ISLINGTON
For a more equal future

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Dear Seb Dance,

TfL Central London Bus Review consultation

Thank you for the opportunity to comment on the Central London Bus Review consultation.

Islington Council supports TfL in its ambition to provide a good quality transport network across all modes including walking and cycling, that fits the post-pandemic needs of Londoners, works towards our shared objectives to cut pollution and carbon emissions, and discourages private vehicle use.

Public transport is vital to how Londoners travel to work, access education and services, and visit friends and family. We are therefore very concerned that the proposals in the Central London Bus Review Consultation includes cutbacks to key bus services, which would have a big impact on connectivity and people's ability to move around the borough and across London. In particular, we are concerned about the impact on those with disabilities, residents on lower incomes, and people who are less mobile, all of whom are more reliant on the good value and high-quality connections that our existing bus service provides. We are also deeply concerned that these proposals would make it significantly more difficult for local people to access Whittington Hospital, St Bartholomew's Hospital and Moorfields Eye Hospital by bus, and could lead to children needing to take several buses to get to school.

Consultation

We would like to thank TfL for hosting a meeting with Islington Council on 28 June to present the details and impacts of the proposed changes affecting the borough to an audience of Ward Councillors. Details of that meeting, and some of the concerns raised, can be found in Appendix 2. We also acknowledge the extension to the consultation deadline to 7 August 2022 and we are using our channels to encourage residents and businesses to respond directly to TfL. However, we remain concerned that it is still a very short period to respond, considering the complexity of the proposals and their impacts. **We would therefore welcome a further extension of the consultation period, alongside a more visually accessible breakdown of the proposals, in order to allow the fullest possible response to the consultation from across the community.**

We have also raised concerns that some of those most likely to be impacted, such as our older residents, are less likely to have access to the online consultation. Anecdotal evidence from Councillors speaking to local people about these proposals suggests that there is still limited public awareness of these plans. Given their scale, we would be grateful for a breakdown of how TfL has reached out to passenger groups less likely to access digital information. **We further propose that TfL hold in-person public information and consultation events at key community hubs to raise awareness and gain additional feedback.**

Given the impacts of the pandemic on TfL's income, alongside the Government's withdrawal of pre-pandemic operational support funding and refusal to provide a fair long-term funding deal, we are sympathetic to the challenges you face. We are clear that it is Whitehall which ultimately bears responsibility for the failure to properly back our public transport network. It is wrong that TfL should be left so reliant on passenger revenue, when virtually every other major public transport network globally receives central government support, and Islington Council continues to call on the Government to back London's recovery with a package of fair funding.

We note also that changing commuter and leisure travel patterns, alongside the improvements TfL has delivered to our rail network, mean it is necessary from time-to-time to re-evaluate whether the bus network is delivering good transport outcomes for Londoners. We recognise the need to balance changes to services in response to severe funding constraints and we share your concerns that the lack of long-term Government support for London will undermine our ability to cut pollution, reduce road danger, and meet our shared 2030 Net Zero Carbon targets.

While we understand these challenges, it is our view that these proposals would cause such significant harm that after careful consideration, Islington Council is unable to support the proposals outlined in the restructure consultation.

Islington's opposition to the proposals

Context and policy aims

We understand that through the proposals, TfL is aiming to ensure we still have a strong bus service to support London's economic recovery, while simplifying the network to ensure buses are operating frequently and reliably in the areas that need them most. However, the corridors that are affected by these changes provide key transport links for local communities. In Appendix 1 we have provided a summary of the impacts that the proposed restructure would have on Islington. As well as providing key strategic links, these routes are vital for connecting residents to essential health services and supporting those businesses that have continued to struggle as a consequence of the pandemic and its aftermath. For this reason, the severance of direct routes and the changes proposed are at odds with our ambition for public transport in Islington.

