





Hammersmith & Fulham Council  
**Response to the TFL bus review**  
August 2022



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## Foreword from Deputy Leader

“We much appreciate the opportunity to respond to TfL’s bus review.

We fully appreciate the challenges facing TfL. The Covid pandemic has caused fare income to collapse, and the government’s response has been inadequate. While they provided some emergency funding, in return ministers have required TfL to make unacceptable cuts – £400m in less than three years.

Meanwhile, other governments from New York to Paris are funding public transport after the pandemic to maintain services and keep fares low. This is even more important in the cost-of-living crisis.

We are deeply concerned that, without sufficient government funding for their public transport, Londoners will effectively end up paying for the pandemic.

Because pay they will if TfL’s proposals go through unchanged. Our analysis shows that Hammersmith & Fulham’s residents will face significant disadvantage as a result.

Where routes in our borough are to be cut, at least one in ten of the alternative routes proposed will require an interchange – and these may not even be at the same stop. This is particularly hard for elderly and Disabled people. It also increases passengers’ risk at night-time.

Night buses, including to Hammersmith town center, will be significantly reduced. Longer waiting times, longer distances to bus stops and more interchanges will expose passengers to greater risk.

Seventy per cent of current N72 users, for example, will have to change buses to reach their destination. And north of Du Cane Road, passengers will have to walk 600m for an alternative bus.

It is hard to see how this sits with TfL’s ambitions to improve women’s safety.

Meanwhile, changes to the numbers 23 and 27 will make it more difficult for people on lower incomes to get to the Tesco superstore at Earls Court.

These changes will also reduce the appeal of buses for those who can afford to drive. Across the borough, these government-forced cuts may see an increase in polluting car journeys.

The plans will hit hard our poorest residents and key workers, for whom buses are a transport lifeline.

They will affect 22% of H&F's poorest areas. For example, on Clem Attlee Court, our most deprived estate, if the No. 74 is cut, getting to central London will add 15 minutes to people's journey.

For all residents, travelling to Hammersmith and Charing Cross Hospitals could take 15 minutes longer after the 74 goes.

Staff working late shifts at Hammersmith Hospital will be hit when the N72 is cut with no replacement, with new routes and interchanges that will add 15 minutes to their journey.

The plans will also hit elderly and disabled people. Up to 20 per cent of residents affected are Freedom Pass holders. Who may have particular difficulty changing buses – and getting use to new routes – especially when the interchange is not at the same stop.

The plans will also hit the young, not least those travelling to school and college. Up to 9 per cent of passengers affected are Zip card users.

And North End Road Market, which we are doing so much to boost with much-appreciated funding from TfL, will suffer from the cuts to the 74, 211 and 14 as the trip there will take longer and become less attractive.

All this assumes, of course, that the new bus routes operate at the same frequency. But except for the 272, TfL has given no idea of frequency for the routes. Will there be more buses, as many, fewer?

We are also concerned at the lack of evidence in the proposals for the claim that there is capacity on alternative routes for the routes that are being cut.

It is clear from TfL's consultation that the government's failure to fund Londoners' transport properly as we recover from the pandemic will seriously damage Hammersmith & Fulham's vital bus network. It will make life harder and more expensive for our residents, and our streets more polluted.

We set out our arguments in more detail in this submission. We hope they will encourage TfL to think again about its plans for buses in our borough."

**Ben Coleman**

**Deputy Leader, Hammersmith & Fulham**

## 1. Introduction

Transport for London (TfL) have proposed changes to fifteen bus routes within Hammersmith & Fulham. The proposals include withdrawal of five routes: C3, 11, 14, 72 and 74, as well as withdrawal of two-night services: N11, N72.

The London Borough of Hammersmith & Fulham (LBHF) oppose the changes to the services within the borough and affecting our residents. LBHF do not believe that TfL has thoroughly researched or considered the implications of the changes proposed, especially in terms of the impact on people. It should also be noted that taken together these changes are incompatible with TfL's own transport objectives.

This document will detail how the changes disproportionately impact groups that are already disadvantaged and who should be protected from the worst impacts of such changes, for example, those on low incomes, people with disabilities and the elderly.

LBHF appointed consultancy WSP to analyse the impacts of the changes, WSP also produced a technical note for LBHF regarding the proposed changes. The findings from that technical note will be referred to throughout this document. One of the key methods used by WSP was to create scenarios for each of the changes individually and at the same time. These scenarios were then mapped out across the borough and their effect on Public Transport Accessibility Levels calculated using TfL's PTAL guidance found in, *Assessing transport connectivity in London, 2015*. The Index of Multiple Deprivation Data (IMD) from the Office of National Statistics was then used to assess the impact of PTAL changes on protected groups. Full details of the methodologies used by WSP can be found in WSP's technical note which is included as appendix A of this document.

## 2. Policy Context & TfL's Bus Action Plan

2.1 TfL Central London Bus Review seeks to reduce 4% in bus kilometers to achieve the savings that it has been ordered to make by the Department for Transport because of its current financial position. TfL state that since the Covid-19 pandemic bus ridership has fallen, has not recovered fully, and is not expected to.

2.2 Currently in LBHF bus ridership is at approximately 72% of 2019 post pandemic levels. It is essential that LBHF and London continue their recovery from the pandemic. It is important that LBHF and London's recovery from the pandemic is a public and sustainable transport lead recovery rather than a car lead one. The proposed changes are counterproductive to both LBHF and London's post pandemic recovery.

