle in 2019, the 45 still links key locations and we therefore object to TfL's proposal.

Horseferry Road

Route 77 - Although the proposed changes to stopping arrangements in the Waterloo area would require some passengers to change bus, we are pleased overall to see that the changes will improve access to and from Waterloo station.

Route C10 - We welcome the proposal to reroute the C10 to cover for the proposed rerouting of the 507, ensuring the continuation of a direct service between Waterloo station and Horseferry Road (albeit only the eastern half of Horseferry Road).

However, we recognise that this will mean longer journey times for through passengers travelling either side of that section of route.

Walworth Road

Routes 12 and 12(N) - As noted in section 5a above, we have concerns about the high number of daily passengers currently using the 12 who would need to change bus in future if this route is withdrawn.

Route 148 - The proposed extension from Camberwell Green to Dulwich to cover the withdrawn section of route 12 will make this already long route even longer. Indeed, the proposed 148 from Shepherd's Bush to Dulwich will be of similar length to route 12 in the 1990s on many of the same roads before it was progressively curtailed. We are concerned that adding approximately 25 minutes onto the off-peak running time (no doubt much higher in peak time) will risk journeys being curtailed to maintain reliability, with a particular impact on passengers at either end of the route. We therefore object to TfL's proposal for the 12, 12(N) and 148.

Waterloo

Route 521 – the proposed withdrawal of the 521 will mean the loss of the helpful, speedier option of using the Aldwych underpass for northbound buses to Holborn and beyond.

c) East London area

Commercial Street

Route 15 - It is sensible to reroute the 15 via Aldgate bus station to allow for better changing between bus routes.

Routes 135 and 242 - By replacing the whole of route 242 with the 135, it would effectively double the journey time of new route 135. We are concerned that adding approximately 50 minutes onto the off-peak running time (no doubt much higher in peak time) and will risk journeys being curtailed to maintain reliability, with a particular impact on passengers at either ends of the route. We therefore object to TfL's proposals for the 135 and 242.

As can be seen in section 5a above, we have concerns about the high number of daily passengers currently using the 135 who would need to change bus in future if this route is withdrawn.

However, if TfL do go ahead with the proposal, they should maintain the 135's existing link from the Isle of Dogs to Liverpool Street and onto Shoreditch (the N135 will serve Bishopsgate, so it would be sensible to mirror the day route as far as possible). A diversion of the 115 at Aldgate East to Shoreditch could then maintain a bus service on Commercial Street.

Essex Road

Route 56 - TfL's proposal explains that to complete a journey from Whipps Cross to Bart's Hospital, customers would need to get off the bus by the Museum of London and walk either approximately 320 or 600 metres to reach one of the hospital entrances. We believe this is an unreasonable ask and so object to the proposal to divert the 56 away from Bart's.

Route 236 - We are concerned that by withdrawing the 236 between Homerton Hospital and Hackney Wick there will be insufficient capacity on this section on route 276 in future. We are also aware of a great deal of bus on bus congestion around Homerton Hospital and so terminating an extra service there will not be helpful.

As single deck vehicles are used on the 236, we hope there will still be sufficient capacity on the 236 should it replace double deck vehicle route 4 on the section of route between Holloway and Archway, where it is not served by any other route.

Route 476 – In our response to TfL's 2018 central London bus service review we said withdrawing the 476 between Euston and Kings Cross 'will put additional pressure on route 73 that parallels this route for most of its length and remove access to Euston station.' Now, with the route no longer serving Euston, the 2022 proposal removes access to King's Cross station and once again will put additional pressure on the 73. The plan to terminate the 476 at Newington Green appears to be operationally convenient (using spare stand space once route 21 is withdrawn from Newington Green?) but it leaves the 476's southern terminus as rather stranded – close to central London but not close enough to avoid inconveniencing many passengers into having to change buses to reach Essex Road, Angel and beyond. We are concerned that the continued cutting back of the 476 hampers its usefulness and will hasten its eventual full withdrawal. We therefore object to TfL's proposal for the 476.

Fleet Street

Route 26 - Whilst we acknowledge the excess capacity across Waterloo Bridge, we are concerned that by diverting this route at Aldwych to Victoria it will add approximately 20 minutes onto the off-peak running time (no doubt considerably higher in peak time) and will risk journeys being curtailed to maintain reliability, with a particular impact on passengers at either ends of the route.