Previous and pending changes

Since the start of the pandemic, there have been frequency reductions on a number of Islington routes, including 21, N63, 55 (N55), 56, 73, 76, 91, 214 and 259. In November 2021, TfL consulted on proposals to restructure routes 21, 143, 263 and 271 that will affect residents and

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businesses along the Holloway Road bus corridor and Newington Green. We were unable to support those proposals and raised significant concerns about their impact. Since the consultation there have been some alterations to the proposals that respond to the issues we highlighted, but we still have significant concerns about the impact of the changes that TfL proposes to implement early in 2023. It is concerning that TfL is proposing further changes before the full impact of these pending changes is fully understood.

The current consultation represents a much wider proposed restructure of the bus network across central London. If the proposed changes to withdraw and restructure routes goes ahead, many previously direct journeys will require interchange, and there will be some reduction in service frequencies. We appreciate the efforts that are being made to preserve the extent of the bus network, but the scale and impact of many of these changes, particularly on our most vulnerable residents, mean we are unable to support your proposals.

Proposed withdrawal of Route 4

Route 4 is a well-loved, iconic bus service used by local residents to access key destinations throughout Islington, including the Whittington Hospital, schools and work. With the proposed withdrawal of Route 4, alternative routes like the 236 (which is proposed to be extended from Finsbury Park to Archway) will see increased ridership. The 236 is a single deck service, and we have concerns about whether it would have the capacity to serve the needs of those passengers that would be displaced from Route 4. **We are clear in our opposition to the withdrawal of Route 4. However, if this route were to be cut, we would like assurances that the risk of overcrowding will be mitigated by delivering adequate additional frequency and capacity along alternative routes.**

Proposed restructure of Route 259

The proposed restructure of Route 259 (to turn around at Camden Road rather than King's Cross) raises a number of connectivity concerns, including the weakening of bus capacity on Caledonian Road, the loss of bus links on to Woodberry Down and Tottenham, and the failure to propose any compensating measures to make up for these losses. Most worrying of all are the interchanges that would be required to complete certain journeys, involving walking distances of up to 130 metres, traversing uncontrolled crossings to access the 17 or 91 on Caledonian Road (see Appendix 1 for further details). **We oppose the restructure of Route 259. Should the changes go ahead, we would like TfL to come forward with clear mitigating measures to address the loss of connectivity, and to propose significant work on improving the nature, accessibility and road safety of any interchange arrangements.**

Proposed restructure of Route 214

The proposed restructure of the 214 would see the service diverted out of Islington entirely, with a loss of links for communities in the Angel and City fringe area to Moorfields Eye Hospital and destinations across Camden. We also have particular concerns about the impact on school journeys towards Highgate. **We oppose the rerouting of the 214 out of Islington. Should the changes go ahead, we would like TfL to come forward with mitigating measures, with particular consideration given to the possibility of new school services.**

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Other significant restructure concerns

Restructuring, resulting in the need for new and additional interchange, raises accessibility concerns for older residents, disabled residents, pregnant residents and residents with children or luggage, who would be particularly affected by interchanges between bus stops where walking is required. Particularly concerning examples include the previously highlighted issue that would be caused by the curtailment of the 259, while proposals to re-route the 56 would result in St Bartholomew's Hospital no longer being directly served, necessitating significant walking distances from the re-routed 56 or alternative bus routes.

Proposals to re-route the 135 would impact passenger accessibility and increase walking distances to Moorfields Eye Hospital. Where interchanges require walking to different bus stops (rather than the same bus stop), the distance between and number of crossing points must be minimised and clearly signposted and made accessible, for example with dropped kerbs and pedestrian crossings. The journey between bus stops should be at safe locations, that are brightly lit and avoid crossing at busy roads. Interchange at same-stop locations should be strategically located in safe places, and bus stops should be of high quality and have a shelter. **We ask that TfL comes forward at the earliest opportunity once proposals are finalised to work with Islington Council to identify and deliver significant interchange improvements in advance of when they are required.**

Maintaining a sustainable bus network

TfL's stated aim is to provide a reliable, frequent, and safe bus network which meets Londoners' needs. Over the past year, following the strictest lockdown restrictions being relaxed, we saw vehicle use reach pre-pandemic levels, whereas bus trips remained at around 65-75 per cent. More private vehicle journeys will have a detrimental impact on bus service reliability, making the bus unattractive to many people. This risks a cycle of decline, whereby bus ridership and revenues continue to fall, prompting further proposed cuts. Rather than the proposed restructure, we ask that TfL works with the council to identify measures that will improve the attractiveness of bus travel, like those innovations delivered for Route 63, where vehicle innovation has enhanced the user experience and will help attract new users.

