

Clements House
14-18 Gresham Street
London EC2V 7PR

Phone: 020 7505 9000
Fax: 020 7505 9003

Our Ref: D/8/7 (GJ)
Your Ref:

25 May 2000

Tom Winsor
The Rail Regulator
1 Waterhouse Square
138-142 Holborn
LONDON
EC1N 2SU

Dear Mr Winsor,

Proposed closure of King's Cross Thameslink station

In accordance with Section 43 (3) (c) of the Railways Act 1993, please find enclosed the Committee's report on the two closure proposals relating to King's Cross Thameslink station.

Yours sincerely,

Rufus Barnes
Director

Suzanne May
Chairman,
King's Cross Thameslink Closures Sub-Committee

Chairman: Sir Alan Greengross Director: Rufus Barnes

The London Regional Passengers Committee is the statutory watchdog protecting, promoting and speaking for the interests of the users of the national rail network and Eurostar in and around London, Heathrow Express, the Underground, Docklands Light Railway, Tramlink, London Transport Buses, Victoria Coach Station and London River Services

London Regional Passengers Committee**Report to the Rail Regulator
under Section 43 (3) (c) of the Railways Act 1993****Proposed Closures at King's Cross Thameslink Station**

1 The closure proposals

1.1 The closure proposals in question are:

- a) Discontinuance of all railway passenger services at King's Cross Thameslink Station, in Pentonville Road, London NW1, with effect from 29 May 2006.
- b) Termination of the use of King's Cross Thameslink Station in Pentonville Road, London NW1, with effect from 29 May 2006.

1.2 The proposals were made under the provisions of the Railways Act 1993, and were supported by the Franchising Director. They were advertised by the Franchising Director on 23 and 30 September 1999, in accordance with the requirements of the Act. The proposals were re-advertised on 1 November 1999.

1.3 They were advertised along with other closure proposals relating to Blackfriars station, London Bridge station and the Farringdon-Moorgate line¹. These other proposals are being considered separately by the Committee, and are not covered by this report.

2 Procedural background

2.1 The Railways Act 1993 establishes a procedure to be followed for closure proposals relating to the national rail network.

2.2 In respect of the proposals in question, the Committee is required (under section 43 (3) of the Act) to:

- a) consider whether or not the proposed closures will cause any hardship;
- b) identify any reasonable means of alleviating any such hardship; and
- c) prepare, and send to the Regulator, a report of the conclusions which it has reached in the discharge of its functions under paragraphs (a) and (b) above.

¹ Document C

- 2.3 For the purposes of (b) above, the Committee is required not to conclude that any particular means of alleviating hardship is reasonable unless, balancing the cost to the Franchising Director (or any other public authority) of employing those means against the benefit of any alleviation thereby secured, the Committee is of the opinion, on the basis of the information supplied to it, that the expenditure involved represents good value for money.

3 Receipt of representations

Closure process representations

- 3.1 Under the statutory closure procedure, objections to the closure proposals are to be sent to the Regulator, who must consider them. (This is a change from the pre-1993 procedure, under which objections were to be sent to the Committee). However, the Regulator must also send copies of the objections to the Committee. Because the Committee has a general duty to consider all the information it receives, it ought to consider the objections too.
- 3.2 A period of six weeks was allowed for objections; this was subsequently extended by about 5½ weeks (see section 6 of this report). The Committee took into account all representations received, whether or not they were ‘duly made’ within the stated time limits. The Committee asked some objectors for further details of their objection or to clarify which of the various closure proposals they were objecting to; not all of these objectors responded.
- 3.3 Forty representations have been made about (or appear to refer to) King’s Cross Thameslink (KXT), of which seven were letters of support for the Thameslink 2000 project and the remainder were (wholly or partly) objections. The letters of support were all from local authorities. Twenty-three objections were from individuals, and the remainder were from local authorities and a range of other institutions.

Transport and Works Act objections

- 3.4 The situation was complicated by the fact that, in parallel to the closure process, Railtrack has applied for a Transport and Works Act (TWA) Order to carry out the Thameslink 2000 works. The TWA process also included a period for lodging objections. Railtrack sent the Committee copies of the TWA objections that it considered relevant to the Farringdon-Moorgate closure proposal.
- 3.5 Some of the TWA objections also mentioned the KXT proposals. There were 22 of these objections. Thirteen were from individuals, and the rest were from a range of institutions.
- 3.6 The Committee asked the Regulator for advice on how these should be considered. In essence, the Committee was directed to take them into account, but should consider for itself how much weight to give them².

