

Response to the DfT South and West London Closures Consultation

August 2012

London TravelWatch is the official body set up by Parliament to provide a voice for London's travelling public.

Our role is to:

- Speak up for transport users in discussions with policy-makers and the media;
- Consult with the transport industry, its regulators and funders on matters affecting users;
- Investigate complaints users have been unable to resolve with service providers; and
- Monitor trends in service quality.

Our aim is to press in all that we do for a better travel experience all those living, working or visiting London and its surrounding region.

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Contents

Executive Summary	1
Introduction	3
Background	6
The formal closure process	9
Discussion about points of principle raised by this case	10
Recommendation	14
Appendix A – Views of Stakeholders and individual passengers	15
Appendix B – Glossary	16

Executive Summary

London TravelWatch welcomes the opportunity to respond to the Department for Transport's consultation on the proposed closure of three sections of railway track in South and West London

We accept

London TravelWatch accepts that the bus service that currently operates between Ealing Broadway, Kensington Olympia and Wandsworth Road stations on a Tuesday does not perform a useful function and has little or no value to passengers. Therefore we are happy to recommend that the Willesden West London Junction to Acton Wells Junction, and Acton Wells Junction to Acton East Junction (both between Shepherds Bush and Acton Main Line stations) section of route be accepted for closure

We recommend

London TravelWatch recommends that :-

On the basis of no additional cost to the DfT and Southern of providing a train service over the Longhedge Junction and Latchmere No 1 junction section of route: and of the potential detriment to users of the Milton Keynes to South Croydon service of this line as an alternative to its usual route via Clapham Junction that consent to close this section of route be refused.

The DfT should consider whether through services from the Great Western Main Line to the West London Line and South London could be provided on a regular basis.

The DfT should consider the provision of a daily through long distance service between Gatwick Airport, East Croydon and the West Midlands.

The Secretary of State should consider a number of changes to the legal framework for rail closures, and to the processes which the Department has in place in respect of franchises to ensure that similar situations to this particular case do not arise in future. These are :-

- revising the current guidance relating to railway closures as there is no sanction or mechanism for redress by passengers or concerned bodies (such as ourselves) if the Department for Transport fails to initiate closure proceedings for a section of the rail network
- ensuring that the Department's franchising process has a 'check and balance' element to it ensuring that where a service change is proposed

that would remove scheduled services from a route, that either a replacement service is provided in a timely manner or an appropriate closure process is initiated

- ensuring that Network Rail does not operate in a manner that frustrates the desire by the Department and/or a franchised train operator to maintain and operate a train service in accordance with legal requirements that such a service be provided.
- Ensuring that where service patterns are substantially altered or reduced (as in the example of the former Cross Country service that was withdrawn), that sufficient redress is available for passengers affected by any decision to withdraw the service. In particular, the needs of elderly, disabled, vulnerable or mobility impaired passengers must be given much more weight in any decision making process particularly if in future interchange is required for a journey to be fulfilled.

Introduction

In responding to the South and West London closures consultation London TravelWatch has been informed by the responses provided by passengers and stakeholders to this consultation, our casework appeals, as well as our current and past research. The area that we have made comments about is shown in the diagram below. Pertinent to this consultation are that our boundary stations are at Slough and Gatwick Airport.

Figure 1 - Map of London TravelWatch Area



Formal Description of the railway lines proposed for closure

The sections of track involved are from Longhedge Junction to Latchmere No.1 Junction (between Wandsworth Road and Imperial Wharf stations) – section in figure 2: Willesden West London Junction to Acton Wells Junction – section 2 in figure 2, and Acton Wells Junction to Acton East Junction – section 3 in figure 2 (both between Shepherds Bush and Acton Main Line stations).

Southern train service

Monday to Friday only

Outward

Kensington Olympia (1002), West Brompton (1004), Imperial Wharf (1007), Wandsworth Road (1019).

Return

Clapham High Street (1611), Wandsworth Road (1612), Imperial Wharf (1624), West Brompton (1626), Kensington Olympia (1629).

Southern bus service

Tuesdays only

Outward

Ealing Broadway (0945), Kensington Olympia (1025), Wandsworth Road (1055).

Return

Wandsworth Road (1315), Kensington Olympia (1345), Ealing Broadway (1425).

These services are in place to cover 3 sections of railway track that would otherwise have no other public franchised train service.

The section of track between Longhedge Junction and Latchmere No 1 junction has third rail electrification, whereas the other sections of track are not electrified at all and so require diesel traction.

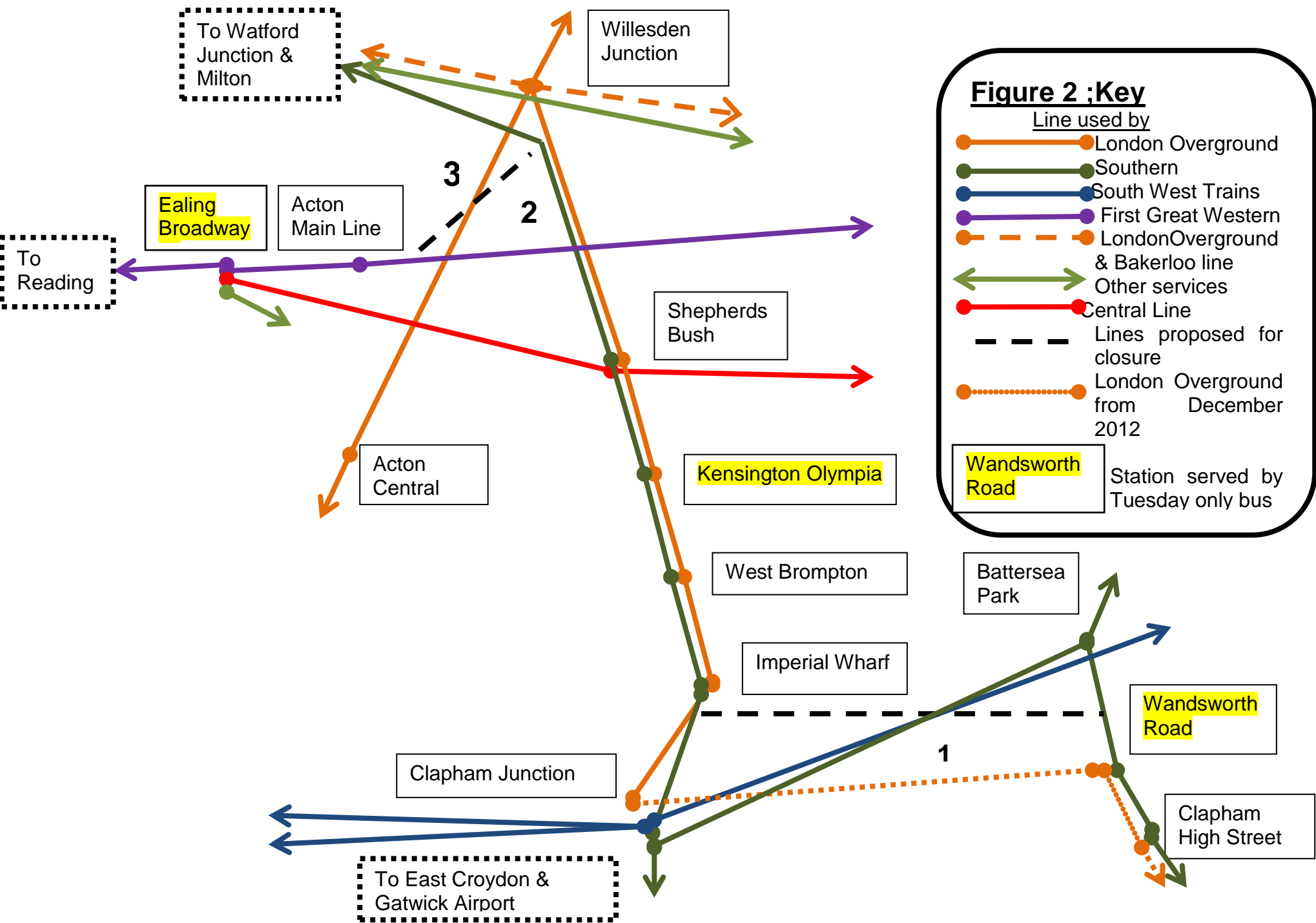


Figure 2 ;Key

- Line used by**
- London Overground
 - Southern
 - South West Trains
 - First Great Western
 - - - LondonOverground & Bakerloo line
 - ↔ Other services
 - Central Line
 - - - Lines proposed for closure
 - ⋯ London Overground from December 2012
- Wandsworth Road Station served by Tuesday only bus

Background

Up until December 2008 a regular train service of up to 5 trains daily was provided as part of the Cross Country franchise over these sections of line. The trains ran from Brighton to points north of Birmingham, and called at Haywards Heath, Gatwick Airport, East Croydon, Kensington Olympia, Reading, Oxford, Banbury, Leamington Spa, Coventry, Birmingham International and Birmingham New Street.

In December 2008 a new timetable was implemented as part of the new Arriva Cross Country franchise which withdrew these trains east of Reading, and redeployed the resources employed to other parts of the franchise to relieve overcrowding concerns.

The trains that were withdrawn carried approximately 65 passengers per day on average, according to figures supplied to London TravelWatch in 2007. These were not equally spread across all trains as some trains ran either very early in the morning or very late at night, and were effectively positioning moves to the operators depot at Three Bridges south of Gatwick Airport. The trains that operated in the off-peak daytime period (one in each direction) did however often carry 30-50 passengers per day. The journey times for these trains were quite lengthy and in most cases a faster journey was possible by interchanging between central London stations or at Watford Junction using the Southern West London Line service. On board observation and analysis of the ticket types sold showed that the majority of passengers were choosing to use these services, because it offered a through journey opportunity without the interchange penalty in central London. These passengers were often either elderly or vulnerable people, or those with significant amounts of luggage for whom the through service was an advantage over the time taken for the journey.

