



Formal consultation response from Transform Tulse Hill on the proposed SL5 Superloop bus service

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To: Transport for London Consultation Team

From: Transform Tulse Hill – transformtulsehill@gmail.com

This submission constitutes the official, collaboratively drafted response of Transform Tulse Hill, a local community group representing over two hundred members who live and work in and around the Tulse Hill area.

Our primary focus is advocating for enhanced road safety and improved public realm conditions around the Tulse Hill Gyratory, a TfL-controlled Red Route location where reducing casualties and improving the environment for residents and businesses remains a paramount objective.

Our campaign benefits from widespread local support, including the Station to Station Business Improvement District, Norwood Forum, local Members of Parliament, Lambeth Council, and local opposition parties. This response has been endorsed by TTG's Steering Group.

Endorsement of the SL15 proposal

We welcome and support the principle of the proposed new Superloop service. It promises to be exceptionally useful for our residents and workers, providing a much needed, direct connection to the Northern Line via the accessible Clapham South station, as well as significantly improving access to green spaces such as Clapham Common and connections eastwards to Lewisham via West Dulwich and Catford.

The new route will deliver substantial benefits to various customer groups, including older people and disabled people, who will gain access to more locations that are currently only conveniently, or in some cases realistically, accessible by car or by taxi. Furthermore, the increased provision of affordable transport will be a considerable asset to residents on low incomes, including young people and senior citizens utilising free travel concessions, particularly given the high levels of deprivation and income inequality that exist in the Tulse Hill area and surrounding communities.

We concur with TfL that the express service concept, utilising the South Circular corridor, successfully fills a major gap in current local bus provision, helping to encourage more sustainable journeys and reduce crowding and waiting times on existing local routes such as the P13, 160, and 201. It will also provide local train station connections from Tulse Hill, West Dulwich and Forest Hill,

providing better connectivity for commuters and school travel to thousands of school places in the wider Tulse Hill and Dulwich areas. The four Dulwich wards have the highest concentration of non-catchment school places in England with statistically higher rates of pupils being driven to school each day by private motor vehicle.

It will help affect modal shift and contribute to the Mayor's wider ambitions and so we strongly support the SL15 concept.

Issues and suggestions

While strongly supporting the strategic concept, we must draw attention to several practical issues and put forward positive suggestions to refine and improve the current proposals.

1. Integration with possible longer-term gyratory improvements

The combination of the proposed Superloop service and its associated increase in passenger volumes necessitates a holistic approach to managing the Tulse Hill gyratory. We urge TfL to ensure that the proposed Superloop SL15 route provision is fully considered within the ongoing development of the Tulse Hill Long Term Change Project. This second stage design work, including the testing of options such as footway buildouts and bus priority sections, offers a unique opportunity to deliver better bus facilities and encourage increased use of the new service. Such an approach could also provide electric bus charging facilities (see point 4.)

The full benefits of the new route will not be realised if buses get caught in congestion on the Tulse Hill gyratory or pedestrians do not feel safe accessing the stops. By fully considering these points in the round as part of a long-term plan for Tulse Hill, the wide-ranging benefits of the new service can be fully realised with the area becoming a 'Superloop Hub'. This could potentially also offer stops for the SL6 service which currently drives straight through without stopping (see point 7.)

2. The benefits of an integrated and collaborative approach involving the local community

Faster, safer and more accessible walking connections to all the bus stops at Tulse Hill Gyratory from Tulse Hill Railway Station, including those proposed for the new SL6 route, would make this service far more attractive to people travelling from and to this busy area of South London.

An integrated approach, correctly executed, could significantly contribute to increasing public transport usage, reducing reliance on private cars, and achieving our shared aim of transforming Tulse Hill for the better. We seek a commitment to active, ongoing engagement with Transform Tulse Hill, the Station to Station BID, the Norwood Forum, and local elected representatives on this matter.

3. Inadequate passenger facilities and the local impact

We express our concern regarding the currently inadequate passenger facilities at the proposed bus stops. The shelters are limited in size, and the poor placement and scarcity of on-street litter bins result in significant littering around the shelters and into adjacent private gardens. This increases cleanup costs for Lambeth Council and negatively impacts the local area, including reducing its

attractiveness as a place to visit, shop and do business. A better approach must be considered with Lambeth Council and their contractors Veolia - this has the support of our local Ward Councillors who have raised this issue previously on a number of occasions.

We also have observed instances of bus drivers not using the appointed TfL toilet facility on Christchurch Road, instead using local gardens and alleyways. We urge that all bus operators are formally reminded to mandate drivers to use this designated facility only.

4. Green infrastructure and air quality

To mitigate air quality concerns and align with TfL's environmental targets, we request clarification that the new single deck buses for the Superloop service will be fully electric. TfL has committed to ensuring all new vehicles entering service are zero-emission but no information has been provided with the consultation information as to which vehicles will be used, and we request more details are made public.

We wish to raise the all-too-common practice of drivers leaving diesel bus engines idling whilst waiting at Bus Stop E. Given the high levels of air pollution and particulates in this specific location, we require a firm commitment to prevent this unnecessary contribution to poor local air quality.