2.3 As highlighted in TfL's Bus Action Plan (2022) the Mayors Transport Strategy sets a target for **80% of trips** in London to be made by walking, cycling and public transport **by**

**2041.** Removing essential bus services in LBHF is not compatible with this target. Residents who can shift to using private vehicles which will often be fossil fuel, those who do not have access to private vehicles will be left with reduced options and increased disadvantage. To make public transport more accessible and appealing for all, frequent and direct buses services must remain in place as a minimum.

### **3. Impacts of Proposed Changes**

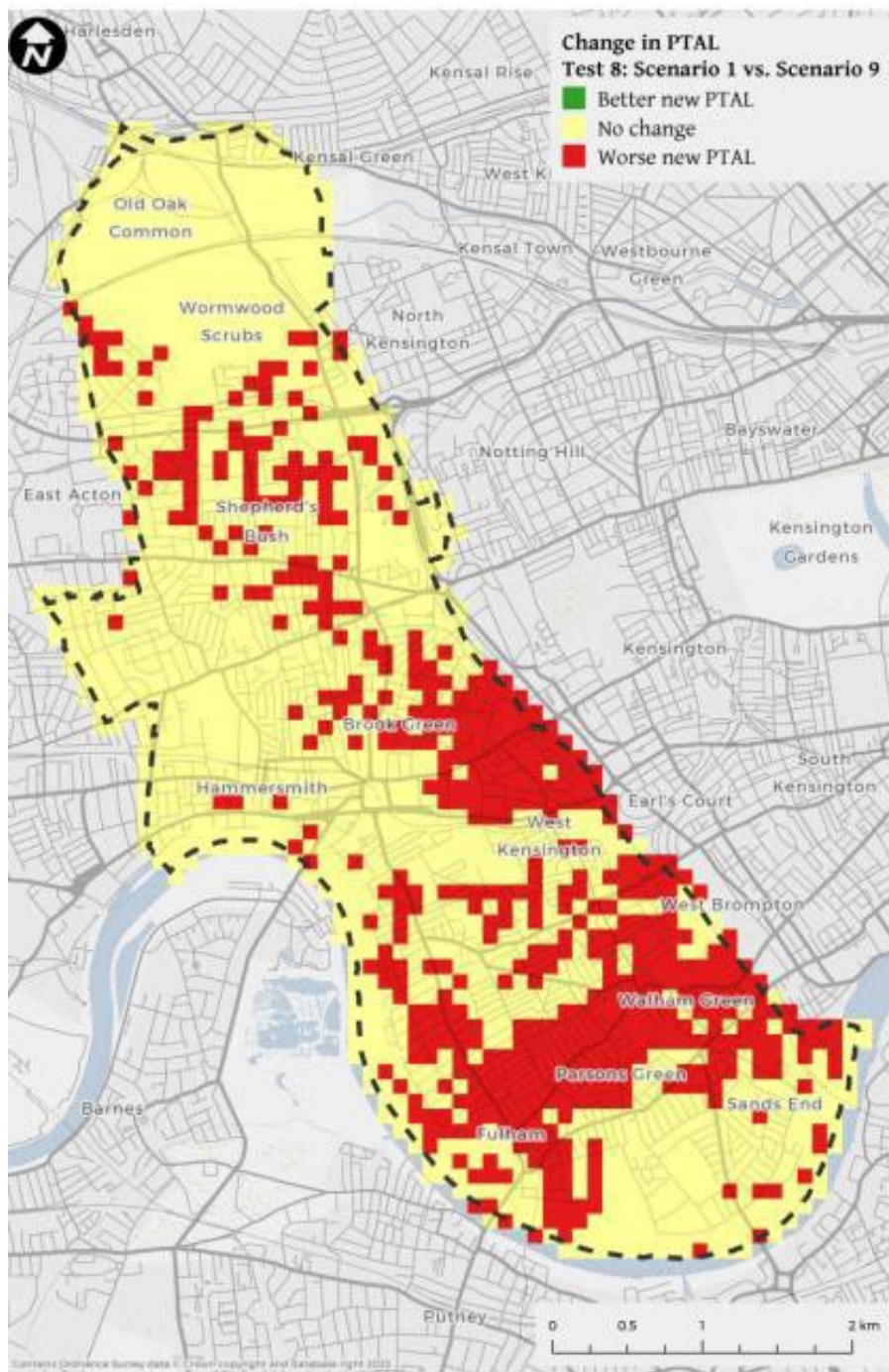
#### **Summary**

3.1 No areas within Hammersmith & Fulham are expected to see an increase in bus PTAL if all changes are applied. However, a considerable proportion of the borough can expect a **decrease in bus PTAL** following implementation of the changes. The changes have the greatest impact in the south and west of the borough and pockets in the north. Examples of areas where bus **PTALs worsen** include Kensington Olympia, West Kensington, the Fulham Road corridor, and pockets within Shepherds Bush / East Acton. The areas where the greatest change occurs do not have a wide range of suitable alternative transport modes, unlike the north of the borough where smaller changes are proposed to be made.