London TravelWatch at the time (in 2006 and 2007), in correspondence with and consultation responses to the Department for Transport (DfT) repeatedly highlighted the effect of the change proposed in the DfT franchise consultation on these existing passengers and that if such a change were to be agreed that either a replacement service needed to be procured for the sections of track not served by other services or that closure proceedings needed to be instigated. Other bodies and persons also raised this with the DfT.

However, despite this it was only in early December 2008, with less than a few weeks to go before the change in timetable that the DfT announced that a once a week bus service would be provided covering the legally required sections of route.

Over the period of the next two years London TravelWatch repeatedly raised the issue of this service because it believed that as a matter of principle either a replacement train service or a closure process should be instigated. In addition, as noted in reports to the London TravelWatch governance committee and in correspondence with the DfT London TravelWatch believed that the DfT did not and does not have powers under the Railways Act 2005 to operate bus replacement services other than of a temporary nature. A temporary nature being of less than one year duration or where a civil engineering project physically prevents rail access. DfT officials were not willing to propose a closure process at the time because they believed that an open access operator might choose to provide a service in the future, and that the Government policy at the time was not to instigate any such procedures¹.

In late 2009 the DfT announced that Southern would provide a train service between Kensington Olympia and Wandsworth Road stations from the May 2010 timetable, and that discussions were taking place with a view to Southern providing an additional service on this route but extended to Ealing Broadway station. This would have utilised a diesel unit from the London Bridge to Uckfield service which would otherwise have not been in use between the morning and evening peak hours.

The Southern train provided from the May 2010 timetable change was done so, by the expedient of converting an existing (electric) empty coach stock movement to passenger service. This started as a non stop service, but subsequently additional station stops were made at Imperial Wharf and West Brompton stations (both directions), and Clapham High Street (afternoon only journey) in response to stakeholder requests. In addition during a series of engineering blockades and possessions in the Clapham Junction area Southern services that operate between Milton Keynes, Watford Junction and South / East Croydon have used the Longhedge Junction to Latchmere No.1. Junction section of route as an alternative route so as to maintain through services from South to North London, Watford and Milton Keynes. This train service does not cost Southern or the DfT any additional money to operate as the trains would operate anyway to move trains and crews to suitable stabling points between their main duties at peak times. This is acknowledged in the DfT consultation.

The proposed diesel service would have provided a daytime link over the route with some marginally useful links – such as connections to and from Heathrow Airport via the Heathrow Connect service. The service did in fact run every day Monday to Friday for several months, at the same times as the proposed public service as an out of service driver training and route familiarisation exercise. However, despite no reported problems with this operation and no reported disruption to other services, Network Rail refused to grant Southern permanent access rights for the service, on the grounds of a performance impact on other

¹ Parliamentary answers given to questions put down by Baroness Hanham in 2009.

train services. At the time London TravelWatch contacted the Office of Rail Regulation on this matter, because we felt that this was unreasonable.

An alternative service was therefore proposed in the evenings of Mondays to Fridays. This however, required drivers to be retrained for night time operations and was much more expensive to operate as at this time of day there were less spare units and crew available.

The greater cost of these services and a desire by DfT to reduce expenditure in 2011, together with a decision by Ministers to reverse previous government policy on closures, led therefore the decision to seek a formal closure in 2012.

The formal closure process

A formal closure process began in May 2012. London TravelWatch has received a number of objections to the closure proposal. These are attached in Appendix A.

To date the principle emerging concerns relate to:-

- Passengers who used the former Cross Country trains as outlined above
- The principles behind the proposed closure and the process by which the DfT has arrived at the decision to seek closure
- The potential future uses that these pieces of track could be used for – such as improved local services within the London area.
- The potential disadvantage to passengers on the Milton Keynes, Watford Junction and South / East Croydon service, if this cannot take its usual route through Clapham Junction for whatever reason. The current one journey in each direction train service between Kensington Olympia and Wandsworth Road ensures that crew knowledge of the alternative route via Wandsworth Road and Herne Hill is maintained.

Discussion about points of principle raised by this case

This closure raises a number of important principles in relation to consumer representation when service changes occur.

The DfT's consultation states that 'it was only realised late in the process of re-letting the Cross Country franchise' that withdrawal of the would leave the lines concerned without scheduled passenger services. London TravelWatch advised DfT on a number of occasions in 2006 and 2007 including in the formal response to the consultation on the Cross Country franchise that replacement services would be required on these lines or that a closure process needed to be considered. The advice from London TravelWatch in 2006 and 2007 should have been ample time to procure replacement services or go through a closure process in time for the timetable change in December 2008. However, it appears that DfT had no procedures for ensuring that a situation such as this did not occur. It should be noted that London TravelWatch officers have had to deal with a large number of DfT officials over the years on this issue, many of whom it would appear did not wish to take responsibility for resolving issues raised in this case.

The DfT in replying to passengers who complained about the withdrawal of the Cross Country services relied heavily on its consultation on the re-letting of the franchise as evidence of the public's ability to comment on the proposed withdrawal of the service. However, without the formal requirements of a closure proposal to be published in appropriate places, it is doubtful whether any of the former users of this service would have seen or realised the significance of the proposal, contained within a much larger document.

The role of the Office of Rail Regulation (ORR). The ORR is responsible for ensuring that the DfT, Network Rail and the train operators comply with the requirements for proposing, publicising, consulting and final decision making on closure proposals. However, early in the process, ORR indicated that they could only take action against any party, if a formal closure process had been started, even if the train service had already been withdrawn, and that their role was limited to ensuring that the closure process had been followed correctly.

At a later stage when Network Rail refused access rights for a timetabled service the ORR declined to intervene on the technicality that Southern had not contested Network Rail's refusal of access rights.

Network Rail is responsible for the granting of track access agreements to train operators, and as guardian of the timetable, agreement needs to be given as to when and where trains can run. There is no obligation on them to ensure that parts of the network which should have timetabled train service running do

actually do so. As noted above, Network Rail has not been as co-operative or helpful as they could have been in either ensuring that there was space in the timetable to ensure that a train service was run over the relevant sections of line.

The above issues show that there are some fundamental flaws in the current railway closure process. These are :-

- There is no sanction or means of redress if the DfT fails to initiate closure proceedings or to provide a franchised train service where the law requires one to be provided.
- The ORR has no means of intervening to ensure that the DfT complies with its' obligations to provide franchised train services, or to ensure that Network Rail makes reasonable efforts to allow a franchise commitment to be adhered to.
- Network Rail has no obligation to co-operate with other parties to ensure that the legal obligation to provide passenger franchised services is adhered to.
- There is no means of redress or representation for passengers who are affected by a decision to replace a substantive train service, with one which only provides the bare legal minimum.

Potential future uses of the lines proposed for closure

All three sections of line proposed for closure could be potentially used for other services. The sections of line between Willesden West London Junction to Acton Wells Junction, and Acton Wells Junction to Acton East Junction (both between Shepherds Bush and Acton Main Line stations) are proposed for overhead electrification at 25kv under the recently announced High Level Output Specification (HLOS) programme of investment. However, this is intended for the benefit of freight trains running from the Great Eastern Main Line toward the Great Western main line. As yet there is no proposal for regular passenger trains to operate over this route.

However, this electrification scheme or the potential use of diesel traction could allow the provision of a number of different services starting from the Great Western Main Line (Heathrow Airport, Reading, Slough, Hayes and Harlington, Southall and Ealing Broadway) and continuing to points either on the North London Line (Barking via Gospel Oak line, Stratford), Euston or via the West London Line to South London (Clapham Junction, East Croydon, Gatwick Airport, Peckham Rye, Lewisham, Dartford, Bromley South, Orpington or Sevenoaks). This would be subject to provision of suitable timetable paths on other parts of the rail network.

From the above a number of potential services could be provided. The most useful might be providing a direct train service between Heathrow and Gatwick Airports calling at interchange stations such as Ealing Broadway, Shepherds Bush, Kensington Olympia, Clapham Junction, Balham and East Croydon.

Alternatively a link solely between Ealing Broadway and Clapham Junction / Peckham Rye – Lewisham would provide major connectivity benefits between West and South London. Either of these options would be compatible with the Mayor's desire to improve orbital rail links around London and relieving pressure on congested central London interchanges.

London TravelWatch has previously advocated the provision of a limited inter regional off peak service between Gatwick Airport, East Croydon, the West London Line and Watford Junction, Milton Keynes, Coventry and Birmingham to provide similar links to that previously provided by the Cross Country service. This would be done using resources otherwise not used between peak times by either the Southern or London Midland franchises.

Potential detriment to users of the Southern West London Line service between Milton Keynes and South Croydon

As mentioned above the train service between Wandsworth Road and Kensington Olympia operated by Southern has the benefit of ensuring that crew route knowledge is maintained. Each crew operates this service five times per year. This means that should for any reason the main route between Imperial Wharf and Streatham Common via Clapham Junction followed by the Milton Keynes to South Croydon service be unavailable: then trains can be immediately diverted to run via Wandsworth Road, Herne Hill and Tulse Hill. This knowledge maintains a South London to West London Line service, without the need to substitute replacement bus services or to require passengers to travel via central London stations such as Victoria or Euston.

Users of the Milton Keynes to South Croydon service could therefore suffer hardship if crew route knowledge were not maintained.

Equalities and inclusion implications

As noted above many of the former users of the Cross Country service were either elderly or vulnerable people, or those with significant amounts of luggage for whom the through service was an advantage over the time taken for the journey. These passengers were significantly disadvantaged by the withdrawal of the through service. The only alternative routes for this group of passengers would be to interchange between central London termini or to use alternative modes.

