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Proposed closure of parts of the network at Blackfriars and London Bridge stations

In accordance with Section 43 (3) (c) of the Railways Act 1993, please find enclosed the Committee's report on these two closure proposals.

Yours sincerely,

Sir Alan Greengross
Chairman

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**

**Closure of the Network adjacent to Platforms 1, 2 and 3 at
Blackfriars station**

**Closure of the Network adjacent to Platforms 8, 9 and 10 at
London Bridge station**

1 The closure proposals

1.1 The closure proposals in question are:

- a) Closure of the Network adjacent to Platforms 1, 2 and 3 at Blackfriars station, with effect from 31 December 2001.
- b) Closure of the Network adjacent to Platforms 8, 9 and 10 at London Bridge station, with effect from 30 June 2003.

1.2 The proposals were made under the provisions of the Railways Act 1993, and were supported by the Franchising Director. The proposals 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 The closure proposals were advertised along with other proposals relating to King's Cross Thameslink station and the Farringdon-Moorgate branch¹. The Committee will be reporting separately about those other proposals.

2 Procedural background

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

- 2.2 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. 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 objectors responded.
- 3.3 The following representations relating to (or which appeared to relate to) the closure proposals in question had been received:

<i>Closure proposal</i>	<i>Letters of support</i>	<i>Objections (wholly or partly)</i>	<i>Total number of representations received</i>
Blackfriars	8	22	30
London Bridge	7	21	28

- 3.4 The letters of support were from local authorities and from the Thameslink 2000 Consortium. The objections were from local authorities, a range of other institutions and individuals.

Transport and Works Act objections

- 3.5 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. Some of the TWA objections also mentioned the Blackfriars and London Bridge proposals.

- 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.

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 In accordance with the Committee's Rules of Procedure, a Sub-Committee was appointed to deal with the closure proposals on behalf of the Committee. The Sub-Committee also dealt with the proposed closures between Farringdon and Moorgate, in view of the potential overlap between the likely issues; the Sub-Committee will be issuing a separate report on those closures. (A separate Sub-Committee was appointed to deal with the King's Cross Thameslink 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 the closure proposals in question.
- 4.4 Members of the Sub-Committee paid an extensive site visit to the two stations on 21 March. The Sub-Committee met on 3, 5 and 6 April 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 24 May to consider a draft report prepared by the Secretariat and to decide on the final report.
- 4.5 This report should be read in conjunction with the minutes of the meeting on 3/5/6 April, 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 The achievability of 24 trains per hour

- 5.1 The Thameslink 2000 scheme proposes that a service of 24 trains per hour (tph) during the three-hour peaks, and 18 tph off-peak, will operate through the core section (between Blackfriars Junction and St Pancras Midland Road).
- 5.2 A number of objectors doubted that such a service could be reliably operated³. There seemed to be two key sub-issues:
- 5.2.1 The first was the achievability of 18/24tph on a timetabled basis. The focus of objections here was not so much that it could not be achieved 'with everything working OK', but rather that it could not be achieved and maintained in the 'real world' where perturbations will inevitably occur.

² Document B, Annex 1

³ Document M, topic 5. Document N, topic 1. Document O, topic 1.

- 5.2.2 The second was the ability of the core to cope with more serious disruption, such as a train failure. This led to questions about whether adequate turnback facilities would exist.
- 5.3 These issues had implications for the closure process – in particular, whether platforms at Blackfriars and London Bridge would need to be retained in order to provide operational flexibility. Some of these implications clearly affected consideration of possible hardship.
- 5.4 Although most of the objections on this topic (and indeed much of the information the Committee had been given in support of the proposals) showed few technical details, to fully investigate some of the contentious aspects would have demanded a great degree of technical understanding and discussion. Given the Committee’s lay status, and given that the TWA inquiry was likely to discuss these issues in full, the Committee felt that it would not be appropriate for it to give such detailed consideration to the issue.
- 5.5 However, the Committee did consider the *implications for the effects of the closure proposals* of failure to achieve 18/24 tph. In effect, the Committee’s deliberations posited two scenarios, according to whether or not 18/24 tph was found by the TWA inquiry to be achievable. Both of these are reported on below.