In support of the Mayor's Transport Strategy, the Islington Transport Strategy seeks to improve capacity on local bus networks and improve their speeds and reliability to increase trips made by public transport and achieve an ambitious target of 90 per cent of trips in Islington being made by sustainable forms of transport by 2041. We are proud that we have already met the Mayor's 2041 target of 80 per cent, and a good quality bus network is central to this. In response to the pandemic, Islington has accelerated active travel efforts and delivered eight Low Traffic Neighbourhoods and rolled out 35 School Streets covering 36 schools. Reduced bus frequencies and increased need for interchange would undermine our efforts in achieving the Mayor's and Islington's ambitions for active and sustainable travel.

We also have concerns about job losses in the bus industry that could undermine our strategic vision and objectives in Islington's Transport Strategy and the aim to support our local economy

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through access to secure, well-paid and unionised jobs. Investment in the transport sector delivers significant social value and provides economic opportunities for local people and small businesses. We have particular concerns about any impact that the proposals may have on those employed on routes that operate from the Holloway Bus Garage, and **we request assurances that operators will commit to no compulsory redundancies, and a maintenance of the maximum number of roles at the Holloway site.**

We are concerned about the timing of these changes, given that ridership is still recovering, and any growth of overcrowding will have a disproportionate impact on wheelchair and mobility aid users, and those with buggies. Restructuring and simplifying the bus service may reduce the overall resilience of London's transport network, especially when rail and London Underground services are significantly reduced (for instance by industrial action, extreme weather, engineering works, technical problems or security alerts), or road network problems cause delays in other parts of the bus network.

An equal future

Older residents have already experienced changes to the Freedom Pass, restricting AM peak use of buses, and are now required to pay for all public transport during peak hours.

Overall, the impacts of the proposals would see decreases in bus frequencies and an increased need to interchange between services. While the £1.55 Hopper Fare provides for unlimited interchanges within an hour, additional interchanges increase travel times and reduce the convenience and attractiveness of bus travel.

We have identified further implications for passengers that are particularly vulnerable, including the need for interchange bus stops to be as accessible as possible, with bus shelters, seating, and Countdown screens provided and positioned considerately relative to adjacent street furniture. With more interchange passengers would need quality travel information through services such as accessible signage, iBus, the TfL Journey Planner and TfL Go app, to ensure that they are provided with optimised guidance for planning journeys, particularly in relation to where they should interchange.

Bus standing impacts

Bus standing is a sensitive issue for local businesses and communities who have first-hand experience of negative impacts, such as road danger, noise and air pollution. We are unsure where Route 254 would terminate at Finsbury Park and where the 236 would terminate at Archway. If the proposals go ahead, **we would like to meet to discuss how any negative impacts to areas around bus standing sites could be addressed and mitigated.**

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Future changes

Pre-pandemic, Islington had experienced overcrowding on key corridors including Essex Road, City Road / Inner Ring Road, Caledonian Road and Finsbury Pavement. If the steps we are taking to encourage mode shift results in greater demand for public transport, then we could see demand for these services begin to grow again. If the proposals go ahead, we would welcome TfL's assurances that it will always keep the bus network under review and make necessary amendments. We ask that you share the monitoring data with us and provide assurances that you will react quickly to accommodate increases in demand and that you will consider reinstating the pre-restructure services.

