

19 and 38 bus routes restructure – 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 the proposed restructure of routes 19 and 38.

We make the following comments:

The proposals and the rationale for the changes

TfL’s proposals will mean that route 19 will be diverted at Hyde Park Corner to Victoria and no longer serve Battersea Bridge, whilst route 38 will be withdrawn between New Oxford Street and Victoria and see its additional weekday services withdrawn. To bridge the gap of these changes, TfL will introduce a new route (provisionally route 10) between Mildmay Park and Battersea Bridge.

TfL’s rationale is two-fold. Firstly, to better match capacity to demand because of a significant decrease in demand at Victoria and between Hackney and Essex Road on route 38. Secondly, to deal with a lack of reliability on route 19, with the busiest section around Islington Green.

Breaking routes because of changed demand and unreliability

London TravelWatch understands the principle of TfL reviewing and adapting the bus network to make the most effective use of its resources by trying to match capacity with demand.

However, we are troubled when bus routes are reduced in length due to problems with reliability and many passengers inconvenienced as a result. We urge TfL to focus more on the (admittedly) challenging task of improving conditions on the roads, whether they be TfL or council owned, to address the underlying issues causing reliability issues. In turn, buses would become more reliable without the need to change their route, which would improve the passenger experience. In our research, just two in five people thought they could rely on buses to get them to their destination on time every time and one-third said that buses being too slow stop them from using the bus more often.¹ This is especially the case in central London, where average speeds remain stubbornly low and show little sign of improvement.

Having to change buses

The impact of broken journeys

The Equality Impact Assessment (EqIA) for this proposal states that 356 trips per day (2%) on route 19 between Knightsbridge and the King’s Road and the areas

¹ [The Next Stop: Making London’s buses better](#), London TravelWatch 2024

north of Angel would be broken. The proposal will also break 1,007 (4%) trips per day on route 38 between Victoria and the areas north of Angel and between Clapton Pond/Dalston and the areas west of Tottenham Court Road.

London TravelWatch knows that passengers don't like changing buses. 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 at night 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. In this context, it is important - and worrying - that approximately one in seven passengers using either routes 19 or 38 are Older Person's Freedom Pass holders.

Safety concerns

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.

TfL refer to an assessment of the impact on safety of women during hours of darkness (18:00-06:00) but do not state how many women would be affected by this proposal.

Interchange locations

Given the above, it is critical that changing between buses is as seamless as possible. TfL say that interchange locations have been reviewed to determine whether existing facilities help to provide a safe waiting environment, and whether any additional mitigations can be introduced to further improve safety.

TfL have identified pairs of stops at Angel as interchange points for trips to/from routes 19 and 38 (though it is unclear why route 10 is also not mentioned here). It is positive that each stop has a shelter, good lighting and real time information, with each pair of stops next to each other. It is positive too that the stops are in an area predominantly overlooked by housing and natural surveillance from traffic and other bus routes. As TfL say, this may increase safety for those making late-night trips.

It is, though, curious that TfL mention interchanging to/from routes 19 and 38 at stops F/G because TfL's bus route spider map for Angel shows that they both already call at stop F. This is sensible given that they are both heading towards Holborn. With proposed route 10 heading in that direction too, we presume it will also call at stop F but would appreciate TfL advising should this not be the case.

On a point of accuracy in the consultation materials, we note that while TfL refer to stops F/G being northbound and stops X/Y southbound, the spider map shows F/G as the southbound stops and X/Y as the northbound stops.

Winners and losers

TfL say that the diversion of route 19 to/from Victoria will create new links between Victoria and Upper Street/Highbury, whilst route 10 will create new links between Battersea/Knightsbridge and Essex Road. Many passengers will benefit from this but, as we have noted, many others will no longer be able to take a direct bus to complete their journey.

Routes 10 and 19

It is encouraging that route 10 will maintain sufficient capacity for passengers between Essex Road and Holborn, where demand is highest. It is welcome too that it is proposed to increase the early morning Sunday frequencies on route 19 from four to five buses per hour.

Route 19 is currently one of London's slowest buses (its average speed so far in 2025/26 is just 6.5 mph²) and so we hope that shortening it would make it more reliable. Although we note that the proposed length of route 19 will still be considerable and therefore presumably remain prone to delays.

It is the experience of route 19 that gives us concern about how reliable route 10 will be, given that it will replace route 19 on the very long stretch between Islington Green and Battersea Bridge. Looking at the current timetables, we estimate that even during the off-peak, the end-to-end journey time for route 10 will be up to around 70 minutes, a significant time. We ask TfL how they will ensure that route 10 will not suffer the same reliability problems as the 19 currently does without the need to regularly curtail buses early.

Route 38

TfL have acknowledged that removing the buses on route 38 to/from Clapton bus garage and Victoria during weekday daytimes will mean that capacity is reduced by around half and make buses on the Balls Pond Road and between Victoria and Holborn busier than present. At other times, the proposed frequency reductions are significant - from every 6 minutes to every 10 minutes on Saturdays, and from every 7- 8 minutes to every 12 minutes on Sundays, early mornings and evenings.

Given the proposed significant frequency reductions across most of the week, and that TfL acknowledge that buses will be busier than present, we are especially concerned about potential issues with capacity on route 38.

On a related point, it is unclear what TfL mean when they talk about capacity – does it refer to the number of seats on a bus or the total capacity of the bus i.e. including the number of passengers who would be permitted to stand? Presumably, if the capacity includes standing room, while it might still technically match demand, it could cause problems for those people who require seats (nor is it generally a pleasant experience for people more widely).

² [Route-all-bus-speeds-to-p09-2025.xlsx](#), Route (All day types & all hours) to P09 2025/26, TfL, 2025

Given the importance of route 38, we would add that we are also troubled by the proposed withdrawal of its substantial section between Victoria and New Oxford Street.

Conclusion

Taking all matters into consideration, London TravelWatch cannot support these proposed changes.

However, if TfL do decide to proceed with this proposal, we call on them to focus on the following:

Route 38

If TfL proceed with withdrawing route 38 west of New Oxford Street, we ask that its new first and last bus stops at least be placed as close as possible to Tottenham Court Road station, given its connection to other bus routes, the Tube and the Elizabeth line. Currently, it is unclear how route 38 will begin and end in that area, with the proposed map shows that it will begin and end on Bloomsbury Way but the linear map indicates the following bus stop.

Monitoring and evaluation

We note TfL's statement that ridership and service quality data will continue to be collected and monitored to evaluate the success of mitigations and the actual impact of this proposal. As we are particularly concerned about potential issues with reliability on route 10 and capacity on route 38, we call on TfL to be ready to take urgent steps once the changes are in place should further mitigations and changes be required.

Reinvesting savings

TfL say that these proposed changes will allow them to make cost savings to ensure they can meet their business plan targets. Whilst it is important to put these savings back into the network, TfL also need to be transparent and communicate with passengers about how it has done so and what it has achieved.

Publicising the route changes

As these are significant changes, TfL will need to ensure that there is clear information about the alternative bus routes including at all current bus stops for routes 19 and 38.