6 Conclusions and Recommendations

- 6.1 The Committee’s conclusions, and the reasoning behind them, are as follows. The conclusions are set out in bold type.

The essence of the issue

- 6.2 In a conventional closure proposal, the issue is essentially whether the loss of a service (whether a route or a station) would cause people hardship, and to assess the extent of that hardship. At first glance, that would appear not to be an issue here, because no station or route is proposed for closure. However, the situation is not so simple. According to objectors, people’s services (and/or the adequacy of those services) would be put at risk by the loss of the platforms in question.
- 6.3 The Committee therefore had a difficult task: to assess whether there would indeed be this risk; how significant it was; and whether it amounted to hardship. The difficulty was compounded by the fact that a number of reasons had been advanced for why there was this risk, any or all of which might contribute to the utility of the platforms, and which may or may not collectively justify their retention.
- 6.4 The Committee was not considering the track layouts at Blackfriars and London Bridge *per se*. It was simply considering the proposed closures of particular parts of the network (the tracks at the terminating platforms). However, the closures, and their possible effects, are so bound up with the track layouts that, in practice, the questions required examination of the layouts as a whole.

Possible design changes

- 6.5 The closure proposals are linked with the TWA Order application for the Thameslink 2000 project; indeed, the Shadow Strategic Rail Authority (SSRA) has said that it and Railtrack would not proceed with the closures if the TWA powers were not given⁴.
- 6.6 It is possible, however, that the TWA powers will be granted subject to amendments – i.e. the scheme would go ahead but with changes to the design. This would have implications for topics where the scheme design was important in assessing whether hardship would occur.
- 6.7 It is impossible to tell, at this stage, whether such changes would take place, how extensive they would be, or exactly what they would be. The Sub-Committee can therefore do no more than assess the closure proposals on the basis of the scheme as presented. Any changes as a result of the TWA process might require reconsideration of the closure proposals.
- 6.8 **Any consent to either closure proposal should be conditional on the TWA powers being granted, and on no changes to the proposal being required that were material to the possible effects of the closures.**

Costs of extra platforms

- 6.9 A number of objectors, having suggested that hardship would be caused, felt that additional terminating capacity would mitigate that hardship.
- 6.10 When considering these suggestions, the Committee bore in mind that there would be costs attached to any changes to the Blackfriars design. Having additional platforms would add to the monetary cost of the scheme; for example, the City Corporation's proposal would cost about £50 million extra⁵. There might also be a delay to the project, if new applications had to be made for any consents, although the Committee felt that this would be a smaller problem than the monetary cost. Furthermore, a wider station would apparently need a higher roof, thus further obstructing the St Paul's sight lines, or else the extent of the roof would have to be reduced⁶.

A) Assuming that the 24tph service is achievable*Ability of the remaining terminating platforms to cope with the proposed timetable*

- 6.11 The most obvious potential reason for hardship is if the remaining terminating capacity is not enough to cope with the trains that are proposed to use it. If that happened, hardship might arise if people could not get to/from work.
- 6.12 At Blackfriars, Railtrack believes that the remaining terminating trains can be accommodated in the two relocated terminating platforms⁷. Some existing terminating trains would have become through trains. Railtrack had stated that the terminating

⁴ SSRA Statement of Reasons, page 1. Also Meeting on 3/5/6 April, Minutes 2.5 and 3.4

⁵ Meeting on 3/5/6 April, Minute 27.9

⁶ Meeting on 3/5/6 April, Minute 27.10

⁷ Document N, page 4.

platforms would have a minimum turn-round time (i.e. the time needed for a train to enter and leave again) of seven minutes, compared to fifteen at present, although discussion revealed that the figure of seven minutes was a minimum whereas the fifteen minutes was a 'comfortable' allowance. Nevertheless, the capacity of the terminating platforms would (according to Railtrack) be no less than at present, and possibly slightly greater.

