

Central London Bus Review 2022

Response to issues raised March 2023



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1. Introduction

This document sets out our response to the key issues raised during the Central London Bus Review (CLBR) consultation held in summer 2022.

The proposals that we consulted on were developed to meet the Government's savings requirements, and as part of our continual review of London's bus network to ensure it remained a viable and well-connected.

On 30 August 2022, with the Mayor, we secured a financial settlement from the Government of £1.2bn through to March 2024. While this deal still left us with a funding gap, the Mayor identified an additional finance facility that could be used if needed. This combination allowed us to balance our budget, move away from the managed decline of the transport network and plan long term sustainable services to support London's recovery from the pandemic.

A range of concerns were raised in response to the consultation, which we have considered carefully. To support us in responding to the issues raised in consultation, the Mayor has identified additional annual funding for TfL of £25m per year.

With this additional funding from the Mayor, we have been able to reconsider the scale of the bus proposals, while still ensuring that the bus network matches customer demand, delivers value for money and supports London's recovery.

Following our reassessment of the proposals following consultation and the additional funding provided by the Mayor, we now plan to progress with four of the original 16 neighbourhood proposals in the CLBR consultation.

Following careful consideration of the feedback received it has been decided that the following bus routes will change. These changes include some modifications, and four routes that will no longer run:

- North London area Edgware Road bus routes 6 (24hr), 16, N16, and 23 (24hr) and new route N32
- South London area Horseferry Road bus routes 3, 77, 507 and C10
- South London area Waterloo bus routes 59, 133, and 521
- East London area Fleet Street bus routes 11, N11, 26, N26, 211 and 507

The four bus routes that will no longer run are: 332*, 507, 521 and the N16.

*Route 332 will be renumbered as route 16. Route 16 will follow the route of the 332 between Paddington and Brent Park, via Cricklewood. At night, the N16 will be directly replaced by new route N32.

It is expected that route changes will be introduced during 2023, after a comprehensive customer communications campaign. The changes will take place in phases where possible to align with bus service contract end dates to ensure the best value for money is delivered. Any changes that are interdependent on each other, such as where customers will need to change buses to complete their journey, will take place at the same time.

2. Background

Between 1 June and 7 August 2022, we held a public consultation proposing changes to bus routes in and around central London.

The proposals included changes to 71 bus and night bus routes, which included the withdrawal of 22 individual bus routes or sections of routes that were covered by other high-frequency bus services or were close to alternative bus stops. We also proposed the introduction of five new 'N' prefixed night bus routes.

We received 21,528 responses to the consultation. Of these, 21,247 were from members of the public and 281 were from stakeholders. A range of views were expressed in response to consultation which have been considered carefully.

A <u>consultation report</u> and a <u>'Decision summary'</u> were published on 23 November 2022. The consultation report contains further details about what was proposed, the consultation process, response themes and feedback received, and details about who took part. The 'Decision summary' document confirms the decision reached for each route in scope of consultation.

3. Response to issues raised

This section details our responses to the issues most commonly raised by respondents to the consultation.

<u>Section 3.1</u> responds to general issues raised across the consultation, and where the comments apply to all the routes that were included. These issues have been categorised by theme.

<u>Section 3.2</u> focusses on the key issues raised in response to the route proposals that will be taken forward. These are the routes that formed the Edgware Road, Horseferry Road, Waterloo and Fleet Street neighbourhood schemes, as detailed in Section 1. In some cases, route proposals are being taken forward with some modifications.

<u>Section 3.3</u> responds to the feedback received about the consultation process.

3.1 General comments across the consultation

General		
Issue	Response	
General opposition to proposals that change or remove bus routes	Following our reassessment of the proposals post consultation and additional funding provided by the Mayor, we now plan to progress with four of the original 16 neighbourhood proposals in the Central London Bus Review (CLBR) consultation.	
	We have always adjusted our bus network to reflect our changing city. The devastating impact of the pandemic on our finances required a more significant review as part of our own recovery from the pandemic.	
Criticism of the plan to reduce services while London recovers from the pandemic	The CLBR was proposed as part of the need to achieve significant financial savings as part of a Government emergency funding arrangement; and, in response to customers changing travel patterns that had seen less demand for buses on some roads leading into central and inner London, particularly since the pandemic.	
	We had carefully designed these changes to avoid overcrowding and ensure that the number of buses that run matched demand.	
Concern that less buses would increase crowding on services that	The flexible nature of the bus network means we can make changes such as frequency adjustments at relatively short notice if required.	
remain, affecting reliability, and availability of seats on board, including buggy and wheelchair	We believe that the revised network of routes in central London is the right one for now and future travel demands.	
space and priority seating	We are also continuing to deliver a range of measures that reduce bus delays and improve customer journey times (known as bus priority). We are working to enhance journey times, including by working with boroughs to deliver 25km of new bus lane by	

General	
Issue	Response
	2025, creating permanent 24/7 bus lanes on
	the Transport for London Road Network, and using technology to give more green time to buses at traffic lights.