² Document B, Annex 1

4 The Committee's consideration of the proposals

- 4.1 The Committee requested, and was granted, an extension of the reporting period, until 5 June.
- 4.2 As allowed for in statute, and in accordance with the Committee's Rules of Procedure, a Sub-Committee was appointed to deal with the KXT closure proposals on behalf of the Committee. (A separate Sub-Committee was appointed to deal with the other closure proposals.)
- 4.3 Members of the Sub-Committee were supplied with copies of all the representations received under both processes that related, or appeared to relate, to KXT.
- 4.4 Members of the Sub-Committee paid a site visit to the area on 14 February. The Sub-Committee met on 1 March to consider the proposals, to hear new or additional representations, and to consider its response. The Minutes of that meeting are attached as Annex 1. The Sub-Committee met again on 23 May to consider a draft report prepared by the Secretariat, to consider further information that had been supplied, and to determine the contents of the final report.
- 4.5 This report should be read in conjunction with the minutes of the meeting on 1 March, and with the documents considered by Members at the two meetings. The Regulator already has a copy of each of these, and members of the public may obtain copies from the Committee Secretariat.

5 Conclusions and Recommendations

- 5.1 The Committee's conclusions, and the reasoning behind them, are as follows. The conclusions are set out in bold type. Although, technically, there are two closure proposals, they relate to a single practical proposal, and one is unlikely to proceed without the other. The Committee therefore considered them as one proposal. Clearly, some conclusions will properly relate to one or other, and some to both.

Importance of one or other station being available

- 5.2 KXT, used by 20,000 passengers per day³, is clearly a very important station, the more so for its major interchange role. St Pancras Midland Road (SPMR) would take over that importance. For neither station to be open would bring difficulty to all its users and considerable hardship to many. Indeed, a number of objectors, seemingly not knowing that SPMR was proposed, referred to the difficulty in (or abandonment of) their journeys in such a situation⁴. It is therefore important that one or other of the stations remains available. The SSRA anticipates that the opening of SPMR will be simultaneous with the closure of KXT⁵. This is welcomed, but the Committee nevertheless feels the matter is so important that this should be guaranteed. As with any major construction project, there is always the possibility of SPMR not being completed to schedule.

³ SSRA Statement of Reasons, page 15, paragraph 5.1

⁴ Document I, section 5

⁵ SSRA Questions and Answers, A25, A31, A34 – Document R, pages 13 and 14

- 5.3 Any closure consent should be made conditional upon SPMR being opened simultaneously with (or before) the closure.
- 5.4 The remainder of this report is based on the assumption that SPMR will indeed be available for passengers.

Adequacy of the SPMR box

- 5.5 The Committee received representations that the SPMR box should have three or four platforms, rather than the two proposed. This would be to provide additional operational flexibility, and also to reduce the likelihood of passengers boarding the wrong train by mistake if trains were running out of sequence. The Committee felt that an additional northbound platform, separating the Midland line trains from the Great Northern line trains, would have been very useful, given that the first stop for a mistaken passenger could be as far away as Luton or Stevenage.
- 5.6 The basic size and design of the box had been enshrined in the Channel Tunnel Rail Link (CTRL) Act 1996; Parliament had therefore approved it. The Committee concluded, with regret, that the design of the box had to be considered as a given, and hence that it could not reasonably make recommendations about it. The Committee was also aware that putting a third track into the box as currently proposed would reduce the platform width, and that the cost of altering the size or location of the box would be very high, as it was bordered by the British Library on one side and the foundations of St Pancras station on the other. There was also the possibility of delay and disruption due to a change in design.

Alternative schemes

- 5.7 The Committee had received a number of suggestions for alternative schemes involving the various railway facilities in the King's Cross area as a whole⁶. The Committee felt that these proposals, which were wildly different from the proposals on the table, were unlikely to happen, and therefore required no further consideration.

Interchange: general comments

- 5.8 In general terms, the Committee felt that the new Underground subways and the new works at St Pancras were likely to have an acceptable ambience; it was the length of these interchanges that would be critical to the conclusions. The Committee accepted that their broad location had been approved by Parliament under the CTRL Act, and hence that they should be taken as a given.