- 6.13 At London Bridge, there would be fewer terminating platforms, but also fewer terminating trains, as some would have been diverted to the through platforms. Railtrack believes that the remaining terminating platforms would be able to handle these⁸.
- 6.14 The Committee concluded that the terminating capacity would be adequate, and thus no hardship would arise from this issue.

Ability of the remaining terminating platforms to cope with disruption

- 6.15 However, the railway will inevitably not always run smoothly, and the Committee examined at length the issue of whether the platforms to be closed would have been useful in mitigating the effects of disruption.
- 6.16 According to Railtrack, there would be a number of places for failed trains to be removed out of the way, or for trains to be turned round in order to restore the service⁹. Part of the solution involved proper contingency planning¹⁰, just as it currently does. Railtrack also said that Thameslink 2000 trains would have their own infrastructure on the approach to London Bridge, thus not impeding Charing Cross or Cannon Street trains, unlike the current situation.
- 6.17 The Committee concluded that there were bound to be situations when the presence of one or more of the platforms to be closed would have been useful in mitigating the effects of disruption and in restoring the service to normal. However, given the wide range of possible circumstances, and the alternative places available for trains to go, the absence of that utility would not amount to hardship. That said, in reaching that conclusion the Committee had no realistic alternative to relying on Railtrack's (untested) evidence described in the paragraph above.
- 6.18 There seemed to be a weak spot in the proposed track layout: the curve between Metropolitan Junction and Blackfriars Junction would be uni-directionally signalled, as it is today¹¹. A train that was on the curve but could not reach Blackfriars would (other than in an emergency) be stuck, until the problem at Blackfriars was resolved. The Committee felt that bi-directional signalling on this curve would increase the flexibility of the layout, and would make it easier to recover from disruption. In terms of the project as a whole, the cost would be small – and much less than the cost of an additional platform at Blackfriars.

⁸ Document O, page 4. Also SSRA Statement of Reasons, page 12

⁹ Meeting on 3/5/6 April, Minute 26.10 and 26.11

¹⁰ Meeting on 3/5/6 April, Minutes 26.13 and 26.14

¹¹ Meeting on 3/5/6 April, Minutes 37.12 and 37.13

Potential benefits of running more trains to Blackfriars during disruption

- 6.19 It had been suggested¹² that, even if the system as a whole could cope tolerably well with disruption, there would be benefits in allowing Thameslink 2000 trains that were turned short during disruption to do so at Blackfriars. (The alternatives included reversing them at London Bridge or diverting them to Charing Cross.) The benefit of Blackfriars would be that it would be easier for passengers on the turned-back train to make an onward connection there. Two reasons were advanced for this:
- a) If the service was mostly normal, there would be more onward Thameslink trains at Blackfriars than at London Bridge.
 - b) If the service through the core was entirely blocked, passengers would be able to resume their onward journey more quickly once the service resumed.
- 6.20 The Committee concluded that there would indeed be benefit from running trains as far as Blackfriars if this were possible during disruption. To the extent that the absence of the platforms to be closed restricted the opportunity to do this, hardship would be caused.
- 6.21 The Committee acknowledged that additional terminating facilities at Blackfriars would mitigate this, but considered that the extent of the hardship was not sufficient to warrant the level of expenditure likely to be involved. However, in some circumstances there would be benefit from the additional flexibility gained as a result of the bi-directional signalling recommended above.
- 6.22 **Under the 24 tph scenario, hardship would be caused (by the closure at Blackfriars) to passengers going to/from the London Bridge corridor who would benefit from trains running between Blackfriars and London Bridge during disruption.**
- 6.23 **In some circumstances, this hardship would be ameliorated by having bi-directional signalling on the curve between Blackfriars Junction and Metropolitan Junction.**

Potential future changes in the relative balance of services between the two routes south of Blackfriars: existing numbers of paths

- 6.24 It had been suggested that flexibility should be maintained to change the relative balance of services between the Elephant & Castle (E&C) route and the London Bridge route, in the light of changing demand. Suggestions referred, in particular, to the regeneration of the E&C area¹³ and to current demand levels and growth rates on that corridor as a whole requiring further services¹⁴.
- 6.25 It was not made clear how this would be done. If it involved maintaining the existing totals of paths on each route, this would presumably mean that some London Bridge services would terminate at Blackfriars, and their paths through the core would be taken up by trains from E&C that are currently planned to terminate at Blackfriars.