Accessibility		
Issue	Response	
General concern the proposals would have a greater negative impact on older, disabled, mobility impaired people, and people with buggies, luggage and shopping due to the need to change bus more often to complete a journey	In all, the plans we are taking forward are significantly reduced from those we consulted on. Safety remains our priority and in addition to the considerations we made in the proposals themselves, we will review all locations impacted by the changes being taken forward to ensure we put in appropriate mitigations. These are informed by our Equalities Impact Assessment (EqIA) and consultation responses.	
	Our EqIA includes an assessment of transferring between interchange bus stops, facilities at bus stops such as seating, lighting and countdown, and we will look to mitigate impacts where possible and appropriate.	
Call for action that where interchange is required in the future, a same stop interchange must be provided	In reassessing our proposals, we have worked to ensure there are as many same stop interchanges as possible or only a short distance between the stops needed to complete the interchange. This includes making amendments to some of our proposals to reduce the number of roads that need to be crossed to change buses.	
Older and mobility impaired bus users may be less able to stand or walk for long periods of time and may find it hard to negotiate busy interchanges when changing bus service to complete a journey	We have assessed the transferring between interchange bus stops, facilities at bus stops such as seating, lighting and countdown, and we will look to mitigate impacts where possible to ensure appropriate facilities where customers need to change buses. This includes looking at bus stop and street design layouts in locations where changing bus at	

Accessibility		
Issue	Response	
	the same stop is not possible to make interchanges as easy as possible.	
	We have also reviewed lighting, wayfinding, and customer information at bus stops, as well on the bus, our website and the TfL Go app to make sure using the bus is as straightforward and as comfortable as possible.	
	We recognise that many older people rely on bus services, and these play an important role in helping people connect with family and friends.	
Concern among older people who say they would become further isolated if service changes reduced access to friends and family	In reconsidering our proposals following consultation and the additional funding provided by the Mayor, we now plan to progress with four of the original 16 neighbourhood proposals in the CLBR consultation.	
	The proposals that we are taking forward are in areas with much higher provision of buses than there is demand. Customers will still be able to travel between the same destinations as they do today, but with an interchange in some instances.	

Accessibility		
Issue	Response	
Improvements must be made to	As further funding becomes available for step-free access projects, we will seek to prioritise improvements at London Underground stations that have an interchange with other Tube and rail lines or other transport modes such as buses and if they serve hospitals or 'plug a gap' between other accessible stations.	
step-free access on the London Underground, and Dial-a-Ride and Taxicard services in areas where direct bus journeys are no longer an option	We will also continue to consider other prioritisation tools such as transport modelling data and the availability of third-party funding sources.	
	In February 2022 we completed a public consultation that focussed on the future of step-free access on the Tube. The responses to this consultation will be at the heart of our decision making for years to come	
	https://haveyoursay.tfl.gov.uk/tube-step-free-access	
It was noted many bus stop Countdown facilities had been removed and not replaced, including at busy bus stops. Countdown displays should be provided at all bus stops, with audio facility where possible to assist visually impaired people	There is no technology available to provide audio at bus shelters. However, at specific locations, for example, at interchanges, we will seek to provide appropriate advice using audio, digital display or by providing guidance to bus drivers.	

Accessibility		
Issue	Response	
Older people and people with accessibility needs may be deterred from bus use due if services get busier and there is less chance of a seat, in particular priority seating	Wheelchair users would still have priority and all buses include wheelchair spaces. We have made every effort in our plans to seek to ensure there would still be enough space for both wheelchair users and buggies with current and expected demand, but occasionally the driver would need to ask for buggies to be moved. While there are no plans to increase the amount of priority seating on buses, we are now rolling out clearer demarcation on those seats which we expect will leave them more available for those who need them most.	
Seating at bus stops needs to be improved as many older and/ or mobility impaired people are not comfortable with the 'perch' style seats provided	Most bus shelters have seating built into their design. We will continue to review the facilities provided at bus stops in the wider sense in relation to new interchange points – this review will include infrastructure and information.	

Affordability		
Issue Response		
Longer bus journeys with more changes would negate the impact of the Hopper Fare. A change to the	When bus journeys are longer than an hour after first boarding, customers are still covered by our daily cap of £4.95, equivalent to three times the single fare of £1.65. We estimate that only 0.2 per cent of trips would newly be over the hour threshold.	
Hopper Fare time limit should be considered to help prevent bus services becoming too expensive	We have carefully planned these changes and expect that, in many instances, changing bus would be at no extra cost to customers due to the Hopper fare. Those aged under 18 and over 60 would continue to benefit from free bus travel.	
The Hopper Fare 60-minute time limit should not apply at night, when journeys are longer and services are less frequent, particularly when there is a need to change bus	When bus journeys are longer than an hour after first boarding the bus, customers are still covered by our daily cap of £4.95, equivalent to three times the single fare of £1.65.	
Bus changes, where these are progressed, will force people to use private cars, with a resulting strain on finances	Following our reassessment of the proposals following consultation and the additional funding provided by the Mayor, we now plan to progress with four of the original 16 neighbourhood proposals in the CLBR consultation	
The proposals may have a greater negative impact on people on lower	We understand those on lower incomes disproportionately rely on the bus network and have designed the changes to minimise negative impacts.	
incomes, as this group is more likely to use bus services and would be impacted financially	We expect that in many instances this would be at no extra cost to customers due to the Hopper fare. Those aged under 18 and over 60 would continue to benefit from free bus travel.	