Interchange with other national rail network services

- 5.9 The Committee concluded that interchange between SPMR and the other rail services at St Pancras would be convenient; in the case of Midland Mainline, particularly so. Interchange with the suburban platforms at King's Cross station would involve a shorter walk than from KXT. Interchange with the main line platforms would be longer, as things stand, but this comparison is highly dependent on how the layout of King's Cross changed in the future. A subway route and a street-level route would be

⁶ Document I, paragraphs 4.4 and 4.11

available; both would be of better quality than their current equivalents. There would be no hardship to these passengers.

Access from easterly areas

- 5.10 The Committee concluded that, in comparison to KXT, access to SPMR would be significantly harder for people coming on foot from the areas east, north-east and south-east of the station. The extra distance (about 600 metres, depending on the route taken) would be an inconvenience in itself. Furthermore, at street level they would need to cross at least one busy and difficult road junction, and pass through a somewhat intimidating environment (in terms of the traffic and of the people likely to be encountered on the streets), particularly at night. (Ticket-holding passengers who could cope with steps could alternatively use the connecting subway to the Piccadilly line platforms, if this were retained, although this would involve further extra time.)
- 5.11 **Some hardship would be caused to passengers who currently enter/leave KXT on foot to/from places north-east, east and south-east of the station.**
- 5.12 Retention of the connecting subway is discussed in more detail below. Even if it were retained, many people would prefer (or find it more convenient) not to use the subway, and so the Committee felt that improvements to the street-level access between the easterly areas and SPMR were needed. The phasing of the controlled crossings should be altered in favour of pedestrians. According to Camden Council, this would have no extra cost, although there would be knock-on effects on traffic flows along Euston Road⁷ (the Committee had no further details of these). The Committee acknowledged this, but considered that (in the circumstances) the needs of pedestrians should be put first. Money for other works could be found from Single Regeneration Budget funds. The Committee also considered whether buses might benefit from not having to go around the one-way system at King's Cross Bridge. Camden said that a contraflow bus lane would cost about £100,000, the highway authority was likely to be opposed, and journey time savings were unlikely. The Committee therefore decided not to pursue this measure further.
- 5.13 **The hardship to passengers from easterly directions could be ameliorated by improvements to the ease, quality and perceived security of the street-level walk from Pentonville Road. This should include rephasing the traffic lights at the Euston Road / Pentonville Road junction in favour of pedestrians, and suitable streetscape improvements. [To be funded by Railtrack and/or from regeneration funds, and carried out by Transport for London, by the closure date.]**

Ease of interchange with LUL

- 5.14 Some objectors had referred to the particular importance, and convenience, of the current interchange with the Victoria line at KXT for passengers from various areas of London. The Committee concurred.

⁷ Letter from Camden Council – Document R, page 5. Also meeting on 1 March, Minute 10

5.15 The Committee noted that interchange with the Victoria line would be substantially longer (about 400m compared⁸ to about 100m). Interchange with the Piccadilly line would also be longer (about 350m compared to about 200m), and interchange with the Northern line would change little in terms of distance. The inconvenience would be exacerbated by the likely need to pass through two gatelines and by the increased number of vertical changes. There would be corresponding increases in the time taken for the interchange.

5.16 **Some hardship would be caused to passengers who currently interchange between KXT and the Victoria or Piccadilly lines; the Victoria line in particular.**

5.17 Passengers interchanging with the sub-surface lines would have little change in distance, but the road crossings would be eliminated and, overall, the route would be of better quality.

Interchange with Euston Road and buses

5.18 Interchange between KXT and westbound buses on routes 30, 73 and 214 is very convenient; they stop immediately outside the station⁹. The eastbound buses stop across the road, which is guarded by continuous handrails and so a short diversion is needed to the nearest crossing. Other routes stop elsewhere in the King's Cross area.

5.19 At SPMR, the exit would be a concourse-walk away from Midland Road and Pancras Road. Interchange with buses on these roads could be quite convenient, depending on exactly where the bus stops would be. Interchange with buses on Euston Road would take much longer, due to the distance (about 250 metres) between the two.