We also note that without separate fares for journeys between stations on the Great Western main line and the West London line / South London that give a cheaper fare, that passengers travelling between these locations would have to pay a higher fare for travelling via central London terminals / Zone 1.

Legal powers

Section 248 of the Greater London Authority Act 1999 places upon London TravelWatch (as the London Transport Users Committee) a duty to consider – and where it appears to it to be desirable, to make recommendations with respect to – any matter affecting the functions of the Greater London Authority or Transport for London which relate to transport (other than of freight). Section 252A of the Greater London Authority Act 1999 places a duty upon London TravelWatch (as the London Transport Users Committee) to keep under review matters affecting the interests of the public in relation to railway passenger and station services provided wholly or partly within the London railway area, and to make representations about them to such persons as it thinks appropriate.

Recommendation

The response should highlight the points of principle that this closure process raises, and ask the Secretary of State to consider in future legislation and also in future franchising arrangements to ensure that a similar situation does not reoccur. This means that there should be means of enforcement against failure to start a closure process where one is required.

On the basis of no additional cost to the DfT and Southern of providing a train service over the Longhedge Junction and Latchmere No 1 junction section of route: and of the potential detriment to users of the Milton Keynes to South Croydon service of this line as an alternative to its usual route via Clapham Junction to recommend refusal of consent to close this section of route.

On the basis that the current bus service is of little or no value to passengers to recommend that the Willesden West London Junction to Acton Wells Junction, and Acton Wells Junction to Acton East Junction (both between Shepherds Bush and Acton Main Line stations) section of route be accepted for closure, but with the proviso that the DfT should investigate the feasibility of providing other services such as those outlined in paragraphs 6.1 to 6.4 in future.

That for passengers travelling between stations on the Great Western Main Line and stations on the West London Line and in South London (not in zone1) fares should be established that give the option of using the London Underground Central line between Ealing Broadway and Shepherd's Bush. These should be cheaper than current fares via zone 1 and should include all South London stations that have or will have direct train services to Clapham Junction.

Appendix A – Views of Stakeholders and individual passengers

In responding to this consultation London TravelWatch has taken into account the previously expressed views of user groups and local authorities in areas affected by this closure and those of individual passengers who have contacted us as part of the process.

These representations are attached to this document with personal details redacted.

Appendix B – Glossary

Term	Definition
DfT	Department for Transport
HLOS	High Level Output Statement
ORR	Office of Rail Regulation
TfL	Transport for London

Rt.Hon Justine Greening MP
Secretary of State for Transport
Great Minster House 4/18
33 Horseferry Road
LONDON
SW1P 4DR

Our Ref:
Your Ref:

August 2012

Dear Secretary of State,

South and West London railway closures consultation

Further to your recent consultation on the proposed closure of a number of sections of railway line in South and West London I attach our response report for you to consider. This includes the responses from passengers and stakeholders that we have received to date.

Issues of principle arising from this closure process.

I would draw your attention in particular to the following concerns that :-

- under current guidance relating to railway closures there is no sanction or mechanism for redress by passengers or concerned bodies (such as ourselves) if the Department for Transport fails to initiate closure proceedings for a section of the rail network
- the Department's franchising process does not have a 'check and balance' element to it ensuring that where a service change is proposed that would remove scheduled services from a route, that either a replacement service is provided in a timely manner or an appropriate closure process is initiated
- Network Rail in this case operated in a manner that frustrated the desire by the Department and a franchised train operator (Southern) to maintain and operate a train service in accordance with legal requirements that such a service be provided.
- the manner in which the original Arriva Cross Country service was withdrawn, did not give sufficient redress for passengers affected by the decision to withdraw the service. In particular, the needs of elderly, disabled, vulnerable or mobility impaired passengers who used and valued this service were not given sufficient attention when the decision was made to withdraw it. These passengers have since December 2008 only been able to make the equivalent journeys by rail, by the use of a number of interchanges and often involving transfer between central London termini.

I am asking you therefore to consider a number of changes to the legal framework for rail closures to be considered, and to the processes which the Department has in place in respect of franchises to ensure that similar situations to this particular case do not arise in future.

Specific recommendations relating to the services affected by this closure process.

Based on the responses received to date and the consideration of the board of London TravelWatch I am recommending that:-

- On the basis of no additional cost to the DfT and Southern of providing a train service over the Longhedge Junction and Latchmere No 1 junction section of route: and of the potential detriment to users of the Milton Keynes to South Croydon service of this line as an alternative to its usual route via Clapham Junction to recommend refusal of consent to close this section of route
- On the basis that the current bus service is of little or no value to passengers to recommend that the Willesden West London Junction to Acton Wells Junction, and Acton Wells Junction to Acton East Junction (both between Shepherds Bush and Acton Main Line stations) section of route be accepted for closure, but with the proviso that the DfT should investigate the feasibility of providing other services such as those outlined in my attached report. I note that in your latest High Level Output Statement for Control Period Five (CP5), you state your intention to electrify these routes, presumably on the basis of use by freight trains, but which could potentially be used for passenger services also.
- That for passengers travelling between stations on the Great Western Main Line and stations on the West London Line and in South London (not in zone1) fares should be established that give the option of using the London Underground Central line between Ealing Broadway and Shepherd's Bush. These should be cheaper than current fares via zone 1 and should include all South London stations that have or will have direct train services to Clapham Junction.

If you have any queries on this response or the attached report please do not hesitate to contact me.

Yours sincerely

Sharon Grant

Chair, London TravelWatch

REDACTED VERSION for Website.



From: [Redacted]
Sent: 10 May 2012 20:30
To: South&WestLondon Consultation
Subject: Concerns about Withdrawal of Services
To whom it may concern.

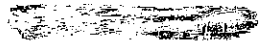
I would like to express my concern about the formal withdrawal of Wandsworth Road to Kensington Olympia Services.

Although the previous services were run under a cross country franchise, the withdrawal of services will most likely have a detrimental effect on the future viability of additional cross London Services for example:

- Ealing Broadway to Dartford or Bellingham Services.
- High Wycombe to Dartford via Shepherds Bush.

It also weakens the case for possible 4 tracking of the West London Line.

With Thanks



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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]



Closure Factory Junction to Latchmere Junction

From: ~~South West London~~ [mailto:~~SouthWestLondon@rail.gov.uk~~]
Sent: 10 May 2012 18:07
To: South&WestLondon Consultation
Subject: Closure Factory Junction to Latchmere Junction

Is not the length of line which will loose all timetabled passenger services actually Longhedge Jn. - Latchmere Main Jn.?

Factory Jn to Longhedge Jn will be served by the new Overground service to Clapham Jn.

~~South West London~~
~~SouthWestLondon@rail.gov.uk~~
10/05/2012



From: [REDACTED]

Sent: 10 May 2012 20:37

To: South&West London Consultation

Subject: consultation on closure of Wandsworth Road-Ealing Broadway

Regarding the formal withdrawal of services between Wandsworth Road and Ealing Broadway:

I write as a member of the public who used the replacement bus between these stations in November 2009. I did so as a novelty activity, rather than for actual transport. I suspect this is the case for the majority of the very small number of users of this service. The formal closure of the services would not inconvenience me in the slightest, and I regard it as a long-overdue step.

--
[REDACTED]

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From: CONSULTATION
Sent: 11 May 2012 15:30
To: South&WestLondon Consultation
Subject: FW: consultation response

This was sent to the general consultation inbox for the reasons Mr Sittampalam states.

As he has complained about the process a response will have to be prepared to him (although the process may have been more flawed by including an unrealistic option). The procedure is outlined below, but hopefully a simple reply will resolve the issue:

Regards,

Chris

Complaints Process

Complaints are normally sent to the Consultation Coordinator; in the first instance, the Coordinator will pass them on to the Policy Lead for reply. If the complainant is not satisfied, then it'll be for their Line Manager (usually DM) to reply. If this does not satisfy them, we refer the case to the DfT Complaints Officer, who will decide whether it is alleged maladministration or a policy issue. If there is alleged maladministration and the Complaints Officer cannot satisfy the complainant, then they will be advised to refer it to the Parliamentary Ombudsman. If a policy issue (where the complainant is against the proposed legislation), then the complainant will be advised to write to the SoS via their MP (in which case it'll come back to the policy lead).

Chris Simon
 Better Regulation Team
 General Counsel's Office
 Department for Transport
 1/14 Great Minster House
 33 Horseferry Road
 London
 SW1P 4DR

020 7944 5339

-----Original Message-----

From: Chris Simon
Sent: 10 May 2012 22:16
To: CONSULTATION
Subject: consultation response

Hi,

This is a reply to the consultation on "Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway", but the email address 'south&westlondon.consultation@dft.gsi.gov.uk' listed does not work in my email client because of the '&' character.

As well as being a specific reply to the consultation, this message should also be taken as a general complaint about the process that has been followed for this consultation.

The consultation does not consider the option of restoring the previous Cross-Country service. Since that is clearly the only useful service

that could be run over the line, omission of this option makes the consultation flawed and I am unable to support any of the options.

Parliament's intention in the Railways Act 2005 is frustrated by the procedure that has been adopted with this line, where first a useful service was replaced with a nearly useless one without any "withdrawal of service" consultation, and then a consultation is held offering no sensible alternative to withdrawal of service.

The proper way to run this consultation would be to present the two realistic options (withdrawal of service versus reinstatement of the Cross-Country service).

Regards,



From: [REDACTED]

Sent: 11 May 2012 09:19

To: South&WestLondon Consultation

Subject: Withdrawal of scheduled passenger services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

To whom it may concern,

It is widely acknowledged that a rail replacement bus service is provided by a TOC (or occasionally by Network Rail itself) in the event of engineering work - whether scheduled engineering work or emergency engineering work - or an accident to either a passenger(s) or to rolling stock resulting in temporary closure of a line or stretch of line.