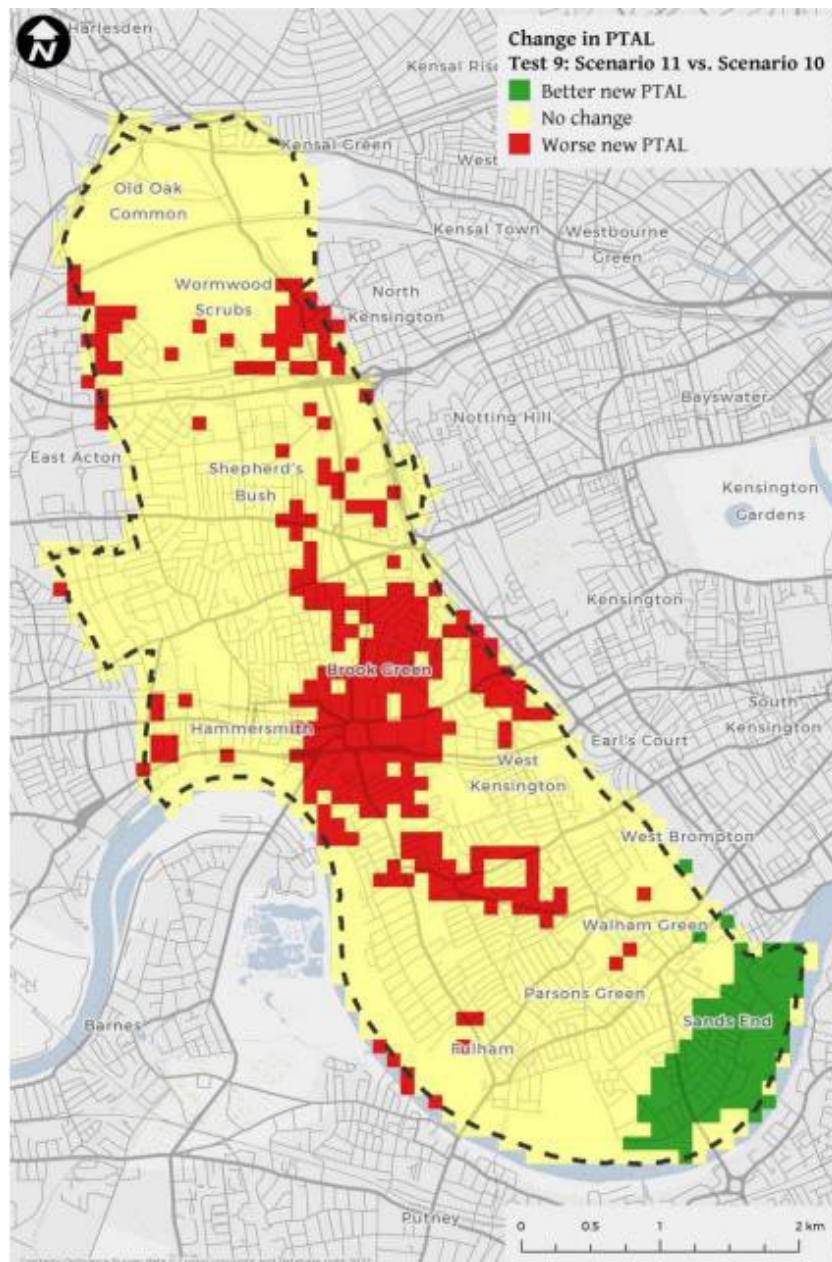
3.2 Both Kensington Olympia and Earls Court where PTAL reductions are proposed are identified in the London Plan as an opportunity area, with development likely to drive up bus demand in the future, reducing bus PTAL in this area would be a missed opportunity to create new neighbourhoods with bus travel rather than private car use at its core.



Map showing impact of all proposed changes if implemented and the effect on PTAL.



Map showing impact of the proposed night bus changes if implemented and the effect on PTAL.



#### 4. Impacts on those who face disadvantage

4.1 Combining analysis of ONS Index of Multiple Deprivation data (IMD) and PTAL analysis has revealed that **12% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for IMD. Areas in the lowest quintile for IMD have multiple deprivation factors that interact to contribute to **disadvantage**. Reducing bus serving to these groups is likely to

further compound this disadvantage. The subsequent analysis explores some of the indices of deprivation in turn – and assesses the impact of the service changes to each group.

### **Income deprivation**

4.2 **13% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for income deprivation. Bus services are particularly important for this group – as they offer lower fares than other public transport services. More than a third of bus journeys are made by Londoners with a household income of less than £20,000. A peak fare Z1-Z2 underground fare costs £3.20, 94% more expensive than a £1.65 single bus journey. Whilst the bus hopper fare might mitigate against the cost of changing buses – some users travelling longer distances (mostly users with no alternative) will be unable to make a change within the 1-hour window of the hopper fare. This doubles the cost of taking public transport for these users. These users are least able to absorb increased transportation costs – costs which already comprise a significant proportion of daily outgoings.

### **Income deprivation affecting older people**

4.3 **42% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for income deprivation affecting **older people**. TfL's data on freedom pass use shows that across the bus routes where changes are proposed – on average 14% of passengers are freedom pass users with the figure as high as 20% on some routes. These users are having difficulty changing buses. Introducing interchanges on established routes increases the cognitive load for those who are more likely to get confused and will be more physically demanding for users with mobility issues.

Older people are particularly reliant on bus services to get out of the house and combat loneliness. Increasing barriers for this group is likely to have negative health and social impacts.

## **Income deprivation affecting younger people**

4.4 **19% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for income deprivation affecting younger people. As previously highlighted, bus services are particularly important for income deprived groups. TfL's data on ZIP card use shows that across the bus routes where changes are proposed – on average 5% of passengers are ZIP card users, with the figure as high as 9% on some routes. These users are likely to have few alternatives to the bus which is always free for ZIP card holders. The proposals are likely to impact students travelling to schools/colleges, who are particularly reliant on bus services. Please see appendix C, the borough's Youth Council have made comments on the proposals as well as attached a petition.

## **Health deprivation and disability-**

4.5 **2% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for health deprivation and disability. TfL's data on freedom pass usage shows that across routes where changes are proposed – 3% of passengers are disabled freedom pass users, with the figure as high as 5% on some routes.

