To TFL Consultations  
Croydon Town Centre Bus Changes  
December 2018  
consultations@tfl.gov.uk

Dear Sir or Madam,

Response to Consultation on Croydon Town Centre Bus Changes

East Surrey Transport Committee represents users of the bus and rail network in the borough of Croydon, parts of Sutton and in North East Surrey. We welcome the opportunity to comment on the proposed Croydon Town Centre Bus Changes and would like to make the following points in our response,

Summary of Objections.

We understand the need to make some changes to the bus routes in Croydon during the construction of Westfield and the closure of the entrance to the Whitgift shopping centre at Wellesley Road. However, we do not believe the scheme put forward in TfL’s proposal is right nor is in the interest of passengers as over 16,000 passengers per day will be inconvenienced and people with reduced mobility will be severely inconvenienced with the loss of almost all same or adjacent bus stop interchanges with passengers having to walk up to 200metres to change buses. There will also be a considerable loss of interchange with the tram.

The proposal recognises the that 190,000 people per day need to cross Croydon, but fails to take into consideration the needs and requirements of passenger to cross Croydon on the individual affected routes especially where there are no alternative routes such 264 and 403. The lack of alternative roads in central Croydon to Wellesley Road, the needs of out-patients, workers and visitors to other hospitals other than Croydon University Hospital, the reopening of Fairfield Halls which has all four routes from West Croydon removed. Nor does it provide additional access to the remaining retail and shopping areas.

Financial and Time Costs: We accept that there is no financial penalty for those passengers that change buses within the hour. However, journeys on routes 75, 154, 250 and 264 may well be over 1hour especially at peak times. Although there may no cost on other routes there is still a time and inconvenience cost factor especially if you need to only go two stops further on and are faced with a 200metre walk between stops.

We believe that the proposals conflict with the Mayors Transport Policy on the Following Grounds:

- It does not encourage people to use public transport by making it more difficult.
- It does not transfer resources from Central London to the outer boroughs
- It reduces public transport in the only London borough that has had an increase use of TfL bus service by 8%.
- It causes considerable inconvenience to people with disabilities and reduced mobility
- It increases pollution and reduces air quality in Croydon Town Centre.
Opportunity to improve services in central Croydon: This reorganisation of buses services should have been used as an opportunity to change the destinations of some bus routes where there are clear alternatives and to improve the Bus network in central Croydon providing new links and journey opportunities. Not as a straight cut in services which looks like a fait accompli as new tenders have already been issued with shortened routes.

Nor does it comply with the Croydon’s Growth Zone which has been agreed by Croydon Council, The Mayor and the Department of Communities and Local Government in which there is a commitment to improve public transport in Central Croydon.

Section 3.4 “The Growth Zone includes a significant investment to the local transport network to cater for the projected growth in residents and visitors. Through the assessment of future growth and travel patterns, a range of schemes have been developed which will ensure people can travel in, out and around Croydon safely and efficiently”.

Summary of Our Alternative Proposals

We would suggest an alternative proposal that reduces the number of buses using Wellesley Road, but maintains all the essential links across Croydon improves connectivity and interchange facilities in central and west Croydon and provides new journey opportunities.

- **Routes 154, 405 and 412** would be diverted from West Croydon to East Croydon to provide new journey opportunities and maintain same or adjacent stop interchange in central Croydon. The additional school journeys from Purley on route 405 would continue to and from West Croydon renumbered 615.

- **Route 403** would continue to West Croydon a there is no alternative route from Sanderstead. This would maintain adjacent stop interchange in central Croydon and interchange with the Overground and Tram at West Croydon and other buses at Wellesley Road.

- **Route 50** would be diverted to Reeves Corner via Tamworth Road. Providing new journey opportunities to Centrale, and Croydon Minster and improved interchange with the westbound tram at Church Street,

- **Route 75** would continue to Fairfield Halls and Croydon College, maintaining same or adjacent stop interchange at Wellesley Road, Fairfield Halls and Central Croydon.