In the case of the bus service provided by Southern Railway Ltd since 2009, between Ealing Broadway and Wandsworth Road, neither of these apply. The stretch of line has been open and available for use and the rolling stock has been available.

It is the opinion of the writer that Southern Railway Ltd. have acted illegally insofar as they have knowingly deprived customers of a train service on a timetabled route for which both track and rolling stock are available; and therefore, to all intents and purposes, the service has effectively been withdrawn since 2009 with no consultation whatsoever. This action on the part of Southern Railway Ltd. is a clear breach of Section 40 of The Railways Act 2005 which makes provision for replacement bus services in limited circumstances ONLY. The action of Southern Railway Ltd. in replacing a timetabled train service with a bus as a long term act clearly goes against the spirit and intention of the legislation referred to.

Deciding, three years into this bus replacement charade, to begin formal proceedings to legally withdraw the service is simply not good enough. Passengers have been severely inconvenienced for no good reason. The stretch of line has been open and available and rolling stock is available for the service yet passengers are offered only road transport with all the extra journey time and unpredictable delays involved.

I urge the Department for Transport to recognize and acknowledge the illegality of the way in which Southern Railway Ltd have operated the service referred to, thereby causing totally unnecessary inconvenience and delay to passengers who are legally and morally entitled to expect a good reliable train service.

Having personally experienced approximately three years of inconvenience and delay at the hands of Southern Railway Ltd. as a result of their failure to provide an actual service of trains; I am appealing to the Department for Transport to order Southern Railway Ltd. to pay substantial compensation to me for the said inconvenience and delay over a totally unreasonable period of time. In the light of the clear breach by Southern Railway Ltd of the spirit and intention of Section 40 of the Transport Act 2005 and their off hand attitude to passengers who are, after all, paying customers entitled to expect a good service, I believe that £5,000 (five thousand pounds) is a reasonable amount of compensation for Southern Railway Ltd. to offer me.

I have no wish to embarrass Southern Railway Ltd. by either publicizing my grievance with them and their conduct or by revealing details of any amount of compensation offered to me as publicity is certainly not my intention. I see myself as a genuinely aggrieved customer of Southern Railway Ltd. who has received an inferior service and attitude from Southern Railway Ltd over an extended period of time and am therefore due compensation for that, just as someone delayed 15 minutes on their routine journey to/from work would be entitled to compensation. How can you put a figure on almost three years of constant delay and inconvenience as a result of the failure of Southern Railway Ltd to provide an actual train service? I believe the amount of £5,000 is reasonable.

Thank you.

[REDACTED]

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From: [REDACTED]
Sent: 12 May 2012 20:56
To: South&WestLondon Consultation
Subject: Response to Wandsworth Rd - Ealing Broadway consultation

Hello

I think the consultation document should be re-issued with an additional option to restore through services between Brighton and Manchester (or East Croydon/Gatwick to Birmingham) as that would provide a more helpful distinction between withdrawing passenger services and keeping them in tact.

Thanks

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South and West London DFT Rail Consultation.

From: [REDACTED]
Sent: 14 May 2012 08:20
To: South&WestLondon Consultation
Cc: Justine Greening; chris.burchell@southernrailway.com;
Yvonne.Leslie@southernrailway.com; caroline.pidgeon@london.gov.uk;
chris.bainbridge@lbhf.gov.uk; sidonie.forrest-brown@rbkc.gov.uk
Subject: South and West London DFT Rail Consultation.

Dear Mr Feast

As an independent West London Line passenger representative, I have campaigned for the upgrading of the Kensington Olympia to Wandsworth Road 'Parliamentary' rail service since its inception in 2009. The starting of the afternoon service from Clapham High Street and the introduction of intermediate stops at West Brompton and Imperial Wharf from December 2011 were a step forward. However, the potential of the service to meet passenger demand between South and West London and to reduce increasing passenger congestion at Clapham Junction remains unrealised.

The DFT consultation document proposes 2 future options for the service: Option 0 - service withdrawal, or Option 1 - one train each weekday between London Bridge and Ealing Broadway via Kensington Olympia. Neither option would be a satisfactory outcome for existing or potential passengers.

Re Option 0, I have no objection to the closure of sections 2 or 3 - Willesden West London - Acton East Junctions. These sections are no longer served by scheduled passenger services, whilst the LU Central Line provides frequent direct services between Shepherd's Bush and Ealing Broadway. However, I do object to the closure of Section 1 - Factory Junction - Latchmere Junction and to the proposed withdrawal of the existing 1002 and 1611 weekday services via this route.

The appraisal, together with the strategic and commercial cases in favour of Option 0 set out in the document are flawed because:

- the costings are based on a 19-year franchise period, whereas the new Thameslink franchise incorporating Southern services will expire in 2020
- the passenger numbers quoted are based on the pre-December 2011 timetable
- no consideration is given to safety issues relating to platform/station congestion at Clapham Junction. This congestion will significantly worsen from December 2012 when existing Battersea Park and London Victoria South London Line passengers are re-routed via Clapham Junction and new passengers switch to the LOROL South London Line from other routes/modes
- no consideration is given to alternative service options with lesser pathing, and rolling stock costs and constraints

Instead of the proposed Options 0 or 1, I propose that from December 2012, the existing 1002 and 1611 skeleton weekday services are replaced by weekday morning, afternoon and evening services in both directions between London Bridge and Shepherd's Bush calling at Peckham Rye, Denmark Hill, Clapham High Street, Wandsworth Road, Imperial Wharf, West Brompton, Kensington Olympia and Shepherd's Bush. These services will:

- provide credible direct services between South East, South and West London
- mitigate platform/station congestion at Clapham Junction
- supplement core route South London Line services
- supplement core route West London Line services
- retain some direct services between London Bridge and Denmark Hill, Clapham High Street and Wandsworth Road, which will otherwise be discontinued from December 2012
- not require use of diesel or dual-voltage rolling stock
- involve fewer train pathing constraints than a London Bridge - Ealing Broadway service under Option 1
- provide many new one-change journey opportunities for cross-London rail/tube passengers
- involve minimal administrative, staffing, driver training, hardware or software costs

South and West London DFT Rail Consultation.

This proposed service should be included in the new Thameslink franchise specification and be subject to review at the end of the new franchise period in 2020.

At a time when the DfT is spending billions on new cross-London rail links (i.e. Thameslink and Crossrail), the comparatively infinitesimal cost to the DfT and/or a TOC in funding this service to plug a significant gap in the London rail network will be seen in hindsight as limited money well spent.

Please could you notify me of the outcome of this consultation.

Yours sincerely

[REDACTED]
West London Line Passenger Representative

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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[Redacted]

awa] of scheduled passenger services between Wandsworth Road Kensington (Olympia) and Ealing Br
From: [Redacted]
Sent: 15 May 2012 10:58
To: South&WestLondon Consultation
Subject: Withdrawal of scheduled passenger services between Wandsworth
Road, Kensington (Olympia) and Ealing Broadway

Good morning,

with regards to this withdrawal, can you tell me when DOES the currently weekly bus service run between Ealing Broadway and Wandsworth Road? on what day of the week, and at what time? Many thanks,

[Redacted]

>>

Summary
This consultation is made in compliance with the statutory requirements of the Railways Act 2005 and relates to the withdrawal of railway passenger services over sections of the network in South and West London. These passenger services are currently provided by a daily Southern train between Wandsworth Road and Kensington (Olympia); also by a weekly rail replacement bus service between Ealing Broadway and Wandsworth Road. There is no proposal to close the lines to other rail traffic.

--
[Redacted]

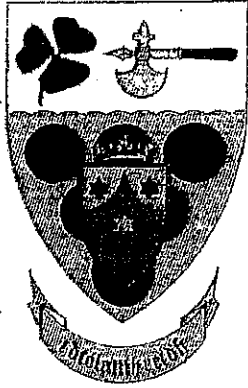
From: [REDACTED]
Sent: 19 May 2012 12:14
To: South&WestLondon Consultation; closures2@londontravelwatch.org.uk
Subject: Objection to planned closures
RE: <http://www.dft.gov.uk/consultations/dft-2012-17>

I object to these proposals, I use all of these services frequently. A bus service would be totally inadequate.

I thought Wandsworth Road was being brought into the orbital network anyway?
These seems like a step in the opposite direction

South London desperately needs a tube and in the mean time please don't take away the rail services

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South and West London Consultation
Department for Transport
Great Minster House 4/18
33 Horseferry Road
LONDON
SW1P 4DR

Dear Sirs

PROPOSAL TO DISCONTINUE RAILWAY PASSENGER SERVICES

I wish to object to the withdrawal of the up and down lines between Factory Junction and Latchmere Junction No 1 on the grounds that this is part of a through line for trains from the North West of England via the West London Junction Line to the South Coast...Bournemouth East to Dover including the Eurotunnel Terminal.

Yours Sincerely,

22 May 2012

Consultation Response to:

Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway (Department for Transport Consultation May 2012)

Submitted by:

I am submitting this response as I regularly used the services that operated along this route under the original Cross Country Trains franchise (and indeed before that on services operated by British Rail, which had run in some form or another since May 1979). These services being the Brighton to West Midlands and North West (and previously through to Scotland up until May 2003) train services (travel in both directions).

I am of the view that train services **should not be withdrawn** over the sections of railway line concerned.

I recognise that the current replacement bus service serves little or no purpose and that financial savings could be made by withdrawing it. This is not to say though that a viable and useful train service could not be developed over these lines.

The DfT's assessment of this has primarily involved discussion with Southern over the costs of operating a minimal service over the route (Option 1). The consultation document makes the point that the service frequency would be limited, and passengers could make the trip via alternative public transport connections (but inevitably involving various changes of train / mode). I suspect that the Economic Efficiency modelling set out in the document (eg Table 3 page 17, Table 5 page 19) is at best very sketchy since it would be hard to model the usage of such a limited service as that proposed in Option 1.