4.6 Bus services are the most accessible mode of public transport that serve all parts of London as part of a comprehensive network. This helps to reduce walking distances at either end of the journey. Low-floor vehicles run on all London buses, which have dedicated wheelchair spaces and access ramps. 52% of disabled Londoners do not have household access to a car and depend on modes like the bus.

4.7 Introducing a requirement to interchange mid-route will be challenging for this group, particularly where same-stop interchange is not available. The changes will also reduce access to healthcare facilities in the borough– with service changes and subsequent PTAL reductions proposed at both Charing Cross and Hammersmith Hospitals.

4.8 The proposed changes will also affect charitable organisations in the borough an example of this is Nubian Life who are situated in White City and are a specialist provider of activity-based care. Nubian Life welcomes clients with a range of health and social care needs such as Alzheimer's, Dementia, physical, visual, and hearing impairments. They have over 25 years of experience and provide day care services for mostly African and African Caribbean residents aged over 65+ within the borough.

4.9 Nubian life has advised LBHF that their clients regularly make use of routes 72, 283 & 211 to access services. These clients are already likely to be disadvantaged due to health, disability plus other factors and would likely be further disadvantaged by cuts to bus services that they rely on.

### **Barriers to Housing and Services-**

5. **22% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for barriers to housing and services. Bus services are particularly important at increasing access to opportunity and essential services. The link between public transport accessibility and economic opportunity is well established. Reducing bus services in areas where these barriers are already substantial will reduce opportunity for disadvantaged groups.

5.1 Bus service changes and resulting **PTAL reductions** are also proposed in **the Kensington Olympia and Earls Court** areas – which are undergoing significant **redevelopment**. Reducing these services would limit access to this new housing and employment opportunity for residents in the borough. Reducing bus service in these areas will also increase the competitiveness of the private car as an alternative for local journeys for occupiers of these developments, making it unsustainable travel behaviour and making it harder to achieve ambitious targets on sustainable mode share.

### **Crime**

5.2 **22% of postcodes** where bus PTALs reduce are in the bottom quintile nationally for crime. Users in these areas will be exposed to greater risk when changing buses or walking further to alternative services. This is particularly important for some protected groups –

who have greater exposure and fear to some forms of crime such as hate crimes or gender-based violence.

5.3 Introducing a requirement to interchange, or requiring users to walk part of their journey, would negatively impact women and members of the LGBTQ+ community who often cite fear of crime as a barrier to using public transport. Almost 70% of users of the N72 will now be required to change services – further increasing anxiety from being victims of crime. These changes do not align with TfL’s very public campaign to raise awareness of Women’s Safety on the London Transport Network.

## 6. Impacts by route

Table 1: Changes to bus routes in Hammersmith and Fulham proposed by TfL

Route	Changes
C3	Withdrawn
11	Withdrawn
14	Withdrawn
72	Withdrawn
74	Withdrawn
N11	Withdrawn
N72	Withdrawn
23 (24hr)	Rerouted
27	Rerouted
49	Rerouted
211	Rerouted
328	Rerouted
430	Rerouted
N27	Rerouted
414	Extended
507	Extended
272	Extended
283	Extended
N430	New
N507	New

6.1 **Bus route 72**-Withdrawing the 72-bus route will impact many residents in the borough. Currently, the 72 bus route travels past Hammersmith Hospital, Latymer Upper School,

White City Station, Westfield Shopping Centre, Shepherd's Bush Station, and Hammersmith Station. Withdrawing this route will affect many LBHF residents, for example students of Latymer Upper School. Latymer Upper School is an independent school and like **53% of independent schools** in Hammersmith & Fulham is **negatively impacted** by the proposals. Pupils attending independent schools tend to be from high income households who are likely to have a high level of car ownership, this makes bus travel less attractive and cuts to bus services will encourage these pupils to be driven to school by their parents/ guardians. This will have a negative effect and is in opposition to the **TfL bus action plan**, causing more congestion in the borough and creating poorer air pollution around schools. This contradicts what LBHF are working hard to deliver in the borough, working with schools to create safer school streets and encouraging more active travel through the STARS accreditation programme and our cycle training programmes.

6.2 In addition, one of LBHF's residents had the following statements to make regarding the 72 bus: **Mr Young:** *"The 72s will be missed because that takes you right to Hammersmith Hospital and the 283 is no good as goes all round the houses. I hope they don't stop the 424s."* Therefore, residents in the borough who have no other means to travel will face difficulty when trying to access hospitals.

6.3 **Bus Route 14-** The 14- bus route serves the following stops: Chelsea and Westminster Hospital, Royal Brompton Hospital and Royal Marsden Hospital. TfL state fewer people are using buses between Fulham and Knightsbridge, via Fulham Road and route 14 is not being used to its full capacity.

6.4 Passengers currently using route 14 between Tottenham Court Road and Russell Square would no longer have a direct bus service to Great Russell Street, Montague Street and Bedford Place. Of the 19,889 trips taken using the 14, 10% (**2,005**) **would involve changing** bus to complete their journey. TfL's data on freedom passes shows that across the proposed route changes **3% of passengers have a disabled freedom pass** and some routes have a high figure of 5%. Therefore, by removing the 14-bus service many disabled residents

may struggle with having to change bus to complete their journey especially where interchange is not available this will reduce their access to healthcare facilities, it is not clear what will be done to mitigate against this.

6.5 In addition, the 14-bus route operates through Fulham making it easier for residents to use the bus route to access other health facilities in other boroughs such as Chelsea and Westminster Hospital, Royal Brompton Hospital and Royal Marsden Hospital. If the 14-bus route is withdrawn this will make it difficult for LBHF residents to travel by bus.