5.20 A further difficulty with access to/from westbound buses along Euston Road would be to cross that road, which is wider and (it seems) busier than Pentonville Road. The new subway would offer an alternative stepped route, albeit with some diversion. The step-free route would involve using the controlled crossing at the junction of Euston Road and Pancras Road (assuming this were retained), then going either along Pancras Road to the concourse or through the gallery level of the western ticket hall and into the St Pancras shopping mall.

5.21 For passengers taking buses to/from the east, the in-vehicle time would also be longer.

5.22 **Limited hardship would be caused to passengers who currently interchange between KXT and the buses that serve Pentonville Road.**

5.23 It is not known exactly what the bus routings will be in the area, or where they will stop, from 2006 onwards. However, they are certainly likely to change. Much apparently depends on the outcome of discussions about alterations to the road network in the area¹⁰. The Committee therefore cannot meaningfully suggest possible changes in anything but the most general terms.

⁸ These distances have been estimated by the Committee from a number of the plans in Documents F and L; unfortunately, no comprehensive and up-to-date plan of the existing and proposed interchange subways was available.

⁹ Document F, Diagram 6

¹⁰ Document N

- 5.24 It was suggested that buses along Euston Road carried many passengers to points beyond SPMR, who would disbenefit from any diversion of their buses¹¹. The Committee agreed, and felt that care would be needed to ensure that the bus services provided the best *overall* service. The Committee also felt that the convenient bus stopping arrangements at the Pentonville Road entrance should be maintained, if the latter were retained (as the Committee recommends – see the discussion below).
- 5.25 **The hardship to bus passengers could be ameliorated if, when the bus arrangements in the area are replanned, buses were to stop as close to, and as conveniently for, SPMR as possible. However, this should not be at the expense of the best *overall* service to bus passengers. [To be carried out by London Bus Services, assisted (as required) by the relevant highway authority, by the closure date.]**
- 5.26 See also the discussion (below) of the north-south mall.
- 5.27 There will be no provision under cover for buses in the St Pancras complex, although coaches will have such provision. The Committee regretted this state of affairs.

The mall

- 5.28 All passengers entering or leaving SPMR would use the east-west concourse at ground level in the centre of the St Pancras complex¹². The north-south mall through St Pancras station (in what is currently the undercroft) would be the principal route for SPMR passengers going to/from Euston Road and the Underground's western ticket hall¹³. The Committee was therefore pleased to note that both the east-west concourse and the north-south mall would fall within the statutory closure procedures.¹⁴
- 5.29 The east-west concourse will be the licensed route to/from SPMR. However, the mall (which will be owned by Union Railways (UR)) will not require a licence, and (except if it were proposed for closure) will be outside the Rail Regulator's jurisdiction. The Committee could therefore not recommend conditions regarding that area to be attached to any consent to the current closure proposals.
- 5.30 Many users of SPMR would be likely to want to walk to or from Euston Road, in order to access the Underground, buses or the local area. The walk would be about 250 metres, which would be a particularly substantial distance for passengers with impaired mobility (such as those with luggage). A travelator would be the obvious solution. The Committee was told, however, that UR's aspiration was for an open shopping environment, to which a travelator (or even a series of shorter travelators) would not be suited¹⁵. The Committee concluded, with great regret, that (as the area in question would be unlicensed) it could not take the issue further. It was of concern to the Committee that this technicality prevented the recommendation that would otherwise have been made.

¹¹ Meeting on 1 March, Minute 9

¹² Document Q. Also meeting on 1 March, Minute 4

¹³ Meeting on 1 March, Minutes 4 and 17c

¹⁴ Letter from ORR – Document R, pages 19 and 20

¹⁵ Meeting on 1 March, Minute 4

- 5.31 Under current plans, the north-south mall may be closed at times when there are no international or Underground services¹⁶ – i.e., presumably, the small hours. Thameslink is currently a 24-hour railway, so there would be passengers at that time. The alternative route to Euston Road would be via Midland Road or Pancras Road. It is currently a less than salubrious area, particularly at night, and passengers would need to feel safe. The costs of additional lighting or CCTV would be worthwhile.
- 5.32 **A secure, monitored, well-lit route (whether through the mall or along a street) between SPMR and Euston Road should be available at all times. [To be procured, as necessary, by Railtrack, in partnership with Camden Council and Union Railways, by the closure date.]**