- **Route 250** would continue to Fairfield Halls maintain same or adjacent stop interchange at Wellesley Road and Fairfield Halls.

- **Route 264** would continue to Park Street to maintain same or adjacent stop interchange with south and westbound buses at Park Street and provide a connection to St Georges hospital from all other bus routes.

- **Route 197** would continue to terminate at Fairfield Halls to provide a link from East Croydon station to Fairfield Halls.

- **Route 433** would divert via Fairfield Halls then continue on via the Flyover and Old Town to provide a new link from East and West Croydon to Old Town in line with reconnecting Old Town proposal and additional route to Centrale.

- **Route 109** remains unaltered and continues to stand in Katharine Street.

- **Night routes 250 and 264** remain as now to maintain connectivity and interchange between all night routes as now.

- **Routes 75, 250, 154 and 403** continue to serve Fairfield Halls.
• **Routes 250 and 264** would be diverted from Park Street to Park Lane stop KD as their first stop to reduce out of service running and improve interchange with eastbound buses.

• **Two new bus stands** are required at Dingwall Road and Reeves Corner and the St Georges Walk one can be removed.

## Issues in detail

1. **Too Many people are affected**: The proposal recognises that 190,000 people per day use the bus network to cross Croydon. The Consultation estimates that 91% of passengers would be unaffected only 3% would need to use a different bus and 6% would need to change buses. This based on 190,000 passengers making cross Croydon journeys on all routes. Using the information in the **Equality Impact Statement**, we believe that this is much higher in that 17% of passengers would be inconvenienced which amounts to 16,100 people per day before Fairfield Halls is reopened. An additional 6,000 on routes 264 from Tooting and 403 from Sanderstead must also be affected as they do not have an alternative route and the alternative for routes 75 and 412 are limited.

### Information from the Equalities statement

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Other Routes Not affected

109 & 197

Night Bus/24hr routes N250 and N264 not recorded separately

2. **Information on a number of bus routes are incorrect:**

We also believe that some of the assumptions are wrong in that it the proposal says that some 6,100 passengers on routes 75, 264, 403 and 412 would need to use another route. Yet for routes 264 to Tooting and 403 to Sanderstead there are no alternative routes as they are solo routes. Passengers using route 412 would have opportunity to use route 64 at only one stop in Selsdon. While on Route 75 the only alternative would be 197 for those passengers boarding between Penge and Sunny Bank South Norwood. Route 197 is already a long route and is often full along this stretch and
passenger may not get on the first bus. Route 75 is the only route between South Norwood and Selhurst to Central Croydon the parallel route is the 157 already only reaches West Croydon.

Although there are still 10 routes that cross Croydon from either central Croydon or East Croydon, but these leave from 3 different locations and again at West Croydon they leave from 4 different locations depending or the passengers intended destination. None of them have a coordinated timetable and in the worst possible case a passenger could be faced with a 20 minute wait to complete a short journey of two or three stops. In the case of West Croydon there will no longer be any route to Fairfield Halls, a distinct problem for those with reduced mobility.

3. Why do passenger need to cross Croydon : Passengers from the South need to get to West Croydon to access the shops and offices at the northern end of the town, to interchange with the London Overground and GTR train services to Sutton and Epsom. As the tram runs in a loop round Croydon passengers from eastbound Trams need to interchange with buses at West Croydon or Wellesley Road.

Passengers from the north need to get to shops and offices in the centre of Croydon along with Croydon College, the main council facilities at The Town Hall and Bernard Weatherall House and the entertainment venues which include Fairfield Halls. The Central Library, The Clocktower, The Croydon Museum and the Grants Vue Cinema. They also need to interchange with westbound trams at East Croydon or George Street stops.

We believe the proposal fails to recognise the need of passengers to cross Croydon and the changes will inconvenience in excess 16,100 and this is before Fairfield Halls has reopened which will increase the number of people affected.