¹² Meeting on 3/5/6 April, Minute 34.7

¹³ Meeting on 3/5/6 April, Minute 34.6. Also Document N, page 15

¹⁴ Meeting on 3/5/6 April, Minute 36.2. Also Document N, page 9

- 6.26 The SSRA saw London Bridge as a key traffic objective, which was why through trains to London Bridge had been the focus of the proposed service pattern. However, it acknowledged that circumstances might change in future years¹⁵.
- 6.27 The Committee felt that the suggested scenario was plausible. However, it had no current official backing, and was one of many plausible ways in which London's rail network might change in the future. The suggestion was thus effectively speculative. Such a service pattern was not sufficiently likely that it warranted the cost of additional terminating facilities at Blackfriars in order to allow for it.

Potential future changes in the relative balance of services between the two routes south of Blackfriars: new paths

- 6.28 An extension of the above points was that additional paths might be needed in the E&C corridor.
- 6.29 An alternative proposal to Thameslink 2000, which involves a very different service pattern south of the Thames, was submitted as part of one of the TWA objections, and is supported by some objectors¹⁶. If it were to be pursued, it would probably result in different consequential closure applications to those currently proposed. In any case, the closures currently proposed would not go ahead if the Thameslink 2000 TWA powers were not given. The Committee concluded that the alternative proposal should be regarded as speculative and, in the context of the present closure proposals, thus deserving no further consideration.
- 6.30 However, that alternative was very distinct from the suggestion that more modest improvements on the E&C corridor might become desirable in future years. Would the Blackfriars closure affect this?
- 6.31 As discussed above, the SSRA felt London Bridge to be an important traffic objective. It also doubted where new paths through the E&C corridor could be found. On the other hand, developments on the South London Metro (currently being assessed for the SSRA and Railtrack, among others) might address some capacity constraints elsewhere, thus making the terminal capacity the outstanding constraint¹⁷.
- 6.32 The Committee agreed that this was plausible (as indeed would be any similar suggestion in relation to the London Bridge route), but felt that, again, it was one of many speculative possibilities. Again, therefore, it was not sufficiently likely to be worth specifically designing into the arrangements at Blackfriars, given the likely cost involved. In any case, there would be substantial spare capacity (during normal running) for E&C trains in the proposed terminating platforms.

¹⁵ Meeting on 3/5/6 April, Minute 34.17

¹⁶ Meeting on 3/5/6 April, Minute 34.17

¹⁷ Meeting on 3/5/6 April, Minute 34.4

Potential extra train services into London Bridge from the south

- 6.33 There is also the possibility of operators wanting to run additional train services in to London Bridge from the south, terminating in the low-level station. Some objectors had suggested that the ability to accommodate these would be limited¹⁸. The SSRA's view was that the remaining platforms would have some capacity for future growth¹⁹. Railtrack had provided more details: apparently, Connex's intention is to run the existing level of off-peak service during the peaks, but with longer trains²⁰. (At present, the peak service is constrained by line capacity, and is less than the off-peak service; there would be additional peak capacity as a result of the works.) There would also be spare capacity at Charing Cross, according to the SSRA, although the City Corporation remained to be convinced of this²¹.
- 6.34 The Committee concluded that there would be no hardship arising from this issue.

B) Assuming that the 24tph service is not achievable*The test scenario*

- 6.35 The Corporation of London, which had undertaken detailed analysis of the Thameslink 2000 proposals, believed that 18tph was likely to be achievable. The Committee therefore took this as the 'worst case scenario'.