Utility of the Pentonville Road entrance to the Underground

- 5.33 KXT station, and its subway to the Underground, together provide a convenient, dry link to the latter for people from areas to the north-east, east and south-east of the station. In particular, this saves more than 200m of street-level walk (partly doubling-back) to the Victoria line.
- 5.34 The closure of KXT has clearly called into question the link's future. The SSRA is not proposing that the entrance itself be closed¹⁷. LUL will be left to decide whether or not it wants to retain the link, and will be making that decision in due course¹⁸. The entrance would thus remain; closure would require further consent from the Regulator (which may or may not be through the Minor Closure process).
- 5.35 LUL could unilaterally (and entirely legally) decide to close *its* part of the subway. The entrance from Pentonville Road through the part of the station owned by Railtrack would then become redundant, and no doubt closure would be proposed.
- 5.36 LUL had recently undertaken a passenger survey in the subway, to find out what proportion of its users were using the Pentonville Road entrance, rather than interchanging with KXT. The results could not be made available to the Committee in time to be taken into account in this report.
- 5.37 The Committee concluded that the link was useful to existing passengers. The area around the Pentonville Road entrance is also the subject of a regeneration programme. If there are to be new facilities in that area, with additional people circulating, it is important that they have easy access to the Underground. Camden Council said that resources could be found to support the link¹⁹.
- 5.38 Furthermore, train loadings on the Victoria line are heavier at the southern end of the train. The Pentonville Road access feeds the north end of the Victoria line platforms, whereas the existing tube ticket hall feeds the south end. The Victoria line is acknowledged to be congested, and retaining the Pentonville Road access would assist in spreading the loads.

¹⁶ Letter from UR – Document R, page 18

¹⁷ SSRA Statement of Reasons, paragraph 3.1. Also meeting on 1 March, Minute 2

¹⁸ Document L

¹⁹ Meeting on 1 March, Minute 10

- 5.39 The Committee believes the link should be retained, for these reasons. Its loss would cause hardship to people accessing the Underground from the easterly directions. (See also paragraphs 5.11 and 5.22.)
- 5.40 The Committee believes strongly that any closure consent should be made conditional upon the Pentonville Road access being retained as a secure, high-quality entrance and exit to/from the Underground for day-to-day use, and upon suitable ticket office and/or staff accommodation being made available to LUL for operating the entrance.

Retention of KXT

- 5.41 The Committee had concluded that there were a number of sets of hardship that would be created by the closure. This created a *prima facie* case for retaining KXT as well as SPMR. (There is no suggestion that KXT should be retained *instead* of SPMR.) The case is supported by the intended regeneration of the area, which would increase the station's catchment.
- 5.42 There was also a *prima facie* case against. This was that to extend the station to take 12-car trains and to be fully accessible would be expensive and disruptive. If the station was not extended, only 4-car or 8-car trains could stop in the peak, and the additional call only by these trains would, it is claimed, reduce capacity by 4 or 5 trains per hour (tph)²⁰.
- 5.43 Furthermore, some passengers for whom KXT would be more convenient might prefer SPMR for its more salubrious environment (for example, people interchanging to or from buses).
- 5.44 In addition, the current station apparently operates under dispensations from the Railway Inspectorate (HMRI), relating primarily to sub-standard platform widths²¹. However, no-one could tell the Committee whether these had been granted on the expectation that the station would close, or in perpetuity, or on some other basis.
- 5.45 If the line capacity would indeed be significantly reduced, then the Committee would feel that there was far more benefit in having the full train service than in retaining KXT. However, the Committee does not have the technical expertise needed to reach a well-informed conclusion as to whether capacity would indeed be lost. The Committee also acknowledges that the station would have to be operable safely.
- 5.46 To create a fully accessible 12-car station at KXT would cost about £60 million²². The Committee accepted that this would not represent good value-for-money.
- 5.47 This leaves the option of retaining the station as it is, and accepting that 12-car trains would not stop there. The Committee considered two possibilities. One was that if line capacity would actually not be reduced, either in the peak or off-peak, then there would be an 8 tph peak service (with 16 tph being of 12 cars and thus not stopping) and the full 18 tph off-peak service. The benefit would be that the hardships would not happen.