4. Fairfield Halls and Croydon College : Today the following bus services serve Fairfield Halls and have done so for many years 75, 154, 250 and 403. These are all well used, they provide an essential part of the cross Croydon network. Under the proposal all four of these routes are removed from Fairfield Halls. This may be only two stops short, but as there will be no connecting services from West Croydon it could add 10 to 15 minutes on to their journey time which would have only taken a couple of minutes if they stayed on the bus.

TfL claim that passengers to these destinations from the 75 and 250 can change buses at West Croydon. **However, there will no longer be any bus routes from West Croydon to Fairfield Halls or Croydon College.** Route 250 is the only direct bus to Fairfield Halls from the north and the main entrance of West Croydon Station. In future passengers for Fairfield Halls and the College will be faced with changing buses and crossing Park Lane by the subway (which is often closed) or on the level across 6 lanes of traffic at the George Street junction.

Passengers from routes 154 and 403 will have to cross 8 lanes of traffic in Park Lane by pedestrian crossing or by subway. In both directions, rather than just one direction with southbound passengers no longer being able to use the stop directly outside Fairfield Halls and the Croydon College an additional distance of around 100 metres.
The terminating of route 197 permanently rather temporarily has some advantages in that it will provide a long asked for bus link from East Croydon to Fairfield Halls which is particularly important for people with reduced mobility who arrive at East Croydon and at present have to get a taxi. It is essential that route 197 picks up passengers from stop KA outside Fairfield halls so that passengers with reduced mobility will have a bus back to East Croydon station without the need to cross 8 lanes of traffic in Park Lane. Again, terminating route 433 at Fairfield Hall also provides a route from East Croydon to Fairfield Halls which would provide a long asked for link from Selsdon and Park Hill direct to Fairfield Halls although a number of passengers would need to use or transfer to the routes 64, 198, 367 & 410 or the tram to reach West Croydon.

5. **Access to NHS Hospitals.** Although with the exception of route 250 the other routes 60, 64, 109, 198 and 289 serving Croydon University Hospital have been maintained and will continue to provide links from Central Croydon and East Croydon to the hospital, although the loss of 250 will reduce the frequency by 8 buses per hour from Central Croydon. Maintaining route 250 to Fairfield Halls will keep this link. However, depending on the needs and the type of treatment residents of Croydon have to attend a number of other hospitals which include St Georges Tooting and Kings College Denmark Hill along with visitors and those that work there.

**St Georges** : The only bus route from both central and West Croydon is route 264 removing this from central Croydon means that there will no longer be interchange between 264 and existing routes 60, 119, 312, 405, 407, 412, 455, 466 and 468 in Katherine Street, Routes All nine routes will lose same or adjacent stop interchange and along with routes 154, 403 which will lose its interchange at West Croydon and will require two changes rather than one along with additional waiting time.

**Kings College** : The only bus route from south, central and west Croydon to Kings College is route 468, although not directly affected by the changes our concern is that with the cut back to West Croydon of routes 50, 75 and 250. Passengers wishing to access Central Croydon from Thornton Heath and Whitehorse Road areas will try and use the quickest route to Central Croydon to avoid having to change at West Croydon. This is the 468 which already has capacity issues, and this will make it harder for existing passengers trying to go to Kings College hospital.

6. **Interchange and connectivity: By terminating routes** 154, 403.405 and 412 in central Croydon. The entire existing same or adjacent stop connectivity in Katharine Street and Park Lane will be lost and replaced by walks of up to 200 metres with the need to cross at least one and frequently two major roads. The common interchange stop for west and southbound buses in Park Street not only loses its same stop interchange, but also loses the 405 and the 412 from the routes that stop there. Although passengers will be able to find a common stop for southbound buses at the next stop at Croydon Flyover this is situated on a narrow pavement and has no bus shelter for inclement weather and of course is another 200m walk and requires crossing at least one or two main roads.
There is one slight exception to this in that the proposal the stand for route 109 moves to Fell Road, but it is proposed to keep the first 109 stop at the present stand in Katherine Street. However, this is also proposed to be the last, first stop and stand for routes 403, 405 and 412 which at present is only large enough for 4 buses at a time. The combined number of buses from routes 403, 405 and 412 are 12 buses per hour in the off-peak and 13 in the peak. These buses have varying layover times from 5 to 12 minutes. We are not sure how the 109 with 10 buses per hour will find room to actually serve this stop at the head of the stand when there are 5 buses already there. This will mean passengers may have to board from the middle of the road or the bus will miss the stop.