Customer information (communicating the changes)		
Response		
Ahead of any changes, we will work closely with groups that represent people with protected characteristics to make sure they are aware of the changes and their requirements are considered.		
We will be undertaking a comprehensive customer communications campaign to make sure as many customers as possible whose journey will be changing will be aware of how it will affect them and how to complete their journey if they need to use a different bus or need to change buses.		
There will be an extensive publicity campaign to make sure as many customers as possible know about the changes. This includes, but is not limited to, emailing customers who regularly use the affected routes, updating information at bus stops, updated maps, local media briefings, a press release, publishing details on our website and displaying posters.		
We will also ask local community and faith groups to cascade details of changes that affect their area to members of their community.		
Printed bus spider maps are displayed at key bus stations, shelters and stops as well as at Tube and rail stations.		
For significant changes, maps are produced and included in prewarn posters and on our website.		
We currently do not plan to reintroduce any maps as a result of the bus changes will we make following the central London bus review.		

Customer information (communicating the changes)		
Issue	Response	
Where people need to work out new journeys, TfL should provide journey planning assistance	An extensive publicity campaign will include emailing customers who regularly use the affected routes, updating information at bus stops, updated maps, local media briefings, a press release, publishing details on our website and displaying posters. There will also be information at key locations and bus stops, and our journey planning tools including our TfL Go app will be updated in advance of the changes so customers can plan their journey. Journey planning is available on TfL website and TfL Go app using Journey Planner and 'buses nearby' functionality. Printed bus maps are displayed at bus shelters and stops in relevant formats (route changes map; buses from/destination finder).	
	Customers are always welcome to speak with TfL staff with any questions, such as bus station teams, bus drivers and our customers services team for the latest information about bus service changes.	
Audio announcements should be available to communicate next bus and interchange information, including at shelters and on board the bus	There is no technology available to provide audio at bus shelters. At specific locations, for example, interchanges we will seek to provide appropriate advice using audio, digital display or providing guidance to drivers.	

Environmental concerns		
Issue	Response	
General frustration that reductions were proposed across a more sustainable mode of transport at a time when people were being discouraged from private car use	The proposals that we consulted on were developed to meet the Government's savings requirements, and as part of our continual review of London's bus network to ensure it remained a viable and well-connected.	

Environmental concerns		
Issue	Response	
	Additional funding provided by the Mayor has allowed us to reassess our proposals and we no longer need to implement all the changes we consulted on in the summer.	
Bus changes, where these are being progressed, will force people to use private cars which would	Following our reassessment of the proposals following consultation and the additional funding provided by the Mayor, we now plan to only progress with four of the original 16 neighbourhood proposals in the CLBR consultation.	
worsen the impact of climate change	We recognise that supporting a high-quality bus service is key to encouraging a shift away from car use and reducing carbon emissions. You can read more about how we are tackling the climate emergency in our Bus action plan	

Journey convenience and connectivity	
Issue	Response
Concern that changes to bus routes in south London would worsen the level of connectivity, particularly in areas where other public transport options (such as Tube, and train services) were already limited	We are only taking forward four of the 16 neighbourhood proposals we consulted on. This equates to around 22 per cent of the reduction in mileage that we originally proposed to remove. Most service changes we consulted on will not now change, including many of the proposals that would have affected south London. Those that remain are mainly in central London. The changes we are making are based on factors including customer travel patterns, the financial case for change, equalities impacts and consultation feedback concerning each bus route proposal (and the extent to which concerns identified can be adequately mitigated)
Where changes will proceed, a general level of discomfort and inconvenience will be experienced by bus passengers due to additional	We are only taking forward four of the 16 neighbourhood proposals upon which we consulted, 22 per cent of the originally proposed reduction in mileage. No road is left

Journey convenience and connectivity	
Issue	Response
interchanges, longer walking distances to change bus, and longer journey times. This would be made worse when applied to any reductions to night bus services	unserved. The additionally required interchange and waiting time is relatively small. There is no net reduction in night bus frequency.
Interchange locations should all have Countdown, shelters, seating, lighting and local directions to the next stop – particularly where this is not nearby or where the next stop is not easy to spot when its busy	Where possible, interchange locations utilise bus shelters, which would provide; seating, printed information displaying all routes and maps of the immediate local area, and a Countdown sign displaying real-time bus arrival information, helping to provide an accessible and comfortable waiting environment. As part of the Bus action plan, we will also look to install real-time digital information.
continue their journey should be contained in bus shelters and be accessible, for example at an appropriate height for wheelchair	Printed bus spider maps are displayed at bus stations, shelters and stops as well as at Tube and rail stations. Where customers need to change between buses as a result of these changes, bus stop posters including maps will be displayed as required.