²⁰ Letter from SSRA – Document R, page 6. Also meeting on 1 March, Minute 14

²¹ Meeting on 1 March, Minutes 2 and 3. Also letter from SSRA – Document R, page 6

²² Cost-benefit analysis submitted by SSRA – Document R, pages 7-8

- 5.48 If, however, the line capacity problem were essentially a peak-only issue, there would be the second option of only stopping trains at KXT during off-peak times, during which all 18 tph could call. The benefit would be that the hardships would not happen for off-peak journeys. The problem with this option was that passengers prefer consistency and simplicity in their service provision; an off-peak only station could be confusing, particularly if peak services were disrupted and were 'catching-up' in the early off-peak. There would also be a problem if a 12-car train were used for an off-peak service.
- 5.49 But the station would have an operating cost, under either option. The cost is currently £821,000 per year, and, if the station were retained along with SPMR, would not reduce substantially²³. The Committee felt, given the limitations of KXT and the presence of SPMR, that this cost would probably not be justified in 2006. The Committee therefore does not recommend that the station remains open.
- 5.50 However, the future is uncertain, both in the six years between now and the closure date, and beyond. The area is undergoing substantial regeneration. The possibility of substantially increased demand as a result means that there ought to be the option of re-opening KXT if this was justified in the future. In addition, technological advances, particularly in signalling, might be able to overcome any line capacity problems. The Committee therefore felt that the station facilities should be mothballed, to allow re-opening if this was justified.
- 5.51 The CTRL terminus is due to open in 2007. This is expected to be a major influence on the area's regeneration, and (judging by experience elsewhere) it is likely to take a number of years after that for regeneration to gain its full momentum. A relatively long period of mothballing would therefore be appropriate. The cost would be small.
- 5.52 **Any closure consent should be made conditional upon the station being mothballed for at least ten years after the closure date, and re-opening of the station being kept under review during that period, in the light of demand changes and other circumstances.**
- 5.53 These conclusions are made on the basis of the train service proposed under the Thameslink 2000 scheme. This may or may not actually happen, depending on the outcome of the TWA process. If a different service pattern were the outcome, these conclusions might need to be revisited.

Accessibility of SPMR

- 5.54 The Committee noted, and welcomed, the assurance given by Railtrack that SPMR will be fully accessible²⁴.

Implications for other stations

- 5.55 Objectors had suggested that the closure would increase the numbers of passengers interchanging at Farringdon, due to the changed interchange distances at SPMR compared to KXT.

²³ Letter from SSRA – Document R, page 6. Also information from Thameslink Rail – Document R, paragraph 5.2

²⁴ Meeting on 1 March, Minute 3. See also SSRA Questions and Answers, A26 – Document R, page 13

- 5.56 Separately from the question of interchange distances, a number of people using KXT have ultimate destinations in the Clerkenwell area, including a few around Farringdon, and around or beyond the Angel (Islington)²⁵. The move to SPMR might encourage some of these people to switch to another station, possibly by virtue of the additional walking distance or worse bus interchange, or some other factor.
- 5.57 The Committee was concerned to ensure that LUL could handle any such extra traffic that might occur. LUL did not foresee capacity problems at any stations as a direct result solely of the closure of KXT²⁶.

Disruption during the blockade

- 5.58 There will be a twenty-five week blockade in order for the SPMR box to be built. On current plans, the trains would mostly be turned round at St Pancras from the north and KXT from the south, although some might be turned earlier on both sides²⁷.
- 5.59 Because the blockade is necessary for SPMR, which is to be a replacement for KXT, and because it is to last for a relatively long time, the Committee felt that examination of potential hardship from the blockade was appropriate.
- 5.60 The Committee believes that the blockade will inevitably be disruptive, although it is accepted as a necessary consequence of building SPMR. The Committee disagreed with the suggestion that it should take place in winter, as the airport traffic was far less than the commuter traffic, and there were fewer commuters travelling in the summer.
- 5.61 **Substantial hardship would be caused by the loss of through services during the twenty-five week blockade for building the SPMR box.**
- 5.62 Thameslink is an important through route, and (in particular) serves two airports. During the blockade, existing levels of accessibility should be preserved for passengers who would otherwise travel through (rather than to or from) KXT. This would logically suggest that a fully accessible alternative should be made available.
- 5.63 **The hardship to through passengers who require (or would be assisted by) step-free accessibility would be ameliorated if replacement bus services were operated between appropriate fully accessible stations, using fully accessible buses. The route(s) should take into account the terminating arrangements for the trains. The bus journeys should be as short as possible, so as to minimise the effects of traffic congestion. [To be procured by the train operator(s) concerned, throughout the blockade.]**
- 5.64 The Committee felt that it was important for the passenger-handling arrangements to be properly planned and implemented. The roles of Transport for London (TfL) and LUL will be crucial, as passengers may want (or be directed) to use their services.
- 5.65 **Any closure consent should be made conditional on the Regulator being satisfied that an adequate strategy is in place for handling passengers during the blockade. This strategy should be to TfL's and LUL's reasonable satisfaction.**