The solution that would be of most benefit to the public, but that is *not assessed* in the options presented in the consultation document, **would be a reinstatement of the Cross Country Trains services to / from Brighton**. This would restore an important link in the wider long distance UK rail service network, as well as re-instate convenient journey options for travellers to / from the important destinations of Brighton and Gatwick airport.

The withdrawal of the Cross Country Brighton services on the review of the Cross Country franchise some years back was a negative step. In response to the consultation carried out at the time I objected to this proposed withdrawal because the service was of considerable value to me and other members of my family who regularly had cause to travel on these trains (mostly between Brighton, Oxford and Birmingham and vice versa). To make this journey without crossing central London now requires two changes of train when none were previously required. Some family members do not drive and also travelled with young children so the through service was very useful in meeting their needs.

A modest procurement of extra rolling stock could allow this service to be re-instated, this would negate the need to consider the withdrawal of the service over the stretches of line

concerned as a closure. Indeed had such an option been planned for in 2007 that rolling stock could easily have been obtained and be in service by now. That procurement need not have been new trains for this route, but could have been managed through cascading rolling stock of the Voyager type used by other operators as part of a wider rolling stock investment plan of the sort the government is involved in.

Options considered in the consultation (e.g. page 9) make the point that it is difficult to provide a service because the route "does not fall naturally within any one TOC's territory". I would make the point that this is hardly the fault of the travelling public! A point like this would not apply were the option of re-instating the Cross Country services have been properly considered and assessed in the consultation.

I would urge the Department to reinstate scheduled train services over the routes concerned through a process of re-introducing a modest level of long distance train service to / from Brighton to re-open journey opportunities between the midlands and north west and the Sussex coast.

I hope these points can be taken into consideration as part of this consultation.

will forward your suggestion regarding the morning service to Southern for them to consider, although it is not normal practice to have a change to a timetable outside of the normal timetable change dates of May and December. Robert Nichols will respond to you when we receive a response from them in due course.

Yours sincerely

Tim Bellenger
Director, Policy and Investigation

London TravelWatch, 6 Middle Street, London EC1A 7JA

Tel: 020 7726 9959
Fax: 020 7726 9999

www.londontravelwatch.org.uk

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From: [REDACTED]
Sent: 30 May 2012 19:33
To: Tim Bellenger
Subject: Kensington Olympia-Clapham High Street/Wandsworth Road

Dear Mr Bellenger

I am writing concerning the proposal to axe the current Parliamentary service which runs from Kensington Olympia-Wandsworth Road and Clapham High Street-Kensington Olympia. I am a supporter of this service and Parliamentary services in general, because they keep options open at relatively little cost. I was keen from the outset that Clapham High Street be the full terminus for this service.

Reading the evidence, including your correspondence in particular (illuminating in so many other contexts), it would appear that London TravelWatch for once was pro-active in seeking to keep/maintain rail links despite the withdrawal of Birmingham-Brighton Cross-Country services.

The DfT supported the May 2010 Ealing Broadway-Wandsworth Road proposed rail link (but were thwarted by Network Rail), yet when Network Rail agreed to the Ealing Broadway-Clapham High Street proposal for December 2010, the DfT dithered. As you can imagine, such inconsistency and vascillation by the DfT is frustrating.

I note the DfT proposal for closure also includes a potential service from London Bridge-Olympia via Wandsworth Road. I am keen that this service be introduced instead until the expiry of the South Central/Southern franchise (when the DfT can decide whether to keep this service in the franchise specification). In fact what would be best would be a service running from London Bridge-Ealing Broadway but on the return terminating at Clapham High Street to enable the unit to run empty to Selhurst Depot. I believe this is path-manageable.

But if this is not possible, then I would appreciate London TravelWatch being again pro-active on the existing service. Currently the outbound journey from Kensington Olympia leaves at 10:02 and is scheduled to arrive at Wandsworth

Road at 10:20 where it terminates.

Southern have stated the reason the train can't serve/terminate at Clapham High Street is that this would entail a 10:22 departure from Clapham High Street and hence the service would miss its 'path' to Selhurst Depot.

However, recent journeys have shown that if the train were to arrive at Wandsworth Road 1 minute earlier (ie at 10:19), it would arrive at Clapham High Street at 10:20 and depart at 10:21. Thus it would be making the same timings on the path to Selhurst as at present.

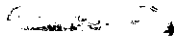
In practice the train has been arriving at Wandsworth Road at 10:19.

So could London TravelWatch look to liaise with Southern to run this service as a Clapham High Street terminator service post-Olympics for the remainder of the summer timetable (ie from September to December) by re-timing the train to arrive at Wandsworth Road at 10:19?

I think this is possible and would cost nothing, whilst benefitting passengers. Please let me know your thoughts on this.

I of course await your response on the totally separate issue of peak hour Victoria services for Clapham High Street/Wandsworth Road and the various options London TravelWatch possesses for realising this objective.

Yours sincerely



Yours sincerely

Tim Bellenger
Director, Policy and Investigation

London TravelWatch, 6 Middle Street, London EC1A 7JA

Tel: 020 7726 9959
Fax: 020 7726 9999

www.londontravelwatch.org.uk

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I of course await your response on the totally separate issue of peak hour Victoria services for Clapham High Street/Wandsworth Road and the various options London TravelWatch possesses for realising this objective.

Yours sincerely



Friday 01 June 2012

South & West London Consultation
Department for Transport
Great Minster House 4/18
33 Horseferry Road
London SW1P 4DR

**Objection to proposed closure of the railway passenger service between
Ealing Broadway and Wandsworth Road**

This objection to the proposed closure is also
being copied to London Travelwatch

I am a retired transport professional, having served my working life in civil aviation (*BOAC and British Airways - 'traffic', reservations and marketing*), passenger traffic and route planning in London Buses, station planning / implementation, graffiti and vandalism controls, Safety Case and safety critical licencing on London Underground, and eleven years in a railway control room for a main line railway franchised operation.

I register my objection to the intended removal of this service, on the following grounds, based on professional and personal experience:

- 1 **HARDSHIP** - the connection facility, such as it is even now has been useful; the alternatives currently on offer take longer and are more indirect. Losing what's left now will add time and changes to journeys which take advantage of the minimal present service.
- 2 **LACK OF PASSENGER INFORMATION** - the operation is wilfully unadvertised and I have missed both the bus and the train on more than one occasion. The replacement trains are not indicated on the Passenger Information System at any platform of any station, the crews are clearly instructed to discourage boarding by the trains not showing any route information on the front nor sides. The replacement bus does not have any clear indication where it can be boarded, nor is it signposted anywhere to assist intending passengers.
- 3 **LACK OF CONNECTIVITY IN PRESENT FORM** - the service now, unlike its predecessor doesn't call at convenient connecting points and appears to have been timed this way deliberately, to the extent of the out and back trains not even linked (what does the rolling stock do in-between those trips?).
- 4 **NO ALTERNATIVES HAVE BEEN CONSIDERED** - the route is capable of supporting more trains and the termini extended, *such as but not limited to*

a through operation between GREENFORD [to replace or supplement the present First Great Western operation] and CLAPHAM JUNCTION, which could be operated by London Overground, which already possesses suitable rolling stock in the form of class 172 Bombardier diesel multiple units. Most traffic on all the routes served is on an hourly 'clock-face' timetable interval, so the traffic / train paths can be replicated throughout the day.

The simplistic claim that any Southern service would have to terminate at London Bridge omits options for other operators, such as London Overground. The Southern service is only restricted because it hasn't got 'spare' diesels for working Great Western Lines, but it does have mixed-mode units capable of running off the overhead wires which do exist on the Great Western and third rail, which powers the majority of rail routes south of the Thames.

5 **DIFFICULTIES TO OBJECT / CONTACT DfT ONLINE** - the online address in the public notice in the London *Evening Standard* on Thursday 10 May 2012 is invalid, which suggests the Department is discouraging objections and may not consider objections impartially.

6 **EXTANT SERVICES DO NOT SERVE TRAFFIC OBJECTIVES** - the substitute bus and the single-operation trains by-pass any useful destination. No attempt has been made to rectify this and generate / develop traffic. The present train operations are non-connecting, and there is no enroute depot so paths must exist to move the train(s) to and from their single scheduled journeys.

7 **DRIVER ROUTE AND TRACTION KNOWLEDGE IS IRRELEVANT IN THIS CONTEXT** - the traction type is common to the operator and no matter who provides the service, this would still apply. The consultation document is disingenuous in making this point.

Route knowledge is only an issue of proportion as so few trains run the service; more trains would make more crews route-aware and the problem is self-creating and capable of self-resolution by increasing the service with through running to link the effective use of rolling stock elsewhere.

8 **LACK OF DEMAND** - the Passenger Demand Forecasting methodology, quoted on page 6 *passim* of the consultation document, only appears to have been used to justify closure, not to show expansion potential.

9 **INTERCHANGE AT SHEPHERDS BUSH** - (as on page 10 of the Consultation Document) the link between Overground/Southern and the Central Line is awkward and can be difficult for anyone with mobility issues.

There are NOT 'many alternative public transport options' and those which exist take longer than a through rail service.

10 **COST OF OPERATION** - page 11 of the Consultation Document lays out a virtually-positive cost-benefit case for service enhancement by the present operator - this is ignored and the word of Network Rail is taken without question as to lack of path availability.

Network Rail's assertions in the past have proved questionable and their present statements should have been examined critically and independently.

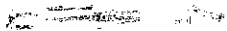
11 'ECONOMIC CASE' OPTION 1 - omits options for other operators and routes, and is therefore flawed and incomplete.