We will continue to raise concerns with the Government about the ongoing funding delays and their failure to bring forward a fair, long-term settlement between TfL and the DfT, which is resulting in cuts to our transport network that will make life more difficult for ordinary Londoners, stall our economic recovery and may force people to use cars at a time when the need to decarbonise our transport network is more urgent than ever.

Concluding remarks

As outlined above, we cannot support the proposals as they are. The reduced bus frequencies and increased need for interchange would undermine our efforts in achieving the Mayor's and Islington's ambitions for active and sustainable travel. The proposed cutbacks to key bus services would have a significant impact on local people's ability to move around the borough and access essential services including health and education, particularly for those with disabilities and on lower incomes.

We hope TfL understands our concerns, especially regarding the impacts the changes will have on our most vulnerable residents and that you will not proceed with the Central London Bus Review proposals. If you do proceed however, the council would welcome further meetings to understand how you will address the concerns set out in this letter and its appendices.

Yours sincerely,

Councillor Rowena Champion
Executive Member for Environment, Air Quality and Transport

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Labour Councillor – Barnsbury Ward

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Appendix 1: Impact of the central bus network restructuring proposals on Islington

As detailed in the consultation materials, changes are presented as being in a 'neighbourhood' covering four areas; North, East, South and West. Proposals in the North and East area have a direct impact on bus services in Islington.

The wards affected by network changes proposed for the **North London area proposals for the Caledonian Road area** include Caledonian, Laycock, Holloway, Tufnell Park and Finsbury Park. **The North London proposals for the Euston Road area** would affect Caledonian, Barnsbury, St Peter's and Canalside, Clerkenwell and Bunhill. The key impacts of the North London area proposals include:

- **259 restructure** – cut back from King's Cross to Camden Road resulting in the loss of direct links between King's Cross and Finsbury Park with significant interchange issues at Camden Road.
    - Southbound to get from the 259 at Camden Road (Stop X) to the 17 or 91 Caledonian Road (Stop V), passengers would be required to walk 130 meters, including a signalised crossing of Caledonian Road and uncontrolled crossing of Biddestone Road.
    - Passengers, especially vulnerable people with mobility issues, would find their journeys more difficult and less reliable when waiting for connecting buses. The distance and number of roads to cross between connecting bus stops would increase journey times, affect travel connectivity and make bus travel less convenient.

- **254 restructure** – cut back from Caledonian Road to Finsbury Park, reducing access to Nag's Head, Finsbury Park Station, and the Finsbury Mosque.
    - With buses terminating at Finsbury Park, we would like clarification about where buses would stand and ask that TfL work with the council to ensure there would not be a negative impact on the local area.

- **214 restructure (withdraw from Islington) –** rerouting the service removes it from Islington, resulting in one or two bus changes to complete journeys, including impact on children accessing schools and those accessing Moorfields Eye Hospital.
    - To replicate the existing 214 journey, residents, including many school children, would need to interchange at least once to access schools at Highgate.
    - Between Old Street and Angel, residents would need to access the restructured 205 route on City Road and change at Camden Town onto the rerouted 214.To reach Finsbury Square, passengers would need to use a third service, using the 43 bus between Old Street and Finsbury Square.
    - Overall, the proposals would make journeys more difficult and less reliable when waiting for connecting buses, and would increase journey times, affect travel connectivity, and make bus journeys less convenient.

- **205 restructure** – would no longer provide a direct link to Paddington from Old Street. For same stop interchange passengers would need to use the 30 and 27 to access Paddington.
    - From Mile End to Old Street and Baker Steet to Paddington would require two interchanges, between routes 205, 30 and 27.