Personal safety	
	Response
	The safety and security of our customers and staff is our top priority.
A call for an abandonment of night bus proposals due to the additional safety and security implications of changing bus at night	We have a range of safety and security measures in place, including dedicated policing for the bus network, hundreds of enforcement officers deployed to priority locations and an extensive CCTV network.
	Our changes to night services are relatively small and we are protecting many of the Night Bus routes we had proposed to change in the consultation.
Concern that any removal and/or re-routing of night bus services would make people, particularly women, feel vulnerable when: • Travelling alone and not able	In some cases, we are changing night services to follow restructured day routes, though in other cases we are keeping the current night route structure even though the day route changes, by introducing a renumbered night service.
 Travelling alone and not able to pay for a taxi Waiting longer for the next bus Longer walks to change bus 	Within the EqIAs for these proposals, we have carefully considered the impact of these changes on women and girls - as we have for other groups with protected characteristics. London is a safe city, but too many women feel unsafe when travelling, working or going out at night. In our proposals we have
	minimised waiting times between bus changes, and we will also review lighting, wayfinding, and customer information at bus stops, as well on the bus, our website and the TfL Go app.
Concern among shift workers about changes to night-time/24-hour services as these were relied on to get to/from work where other transport options were not available	New Equality, Diversity, and Inclusion training for bus drivers is being developed in partnership with a specialist training provider and will help drivers provide even better customer assistance. We also continue to deliver a range of measures that reduce bus delays, including 24/7 bus lanes, which will further minimise waiting times at stops.

3.2 Comments about proposals that will go ahead

3.2.1 North London area - Edgware Road - routes 6 (24hr), 16, 23 (24hr)

North London at night – routes N16 and new route N32

Edgware Road scheme in general		
Issue	Response	
With new developments planned in the Brent Cross Cricklewood regeneration area, there is concern that a reduction of bus services would make already crowded buses worse	TfL will be consulting on changes to serve the new developments in the Brent Cross area in 2023. Analysis shows space on buses can cater for customer demand in the area as a whole.	
Concern that the growth forecasts used to determine the proposals for the Edgware Road corridor had not taken future growth into account	We have taken account of possible future growth. Analysis shows space on buses can cater for customer demand in the area as a whole.	
Route 6		
Route 6 should be diverted to Victoria or rerouted to cover parts of route 16 so that route 98 can remain unchanged	Route 6 will now run to Victoria covering the section of the current route 16 between Maida Vale (Clifton Road) and Victoria. Route 98 will remain unchanged.	
Route 6 should be extended to Russell Square via Oxford Street if route 14 is to no longer run	Route 14 will continue to operate on its current routeing.	
Route 16		
Concern that removal of route 16 would take away a direct journey between Cricklewood and St Mary's Hospital, Paddington	The restructured route 16 will run between Brent Park, Cricklewood and Paddington, with a pickup outside St Mary's Hospital on Praed Street on the northbound journey and 5-minute walk to the hospital from the southbound stop on Harrow Road at Hermitage Street.	

Customers, in particular older passengers, welcomed the ability to board an empty bus at the start of route 16 in Cricklewood for onward travel as they were guaranteed a seat. Concern this may not be possible in the future	Sufficient capacity would be provided on southbound services at Cricklewood for demand.
If proposals for routes 31, 113 and 189 are progressed, then route 16 should be restructured and operated operate between Marble Arch and Highgate Village via Edgware Road and Abbey Road	Proposals for routes 31, 113 and 189 are not now being progressed.
Route 16 should be extended to Edgware and converted to a 24-hour route so that route 32 and the N16 can be removed from service instead	Running a through service during the day between Edgware and Victoria via the Edgware Road corridor would give a very long route which would be difficult to operate reliably.
Route 16 should be kept and extended to the Brent Cross Shopping Centre	We will be consulting on changes to serve the
Route 16 should be kept and extended to Brent Cross station via Staples Corner (not serving Brent Cross)	new developments in the Brent Cross area in 2023.
Route 16 should be retained and operated between Victoria and Colindale Station to open links to the Northern Line and buses to Edgware	Running a through service during the day between Colindale and Victoria via the Edgware Road corridor would give a very long route which would be difficult to operate reliably.
Route 16 should remain and operate between Victoria and Willesden, then route 98 could be withdrawn instead	Route 6 will run between Willesden and Victoria and route 98 will retain its current routeing.