The route is capable of development and as London Overground has shown over the last few years, new routes generate new and previously uncatered-for passengers. The coming new Overground link to 'complete the circle' via Surrey Quays to Peckham Rye reinstates a link not used for several decades (and on to Clapham Junction, where new infrastructure is being specifically provided), and with no prior-provable demand for traffic. These through links will prove invaluable, popular and useful, as has the line from Highbury & Islington to Crystal Palace and West Croydon, a facility which has never previously existed, or at least not in living memory.

London Overground has shown itself willing to invest in flying junctions ('grade separation'), new track and stations etc to overcome path conflicts; the overall issue is development of a service, not withdrawal.

I therefore object to a rail closure in inner London which could be developed to take traffic off roads, generate new revenue, reduce highway pollution, noise and accidents, and be of benefit to leisure, business, industry and commerce.

Yours sincerely



Monday 4 June 2012

South & West London Consultation
Department for Transport
Great Minster House 4/18
33 Horseferry Road
London SW1P 4DR

Objection to proposed closure of the railway passenger service between
Ealing Broadway and Wandsworth Road

I am a retired Railway maintenance engineer. Working for British Rail, Conex South Central and South West Trains in various shop floor, supervisory and Management capacities.

I register my objection to the intended removal of this service, on the following grounds, based on professional and personal experience:

1. **HARDSHIP** - the connection facility, such as it is even now has been useful; the alternatives currently on offer take longer and are more indirect. Losing what's left now will add time and changes to journeys which take advantage of the minimal present service.
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Route knowledge is only an issue of proportion as so few trains run the service; more trains would make more crews route-aware and the problem is self-creating and capable of self-resolution by increasing the service with through running to link the effective use of rolling stock elsewhere.
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There are NOT 'many alternative public transport options' and those which exist take longer than a through rail service.
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Network Rail's assertions in the past have proved questionable and their present statements should have been examined critically and independently.
11. **'ECONOMIC CASE' OPTION 1** - omits options for other operators and routes, and is therefore flawed and incomplete.


The route is capable of development and as London Overground has shown over the last few years, new routes generate new and previously uncatered-for passengers. The coming new Overground link to 'complete the circle' via Surrey Quays to Peckham Rye reinstates a link not used for several decades (and on

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I therefore object to a rail closure in inner London which could be developed to take traffic off roads, generate new revenue, reduce highway pollution, noise and accidents, and be of benefit to leisure, business, industry and commerce.

Yours sincerely

A heavily redacted signature, appearing as a dark, textured horizontal bar.A heavily redacted name, appearing as a dark, textured horizontal bar.

From: [REDACTED]
Sent: 11 June 2012 02:33
To: South&WestLondon Consultation
Subject: Fw: Wandsworth Rd etc

----- Forwarded Message -----

From: [REDACTED]
To: "southandwestlondon.consultation@gsi.dft.gov.uk"
<southandwestlondon.consultation@gsi.dft.gov.uk>
Sent: Monday, 11 June 2012, 2:07
Subject: Wandsworth Rd etc

Dear Sirs

Having read your document on this I'm afraid I am still puzzled as to

(a) why it is said that the withdrawal of the Brighton cross-country service requires the legal closure of Latchmere Jn - Factory Jn, given that that service did not use this route. [The previous Folkestone and Margate Cross country trains did - is that the real reason?]

(b) why it is proposed to close the Longhedge Jn to Factory Jn portion of Latchmere Jn to Factory Jn, given that a new 15-min interval service is to be started over this portion on the very day you propose to 'close' it.

Could you elucidate please? Thanking you

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Keletha Barrett

From: [REDACTED]
Sent: 12 June 2012 11:58
To: South&WestLondon.consultation@dft.gsi.gov.uk
Cc: [REDACTED]
Subject: Edenbridge & District Rail travellers'Association:Withdrawal of scheduled passenger services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

Edenbridge & District Rail Travellers' Association has an interest in potential future reinstatement of scheduled cross country or similar services via East Croydon, which might use the Acton Wells route. Also, although any such service is likely to travel via Clapham Jn., it might possibly require to go via Herne Hill, thereby using the Factory Jn- Latchmere Jn. section.

'For the avoidance of doubt' we would wish that the wording of any closure notice should be unequivocal to the effect that it in no way precludes any such scheduled services being operated in the future.

Regards,
Geoff Brown,
Secretary, E&DRTA

From: [Redacted]
Sent: 12 June 2012 09:23
To: South&WestLondon Consultation
Subject: Closure Proposal

I strongly support the proposed withdrawal of passenger services. The West London Line is best used for the present high frequency services and as the Report states, Ealing is easily accessed via Shepherd's Bush and the Central Line.

It is regrettable that the Department has had to produce such a lengthy report in order to justify these proposals.

[Redacted]

[Redacted]

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Keletha Barrett

From: [REDACTED]
Sent: 21 June 2012 16:33
To: south&westlondonconsultation@dti.gsi.gov.uk
Cc: Keletha Barrett
Subject: South to West London direct rail service

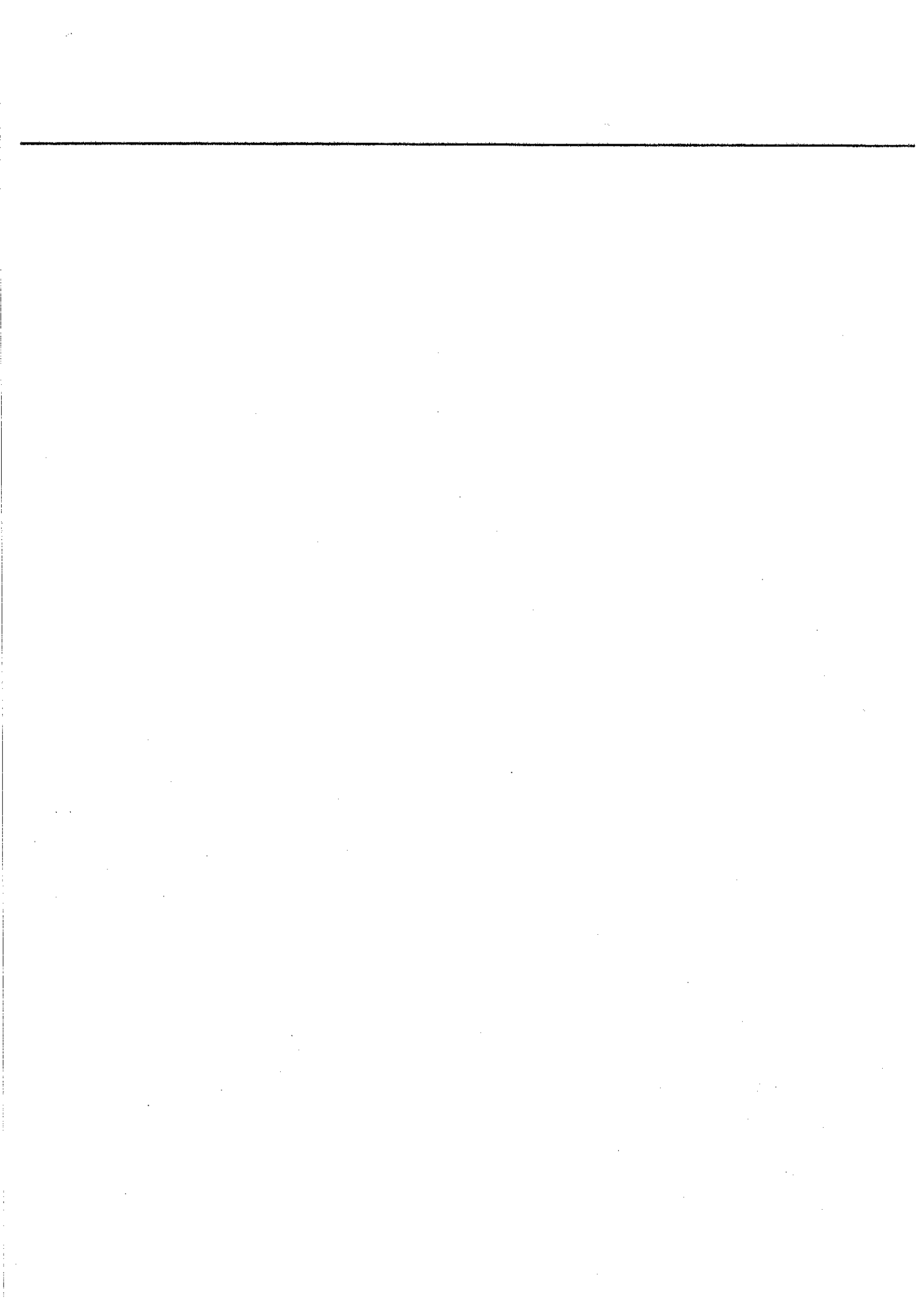
Dear Sirs,

I was not surprised to learn that the Secretary of State has concluded that the residual 'Parliamentary' rail service running once only on weekdays between Wandsworth Road and Kensington Olympia, supplemented by a weekly replacement bus service out to Ealing Broadway, does not represent value for money. However, I cannot believe that it was ever intended to do so. On the one occasion I used the train from Wandsworth Road, out of interest, its arrival at the platform was accompanied by an announcement that the approaching train was not for public use. Ignoring that, I boarded it and was greeted by a more encouraging announcement welcoming passengers to the 16.12 train to Kensington Olympia.

While the abandonment of such a farcical service might be expedient in the short term, I would very much hope that for the future London's transport planners would give some thought to the potential viability of a regular Overground service connecting South London and Ealing Broadway, including the rebuilding of East Brixton Station, the omission of which from the forthcoming Overground extension to Clapham Jct seems a sadly missed opportunity.

Thank you for your attention.

Yours faithfully





EALING PASSENGER TRANSPORT USERS' GROUP
www.eptug.org info@eptug.org 020 8998 0999

3 Gordon Road
Ealing
London W5 2AD

EPTUG

21st June, 2012

Mr T Bellinger
Travel Watch London
6 Middle Street
London, EC1A 7JA



Dear Tim,

**Proposed withdrawal of service between
Ealing Broadway and Wandsworth Road**

EPTUG, which represents public transport users in and around the London Borough of Ealing, wishes to object to the withdrawal of this service.