Ability of the remaining terminating platforms to cope with the proposed timetable

- 6.36 As with the 24tph situation, the most obvious potential reason for hardship was if the remaining terminating capacity was not sufficient. In this case, the question revolved around what terminating capacity was available to any trains that had been intended to become Thameslink 2000 trains but (due to the shortfall in throughput) could not do so. (These are referred to in this report as 'displaced' trains.)
- 6.37 The SSRA had done little detailed analysis of what would happen if 24tph was not achieved²². But there had been a sensitivity test, which looked at a 20tph scenario.
- 6.38 Under Thameslink 2000, the current 2tph from Guildford to West Croydon would be extended via London Bridge to Thameslink. If 24tph could not be accommodated, these two trains would terminate at West Croydon, as now. (Thus a 22tph service could be accommodated without problems.) The SSRA would then select a destination with 2 tph and would divert those to Charing Cross. Under the 18 tph scenario, the SSRA would do the same for a further 2tph.
- 6.39 There was disagreement as to whether Charing Cross could indeed accept those extra trains. The SSRA's view was that Thameslink 2000 diverted some trains away from

¹⁸ Document O, topic 1

¹⁹ SSRA Statement of Reasons, page 12

²⁰ Document O, topic 1

²¹ Meeting on 3/5/6 April, Minute 30.2

²² Meeting on 3/5/6 April, Minute 26.19

Charing Cross, and so the displaced trains would simply be filling the vacated capacity, although the City Corporation remained to be convinced about this²³.

6.40 In the absence of agreement between the City Corporation and SSRA on the subject, and in the absence of sufficient evidence for the Committee to decide for itself, the Committee believes that the Regulator needs to ensure that sufficient capacity is maintained.

6.41 **Under the less than 24 tph scenario, any consent to either closure proposal should be made conditional on the Regulator being satisfied that there would be adequate London terminal capacity to accommodate the displaced trains.**

Ability of the remaining terminating platforms to cope with disruption

6.42 The issue here is the same as with the 24 tph scenario, but with an added twist. If it turned out that any of the proposed terminal capacity at Blackfriars or London Bridge would be in use to accommodate displaced trains, then the ability to cope with disruption would be reduced accordingly. However, the Committee concluded that such a reduction in the ability to cope with disruption did not substantially affect the situation (compared to the 24 tph scenario), and so there would not be hardship.

Potential benefits of running more trains to Blackfriars during disruption

6.43 The issue here is the same as with the 24 tph scenario, except that there would be fewer trains coming from London Bridge, and thus the benefit of being able to reach Blackfriars would be increased.

6.44 The Committee concluded that, as with the 24 tph scenario, there would be hardship; with less than 24 tph, the hardship would be slightly greater. However, the increase in benefit from being able to reach Blackfriars under the less than 24 tph scenario would not be sufficient to warrant any further alleviatory measures.

6.45 **Under the less than 24 tph scenario, hardship would be caused (by the closure at Blackfriars) to passengers going to/from the London Bridge corridor who would benefit from trains running between Blackfriars and London Bridge during disruption.**

6.46 **In some circumstances, this hardship would be ameliorated by having bi-directional signalling on the curve between Blackfriars Junction and Metropolitan Junction.**

Potential future changes in the relative balance of services between the two routes south of Blackfriars: existing numbers of paths

6.47 This issue would be the same as under the 24 tph scenario.

Potential future changes in the relative balance of services between the two routes south of Blackfriars: new paths

6.48 This would be the same as under the 24 tph scenario, except that there may be the possibility of extra trains from London Bridge terminating at Blackfriars, replacing

²³ Meeting on 3/5/6 April, Minute 30.2

those that had been displaced. Again, the Committee regarded this situation as speculative, and reached the same conclusions as under the 24 tph scenario.

Potential extra train services into London Bridge

- 6.49 This issue would be the same as under the 24tph scenario, unless displaced trains had been accommodated in London Bridge low level, which would reduce the scope for extra trains. Again, the Committee regarded this as speculative, and reached the same conclusions as under the 24 tph scenario.

