

Proposed changes to routes 72/N72 and 283 between Hammersmith and East Acton – London TravelWatch's response

London TravelWatch is London's independent transport watchdog, using evidence to campaign to improve journeys, and advocate for all people travelling in London.

It is in this role that we are responding to TfL's consultation about the proposed changes to routes 72/N72 and 283.

We make the following comments:

Having to change buses

The impact of broken journeys

The Equality Impact Assessment (EqIA) for this proposal states that 151 trips per day on route 72 would be broken. It is unclear how many passengers could take an alternative direct bus when making the journey although there will certainly be passengers who would need to change bus to complete their journey. London TravelWatch knows that passengers don't like changing buses. Time spent doing it is involuntary because having to change is always second best to using a direct service. Changing buses adds extra time to a journey and an uncertainty of timing of the journey. Changing buses can also potentially mean an additional cost for passengers if they go outside of the 60-minute Hopper fare window while waiting for their second bus, particularly at night when buses are less frequent.

Interchange can also be inconvenient and stressful, especially for passengers such as older and Disabled passengers or those with children or luggage, who choose the bus because it is easier for them to use. In this context, it is worth highlighting that TfL note that 15% of route 72 passengers hold the 'Older Person's Freedom Pass'.

Safety concerns

Passengers can be concerned for their safety whilst waiting at bus stops, especially at night, when perpetrators of crime have the benefit of dark streets and fewer bystanders. People don't want to be alone for an extended period as it can feel it invites opportunities for people to take advantage when no one else is around. This is particularly important here as this consultation also covers night bus route N72.

TfL refer to an assessment of the impact on safety of women during hours of darkness (18:00-06:00) but unhelpfully do not state how many women would be affected by this proposal. This section also states that the proposals would not affect

passengers using the night bus network, but we question if that is the case given that night services on route 72 are in scope.

Expected impact on protected characteristics and inclusion groups

The section of the EqlA summarising the customer impacts of the proposal lists the positive impact of increasing route 72's frequency during early hours at weekends. This is welcome even though it will only benefit a relatively small number of passengers. The negative impacts, however, cover broken journeys and longer journey times, which will affect far more passengers

Looking at the analysis by protected characteristics and inclusion groups, the impacts seem to be more negative for every characteristic and group, with few positive impacts listed. Disabled people are expected to be most negatively affected, with eight different negative impacts listed.

Longer (and less reliable?) journeys on revised routes 72/N72

One impact of the proposal to 'rationalise and simplify the network' is an increase of up to 10 minutes of journey times for passengers travelling between Brunel Road and Shepherd's Bush in each direction, and from East Acton/Du Cane Road and Hammersmith. Such a lengthening of the 72 increases the chance that it will become less reliable and that some journeys will need to be curtailed early.

Enigmatically, TfL say the issue of extra journey time when travelling between Brunel Road and Shepherd's Bush 'will be partially mitigated towards East Acton if the Blomfontein routeing is progressed.' But nothing further is said about what that means for Blomfontein Road and how exactly it will help passengers.

If TfL decide to proceed with this proposal

The interchange locations

It is of some reassurance that there is a shelter at each of the four bus stops which TfL have identified for passengers to change bus. It is positive too that three of the stops also have a Countdown screen but we ask TfL to install Countdown at the bus stop which does not currently have real time information (East Acton station/Fitzneal Street, stop H). It is welcome that the location of the bus stops are predominantly overlooked by housing and natural surveillance from traffic and other bus routes. This should help to reassure passengers of their safety when having to change buses, especially late at night.

Frequency, capacity and reliability

It is positive that TfL do not expect that the changes will cause crowding on the revised 72. However, we urge TfL to carefully monitor this and to further increase the frequency of the 72, if required. We also urge TfL to carefully monitor whether the

lengthening of the 72 is affecting reliability and/or requiring journeys to be curtailed early, and to take appropriate action if necessary.

Publicising the route changes

As these are significant changes, should they go ahead, TfL need to ensure that there is clear information about the alternative bus routes at all current bus stops for routes 72 and 283.

Reinvesting savings

TfL have said that this proposal will make savings to help meet financial targets. Whilst it is important to put these savings back into the network, TfL also need to be transparent and communicate with passengers about what it has done and what it has achieved.

Concerns with the EqlA

While we welcome the creation and publication of EqlAs as part of the consultation process, we are concerned about the quality of the document provided, in particular ensuring it is accurate. When reviewing the document we noted multiple errors. For example, reference is made in the section on safety and in the title of the EqlA to routes 27, 30 and 205, which was a previous consultation (not the first time that TfL have incorrectly referenced routes from a previous consultation in an EqlA).

All of this gave us concerns about the credibility of the EqlA as a whole, and so we raised these issues with TfL ahead of the closing date for this consultation, asking for corrections to be made and an updated EqlA published. Shortly before the closing date for feedback for this consultation, TfL provided us with an updated version. While this corrected version is appreciated, there was limited time between receiving this and the deadline for responses, and furthermore at the time of this submission the updated version had not yet replaced the incorrect one on the consultation webpage.

It is vital that information provided as part of all consultations is thorough and accurate, so people can respond with all the information needed to inform their view. It is therefore essential that in future all consultation documents are thoroughly checked, and in any unfortunate instances where information is incorrect, respondents are proactively provided the updated information and given adequate time to amend their response if needed.