Route 23	
Route 23 should serve Oxford Street for shopping (to support route 7 which is too busy) and the Strand for night-time journeys to and from Theatreland	There is already sufficient capacity along Oxford Street for demand, and another service is not required. Route 23 will serve the Strand.
Route 23 should terminate at Trafalgar Square not Aldwych as the Strand corridor is already well served by buses	Route 23 will run through to Aldwych to continue to provide through links currently given by route 6 between Edgware Road, Hyde Park Croner and Aldwych.
Route 23 should be extended to Waterloo Station to create new links between Waterloo/Hyde Park/Paddington/Westbourne Park	Customers will be able to change at stops on the Strand between buses on route 23, and routes 139 and 176 to travel to and from Waterloo.

3.2.2 South London area – Horseferry Road – routes 3, 77, 507 and C10

Issue	Response
Route 3	
Route 3 is a valuable link to Whitehall. Rerouting to Victoria was not necessary as this was a journey already in place via mainline trains. Criticism the change is only proposed as cover for changes to the 507 and not in customers interests	There are direct rail links between Brixton and some areas south of there to Victoria. However, parts of Kennington do not have direct links to Victoria despite being relatively close to it. TfL expect that people will make use of this new direct journey opportunity.
Changes to routes 3 would result in a difficult interchange point at Millbank and the need to interchange if travelling from points south of Brixton	The interchange at Millbank is relatively poor, involving crossing roads, albeit at zebra crossings. However, most people will be able to change between routes 3 and 159 at the same stop to make their journey.
Route 3 has already been cut back considerably. It should be made more frequent and have its stop outside Brixton Underground Station reinstated permanently	The 3 provides sufficient capacity for the peak demand and so operating at higher frequencies cannot be justified. The stop at Brixton station has been reinstated.

Route 3 should also be reinstated back to Trafalgar Square and Oxford Circus as Horseguards is not a destination for many passengers, and may be why data shows it as not well used in this area	Route 159 will continue to give links between Brixton, Oval, Parliament Square, Trafalgar Square and Oxford Circus
Route 3 should be withdrawn between Westminster and Whitehall and rerouted along Victoria Embankment as this area is not yet served by buses	There is little demand for bus services to and from Victoria Embankment as demand is only to the north side and better provided by bus services along Whitehall and Strand
Route 77	
Changes to route 77 would worsen access to the South Bank for disabled people	While we acknowledge access to the South Bank would be reduced, we also consider that access to Waterloo Station would be improved.
Route 77 should have a frequency increase and consider extending it to London Bridge to avoid changing to the Underground	Route 381 gives bus links between Waterloo and London Bridge with an interchange with the 77 at Waterloo. The frequency is set to be matched to customer demand.
Route 507	
Concern that a rerouting of the 507 would reduce access between Victoria Station and St Thomas' Hospital and Lambeth Palace library; access is also affected between Horseferry Road and Marsham Street	The restructured route 3 will maintain the through links between Victoria Station and St Thomas' Hospital / Lambeth Palace via Horseferry Road and serve Marsham Street. The restructured route C10 will also link Victoria Station with St Thomas' and Lambeth Palace.
Route 507 should be renumbered as route 11 as the future route proposed bears no resemblance to the current route – this would enable historic route 11 to continue	The revised route 507 will be numbered 11.

Route C10	
Changes to route C10 would result in longer journey times between Pimlico and Canada Water	There would be some increase in journey times for passengers between Pimlico and Canada Water. However, this would be offset by improved access to Waterloo Station
Concern the C10 would not have enough capacity on board to replace route 507	Our analysis does not identify this as a problem.
Concern that changes to route C10 create an unsafe interchange to routes 148 and 453 at Westminster Bridge under the railway bridge at Lower Marsh.	An alternative would be to interchange between route C10 and routes 148 or 453 at Westminster Bridge / York Road / Lambeth Palace Road. Towards Canada Water passengers could alight route C10 at St Thomas' Hospital / A&E Department (stop C) on Lambeth Palace Road and board routes 12, 148 or 453 at St Thomas' Hospital / County Hall (stop E). They are about 190m apart and Westminster Bridge Road would need to be crossed at a controlled pedestrian crossing. In the other direction they would alight routes 12, 148 or 453 at St Thomas' Hospital / County Hall (stop D) and board route C10 at County Hall (stop G) on York Road. They are about 330m apart and Westminster Bridge Road and York Road would need to be crossed at controlled crossings. All these stops have seats and shelters.
It was suggested that altering the routeing of the C10 near Tate Britain would be easier to operate, making the route more efficient.	Options to reroute the C10 will be investigated in more detail with the operator and City of Westminster.