6.6 TfL's Bus Action Plan states that *'journeys by public transport will be pleasant, fast and reliable.'* Removing essential bus routes, does not create a pleasant and fast, reliable service for residents in Hammersmith & Fulham especially if residents are having to make interchanges to complete their journey.

6.7 **Bus Route 74** - Route 74 would no longer run. TfL argues it has excess space on board because they are running more buses than needed between Fulham and Knightsbridge via Lillie Road, this will simplify bus routes in the area and be a more efficient use of resources. Of the 14,311 trips that previously could have been completed using a direct service, **15% (2,147)** of those would now require an **interchange** to complete their journey.

6.8 The following hospitals are impacted by the bus changes: Hammersmith Hospital and Charing Cross Hospital. Patients that are travelling to Charing Cross Hospital will be impacted by a reduced bus frequency on Fulham Palace Road following the withdrawal of the 74. This will mean patients travelling from Central London will need to take the 430 and change to the 414 at High Street Kensington. This is assuming that the 414 bus operates at the TfL definition of 'high frequency' (a bus every 12 minutes), this could add almost 15 minutes to a journey. As indicated in the above paragraphs, having to change buses can be a struggle for residents of LBHF and elsewhere who have disabilities.

6.9 The 74-bus service is an essential route for some students in the borough, as one of our students stated: *'Victor Ramsy: "I rely on the buses to get to school and into town. Especially the 74 – my journey would be way longer if the bus was to disappear for good."* By removing an essential bus route pupils such as Victor will have to find alternative routes to



complete their journey. This will create challenges such as having to travel a longer journey to reach school or having to wake up earlier which will mean pupils will have less rest which could impact on performance in school.

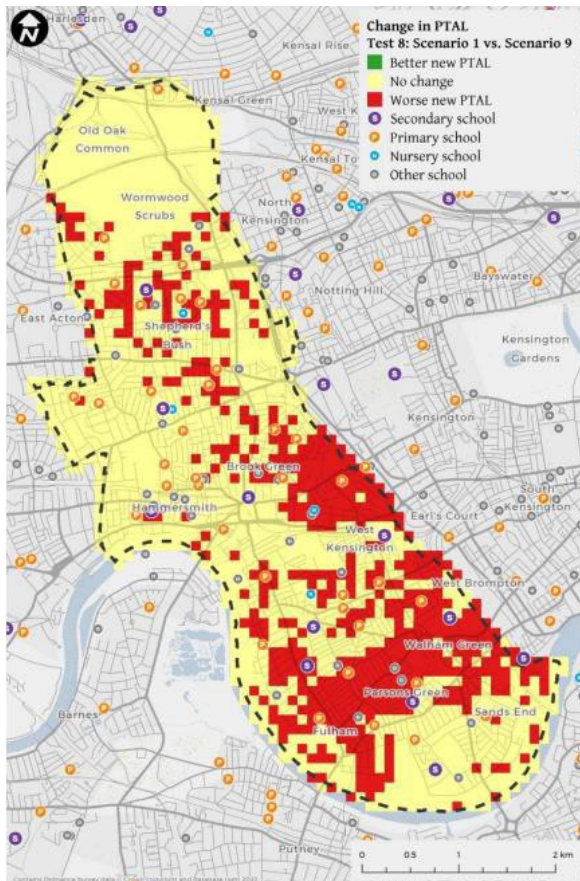
**7. Bus routes N11 & N72** - N11 and N72 night bus services will be withdrawn under the proposals. Between them these two services travel past Charing Cross Hospital, Hammersmith Station, Roehampton University and Queen Mary's Hospital. Cancelling these two integral bus services will affect many health care workers who work late night shifts at the hospitals.

7.1 Bus Action Plan mentions the following: *'our bus network covers the widest area of any public transport mode in London. More than 96 per cent of Londoners live within 400 meters of a bus stop. This ensures almost all Londoners are connected to their local area, wherever they live. Our extensive Night Bus network also supports those working during the night (p, 16).'* However, by removing the N11 and N72 buses the night bus PTAL of Hammersmith Town Centre would be significantly reduced this will result in passengers having to walk further, if they are able, to access a night bus service.

7.2 The area north of Du Cane Road (Hammersmith Hospital is situated here) will not be served by a night bus service at all and passengers will be 600 meters from a stop which is served by an alternative route. Cutting night-bus services creates more challenges for the residents of the borough who will have an increased fear of being a victim of crime whilst travelling for longer distances by foot to access bus services. Increased fear among bus travelers at night will likely have a negative impact on the night-time economy, which is still struggling following the Covid-19 pandemic.

## **8. Impacts on schools**

There are also some very negative impacts on schools in Hammersmith & Fulham. The map below shows all the proposed changes implemented, the effects on bus PTAL and the location of primary and secondary schools within LBHF.



8.1 The analysis shows that the proposed cuts would have a significant negative impact on accessibility of bus services for many of the schools within the borough, particularly those to the south and west, with some schools also impacted in the north. Of the 83 schools in the borough, 41% (34) are expected to experience a fall in bus PTALs following the proposals. Of the schools impacted by the proposals, 18 are state primary schools, six are state secondary and ten are independent schools.

8.2 Our analysis shows that **60%** of the ten **state secondary schools** in Hammersmith & Fulham will be **negatively impacted** by the proposals. Secondary school pupils are particularly reliant on bus services, as many travel to school independently and have no viable alternatives. The proposals are likely to require more pupils to have to interchange as part of their journey, increasing journey times and reducing the attractiveness of bus trips. This may reduce the choice of schools available to pupils within a single bus journey and/or within an acceptable journey time. In addition, increased journey times may expose some school aged children to crime such as gang related violence.