TfL has evaluated through a trial in Lewisham of green roofed bus stops and has decided not to roll these out across London. This is disappointing and we would encourage TfL to see Tulse Hill as an ideal location for testing out new and innovative approaches for bus shelters, including greenery / planting. There is an active community of volunteer gardeners supported by not-for profit organisations in the area who may be willing to support and maintain any new provision.

Examples already exist of how green infrastructure can enhance a local area, including on Red Routes. TfL and local councils have implemented various green infrastructure projects near busy roads. For instance, Lambeth Council, often with TfL collaboration, has installed dense ivy green screens at the perimeters of numerous schools bordering busy roads like Brixton Hill.

These screens, acting as linear pollution and noise barriers, significantly reduce particulate matter (PM) exposure for pedestrians and students. Larger, more formal green walls have been installed at transport assets like Edgware Road Tube station and near Blackfriars Bridge, serving examples of TfL's efforts to enhance air quality, reduce noise, and boost biodiversity in highly urban areas adjacent to heavy traffic.

We would like to see such options considered for the bus stops that the proposed SL15 service would use and adjacent areas to them, although we understand this would need to be considered as part of a longer-term approach rather than being introduced when the new service commences.

5. Safety and security

There is a high prevalence of crime in Tulse Hill. To help counter this, and support the police, bus shelters could be equipped with CCTV. We note that TfL is doing this elsewhere in London and that measurable benefits have been seen. The trial results have found that 80% of surveyed women feel safer with CCTV at bus stops they use, and in addition 73% would be more likely to use buses if use of cameras was extended.

Introduction of this technology at bus stops in Tulse Hill would help deter crime, which is an issue locally, with the system providing 31 days of recording for police investigations. These cameras have been shown to have a “very positive impact” according to TfL’s Chief Operating Officer.

6. Inaccuracy in consultation materials

We wish to flag an apparent error in the diagram named ‘Proposed Superloop route SL15’, accessed via the ‘Maps and more information button’ on the TfL Have Your Say consultation page.

On the route map, it incorrectly states that both directions of the service will use the bus stop at the Tulse Hill Hotel (Stop A) on this list of stops. The ‘SL15 Geographic map’ is correct).

Due to the one-way gyratory system, the service heading towards Clapham Junction must actually use Tulse Hill Station (Stop E). This inaccuracy could cause customer confusion and should be clarified when the consultation results are made public.

We support the proposed service stopping at Stop A and Stop E.

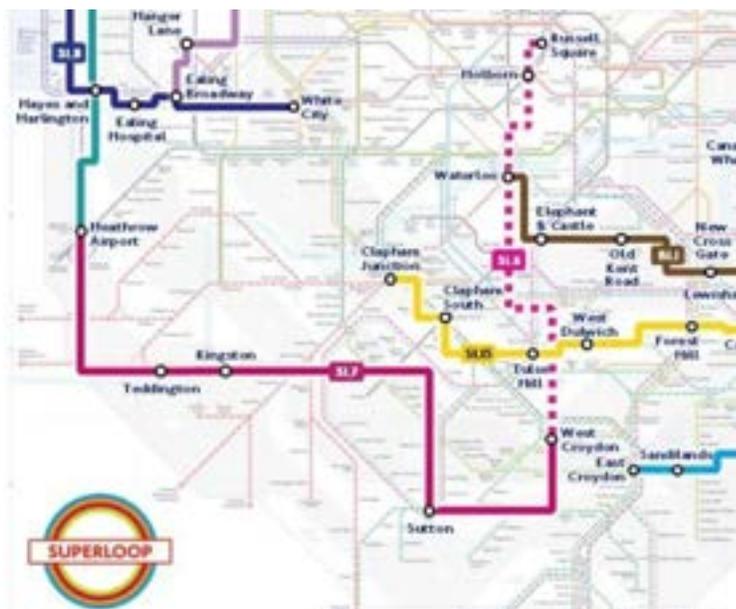
7. Proposal for better use of existing Superloop services for people in Tulse Hill

Finally, we submit a positive proposal for a future service improvement: we suggest that the existing SL6 Superloop service, which currently passes through Tulse Hill without stopping during peak hours, be amended to call at the existing bus stops (F and G). This would immediately open up significant new public transport options for our community, including the potential for passengers to transfer to the SL7 service to Heathrow at West Croydon.

We also note call from some local residents and groups for additional SL15 stops to be included on Christchurch Road - Stop BJ (Christ Church) in St Martin’s Ward and stop BM (Christ Church) in



Streatham Hill East ward. The TTH group has not taken a position on this as the group's focus is the immediate gyratory area only, but generally we support widening access to bus services.



Conclusion

We are excited about the potential for this new express service and endorse the proposal subject to our points and suggestions as made above being considered, and we hope, addressed. Transform Tulse Hill is eager to engage with the next stages of the consultation process and is committed to working constructively with Transport for London to improve transport options for all.

Thank you,

Transform Tulse Hill

