

Proposed express bus service SL14 between Stratford and Chingford Hatch, with changes to route D8: London TravelWatch's response

London TravelWatch is London's independent transport watchdog, using evidence to campaign to improve journeys, and advocate for all people travelling in London. It is in this role that we are responding to TfL's consultation about proposed route SL14 and changes to route D8.

We make the following comments:

The benefits of limited stop, orbital bus routes

We support TfL's proposal to introduce the SL14. London TravelWatch has called for more orbital and limited stop bus routes for many years because we know that people value being able to travel across boroughs for work, healthcare appointments, schools and shopping trips. In this consultation, we support that the SL14 will connect with other bus routes, the Elizabeth line, two DLR branches, three London Overground lines, three London Underground lines and National Rail services. By doing so, it will help connectivity and bring new, speedier connections to the boroughs of Newham and Waltham Forest.

Making Superloop (and all other bus services) better

We are pleased that passengers view Superloop as a widely valued addition to London's bus network. However, Superloop services operate within the wider bus network rather than in a vacuum. Average bus speeds in London continue to fall year on year, with an average network speed of just 9.2 mph so far in 2025/26. It is even worse on the SL14's parallel route - the 158 - at only 8.7 mph. And so, whilst London TravelWatch supports Superloop, we remain concerned that for passengers a limited stop bus stuck in traffic is still just a bus stuck in traffic.

To make the Superloop better – indeed, make all of London's bus routes better - we call for TfL to redouble their efforts to urgently give the bus the priority it needs on the road, whether this be their own roads or in working more efficiently and productively with London's boroughs on their roads.

Concerns with bus stop boarders and bus stop bypasses for some route SL14's stops

Looking on paper at the proposed location for the SL14's stops, there was no obvious reason to change or add to them. Each of the proposed stops also connects directly with buses heading in the same direction. This is especially helpful as the SL14 will call at all the same stops as route 158, which the SL14 will shadow in full.

However, during a site visit we saw that several of those bus stops were Shared Use Bus Boarders (SUBBs), where the cycle lane runs directly between the bus stop and

footway. This means that passengers must cross the cycle lane immediately before getting on the bus or immediately after getting off it.

SUBBs worry London TravelWatch because asking anyone to step directly into a cycle lane is dangerous for **all** bus passengers, particularly when getting off a bus. This is, of course, an even greater danger for visually impaired or blind bus passengers. Having travelled on the 158 to the bus stops where the SL14 will also call, even TfL recognise the risk in their iBus announcements before some - but not all - SUBB stops that passengers should 'cross the cycle lane with caution.'

Our concern is seemingly mirrored by the Department for Transport, which has asked all English local authorities to pause the implementation of SUBBs.¹ It should be noted that the SUBBs on the route of the 158/SL14 are on roads owned by Waltham Forest council not TfL. But as the SL14 will be a TfL bus service, it effectively makes no difference to the experience of bus passengers.

We have considered suggesting alternative bus stops but this is not a simple matter as some alternative stops that the SL14 could serve are also SUBB stops. And some locations, such as the bus stops at Blackhorse Road station, which are SUBB stops, are already the most convenient for SL14 passengers to call at. However, we remain concerned about the use of SUBB stops and ask TfL to take the necessary action to address the problems they present - it is important Superloop services are accessible to everyone.

We are also concerned that the bus stop bypass at Shakespeare Road stop BM does not contain the full safety design features for either cyclists or bus passengers. This should be rectified by Waltham Forest council in conjunction with TfL using updated guidance from TfL's Bus Stop Bypass Design Guidance Review, which we understand is currently ongoing.

Omissions in the Equality Impact Assessment (EqIA)

Given the issues with SUBBs, we question that TfL make no reference to them and their impact in the consultation's 29-page EqIA. This follows on from TfL's similar omission about the impact of bus stop bypasses in the EqIA in their Shoreditch High Street consultation.

We acknowledge that section four of the EqIA is intended to consider and describe 'the potential impacts this work [introducing the SL14] could have on people with protected characteristics and other inclusion groups', and the SUBBs are existing infrastructure and so not technically part of this. However, considering the existing concerns around SUBB stops and how integral bus stops are to the passenger journey, we believe it is an oversight not to include them.

The impacts for passengers using routes 158 and 357

It is positive that the SL14 will provide extra capacity on the whole of route 158 between Stratford and Chingford Mount. Passengers who choose to make journeys

¹ [Pause on new 'floating' bus stops welcomed by campaigners - BBC News](#)

between the stops served by the SL14 will also helpfully free up space for passengers using the 158 at stops which will not be served by the SL14.

We note that one negative impact associated with the introduction of the SL14 will be a reduced frequency on the 158 during Monday to Saturday daytimes, dropping from a bus every six minutes to one every eight minutes. We urge TfL to carefully monitor passenger numbers on the 158 and to restore the frequency to current levels if demand requires.

Although only a partial section of route 357 will be covered by the SL14, it is a positive that this offers passengers between Hatch Lane and Walthamstow Stadium the option of faster journeys using the SL14. It will also open up new direct links, such as between Chingford Hatch and Stratford.

The impact for passengers using route D8

The impacts of broken journeys

To provide sufficient space for route SL14 at Stratford, route D8 would in future be diverted to serve Stratford City Bus Station rather than Stratford Bus Station. This would result in three pairs of stops no longer being served on the route and mean that approximately 250 D8 passengers on a typical weekday would need to change bus to complete their current journey or walk the remainder of their journey.

We also noted that around 200 passengers on a typical weekday who change to other bus routes in Stratford would experience significant impact to their journeys, by having to either walk between the two bus stations or interchange twice to complete their journeys in future.

For passengers who will need to walk or wheel between the two bus stations, we urge TfL and, where necessary, Newham council to ensure that street lighting by bus stops and on the affected routes is made as good as possible. Pavement quality between stops must also be good to make the journey as accessible as possible.

In terms of changing buses, we know that passengers don't like having to do this. Time spent doing it is involuntary because having to change is always second best to using a direct service. Changing buses adds extra time to a journey and an uncertainty of timing of the journey. Changing buses can also potentially mean an additional cost for passengers if they go outside of the 60-minute Hopper fare window while waiting for their second bus, particularly in early mornings and late evenings when buses are less frequent. Interchange can also be inconvenient and stressful, especially for passengers such as older and Disabled passengers or those with children or luggage, who choose the bus because it is easier for them to use.

Concerns about safety and information

Passengers can be concerned for their safety whilst waiting at bus stops, especially at night, when perpetrators of crime have the benefit of dark streets and fewer bystanders. People don't want to be alone for an extended period as it can feel it invites opportunities for people to take advantage when no one else is around. The availability of Countdown is important because its absence means that even people

with digital devices may not want to use them in these locations, particularly at night. In these situations, Countdown and public lighting are even more important.

There is a passing mention in the EqlA that where an interchange is required 'passengers have bus shelters and lighting at stops'; we hope this covers all the interchange bus stops and would appreciate clarification about this. There is no mention, though, as to whether Countdown is available at each - or any - of those stops. This is yet another example of TfL's inconsistency in completing EqlAs, where basic but important information is often not provided.

The impact for passengers using route 108

We welcome that around 300 passengers on a typical weekday who use route 108 to access Stratford City Bus Station would experience an increase in overall frequencies where the D8 runs parallel to the 108 in the future.

Advertising the consultation

Whilst we acknowledge that the Superloop network map is intended to be schematic rather than geographically accurate, the northern end of the SL14 should show Chingford Hatch as a right turn rather than its current left turn.