8.3 53% of independent schools in Hammersmith & Fulham are negatively impacted by the proposals. These pupils tend to be from higher income households who have higher levels of car ownership. Making bus travel less attractive may encourage some parents to drive children to school. School run trips are often chained to other trips made by parents/guardians, so any increase in the share of trips by car to school would likely feed through to more car trips to work, to the shops etc. More cars on the road may result in higher levels of congestion and poorer air pollution and bus reliability, making it harder to meet the ambitious targets for sustainable transport usage that we need to meet in order to tackle climate change.

## **9. Impacts on retail and economy**

9.1 The Kensington Olympia/Earls Court area is hit particularly hard by the changes. The Tesco superstore Earls Court is a key grocery location for LBHF residents, particularly lower income residents who avoid more expensive local convenience stores.

9.2 The rerouting of the 27 and the 23 away from the Hammersmith Road corridor will reduce the frequency of buses to this destination from Central Hammersmith increasing journey times.

9.3 North End Road Market is a significant attractor of both visitors and residents and suffers from a drop of accessibility from multiple angles. Removal of the 74 will reduce bus frequency on the Lillie Road corridor to the north and the withdrawal of the 211 and 14 will reduce bus frequency on the Fulham Road corridor. This means that travel to the market will now require a longer wait for a bus. If the bus becomes less attractive to car owners, bus journey time reliability could suffer with the increased number of cars on the road compared to a scenario where progress against the Mayor's Transport Strategy targets is sustained.

9.4 Transport for London's proposed changes will negatively affect both the daytime and night-time economy in Hammersmith & Fulham. Areas designated as development opportunities, such as the Kensington Olympia, West Kensington (including North End Road

Market,) and the Civic Campus on King Street will be particularly badly impacted at a time where businesses are still suffering in the aftermath of the Covid-19 pandemic. Footfall across the borough remains down by 39% compared to pre-pandemic levels and any measures reducing accessibility to key centres will further confound problems. Indeed, findings from the GLA following a Night-Time Economy Surgery in the borough in February 2022, stated that increasing public transport options were key to reviving footfall. Removal of services along the Fulham Road corridor also affect match days at Chelsea Football Club, with reduced public transport options forcing match-goers to find alternative modes of transport, including fossil fuel burning private vehicles, which negatively affect the environment and increase road congestion.

9.5 The Night-Time Economy Surgery report also identified issues around lighting and wayfinding in the borough. The issues have heightened perceptions of a lack of safety for night-workers and women and these concerns are confirmed by GLA data showing 71% of women in Hammersmith & Fulham have experienced unwanted attention in the last 12 months, of which 36% has been of a sexual nature. A Women's Night-Time Safety Survey conducted by the Council found that 74% respondents cited access to public transport as one of the key factors that would make them feel safer at night. Therefore, any removal of night bus services will exacerbate existing problems for women and other vulnerable groups. Furthermore, the Council has signed up to the Women's Night Safety Charter. The charter states that "too many women feel unsafe when travelling, working or going out at night." Again, any removal of night bus services undermines the Council's commitment as a signatory of the charter.

## **10. Impacts on residential and social housing**

The Clem Attlee Estate is in the bottom **10% of IMD nationally** and is the **most deprived** location in Hammersmith & Fulham. Residents here are particularly reliant on bus services, which provide a low cost means of travel. Residents travelling by bus towards Central London will no longer be able to use the 74 which is being withdrawn, and instead will have to take the 430 and change to the 414 at High Street Kensington. Assuming the 414

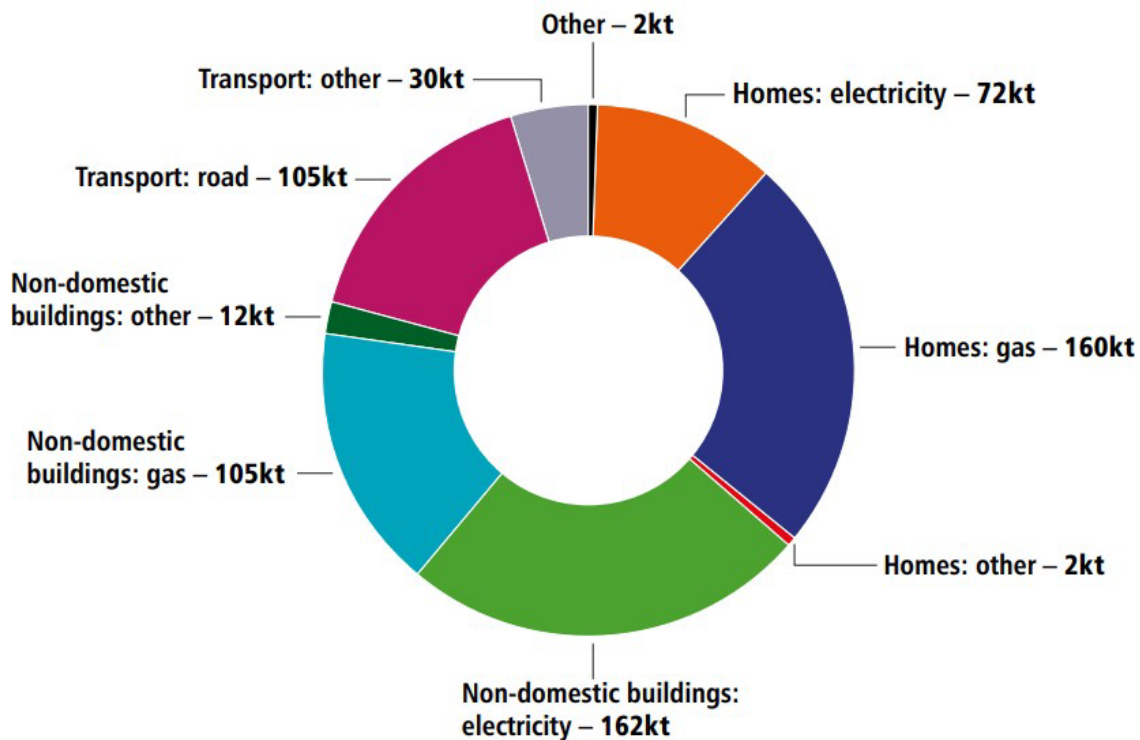
operates at the TfL definition of 'high frequency' (a bus every 12 minutes), this could add almost 15 minutes to a journey. This is before any drops in frequency are considered.