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The wards affected by network changes proposed for the **East London area proposals for the Essex Road area** include Hillrise, Junction, Tollington, Finsbury Park, Arsenal, Highbury, Laycock, Mildmay, Canonbury, St Mary's & St James', St Peter's & Canalside and Bunhill. The **East London area proposals for the London Bridge/ Tower Bridge area** would affect Hillrise, Junction, Tollington, Tufnell Park, Arsenal, Holloway, Highbury, Laycock, St Mary's & St James', St Peter's & Canalside and Bunhill. The **East London area proposals for the Commercial Road corridor** would directly affect Bunhill Ward. The key impacts of the East London area proposals include:

- **4 route withdrawn** – important route between Archway and the Whittington Hospital and Blackfriars lost.
    - Passengers travelling between Archway Station and Angel, via Finsbury Park and Highbury Grove (approximately 560 daily trips are made on route 4 currently) would need to change between bus routes 236 and 19 or 43 to complete the journey in the future.
    - Customers who currently use route 4 to travel between Archway and Blackfriars would need to change twice to complete their journey. Between Archway, Finsbury Park travelling on the 236 and 19 or 43. Between Angel and Blackfriars passengers would need to change to the 56.
    - Concerns have been raised about the ability of proposed route 236 to cope with additional passengers as a single decker bus, plus the potential worsening of journey times resulting from extending this route.
    - For vulnerable passengers with mobility issues, bus journeys would be more difficult and less reliable when waiting for connecting buses. The overall impact would be to increase bus journey times, affect travel connectivity and make bus travel less convenient.

- **56 restructure** - would no longer directly access stops that directly serve St Bartholomew's Hospital at Giltspur Street. Access to the hospital would involve walking significant distances from alternative bus stops.
    - The 56 would be extended from St Paul's Station to terminate at Blackfriars Station to cover the withdrawn route 4 links to Blackfriars Station.
    - To reach St Bartholomew's Hospital, passengers would alight at the Museum of London (stop BD) which is approximately 600 metres from the former St Bartholomew's Hospital stop (stop HQ). There is another entrance and the main reception to the hospital located on King Edward Street, this is approximately 320 metres from stop BD.
    - Because stop HQ would no longer be served by route 56, customers travelling from St Bartholomew's Hospital would access the 56 from the Little Britain stop (stop SV) on Montague Street, approximately 350 metres from Stop HQ. Stop SV has no shelter or Countdown.
    - To access St Bartholomew's Hospital from Finsbury Park would involve at least one interchange from 19 to the 56 (at Angel).
    - From Archway to St Bartholomew's Hospital would involve at least one interchange from 43 to the 56 (at Angel).
    - For vulnerable passengers, including patients of St Bartholomew's Hospital and other people with mobility issues, bus journeys would be more difficult and less reliable when waiting for connecting buses. The distance and number of roads to cross between connecting bus stops would increase journey times, affect travel connectivity, and make bus travel less convenient.

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- **476 restructure** – would see the withdrawal of the route between Kings Cross and Newington Green.
    - 230 daily trips are made between Kings Cross Station (stops on York Way, Wharfdale Road and Caledonian Road) to stops to Stoke Newington. These passengers would have to walk up to 200 meters to access the route 73 at King's Cross Station (stop E) on Euston Road. It would also be possible to use route 91 to access the 73 bus. However, this would include a circuitous route around the gyratory and a 100 meter walk between Gray's Inn Road (stops R) and stop E, via a signalised crossing at Euston Road.
    - Passengers who currently travel from stops north of King's Cross Station to stops between Stoke Newington and Northumberland Park would need to change twice to complete their journey in the future. Approximately 60 daily trips start from the three stops at York Way, Wharfdale Road and Caledonian Road to stops between Stoke Newington and Northumberland Park. Those passengers who currently use these three stops would need to interchange twice between route 91, 73 and 476 at the locations mentioned above to complete their journey. Passengers willing or able to walk up to 200 meters to access the 73 at Euston Road (stop E) could complete their journey with a single interchange between the 73 and 476.
    - Passengers, especially vulnerable people with mobility issues, would find their journeys more difficult and less reliable when waiting for connecting buses. The distance and number of roads to cross between connecting bus stops would increase journey times, affect travel connectivity, and make bus travel less convenient.