3.2.3 South London area – Waterloo – routes 59, 133 and 521

Issue	Response
Route 59	
Proposed changes to route 59 would remove a direct link between stops south of Waterloo and Russell Square and Euston – this would also affect access to hospital complexes east of Russell Square including Great Ormond Street, and the National Hospital for Neurology and Neurosurgery	There is same stop interchange with other routes such as route 68.
Suggestion that route 59 be extended to Kings Cross via Gray's Inn Road	Running route 59 through to St Bartholomew's Hospital maintains the capacity and links that the 521 currently gives. Changing the route to run along Gray's Inn Road from High Holborn would reduce these mitigations.
Suggestion that route 59 be extended to Streatham Hill train station – in more detail, by running the 59 on a one-way loop via Clapham Park, Sternhold Avenue then Streatham Hill to provide many people with a direct bus service	There is sufficient capacity along Streatham Hill without extending route 59
Concern changes to route 59 would impact route 159 which Streatham residents depended on heavily due to a lack of other transport options	Route 59 will continue to run to and from
Concern at the loss of a direct journey between Streatham and the South Bank if route 59 starts at Clapham Park	Streatham Hill

D / 400	
Route 133	
Concern proposals for route 133 removed a direct and step-free bus service between Liverpool Street and parts of south London, an area with no accessible London Underground route	Route 35 provides an alternative link with same stop interchange. Bank station is newly accessible as well which will enable certain journeys.
General concern about changing bus at Elephant and Castle due to crowded bus stops	The revised proposals materially reduce the degree to which there is additional interchange at Elephant and Castle
Route 521	
Concern a proposed removal of route 521 removes a key, accessible, commuter link between Waterloo, Holborn, City Thameslink, Cannon Street and London Bridge	Other bus routes including re-routed 133 and 59 will provide this.
Concern a proposed removal of the 521 would create a five-minute interchange walk between routes 133 and 59, and capacity issues due to extra passengers	The extension of route 133 to Holborn will cover most broken links and the 59 and 133 extensions will provide sufficient capacity. Customers will be able change between the two routes on their parallel section.
Concern that if route 521 no longer runs, there would not be a bus service between London Bridge and Holborn/ Holborn Station	It is now proposed to run route 133 between Streatham Station and Holborn Station. This will maintain a direct bus service between London Bridge and Holborn/High Holborn
Concern that the removal of route 521 would remove an important link from London Bridge to St Bartholomew's Hospital via Cannon Street	Other bus routes notably re-routed 133 will provide this.
It does not appear possible to efficiently replace route 521 as double deck buses such as the 59 would not be able to access the Strand underpass	Bus services will be removed from the Strand underpass

Suggestion that route 521 be retained, but withdrawn between Waterloo and Holborn, then extended to Oxford Circus to maintain existing links between Holborn and London Bridge and create new links between London Bridge and Oxford Circus

Floot Stroot proposals in general

The revised route 133 will maintain links between London Bridge and Holborn. However, we believe there is little demand for a new through bus service between Oxford Circus and London Bridge. This journey will be able to be made by changing between buses once e.g., between routes 133 and 55 at Holborn Station.

3.2.4 East London area – Fleet Street – routes 11, 26, 211 and 507

East London at night – routes N11 and N26

Fleet Street proposals in general	
Issue	Response
Concern that changes to bus routes in the SW10 Chelsea and West Brompton area would negatively affect access to key medical services at The Royal Brompton, Marsden, and Chelsea and Westminster Hospitals	No route will be withdrawn in the area around the hospitals, the main change will be the restructuring of route 11 which would affect links to the east of Parliament Square
Parson's Green and Sloane Square to assist people needing to	Step-free access at these stations and others must necessarily await additional funding. There is a prioritisation process for this. In February 2022 we completed a public consultation that focussed on the future of step-free access on the Tube. The responses to this consultation will be at the heart of our decision making for years to come https://haveyoursay.tfl.gov.uk/tube-step-free-access
Route 11	
Objection to the removal of route 11 due to the loss of a heritage route number, less frequent buses in the area, and the loss of a link between Victoria Station and Liverpool Street via Westminster and Charing Cross	The restructured route 26 will maintain links between Victoria Station and Liverpool Street via Westminster and Charing Cross. The number 11 will be retained for the Waterloo – Fulham service.