## **11. Impacts on Climate change**

11.1 There are negative impacts on both air quality in Hammersmith & Fulham and climate change. Reducing bus services will result in a higher number of car trips as people switch to alternative modes. Whilst a small proportion of trips may switch to walking and cycling, a higher number are likely to use a car for journeys, particularly in parts of the borough where PTAL levels are already low, and the demographics suggest switching to active travel will be more difficult, especially for longer journeys. The result will be worse air quality, more so as the cost-of-living crisis delays the switch to electric vehicles. The air quality impact will be greater in areas with already worse air quality and a higher proportion of people with underlying health conditions, including older adults. School car traffic is likely to increase with a reduction in bus services just as the council's business plan states a commitment to working with schools to reduce school run traffic and an improvement in air quality around school entrances.

11.2 The impact on climate change will be significant and long-term. Good, efficient, and extensive public transport is crucial in addressing human-induced climate change. If anything, TfL should be working with London boroughs to enhance, expand and improve bus services to enable the switch away from petrol and diesel private transport to shared mobility services like buses that are more efficient at moving large numbers of people. CO2 emissions are likely to increase in line with increases in NOx and PM2.5 and PM10. This will exacerbate and lengthen the prolonged stagnation in emissions reduction from transportation in London, putting the ambitious net-zero London targets at risk.

## H&F borough production-based emissions, 2018 (kilotonnes CO<sub>2</sub>e)



11.3 As shown in the above pie chart, 105 kilotons CO<sub>2</sub> emissions is from Road Transport. Personal travel accounts for 72% predominantly made up of car usage. Our vision for travel in 2030 is for residents and visitors in the borough to take pleasure in travelling by foot, bike, and public transport along safe, healthy, and green streets. However, we cannot achieve this vision if the proposals go ahead. We have a vision for the vehicles on our roads to be fewer and zero carbon.

## 12. Equalities Impact Assessments

12.1 TfL have provided an EQIA for the proposed bus changes on London and TfL have stated the EQIA is an evolving document and will continue to be developed through the

consultation process. TfL have also provided area specific EQIA's for those areas affected by the proposed changes however, none of the provided EQIA's fall squarely within The London Borough of Hammersmith & Fulham and as a result this does not give a full picture of the impacts and mitigations that TfL proposes, once again this suggests that the necessary thought and consideration has not be given to impacts in our borough.

12.2 TfL have identified that women may face greater **safety concerns** because of the proposed bus changes as they may need to wait at a second bus stop especially at night where it is dark and isolated. Also, by withdrawing two of the night bus services this may mean women have to travel further to access a bus stop. Therefore, it is important to not withdraw any of the proposed bus services in Hammersmith & Fulham as this can increase the safety concerns against women travelling during the night.

12.3 In recent news reports there has been several incidents where women have been attacked walking home. For example, there was an incident reported in June 2022 where a 35-year-old was attacked walking home after a night out in Ilford and sadly passed away. Sadly, there was another reported incident earlier this year in March 2022 where 33-year-old women was walking alone at night in South London and went missing, she was also murdered. Continuing report of crimes like this continue to grow fear in women when having to travel alone at night.

12.4 IMD data analysis shows that **22% of postcodes** where bus PTALs would be reduced are in the bottom quintile nationally for crime. Residents of LBHF will be exposed to greater risk when having to change buses or walk further to an alternative service if the proposed changes go ahead.

Route	Total Trips (Current)	% Broken Links*	Broken Links*	% Older Passengers	% Young passengers	% Disabled Passengers
23	15,788	16%	2,496	17%	5%	3%
211	13,898	10%	1,401	20%	8%	3%
11	14,056	4%	589	17%	5%	2%
C3						
27	18,639	7%	1,212	16%	6%	3%
328	20,246	6%	1,131	20%	6%	5%
14	19,889	10%	2,005	14%	5%	2%
414						
74	14,311	15%	2,147	13%	5%	2%
430	14,401	4%	646	17%	9%	3%
72	8,415	1%	91	15%	9%	4%
272						
283						
49	19,669	22%	4,331	15%	6%	2%
N72	190	68%	130	5%	0%	2%
N27	190	20%	40	5%	0%	2%
N11	710	17%	120	5%	0%	0%
23 (24hr)	385	21%	80	10%	0%	3%

12.5 The following table has been extracted from TfL's EQIA. TfL report the number of broken links where a route is being withdrawn or rerouted. This refers to the number / proportion of direct trips that would require 1 or more interchanges to complete a journey following the changes being proposed. As shown, route 211 currently makes 13,898 trips 1,401 of these trips are broken links and this will be affecting 20% of their elderly passengers.