- **43 restructure** – would see the removal of a direct route to London Bridge via Moorfields Eye Hospital, with long additional walks required from the alternative bus routes.
    - Passengers would have to interchange on the Moorgate corridor to access route 141 to continue to London Bridge. We have concerns about an increase in interchange demand on bus stop facilities (size of bus stop vs number of passengers waiting to interchange).
    - For vulnerable passengers, especially those with mobility issues, bus journeys would become more difficult and less reliable when waiting for connecting buses. The proposals would increase journey times, affect travel connectivity, and make bus travel less convenient.

- **135 restructure** – would have an impact on those accessing Moorfields Eye Hospital, with additional walking distance between the bus stops for the current bus routes compared to the proposed alternative bus routes.
    - 312 daily trips are currently made on route 135 to Moorfields Eye Hospital. These customers would need to walk 190 meters from Moorfield Eye Hospital (stop P located along route 205 from City Road). Customers would be required to cross a staged pedestrian crossing to arrive at the previously served stop on route 135.
    - Approximately 640 daily trips are made from Old Street Station (stop D) towards Crossharbour. These customers would need to walk 75 meters from Old Street station bus stop D to bus stop C to use the route 205, via a signalised pedestrian crossing across East Road and crossing at Brunswick Place without crossing facilities.
    - Westbound towards Old Street, customers could alight route 135 at Aldgate East Station (stop F) and board route 205 at Aldgate East Station (stop J). These stops are about 170 metres apart, and the route involves a signalised pedestrian crossing on Whitechapel High Street. Aldgate East Station (stop J) has shelter and seating but does not have Countdown.

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- Eastbound, from Old Street, customers could take route 205 to Aldgate East Station. They would alight the 205 at Aldgate East Station (stop E), and board route 135 at Aldgate East Station (stop H). These stops are about 110 metres apart, via a signalised pedestrian crossing of Whitechapel High Street. Stops E and H have shelters and seating, but Countdown is not available at stop H.
- Eastbound, customers could also interchange between Aldgate East Station (stop E) and Aldgate East (stop C). Interchange requires a 75 metre walk without a road crossing. There is shelter, seating, and Countdown facility at Stop C.
- For vulnerable passengers, including patients of Moorfields Eye Hospital and other people with mobility issues, bus journeys would be more difficult and less reliable when waiting for connecting buses. The distance and number of roads to cross between connecting bus stops would increase journey times, affect travel connectivity, and make bus travel less convenient.

Appendix 2: TfL Briefing to the council

TfL hosted a meeting with the council, including ward councillors on the 28 June at which a number of concerns emerged:

- Concerns were raised about what is being done to increase safety for women and other vulnerable people who would need to interchange buses more.
- Concerns were raised as to whether TfL has undertaken modelling taking into account local changes like the delivery of Low Traffic Neighbourhoods. At a time when people are being urged to drive less, the quality one of the main alternatives, buses, is proposed to be reduced.
- Concerns were raised about the impact of the loss of route 4, as detailed above under Impacts of route 4 withdrawal.
- Concerns were raised about route 236 changes (extending from Finsbury Park to Archway to replace route 4) and its ability to cope with additional passengers as a single decker bus, plus the potential worsening of journey times resulting from extending this route.
- Concerns were raised about whether route 73 would be able to cope with the additional passengers resulting from cuts to route 476 from Kings Cross to Newington Green.
- Concerns were raised about how much longer journeys would take for passengers required to interchange at least once and whether this could have been quantified.
- Concerns were raised about whether TfL's capacity modelling had taken into account the cost-of-living crisis and increasing fuel costs that may result in more people choosing to use public transport?
- Concerns were raised about whether capacity modelling of the routes that serve schools, hospitals and main stations had taken into account that these destinations are always busier.
- Concerns were raised about whether the proposed changes, resulting in fewer buses, would negatively impact on the availability of the wheelchair spaces on buses resulting from increased competition for this space between wheelchair users, parents with pushchairs, older people with trollies and travellers with luggage.

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