Concern proposals would negatively impact older and vulnerable residents of the World's End estate who may lose direct bus links if routes 11, N11 and C3 are removed	Routes 11, N11 and C3 are being retained in the World's End area
The removal of route 11 would negatively impact school children travelling from Fulham to City of London school	There will be same stop interchange between route 11 and 26 on Victoria Street to maintain these links.
Suggestion that route 11 be diverted via York Road, Waterloo and Southwark Street to London Bridge to recreate a link between London Bridge and Victoria	We believe there is little demand for a new through bus service between Victoria and London Bridge. This journey will be able to be made by changing between buses once e.g., between routes 11 and 381 at Waterloo or between routes 26 and 17 on Ludgate Hill
Suggestion that route 507 be renumbered route 11 to make it simpler for passengers and to retain a heritage route number.	The restructured route between Waterloo and Fulham will be renumbered 11.
Route 26	
Concern about the loss of a direct journey between Hackney/City of London and Waterloo if route 26 is rerouted at Aldwych to Victoria. This was a particular concern for people travelling at night	Routes 76 and 341 will continue to provide a direct service between the city and Waterloo and same-stop interchange is available between the 26 and these routes for journeys between Waterloo and Hackney.
Concern changes proposed to route 26 will lead to longer journey times and an increased chance that buses would be curtailed to maintain reliability	The longer length of route 26 would not reduce reliability as sufficient scheduled layover and run times are proposed.
Route 211	
Rerouting the 211 to Battersea would work better if the service could continue to Waterloo	Serving both Waterloo and Battersea with route 211 would result in either a significant number of broken trips or a very circuitous route with limited appeal.

Concern if the 211 is rerouted at Chelsea Bridge to Battersea Power Station, there would no longer be a direct link between Fulham Road and Victoria	Trips between Fulham Road and Victoria would require customers to change bus between the 211 and route 11, same-stop interchange is provided at a number of stops between the King's Road and Lower Sloane Street.
Concern that if route 211 is diverted it would no longer serve as an alternative to the Underground when Tube services on the Piccadilly and District Lines are disrupted	There are multiple other bus and rail routes that serve as alternatives for many journeys.
More information is requested about the rationale behind the proposal to divert route 211 to Battersea Power Station	Battersea Power Station is a new area of growth that is in relatively close proximity to Sloane Square and Fulham
Suggestion route 211 be terminated at Victoria remove excess buses between Parliament Square and 11 Chelsea Bridge Road to keep a direct journey connection for passengers	The capacity route 211 provides between Sloane Square and Victoria is not required as route 11 provides sufficient capacity for demand for these journeys. Same-stop interchange is available for onward journeys to Victoria and Parliament Square.
Suggestion route 211 is withdrawn between Waterloo and Victoria, and instead extended to Vauxhall via Horseferry Road and Albert Embankment	We think that this would duplicate existing routes.
Route 507	
Concern about crowding on route 507 if this remains a single deck service and is expected to take additional passengers due to proposals for routes 11 and 211	The restructured route 11 (consulted as route 507) will be operated by double deck buses.
Suggestion route 507 is extended to London Bridge via route 521	Route 59 will give the links between Waterloo and Holborn; giving a through service between the restructured 11 and the current 521 corridor is not considered to be a good use of resources.

Route N11	
Route N11 is an important service supporting safe travel for women and girls, and should stay in service	The N11 will continue to run between Ealing
General opposition to the proposed removal of the N11	and Trafalgar Square.
Route N26	
Concern about proposals to change the N26, only required to support the unpopular removal of route N11	Multiple routes will continue to provide a service to/from Waterloo and same-stop interchange is available between the 26 and these routes for journeys between Waterloo and Hackney.

3.3 Comments about the consultation process

Issue	Response
Due to the size of the consultation, and the number of documents to consider, more time to respond should have been provided	The consultation ran for a period of nine weeks and five days from Wednesday 1 June to Sunday 7 August 2022
	We originally planned to run the consultation for six weeks from Wednesday 1 June to Tuesday 12 July, as we considered this would be an appropriate amount of time.
	All our consultations are closely monitored as they progress. This includes the during the part of the process where comments are being invited. This includes looking at activity levels and ensuring people have the information they need to enable them to take part.
	We noted interest in the consultation remained exceptionally high during its first four weeks. In recognition of this continued high level of interest, on Tuesday 28 June we announced that we would extend consultation end date to midnight on Sunday 7 August to ensure people had adequate time to respond.
In the future any large-scale consultations should be open for an extended time period	We agree that what is an appropriate timeline to respond to any consultation is likely to depend on the nature and impact of the proposals. In most cases we have found that six-week consultations are appropriate
Where consultation proposals are complex, a 'dashboard' style arrangement would be useful to assist people wanting to comment on main changes only	We recognise that every London bus customer's journey is unique to them, and it can be difficult to categorise proposals based on a perceived level of change or impact.
	We recognised most respondents would be interested in specific sections of proposals, in the areas of London that were relevant to them.
	To assist people reaching the information of importance to them, we categorised the proposals into 16 neighbourhoods, arranged into quadrants of north, south, east, and west