The temporary weekly bus service has for obvious reasons not been well used. It was poorly advertised and was not a frequent service, yet it could provide a useful service if these deficiencies were overcome. The quality of the replacement bus service was seriously impaired because it had to traverse some of the UK's most congested road network.

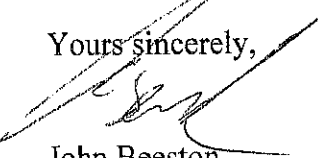
The bus service replaced a rail service and we would like to see a re-instatement of the rail service albeit one stopping at Ealing Broadway and stations en route to Clapham Junction. This would provide a much needed link between west London and the rail network south of Clapham. Importantly it would also provide a same platform interchange for passengers from south London and wishing to reach Heathrow Airport using the Heathrow Connect service.

An opportunity to link this proposed reinstated rail service presents itself when the Greenford Branch service into Paddington is due to terminate at West Ealing prior to the introduction of the Crossrail services. Terminating services at West Ealing is strongly opposed by Ealing Council and residents since it provides a vital link to the centre of the Borough.

Providing the extra service along the West London Line would provide much needed capacity for passengers on that line. We understand that at most times of day serious overcrowding occurs on that line.

The provision of a "dive under" near Twyford Bridge will help minimise the impact of the new Greenford – Clapham service on Crossrail services.

Yours sincerely,


John Beeston,
Hon Chairman, EPTUG

A volunteer organisation dedicated to improving public transport in and around the London Borough of Ealing

Keletha Barrett

From: [REDACTED]
Sent: 24 June 2012 13:39
To: Keletha Barrett; south&westlondon.consultation@dft.gsi.gov.uk
Cc: Tim Bellenger
Subject: Cross Country Closure from East Croydon to Reading and North of England

Dear Sirs,

I note that there is now an official request to close a number of railway lines in South London that were used by the Cross Country Intercity services from East Croydon to Reading, Oxford, Birmingham and the North of England.

Generally, it is my belief and understanding that the Closure Proposals should have been made prior to the unilateral withdrawal of passenger service on this Intercity route.

In regard to the actual Consultation document, please can I draw your attention to page 4 where it states that the Intercity trains were "lightly used". To support this statement, please can you publish the loading figures of the trains in question. The dates of the count should also be stated.

It is interesting to note that direct Intercity train from East Croydon were introduced in 1977, and despite various recessions, and downturns, the trains were always "well used" up until Arriva were given the Franchise.

Noting the points above, I object to the closure, and formally request that immediate resumption of direct trains services from East Croydon to Reading, Oxford and the North of England.

Best regards,

Keletha Barrett

From: [redacted]
Sent: 02 July 2012 07:54
To: consultation@dft.gsi.gov.uk; Keletha Barrett;
south&westlondon.consultation@dft.gsi.gov.uk
Subject: Factory Junction to Longhenge Junction

Department for Transport, attn Simon Feast, #4/18
London Travelwatch

Dear Sirs, Mesdames

I have looked at the DfT's consultation on the proposed discontinuation of certain 'train services' in the Acton and Willesden areas, and another section of railway in the Wandsworth area near Clapham Jct.

I write to object to the proposed closures to passenger services as the DfT has made an error in one of the sections of railway to be closed. I have no objection in principle to the discontinuation of the rail-replacement bus / taxi and the 'technical' withdrawal of services from Acton East to Acton Wells Jct (w) and from Acton Wells Jct (E) to Mitre Bridge via the SW siding loops. No station is involved since the substitute service could technically have called at Shepherds Bush, although the XC services only called at Olympia.

If one were to assume that following the present arrangements, and notwithstanding what is planned for new LO services from December your closure proposals are fallacious. Also the train service proposed in option Table A1 #4 would not necessarily have to operate to London Bridge, and as such could be operated by London Overground. This could form a regular daily vehicle movement to and from the ELL, as stock movements between the two parts of LO's operations are not connected as planned by the interconnecting spur from Westbourne Road Junction to Highbury and Islington Platform 2. Thus daily passenger services over this route would facilitate LO's maintenance of route knowledge for their own crews operating between Willesden and New Cross Depots.

Furthermore, as to the section between Factory Junction and Latchmere No1, you may not withdraw services between Factory Junction and Longhenge Junction, as from 8 December 2012 these lines will carry London Overground services from the South London Line and Wandsworth Road station to the new Platform 2 at Clapham Junction, crew training runs start from late June, and there is considerable controversy as to why this service could not start from around 24 July to facilitate the Olympic travel plan.

Therefore the Department will need to re-issue its notices to correct this error. This is clearly demonstrated in Table A1.

Please take this letter as my objection to the closure, however I am not objecting to the abandonment of the bus / cab from Ealing Broadway

Yours faithfully



Keletha Barrett

From: [REDACTED]
Sent: 17 July 2012 08:28
To: South&WestLondon.consultation@dft.gsi.gov.uk
Cc: Keletha Barrett
Subject: Consultation on the withdrawal of scheduled passenger services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

As an occasional user in the past of the through Cross Country service that used these routes, and more recently of the Wandsworth Road to Kensington O and Shepherds Bush service, I must register an objection to the proposals to withdraw regular passenger services over these routes. The suggestion that alternative services will be available involving changes at Clapham Junction and Shepherds Bush is not one readily available to people with cycles, since these cannot be taken on tube sections of the underground e.g. west of Shepherds Bush (or on other routes at busier times) and this is therefore of less use that might otherwise be the case. It would be preferable if some revised through services (i.e. not involving changes at Clapham Junction and Shepherds Bush as outlined, but possibly also Bromley South and Ealing Broadway too) between Kent and Reading and the Midlands be reinstated.

Further it appears to me that it would had been more appropriate to compare the costs and benefits with the provisions of a longer distance service between Kent stations and the Thames valley (and the Midlands), whether as part of the cross Country franchise or as part of either Crossrail, greater western or the new combined south / south-east London / Thameslink franchise going forward.

With all lines electrified** a new service - say hourly initially - from perhaps Slough (or Windsor, or Greenford) via Ealing Broadway, Kensington Olympia to Wandsworth Road, Peckham Rye, Bromley South (perhaps semi-fast via Catford) and beyond would be useful to provide additional capacity on inner Thames valley routes as well as opening up new journey opportunities across London away from the new Crossrail route towards Stratford and Woolwich. (** including the recently announced fill-in electrifications between Acton ML and Acton Wells, and pathing at the former will become easier soon.)

I look forward to hearing from you.

Regards

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Web Site: <http://www.fox.com>

Tim Bellenger

From: [REDACTED]
Sent: 31 July 2012 15:58
To: South&WestLondon Consultation
Cc: Robert Nichols; [REDACTED]
Subject: Proposed Service Withdrawal: Ealing Bdy-Wandsworth Rd

Dear Sir/Madam,

COMMENTS ON PROPOSED WITHDRAWAL OF PASSENGER SERVICE - Ealing Broadway- Wandsworth Rd

As a seasoned transport campaigner, I am more accustomed to fighting proposed service withdrawals, so it feels very strange to be writing in wholehearted support of this one. This proposal is long overdue; the existing "Ghost Bus" replacement service is completely useless and has been a scandalous waste of taxpayers' money ever since it was introduced. It has only ever been of interest to connoisseurs of quirkiness, and the sooner it is taken off the better. However, I would ask that the SoS stipulates that nothing should be done to the infrastructure which would prevent an Ealing Broadway-South London Line service being introduced in the future.

Having said that, this proposal throws up other issues that I should like the Secretary of State to consider, as follows:

a). The proposal highlights the whole dubious area of "Parliamentary" services which are provided solely to avoid proposing formal withdrawal. As in this case, they are usually of no practical use whatsoever, and to all intents and purposes the usable service has been withdrawn without any formal process having been followed or any opportunity for users to object. Other examples include Stockport-Stalybridge (one train a week, one way only) and Pilning (one train each way, Saturdays only). This is fundamentally and morally wrong, and I urge the Secretary of State to put a stop to it by insisting on a minimum acceptable level of service for all lines and at all stations. I would suggest that this minimum should be set at three trains a day each way, Monday-Saturday: morning peak, middle-day and evening peak. Any level lower than that should require a formal consultation on reduction/withdrawal.

b). The Secretary of State should insist that skeleton "Parliamentary" services are fully and properly advertised so that anybody wishing to use them can find out the details as easily as if it were a "proper" service. This is not the case at present: the weekly Wandsworth Road-Ealing Broadway bus service has never been included in the National Rail timetable or on the NRES online database, and for long periods was not even properly advertised at the stations it served. At Wandsworth Road, its pick-up point was not properly indicated until recently – indeed, it roared straight past me on the one occasion I attempted to use it! Stockport-Stalybridge is only shown in the National Rail timetable as a hard-to-find footnote, and trains to Pilning are omitted from the departure posters at most stations on the route that serves it. This is unacceptable and the Secretary of State/DfT should act to rectify it.

c). The Secretary of State should ensure that all proposals to withdraw services are properly and accurately advertised – this was not the case here. The text of the proposal was incorrect: one of the curves involved was wrongly identified, the daily Southern rail service is not actually a statutory requirement so need not have been included (though doing so is helpful) and I could not find any sign of the withdrawal-proposal poster at Ealing Broadway station when I used it a couple of weeks ago. More care needs to be taken over this in future, as such lapses could trigger a complaint which could require the whole process to be started again from scratch. (If I was opposing this proposal I would have waited until the final week of the consultation before doing exactly that, which could have delayed the whole process by several months!).

d). Finally, the ridiculous and expensive situation regarding this service would never have arisen if correct procedures had been followed before the Cross Country rail service was withdrawn several years ago. DfT needs to take steps to ensure that this does not happen again.