Terminating the 50, 75 and 250 at West Croydon creates the problem for passengers that onward buses leave from a number of different locations including West Croydon bus station, Wellesley Road, St Michael’s Road and London Road depending on passengers’ destination. Passengers might be lucky with same or adjacent stop interchange, but on many occasions, they will also be faced with a 100 metre walk and dependent on the service frequency they may be faced with a 15 minute wait. Nor will there be any buses routes from any of these locations in west Croydon to Fairfield Halls or Croydon College. Whereas today they have through journeys or the same or adjacent stop interchange at Wellesley Road to 4 routes.

7. **Night Bus Connectivity:** Today Croydon has a good all night public transport service with all night trains from Central London and Gatwick Airport twice per hour throughout the night between midnight 30 and 04.30. In addition, it has 6 all night buses services all week that serve East Croydon:
   - 64 From Thornton Heath to New Addington,
   - N68 from Old Coulsdon to Tottenham Court Road,
   - 119 from Bromley to Waddon,
   - 250 from East Croydon to Brixton.

All these have good interchange with each other and trains at East Croydon.

In addition three more night bus routes serve West Croydon, Wellesley Road and Central Croydon:
   - N109 Katharine Street to Brixton.
   - 264 Katharine Street to Tooting Broadway,
   - 154 West Croydon to Morden on Friday night and Saturday night,

The following night buses make connections with the All-night Tube on Fridays and Saturdays nights at the following locations:

   - N68 Elephant and Castle
   - N109 and N250 Brixton
   - 154 Morden
   - 264 Tooting Broadway

All these night bus routes make connections with each other at either West Croydon or Wellesley Road. With the cutting back of route 250 and 264 this will be lost as the
majority of night services run every 30 minutes this could mean making two changes instead of one or having to walk between East Croydon and West Croydon either way adding both inconvenience and considerable additional waiting and journey time. Do we really want people and especially vulnerable people at 2.00am in the morning having tramp between East and Central Croydon and West Croydon to change buses?

8. Maintaining Croydon as a Major Retail Shopping Centre: With the closure of the Wellesley Road entrance to the Whitgift Centre it is important for the retail economy of Croydon that there remains good access to the remaining retail outlets in North End and Centrale. The Tram and interchange with the tram becomes even more important as the tram provides access to all parts of the remaining shops with stops in George Street, Church Street, Centrale and West Croydon, The proposal fails to recognise this at all and in fact makes interchange with the tram more difficult for over 16,000 passengers per day. Bus access to and from both central Croydon and Centrale also becomes more important as does access via West Croydon. The cutting back of route 264 removes one of the two routes linking Centrale to central Croydon.

9. Air Quality and bus stands in Central Croydon: The proposal does little to reduce the need for stand space in central Croydon or reduce the out of service running in central Croydon. It keeps in use the poorly located bus stand in St Georges Walk which must be a serious health hazard to anybody working in the offices or the proposed residential accommodation above.

What is the alternative?

We believe there is an alternative that can reduce the number of buses using Wellesley improve the reliability of the bus network, improve the range of journey opportunities continue to serve Fairfield Halls and Croydon college from the north of the borough maintain the night public transport and bus connectivity. Improve interchange with the tram. Improve air quality with changed the bus stand arrangements and reduced out of service running. It would also provide improve bus links to the Croydon Growth Zone areas of Dingwall Road and Lansdown Road.

1. By Route

Route 403 which has one of the largest percentage of carry over traffic should remain at West Croydon as there is no alternative route from Sanderstead and the need to maintain connections with the Overground and eastbound trams at West Croydon and continue to serve Fairfield Halls. Also maintains the link between West Croydon Bus station and Fairfield Halls.