²⁵ Statement of Reasons, Figure 5.1. See also Document E, item 4.

²⁶ Letter from LUL – Document R, page 4.

²⁷ Meeting on 1 March, Minute 15. See also SSRA Questions and Answers, A33 – Document R, page 14

- 5.66 During the blockade, through passengers will need to bridge the gap somehow. For some, it will be most convenient to walk between St Pancras and KXT. For others, an alternative route by bus or Underground, by-passing the affected area, might be more useful or even necessary (e.g., for passengers whose trains were turned at Farringdon or Kentish Town). For some passengers, a more substantial diversion, using a wholly different route, might be useful.
- 5.67 The Committee felt that passengers should not lose out financially as a result of the blockade. Tickets should be made valid on appropriate alternative routes (national rail network, Underground and bus). In particular, there are a number of key commuter flows routed ‘not Underground’, which might need to have that restriction lifted. There would be no additional cost to the operators as a whole, although the operators might wish to re-allocate money amongst themselves. The Committee noted a precedent: agreement has been reached between Silverlink and London Transport (LT), to allow a Silverlink ticket to be used on LT services during this year’s blockade of Euston station.
- 5.68 **The hardship from the blockade would be ameliorated if tickets that are valid through the blockade area were to be made valid on appropriate alternative rail, Underground and bus routes.**
- 5.69 **Any closure consent should be made conditional on passengers directly affected by the blockade suffering no financial penalty in respect of transport fares during that period.**
- 5.70 The Committee felt that because of the substantially lower quality of service offered, affected passengers should have reduced fares for the duration. There would be some cost, but the Committee considers it justified.
- 5.71 **The hardship from the blockade would be ameliorated if, by way of recompense, fares on flows likely to be used by affected passengers were to be reduced during that period.**
- 5.72 Members felt that passengers should be offered adequate information on the altered travel arrangements, and also on the full range of alternative routes available to them, in order that they could avoid any congestion between KXT and St Pancras – for example, by using the replacement buses, by changing at Kentish Town onto the Northern line, or by changing at London Bridge.
- 5.73 **Any closure consent should be made conditional on the Regulator being satisfied that an adequate strategy is in place for informing passengers of the blockade and of alternative routes available to them.**
- 5.74 The blockade is currently planned to start in week 120 of the Thameslink 2000 construction works, after completion of works at Blackfriars but during the long period of works at Farringdon²⁸. During the blockade, some Thameslink passengers would prefer to interchange at Farringdon, and (on current plans) others would have to²⁹. Farringdon must be able to cope with the influx. The impact of failure to cope could be felt not just by the diverted Thameslink passengers, but potentially by *all*

²⁸ Meeting on 1 March, Minute 17

²⁹ SSRA Questions and Answers, A33 – Document R, page 14

users of the station, depending on exactly what problems there were and how they were managed.