Issue	Response
	London. This was designed to help break down the documents we produced into easily digestible segments.
When the consultation launched on 1 June, all materials should have been available at the same time – including: • All maps showing the proposed changes • The route-by-route summary of proposals • Easy to Read versions of the detailed proposals • British Sign Language video with audio	At consultation launch on 1 June all the information required to form a response to consultation was provided. We then enhanced this information with different versions of maps to assist the people wanting to comment and the route summary reference guide.
Clearer, more accessible map formats should be made available for future bus consultations	We carefully considered the amount of information to place on to the proposal maps and sought to achieve a balanced level of information.
	We opted not to include every bus route in the area, and only routes with changes proposed. This was to avoid crowded maps or the overuse of colours which may have made it more difficult for some customers to read.
Criticism that proposal maps for north, south, east and west London did not show the overall effect of the proposals on the bus network. For example, all bus routes in the area should have been included, not just those that were part of the consultation	We provided bus route information in three ways to help ensure respondents were able to see the effect the proposals may have on their bus journey. This included neighbourhood specific current and proposed routes, a wider view with proposals categorised into north, south, east and west London, text descriptions and linear current and proposed routes. Copies of consultation materials are included in Appendix C of the consultation report (page 148)
	We are always keen to improve and develop the maps we use and will share this feedback with our cartographers for advice and consideration with future consultations

Issue	Response
Some detailed routes proposal documents were inconsistent with others, in relation to interchange information and time of next bus 'Countdown' facilities	When preparing the detailed route proposal documents, we ensured all information available to us at the time was included.
	However, we recognise it would have been inconvenient for people that did not have all the information they needed to respond.
	Throughout the consultation period respondents are able ask us questions via our website, by telephone, by email or in writing and we encourage anyone requiring further information about the proposals to contact us.
Criticism that the language used in the consultation was considered unhelpful, such as stating the proposals would rationalise and simplify the network. This did not consider that people having to change bus would face a more complicated journey than before	The consultation aimed to provide a balanced view of the need for the changes, while recognising that the proposals may negatively impact some people.
	The text included a section to set out how the proposals might change a bus journey and what mitigations we were considering to minimise any negative impacts, such as the need to change bus.
	The text also included details about the Equality Impact Assessments conducted for the proposals. These documents set out in more detail what positive and negative impacts there may be on individuals with protected characteristics, together with our equality objectives and how we proposed to mitigate any negative impacts.
	In our consultation survey we also noted we recognised the proposals may change the way our customers used bus services and sought to prompt views about what else we could do to make any potential changes easier.

Issue	Response
Suggestion that the bus stop poster publicity used should have: • included route numbers to remove the need to go online to find out which routes were being consulted on • been larger, particularly at busy/key locations • been handed out or displayed inside buses	Due to the large amount of bus routes included in the consultation, we looked at other more concise ways to publicise the consultation.
	Previous feedback has told us that when posters contain too much information, people do not have the time to read all the details
	The provision of a QR code on posters was designed to allow people the convenience of capturing the information they need, quickly.
	For people without the ability to go online, we also included other ways to get more information – this included a telephone line and a FREEPOST address.
	Bus stop posters are typically placed in the bus flag which is an area reserved for operational messages and is a part of the bus stop environment we own and manage.
	In comparison, we do not own all bus shelters at our bus stops and display space at the bus shelters we do own is reserved for advertising (which is also an important revenue stream) or longer- term customer messaging. In a similar scenario, this is also the case for advertising space on board the bus.
	While the distribution of leaflets on board the bus is a valuable suggestion, this was not put into place for the CLBR consultation due to the scale of coverage required and the associated cost.

Issue	Response
Concern that in some instances where bus stops served by routes included in the consultation did not display a poster. All relevant bus stops in the consultation should have had a poster on display	The routes included in the consultation collectively served 3,233 bus stops in London.
	We placed bus stop posters in all stops where space was available. Sometimes space is not available where space is required for operational messages.
	In addition to the bus stop posters, three-sided publicity was displayed on street at a lower level for easier access by wheelchair users. We placed this at the following TfL owned and managed bus stations: Aldgate, Crystal Palace, Canada Water, Euston, Hammersmith, London Bridge, Stratford City, Vauxhall, Victoria, Waterloo, and White City.
General criticism that the outcome of the consultation will not be listened to	A range of concerns were raised in response to the consultation, which we have considered carefully.
	It's important to note that a consultation is not a referendum or a vote. Its purpose is to gather feedback and views from those impacted by our proposals to assist our decision-making process.
	A consultation doesn't simply present a binary vote of support or opposition, rather it provides the detail as to why people may support or oppose a proposal. This detail assists us in determining how we can respond to these concerns and potentially mitigate them.
	To support us in responding to the issues raised in consultation, the Mayor has identified additional annual funding for TfL of £25m per year.
	With this additional funding we have been able to reconsider the scale of the bus proposals, while still ensuring that the bus network matches customer demand, delivers value for money and supports London's recovery.

Issue	Response
Criticism of consultation accessibility for those without access to the internet	We recognise that not everyone has access to the internet and made several channels available through which people could respond to the consultation. This considered people without access to the internet, who were able to have their say via the following methods:
	 FREEPOST Telephone call back service The receipt of paper copies of the consultation and the survey, for return to us, again via FREEPOST
	These methods enabled us to support people without access to the internet, visually impaired people and others with specific requirements to help them participate in the consultation.