C) Implications of arriving at different platforms at London Bridge

- 6.50 There was one further issue regarding London Bridge. Some passengers for whom that station was the origin or destination would enter or leave their trains on through platforms, rather than terminating ones. This would affect the relative ease (or otherwise) of interchange between those trains and others, or between those trains and other modes. Some people would gain, and others would lose, but all the effects would be small. The new platforms would be fully accessible.
- 6.51 The dominant rail-rail interchange was by people who arrived in the terminating platforms and wanted to reach Charing Cross or Cannon Street²⁴. If their train was diverted to the through platforms, this interchange would become easier.
- 6.52 The Committee accordingly felt that there would be no hardship arising from the effects of the platform closures there on interchange movements.

D) Disruption during works

- 6.53 A number of objectors suggested that the works at both locations would be disruptive to services or to passengers' walking routes²⁵. There would be a period when the platforms in question had been closed but the works would still be taking place and the Thameslink 2000 service would not be in place; thus, it was suggested, hardship would be caused.
- 6.54 The Thameslink route through Blackfriars is both an important commuter route and an important through route (especially for its two direct airport links). The duration of these particular works would be substantial, and the Committee therefore felt that consideration of possible hardship during that time was appropriate, particularly as the timing of the platform closures would have a bearing on the way the works affected passengers.
- 6.55 The Committee was informed of the proposals for managing train services during the works²⁶. At Blackfriars, for all but four weeks, only late evening and overnight services will be unable to serve the station. For the remaining four weeks, all services would run through without stopping. At London Bridge, Railtrack says that there

²⁴ Meeting on 3/5/6 April, Minute 37.9

²⁵ Document N, topic 2. Document O, topic 3

²⁶ Document H

would be rescheduling and train path alterations, but these would be insignificant due to the level of platform capacity.

- 6.56 The works would inevitably cause disruption, which should be mitigated as far as reasonably possible. The Committee felt that it was important for the passenger-handling arrangements to be properly planned and implemented – not just in terms of where trains go, but also in terms of how passengers are told about the changes, and how the affected passengers are treated.
- 6.57 **Hardship would be caused (by the closure at Blackfriars) to passengers whose trains could not call at Blackfriars during the works there.**
- 6.58 **The hardship would be ameliorated by planning in order to mitigate the disruption as far as reasonably possible. The planning should take place before construction works begin, in order to avoid problems rather than treat them reactively once they happen. [To be carried out by Railtrack and the train and station operators concerned, at an early stage in the detailed planning of the works.]**
- 6.59 **Any consent to the Blackfriars closure proposal should be made conditional on the Regulator being satisfied that an adequate strategy is in place for handling passengers who would be displaced from Blackfriars during the works. This strategy should particularly address passenger information, accessibility, personal security, staffing and ticketing issues, and should consider both the works period as a whole and the four-week total closure.**
- 6.60 More specifically, some trains (both Connex and Thameslink) will be diverted or turned short during the overnight closures of the station. Passengers making through journeys will need adequate alternative routes. Existing levels of accessibility should be preserved. This would logically suggest that a fully accessible alternative should be made available to bridge the gap at Blackfriars.
- 6.61 **Hardship would be caused (by the closure at Blackfriars) to passengers who could not travel through Blackfriars during the works.**
- 6.62 **This hardship, particularly to 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 and with adequate staff assistance available. The route(s) should take into account the terminating arrangements for the trains. [To be procured by the train operator(s) concerned, throughout the blockade.]**

7 Advertising of the closure proposals

- 7.1 The Committee had been concerned about the SSRA's initial approach to advertising the closure proposals²⁷. 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 the stations concerned, and extending the period for objections accordingly.

²⁷ Document S

- 7.2 There were initially some difficulties with this; some stations required some prompting, and at others the poster was in an insufficiently conspicuous location. The SSRA has no power to require these posters to be displayed, and is dependent on the goodwill of the station operators concerned.
- 7.3 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.
- 7.4 The style of the posters also needs to be revised. They were hardly eye-catching, and were difficult to comprehend. Attention should also be given to how people who cannot see or read (or understand) posters could be better notified of the closure proposal.
- 7.5 **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.**
- 7.6 The cost of improved publicity will be very small.