Route 211 - The rationale for the change to the 211 is to reduce the excess bus capacity along routes between Parliament Square and Chelsea Bridge Road. This could be partly mitigated by terminating route 211 at Victoria instead, which would enable many current passengers to continue to make direct journeys. We would also be interested to know the basis on which it was decided to divert the 211 to Battersea Power Station.

Routes 507 - The current vehicles used on route 507, with its largely standee layout on its short route, will be inappropriate and insufficient if the proposed change to its routing goes ahead. Double deck vehicles, as currently on route 11, should be used for the proposed 507. And as the proposed 507 would run almost entirely on the current route 11, the new route should be numbered 11 and not 507. This will assist with passenger familiarity with the route and keep the consistent numbering with route 211, with which the 11 shares some common roads.

Isle of Dogs and Wapping

Route D3 - The proposed changes to the D3 will remove much of the purpose of this current cross-borough service, instead making it a short route that we think would be vulnerable to a full withdrawal in future. TfL's proposal would remove direct, step free connections from the Isle of Dogs to two hospitals and require passengers to change bus at least once to complete their journey. Given that Wapping station does not have step free access, travelling from there to Canary Wharf via Canada Water would not be a feasible alternative option for many. Critically, this proposal would remove bus services from nine stops in a large area between Limehouse and Wapping, which we visited to better understand the scale of the proposed change. Taken together, we find this an unacceptable proposal and therefore object to it.

Route D8 - TfL propose that the D8 no longer serves Bow Church to 'simplify the bus network in the Bromley-by-Bow area.' This abstract statement masks the fact that passengers who currently use the stops at Bow Church and on Bromley High Street will need to board the D8 from an alternative stop 450 metres away. We think it is unreasonable to ask passengers to do this and so object to this proposal.

London Bridge and Tower Bridge

Route 78 - In proposing to withdraw the 78 without replacement south of Peckham, we are concerned about the impact of passengers in Nunhead. We question if there will be sufficient capacity on alternative route P12 between Peckham and Nunhead. Also, as noted in section 5a, we have concerns about the high number of daily passengers currently using route 78 who will need to change bus in future.

Route 388 - By replacing most of the 78 with the 388, we are concerned that adding approximately 25 minutes onto the off-peak running time (no doubt considerably higher in peak time) of the 388 will risk journeys being curtailed in order to maintain reliability, with a particular impact on passengers at either end of the route.

We therefore object to TfL's proposal for the 78 and 388.

d) West London area

Earl's Court

Routes 27, 27(N) and 328 – We are surprised at the proposal to significantly lengthen the 27 given that it was shortened in 2019 to go no further west than Hammersmith. We are concerned that adding approximately 20 minutes onto the off-peak running time (no doubt much higher in peak time) will risk journeys being curtailed to maintain reliability, with a particular impact on passengers at either end of the route. To lessen the number of passengers who will need to change bus and to retain passenger familiarity with the current route numbering, the 27 and 27(N) should keep to its current routing to Hammersmith and the 328 should instead be extended from its current terminus of Chelsea to Clapham Junction.

South Kensington

Route 14 – It is disappointing that the proposed changes would mean that the on-off provision in recent years of useful day services directly to the British Museum and on to Russell Square is now off once again.

Route 49 - To alleviate the need for many passengers to have to change bus in future, consideration should be given to retaining the 49 between South Kensington and either Battersea Bridge South Side (using stand space where the 19 currently terminates) or by diverting it at King's Road/Beaufort Street to terminate at Chelsea World's End (should the proposal to change the 328 go ahead). And to retain a direct connection from the Brunel Road end of East Acton with Shepherd's Bush, which would be lost with the withdrawal of the 72, consideration should be given to routing the 49 via Shepherds Bush Green rather than White City.

Route N72 - TfL list five replacement routes as alternatives that passengers could use if the N72 is withdrawn. TfL state that fewer people are using night buses in this area but no day or night route in TfL's proposals will have a higher percentage of current passengers affected than the N72. Those travelling at the ends of the route will no longer have either a bus service in one direction (Alton Estate) or a service at all (north of Du Cane Road in East Acton). This is just one example of why TfL need to abandon their night bus proposals.

Route 283 - Extending the 283 the short distance from Hammersmith bus station to Hammersmith Bridge north side is a helpful proposal, should the 72 be withdrawn.

Route N430 - TfL propose to replace route N74 almost exactly with new route N430 but by no longer covering the short section from Marble Arch to Baker Street, this is an example of where TfL have created a need for passengers to change bus.

Yours sincerely

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