Routes 154, 405 and 412 although a considerable number of passengers use these route to West Croydon a large proportion of these routes do have reasonable alternative routes to West Croydon. Therefore, they should be diverted to East Croydon to provide new journey opportunities and maintain existing north and southbound same or adjacent stop interchange in central Croydon and improve both east and west connections with the tram at East Croydon, while improving access to the Croydon Growth Zone area of Dingwall Road and
THE EAST SURREY TRANSPORT COMMITTEE

Lansdown Road. Route 154 would continue to serve Fairfield Halls *(Driver may be able to use the toilets on East Croydon station).*

**Route 405 school journeys** the existing three school journeys between West Croydon and Purley would remain and be renumbered 615.

**Route 264** Should remain at Central Croydon as there is no alternative route to Tooting and it is the only route for St George’s Hospital it needs to connect with all other buses in central Croydon. It should stand at Fell Road/Flyover to eliminate the existing St Georges Walk Stand and return via Park Lane stop KD to reduce out of service running and make adjacent stop connections with all eastbound Buses 119, 154, 166, 312, 403, 405, 412 and 466. It would still make same stop connections with Routes 60, 109, 407 & 455 at Wellesley Road or West Croydon

**Route 75** Should continue to Fairfield Halls and Croydon College as it has the greatest number of people affected and is the only route from South Norwood and Selhurst as the alternative route 157 already only reaches West Croydon. It would maintain eastbound tram connections at Wellesley Road and not make westbound connections any worse than now.

**Route 50** This should be diverted at West Croydon and continue via Tamworth Road to a new stand at Reeves Corner. This would improve bus access to the remaining shops via Centrale and improve westbound tram connections at Church Street. It would also provide improved bus links to Croydon Minster and it would also provide same stop interchange with route 264 to St Georges Hospital.

**Route 250** Should continue to Fairfield Halls to maintain direct links from Thornton Heath and London Road to Fairfield Halls and Croydon College. It also maintains connection with the eastbound tram at Wellesley Road and makes connections with westbound trams no worse. On leaving Fairfield Halls it should call at stop KA then return via stop KD in Park Lane again making same or adjacent stop connections with eastbound buses and reducing the out of service running in Central Croydon. Routes 60 and 455 will still have same or adjacent stop connections at Wellesley Road or West Croydon.

**Route 197** This route has terminated at Fairfield Halls since August this should continue. However, it should also call at stop KA and KC to provide direct access to and from Fairfield from East Croydon Station which has long been asked for.

**Route 433** The diversion to Fairfield Halls is acceptable as the majority of passengers can use route 64 or change to other routes or the tram at East Croydon to reach West Croydon. This would provide the long asked for direct link to Fairfield Halls from Selsdon and Park Hill. *Also See reconnecting Old Town*

**Route 109** This could remain on its present stand in Katharine Street. *Consideration should be given to the long asked for reinstatement of this route to South Croydon to improve the cross Croydon links from Croydon University Hospital to South Croydon and the restaurant quarter.*
2. Night Bus Routes

N109, 250 and 264 to maintain maxim connectivity and ease of Interchange of the Night public transport and bus network these should remain at their existing terminals or failing that should be diverted to East Croydon.

Other routes 194 If it was deemed that additional bus routes were needed to be withdrawn consideration should be given to route 194 as from casual observations this has the least carry over of passengers between East and West Croydon This could be diverted to Park Street to make connections with other southbound buses and stand at Fell Road/ Flyover and pick up from Park Lane stop KC with route 119.

Reconnecting Old Town : This area which is just half a mile from Croydon Town centre has no public transport at all. A bus to serve this area has been a long-standing request of local residents. Croydon Council have also recently submitted a plan to improve the area including providing it with a bus service. Diversion of route 433 to Fairfield Halls provides the opportunity to extend route 433 to West Croydon via the flyover, Old Town, Centrale and Tamworth Road. This would provide the Old Town area with a direct bus route to both East Croydon and West Croydon. It would provide an addition bus link to the remaining shopping areas via Centrale and passengers from Forestdale especially those with reduced mobility could remain on the bus to reach West Croydon.

