

Routes 106, 253 and 254 proposed changes – 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 changes to routes 106, 253 and 254.

TfL propose to withdraw route 254 but extend route 106 from Whitechapel to Aldgate in its place to retain existing links between Clapton and Aldgate. Route 106 would gain an increased frequency to provide sufficient capacity on that section whilst route 253's frequency would be increased to meet the demand on route 254 between Hackney Central and Holloway.

We have the following comments:

The rationale for the changes

TfL explain that there is surplus capacity on the corridor served by route 254 between Holloway and Whitechapel, so proposals have been developed to better match capacity to demand and simplify the local bus network. TfL say that their proposal would reduce the number of parallel routes running on the 253/254 corridor while retaining key links and introducing new links. The latter would remove the need for some passengers to change between buses and thus reduce their journey times.

We understand the principle of reviewing the bus network and adapting it to make the most effective use of its resources, redirecting them where most needed. Given this, we understand the reasoning for withdrawing the 254.

Having to change buses

And yet, TfL say that approximately 2,430 daily trips currently made on route 254 would require interchange between bus routes in future. Unfortunately, unlike for the other live consultations for routes 42 and 67/149, TfL have neither provided the percentage of affected trips out of the total of all trips nor a breakdown of the number and percentage of broken trips specifically for concession holders.

While both the Word and PDF versions of the Equality Impact Assessment (EqIA) note that this data 'is shown in the table below' there is no table, just an empty space (see *screengrab below*). Such an omission is yet another example of the inconsistency in the availability and quality of information in a TfL EqIA.

Broken links

As described above, the proposed changes would mean that some passengers would no longer be able to make a direct bus journey without having to change between buses. The estimated number of daily trips

which could no longer be undertaken on a direct bus journey – or broken links – is shown in the table below. This includes estimated trips using Freedom Passes and young persons' tickets ¹

Routes 106, 253 and 254 serve bus stops in the London boroughs of City of London, Hackney, Islington, Camden and Tower Hamlets.

The impact of broken journeys

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. TfL acknowledge in the EqIA that the need to change between buses 'may cause confusion or be physically demanding for passengers with limited mobility' and that the proposals 'could reduce access to medical centres, which may have a greater effect on older passengers.' In this context, it is important - and worrying - that approximately one in eight passengers using route 254 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 at any of the alternative or interchange stops.

Interchange locations

Given the above, it is critical that changing between buses is as seamless as possible.

a) Cavell Street

An extended route 106 would no longer serve its current first/last stop on Cavell Street. In EqIA, it notes that this would affect 954 trips made per day from that stop, which includes 3% of disabled passengers and 11% older passengers.

Passengers who currently alight or board at Cavell Street would need to use alternative stops on Whitechapel Road. For those alighting, the closest bus stop is 290 metres away, whilst it is a 270 metres journey to board a northbound 106, each not inconsiderable distances. Passengers heading for the northbound 106 would also need to cross Whitechapel Road, though a signalised crossing is available. Pavement quality to and from those alternative stops, including tactile paving and dropped kerbs, must be made as good as possible for those walking or wheeling. We would also call for reduced street clutter and, where it exists, making sure that it's appropriately placed not to reduce mobility. We urge TfL and the local council to ensure that all the above is the case, if it isn't so already.

It is positive that there is a shelter with seating, real-time information boards and street lighting at both stops. As well as helping to provide a more comfortable environment, this should help to reassure passengers of their safety especially during hours of darkness.

b) Clapton station:

For passengers who will in future need to change between the 106 and 253, it is positive that the recommended interchange stops in each direction at Clapton station have shelters, seating and Countdown, along with streetlights nearby.

In terms of the specific bus route proposals:

Route 106

Except for those who currently use the Cavell Street stop, route 106 passengers will significantly benefit from these proposals, including those who use the 106 between Clapton, Stoke Newington and Finsbury Park, away from the 253/254 corridor. They will benefit from an increased frequency for most of the week and new direct links.

Route 253

Route 253 passengers would benefit from frequency increases including the section between Holloway and Euston away from the joint 253/254 corridor. However, TfL admit that some 253 passengers will experience busier buses on the section between Holloway and Hackney Central, as capacity would be reduced here with the 254's withdrawal. We address this further in the *Monitoring and evaluation* section below.

Route 254

A restructured 106 would helpfully retain all current links on route 254 between Aldgate and Clapton Station, and the 253 will retain the 254's links between Hackney Central and Holloway. However, as noted above, a significant number of daily trips made on the 254 would require a change of bus in future.

Route 310

The diversion of route 310 between Finsbury Park and the Nag's Head will provide helpful additional capacity between Stamford Hill and Holloway. But TfL don't appear to have explained this in the consultation – except noting in the FAQs that route 310 will be changing, without saying what the change will be.

The omission of the 310's new routeing on the restructure map is particularly odd given that the new routeing began two weeks before this consultation closed, let alone months before these proposals would be implemented. TfL say that 'showing the new route could be confusing to people looking at the map before the route changes.' However, we think it would have been possible to annotate the map and its key to show the 310's routeing from 5th September without causing confusion, and in turn provide a more accurate picture of how the changes will work in practice.

This was a missed opportunity by TfL as information about the 310 could have at least given some reassurance to passengers who use the 254 between Stamford Hill and Holloway. Namely that if these proposals go ahead, they will have the option of using the 310, as well as the existing 253.

For future consultations, we call on TfL to be clearer in showing all relevant information, both in written and map form, so that people can clearly see the impact of proposals (whether it be negative or positive).

Conclusion

Taking all matters into consideration, London TravelWatch has concerns about these proposals, particularly the number of passengers who will need to change between buses in future.

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

Monitoring and evaluation

We note that TfL have said that passenger loading surveys would be undertaken on the 106 and 254 to confirm that the right level of service is being provided and that there are no crowded services. TfL state that capacity requirements and reliability would be reviewed on an ongoing basis to ensure that there is enough resource and level of service. Should further resource be required, we call on TfL to do this as a matter of urgency. We would also ask TfL to offer transparency in the monitoring and publicly provide a summary of their results where possible.

Reinvesting savings

Although TfL do not specifically say that the proposed changes will allow them to make cost savings, we presume that it will do so. Alongside putting these savings back into the network, TfL need to be transparent and communicate with passengers about what those savings have 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 106, 253 and 254.