- 5.75 Railtrack is seeking to ensure that the new interchange between the Thameslink and LUL platforms was available by the time of the blockade³⁰. The Committee believes it important that this is actually achieved – especially given that the timing of the blockade is dictated not by the Thameslink 2000 programme but by the CTRL works.
- 5.76 **Hardship (possibly substantial) would be caused to passengers at Farringdon station during the blockade if the station were not able to cope adequately with any extra passengers using the station as a result of the blockade.**
- 5.77 **This hardship would be reduced by the works being as far advanced as possible by the start of the blockade, so as to give the most freely-flowing and capable interchange possible at the time.**
- 5.78 **Any closure consent should be made conditional on the Regulator being satisfied that the works at Farringdon were sufficiently advanced to allow passengers to interchange reasonably easily during the blockade.**
- 5.79 The termination of most trains to/from the south at KXT would presumably increase the numbers of passengers using the station, which is already crowded. The Committee is particularly concerned about conflicting flows of passengers on the footbridge and elsewhere. Management would be needed to avoid problems from overcrowding³¹. Passenger information must be adequate.
- 5.80 **Hardship (possibly substantial) would be caused to passengers at KXT during the blockade if the station were not able to cope adequately with any extra passengers using it as a result of the blockade.**
- 5.81 **This hardship would be ameliorated by pro-active management of the station to avoid overcrowding, close attention to management of train turn-rounds, and by achieving an appropriate balance between the use of KXT and other stations for terminating trains from the south. [To be carried out by the station operator and train operator, throughout the blockade.]**
- 5.82 Many passengers who would otherwise make Thameslink journeys passing through KXT would want to (or be advised to) walk between KXT and St Pancras during the blockade. The Committee's concerns about that walking route are described above. The Committee feels that an improved route should be available during the blockade. Rephasing the lights and other small physical works might be worthwhile, particularly if they also addressed the permanent hardship to passengers from easterly directions (paragraphs 5.10 to 5.13).
- 5.83 **Limited hardship would be caused during the blockade by virtue of the need for many passengers to walk between St Pancras and KXT.**

³⁰ Meeting on 1 March, Minute 17

³¹ Meeting on 1 March, Minute 15

- 5.84 This hardship would be ameliorated by improvements to the quality of the walking route. [To be funded by Railtrack through TfL, to be complete before the start of the blockade.]

Revised arrangements after closure

- 5.85 The Committee felt that LUL's role as operator of the Underground station complex was vital to both passenger convenience and passengers' safety, and that LUL therefore needed to be satisfied with the operational arrangements. The Committee therefore concurred with LUL's recommendation in this respect.
- 5.86 Any closure consent should be made conditional on agreement being reached between LUL, Railtrack and the relevant train operator(s) regarding revised operational control arrangements and responsibilities.

Ticketing arrangements

- 5.87 The Committee is concerned to ensure that, as a 'replacement' station, SPMR would retain the fare and ticketing regulation as applied to KXT, in order to protect the interests of passengers who would likewise transfer stations. The Committee noted the SSRA's assurances on this subject³², but felt that this should be made a requirement. The Committee's aim is not to lock SPMR into *current* regimes, but rather to ensure that SPMR would be regulated in an equivalent way to the way KXT would have been if the closure had not occurred.
- 5.88 Any closure consent should be made conditional upon the fare and ticket retailing requirements applying to KXT (and flows to/from KXT) immediately before the closure being transferred to SPMR thereafter, as if there had been no change of location.

6 Advertising of the closure proposals

- 6.1 The Committee had been concerned about the SSRA's initial approach to advertising the closure proposals³³. The decision not to put up notices at stations, although legal, went against custom and practice. The SSRA reacted well to these concerns, by seeking to put up posters at all stations with direct trains to KXT, and extending the period for objections accordingly.
- 6.2 There were initially some difficulties with this; some stations required some prompting, and at others the poster was in an insufficiently conspicuous location where hardly a passenger was likely to have found them – in one case, quickly rectified, on a disused platform. The SSRA has no power to require these posters to be displayed, and is dependent on the goodwill of the station operators concerned.
- 6.3 The Committee feels that such problems must be overcome, if passengers are to be given an opportunity for their views to be heard adequately. Informing local authorities and MPs is worthy, but the information does not often filter through to the passenger – as some of the objectors said.

³² Meeting on 1 March, Minute 15

³³ Document J

- 6.4 The style of the posters also needs to be revised. They were hardly eye-catching, and were difficult to comprehend. In this particular case, it was obvious from some of the objections that the lack of reference to SPMR as a replacement for KXT had given some objectors a false impression. More informative posters could help avoid this sort of problem in future.
- 6.5 Attention should also be given to how people who cannot see or read (or understand) posters could be better notified of the closure proposal.
- 6.6 **The current requirements for publicising closure proposals are inadequate. The industry and its regulators should consider how to improve on them – or, at least, improve on the steps taken in practice.**
- 6.7 The cost of improved publicity will be small.