12.6 The N72 currently makes 190 total trips however on the table it shows 0% of young people will be affected. This data does not seem to be accurate, as young people are travelling during the night. It is raising the question on how TfL gathered this data.

### 13. TfL's Consultation methods

13.1 TfL have used bus demand data collected on monitoring corridors to inform where cuts to bus services should fall. None of these monitoring corridors are in Hammersmith & Fulham as far as we can tell. The data from this monitoring exercise was not shared with The London Borough of Hammersmith & Fulham or the public.



13.2 When reviewing the consultation materials that have been provided to LBHF; there appears to be some important omissions of key information needed to aid us in our understanding of the impacts of proposed cuts. For example, where routes are being withdrawn, TfL have suggested there is capacity on alternative routes. However, no evidence has been provided to show that this is the case. Whilst TfL have provided details of the frequency increase on the 272, it should be noted that no details have been provided on the reduction in frequency proposed on any of the other routes.

13.3 How did TfL raise awareness about their consultation to these residents? Have TfL sent letters to residents in the borough on how they can submit their feedback? Has there been any face-to-face consultation groups? LBHF can find no evidence that any of the above has taken place. LBHF are concerned that without this information, many of our residents will not have been given the necessary opportunity to share their feedback on the consultation and will be disadvantaged because of this.

## **14. Conclusion**

To conclude, The London Borough of Hammersmith & Fulham are against TfL's proposal to change the bus services. 16,419 daily trips would no longer be possible without changing bus at least once. As discussed, this will affect our residents especially those who are already at a disadvantage such as those on low incomes, residents with disabilities and the elderly. As examined in this document there are no areas within Hammersmith & Fulham which are expected to see an increase in bus PTAL if all changes are applied. A considerable proportion of the borough can expect to see a decrease in bus PTAL once the changes are implemented. The withdrawal of two integral night bus services will expose users to the risk of crime, gender-based violence as it is requiring residents to walk further and interchange late at night. In addition, this will affect the borough's night-time economy which currently remains low due to the pandemic. By removing these bus services, this will increase the number of trips made by cars and will increase CO2 emissions which the Council are working hard to achieve net zero by 2030. LBHF are asking TfL to reconsider

these proposals and LBHF do not believe TfL have thoroughly researched our borough or the implications on our residents.

## Appendix



A - LBHF London Bus Review Technical Note.pdf



B- Consultation-Principles-Oct-2013.pdf

### Appendix C- Youth Council

“As of 27/07, Transport for London (TfL) is going to completely axe some of the most used bus routes to get from borough to borough, home to school, by the youth of today. Buses like the C3, 14, 11, 72 and 74 are going down, and others like the 430 and 27 are going to be reduced in service.

These routes being removed from service means that students may need to take more than 4 buses to get from Central London to schools like The Hurlingham Academy with a journey length of over 2.5 hours. Students not only will need to wake up extremely early to get certain buses in order to be on time for their vital education (resulting in sleep deprivation), but these students will also be endangering themselves as they need to travel in multiple directions with many bus changes in between, making them more vulnerable to crime and accidents. This is even worse in the winter, where there is only sunlight for 7 hours when students do not travel in, meaning they are in a more dangerous environment.

Alternatives which TfL have proposed are often unreliable, or even completely inaccessible for people in some areas, due to financial reasons and/or physical factors. It is a 10-minute walk from Parsons Green Station to my school and is more expensive than the completely free bus, meaning that some people just can't afford the price they pay in time and/or money to get the education they need. On top of this, we all know that tube strikes are becoming exceedingly more common in recent times, and we all know how detrimental it can be when we can't get from place to place. Now that the alternative to the alternative is gone, what alternative do we have?

The thing that strikes most is that fact that TfL have not considered us, the youth, and decided to kill off some of the most valuable routes that us as students have today. We at the Youth Council of Hammersmith and Fulham has received countless reports on the degrading impacts of these decisions and are actively working with the Hammersmith and Fulham Transport Team to bring these harmful actions to a stop.

### **Youth Council of Hammersmith and Fulham**

“The bus routes 14 and C3 are personally important to me as a lot of my friends use the C3 to travel from the Earl’s Court area towards my school near Wandsworth Bridge. The 14 is also important for connecting Hammersmith and Fulham to central London. The journey from my house to school by bus is a 5am start, takes 2 and a half hours and four buses, one of which is the 14. It has become a vital route for me due to all the tube strikes which also cause more traffic on the roads and prevent multiple buses at full capacity from stopping at bus stops. These transport issues now pose two main problems to young commuters such as myself, the first being the fact we have to wake up from 5am and earlier in order to accommodate new routes and unreliable waiting times, and the second is having to make long walks between bus stops that we now need to change bus routes. This is a particularly big issue for young girls like myself during winter when it gets dark much earlier and the roads become less safe and tube alternatives are not always feasible for young people from poor socio-economic backgrounds. These cuts could end up affecting school attendance as young people may no longer be punctual or able to attend their school due to commuting issues, especially when travelling from outside of the borough. As a result of these transport changes I have one main question: How has TFL determined which bus routes should be axed completely and which ones should be running on reduced services?”

I can only hope that the effects these cuts will have on young people is taken into consideration and a decision is made that benefits all demographics of young people not just within my borough but across London”.

**Kind regards.**

## **Deputy Youth Mayor**

“The cuts will mean that travelling in winter will be a huge safety risk for children and especially if they have to take multiple buses to complete their journey. Additionally, many will need to adapt their morning routines by waking up earlier just to accommodate the cuts in bus services which is just not fair”.

## **Member of Youth Parliament**