3. Bus Stands

This has long been a problem in Central Croydon and the present road layout, location of bus stands and routing causes a considerable amount of out of service running and poor air quality in areas such as St Georges Walk. For over 10 years it has been proposed that additional stands could be provided at Wandle Road near Old Town, However, these would be difficult to access via either Whitgift Street or Scarbrook Road due to their configuration which also now contain many residential properties. This location would also require a lot of out of service running.

Tfl’s stand proposals :

Route 109 stand Katharine Street : To replace the existing 109 stand/stop with a stand for routes 403, 405 and 412, with the 109 standing at the current 50 stand in Fell Road/Flyover. Route 109 would still use the stop at the head of the stand. We believe this is wrong as it will passengers to and from routes 403, 405 and 412 will lose all their existing same or adjacent stop connections both north and southbound, requiring between 100m and 200m walk. In addition, this stand can only hold 4 buses if it is to keep the stop at the head clear. We are of the view that 12 buses per hour on these routes and 10 buses per hour on route 109 will be too many and passengers will often have to step into the road when alighting or boarding a bus.
**The 264 Stand St Georges Walk**: For 154 to replace 264 which at present uses this hastily created stand which cannot be very good for the office or proposed residential accommodation above. You can also see the damage to the underside of the building that this stand along with passing vehicles done.

**Route 75, 250 and 197 Fairfield Halls Bus stand and stop KA**: It is proposed to remove routes 75 and 250 from the stand to make the temporary arrangements for 197 permanent and to remove routes 75, 154 and 403 from bus stop KA leaving no routes from the north or to the south serving Fairfield Halls.

4. **Our Proposals on Stops and Stands**

We believe that if our proposals were adopted that both the St George’s Walk stand and the Wandle Road stands would not be needed.

**New stop and Stand at East Dingwall Road East Croydon for routes 154, 405 and 412**: Diverting these routes to Dingwall Road East Croydon which is lightly used with a new set down stop outside AMP House with a second stop and stand near Carolyn House and the Dingwall Road entrance to East Croydon station. Buses would leave the stop/stand and circulate the roundabout and use the existing southbound stop in Dingwall Road.
This would have a number of advantages by proving both new journey opportunities and better links to central and south Croydon from East Croydon and this part of the Croydon Growth area. *Bus drivers at the stand may also be able to use the toilet facilities at East Croydon.*

To enable these stops and a stand would require a removal of a small section of the northbound cycle lane. There would be no change to southbound cycle lane. To check whether this would cause any problem to cyclist we undertook several hour long surveys of the number of cyclist using both the northbound and southbound cycle lanes.

As you can see from the results only a small number of cyclist using the northbound cycle lane would be affected ranging between 2 and 15 per hour. The studies also showed that traffic in Dingwall Road was considerably lighter than most other roads in central Croydon.

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**New Stand at Reeves Corner for route 50:** Diverting route 50 via the Bus station and Tamworth Road would provide new journey opportunities, access to the shopping area via Centrale and improved westbound tram connections at Church Street along with improved access to Croydon Minster area. We believe there is room to provide a stand here by using the existing 264 stop and 264 stopping at the same stop as 157, 410 and 455 or by using part of the lightly uses loading bay on the opposite side of the road.
Existing 109 stand Katherine Street: Can continue to be used by 109 and N109.

Existing 50 and 264 stand in Fell Road/Flyover: Can continue to be used by route 264 and 194 if diverted.

Existing 75, 250 and 197 stand: Can continue to be used by 75, 250 and 197 and 433 if this route is not extended.

Existing Stop KE Park Street: This would no longer be served by routes 250 and 264 which would stop at stop KD reducing congestion at stop KE and providing same or adjacent stop interchange for Croydon University and St Georges Hospitals with all eastbound buses. This would also reduce out of service running in central Croydon.

West Croydon Bus Station: Would have additional Room for northbound routes 468 and N68.

Yours Faithfully

Charles King

Charles King MBE MA

Chair: East Surrey Transport Committee