Thank you – yours faithfully,

[REDACTED]

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Transport Salaried Staffs' Association

Walkden House, 10 Melton Street, London NW1 2EJ

t 020 7387 2101

f 020 7383 0656

e enquiries@tssa.org.uk



TSSA (DNIES)

London TravelWatch
6 Middle Street
London EC1A 7JA

Our Ref: AC/12/E12
2nd August 2012

Dear Sir/Madam,

Department for Transport Consultation: Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

Please find attached copy of letter TSSA has submitted to the Department for Transport that I have been asked to bring to the attention of various interested parties including London TravelWatch. We would, of course, welcome any comments your organisation would like to make regarding support for TSSA's policy objective on this issue.

Yours faithfully

Neil Davies
Policy Adviser

Transport Salaried Staffs' Association

Walkden House, 10 Melton Street, London NW1 2EJ

t 020 7387 2101

f 020 7383 0656

e enquiries@tssa.org.uk

South & West London Consultation
Department for Transport
Great Minster House 4/18
33 Horseferry Road
London SW1P 4DR

Our Ref: AC/12/E12
2nd August 2012

Dear Sir/Madam,

Department for Transport Consultation: Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

I am responding on behalf of the Transport Salaried Staffs' Association (TSSA), an independent trade union with approximately 24,000 members employed by various transport and travel undertakings in the United Kingdom and Republic of Ireland. Most of our members work in the railway industry, including the companies mentioned in the consultation document. TSSA members also work for Transport for London and London Overground - the organisations we want the service to be transferred to.

Set out below is the text of a self-explanatory resolution that was carried by delegates at TSSA's Annual Conference this year that I have been asked to convey to various organisations including the Department of Transport and forms the basis of our response to the above consultation.

TSSA 2012 ANNUAL CONFERENCE: ITEM E12 - TRANSPORT POLICY

That this Conference rejects the proposition published by the Secretary of State for Transport to discontinue the remnants of the rail operation formerly linking Reading and Brighton, as publicly notified in the London Evening Standard on Thursday 10 May 2012.

Conference notes the remnant train service between Wandsworth Road and Olympia stations, referred to as a "Parliamentary" train, indicating its operation is solely to comply with a legal obligation, is unadvertised and passengers are discouraged from using the route/facility, which includes a rail replacement bus between Ealing Broadway and Wandsworth Road, which is also unadvertised.

Conference believes in, and supports, expansion of rail services and as this proposed withdrawal is entirely within Greater London, that it should be passed

www.tssa.org.uk

members' helpdesk 0800 3282673
General Secretary Manuel Cortes

tssa



to TfL as part of the successful and growing London Overground network and publicised as widely as possible to ensure future success. This group of passenger services, designed and introduced by Ken Livingstone's administrations has proved successful beyond all projection.

Conference calls on the EC to promote the retention and improvement of this service, to pursue this with the Greater London Assembly, the Mayor of London, TfL and to lodge a formal objection to the closure proposal before the published deadline of 9 August 2012, with a copy of that objection to be supplied to London Travelwatch, the passenger watchdog for Greater London.

I would urge the Department to take the necessary action called for in the resolution to give effect to its objectives.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Neil Davies', written in a cursive style.

Neil Davies
Policy Adviser

West London Line Group Executive Representations on the Consultation Document on the Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington Olympia and Ealing Broadway

Introduction

The Executive welcomes the production of these Proposals and the opportunity given to reflect on the options therein for the future development of rail services in inner West and South London.

However we are concerned that there appear to be deficiencies both in the present service arrangements following the Cross-Country service withdrawal, and in these Proposals.

We also note that the DfT as the Rail Funding Authority, in taking future action, must abide by the Closures Guidance it published in 2006. Under the second section (Assessment) of this document is paragraph 2.1 from which the following extract has been taken:-

"2.1 As noted, the decision to consider a rail service for closure rests with the relevant RFA or operator. Prior to considering closure, the RFA or operator will want to satisfy itself that all options for re-invigorating services have been considered. However, once a RFA or operator has decided to consider a rail service for closure, then it must carry out an appraisal of the closure. This appraisal must follow this guidance. Where the closure proposal comes from a train or network operating company in relation to a station or network, the operator must carry out an appraisal in accordance with this guidance before submitting it to the National Authority. The National Authority will then evaluate the appraisal as part of its consideration of the proposal."
(All the underlining above is ours.)

We do not believe that all the options for re-invigorating the present services that should have been considered have been so considered.

We also believe that it would be right and fair to take a wider focus than that being taken by these Proposals and that regard should also be given as to actual increased activity in the rail sector as well as national, regional and local policies in relation to:-

- (i) offering new public transport routes and thus greater travel choices through improved integration and connectivity, thereby enhancing employment and leisure opportunities;
- (ii) supporting regeneration and employment across inner London; and
- (iii) easing pressure on the key parts of the Underground.

We believe that to do otherwise would run the risk of (i) an incomplete assessment being made of the present situation, (ii) an inadequate appraisal taken of the potential for rail services along this axis, and (iii) a less-than-optimal set of solutions being implemented.

1. Purpose of Consultation

1.1 Concerns with the Existing Arrangements and the Proposals Document

The Executive does not wish to be at odds either with those responsible for the present arrangements or for the drawing up of the Proposals.

However, we believe that the present arrangements do not conform with what should have been provided upon the withdrawal of the Cross-Country Manchester to Brighton service to the extent that they are deficient and possibly outside agreed procedures and may be illegal.

It is somewhat suspect to believe that withdrawal of a twice-daily service between the south coast, West London, the Midlands and the North can be properly provided for by alternative Cross-Country services to Reading, connecting train services to Ealing Broadway, a once-a-week bus between there and Kensington Olympia, where no attempt has been made to connect this with a once-a-day substitute train between there and Wandsworth Road, with no direct connection from there to East Croydon (for other trains to Gatwick and Brighton).

The Executive is also concerned with the wording of the opening assertions in these Proposals, viz. "The sections left without scheduled passenger services comprise three short sections of track, no stations are involved. These sections are:

1. Factory Junction to Latchmere Junction no.1 (a short chord between Wandsworth Road and Imperial Wharf stations)
2. Willesden West London Junction to Acton Wells Junction (between Shepherd's Bush and Acton Main Line stations)
3. Acton Wells Junction to Acton East Junction (between Shepherd's Bush and Acton Main Line stations) "

1.1.1 Factory Junction to Latchmere Junction no.1

We are concerned with the word 'short' being used to describe the chord between Factory Junction and Latchmere Junction no.1, when this is 1 mile 40 chains in length and when the other two are not so described, while being only 1 mile 3 chains and 0 miles 41 chains respectively.

The insertion of this description only against the first of these sections gives the distinct impression that this is an insignificant piece of rail infrastructure, when in fact it is the prime link between the whole of the south-eastern rail network with the Great Western Main Line, the West Coast Main Line, the Midland Main Line, the East Coast Main Line and rails across East Anglia.

This chord has a vital role to play in both the national and local inner London rail network.

First, it is still regarded within the rail industry as the primary and most easterly rail link between both banks of the Thames, despite the three more-recently developed crossings of HS1, the East London Line and Thameslink.

Second, it links the two inner London stations of Wandsworth Road and Imperial Wharf which are some 2½ miles apart (a greater distance than between most consecutive stations in the London area), both reasonably populous and, at Imperial Wharf, with present and future attractors.

Third, there are other important traffic generators along this axis, if this is extended even for only short distances, e.g., (i) eastwards towards Brixton and Peckham and (ii) north-westwards to Earl's Court, Olympia (for Kensington and Hammersmith), Shepherd's Bush or Willesden. This would link south London to no less than three Opportunity Areas (Earl's Court, White City and Park Royal) and offer the potential of very easy interchange at Old Oak Common where it straddles the alignments of Crossrail, GWML, Heathrow Express and HS2.

1.1.2 The omission of Shepherd's Lane Junction

The second shortcoming in these Proposals is the omission from the sections of line from which scheduled passenger services are to be regarded as withdrawn of Shepherd's Lane Junction. Just as the Cross-Country service was withdrawn over the three other sections above, it also used this link

between the Atlantic and Chatham lines, which as far as we are aware has since had no other regular scheduled passenger service.

Although this is only a crossover between two parallel sets of lines between Clapham High Street and Brixton stations, these sets are within two distinct and separate networks, and the withdrawal of the trains without replacement over this crossover is just as significant as that between within the other three sections cited above and therefore this section should be included as a fourth element within the Proposals.

Thus the potential offered by the link across Shepherd's Lane Junction should also be fully considered within any assessment of the Proposals.

Whether or not it can be shown that some other service has been regularly scheduled to ply over Shepherd's Lane crossing (and not merely taken *ad hoc* diversions over it to meet some occasional tactical operational need on the approach to Victoria), the option to re-invigorate the existing service by its short extension in service (rather than, as at present, as empty coaching stock ("ecs")) on to the Southeastern network, as suggested below, not only should not be overlooked, but should be fully assessed and appraised.

Given the Cross-Country service withdrawal, the scope of these Proposals ideally should stretch between Reading and East Croydon. However, with the alternative services between (i) Reading and Ealing, and (ii) south London and East Croydon, the Executive has concentrated in this submission on the options for the lines and services between Ealing Broadway and Brixton.

1.1.3 Service withdrawal between Manchester, Birmingham, West London, East Croydon, Gatwick and Brighton

It should also be remembered that a key aspect of the Cross-Country service were the direct – if slow – links between these centres. No attempt has yet been made to re-invigorate these beyond retention of other services. It was noted that, with little or no advertising, 28 people starting their journeys before East Croydon were travelling beyond Reading on one of the last mid-week Cross-Country trains.

One option that should be investigated in relation to these Proposals would be a two train per day service between Birmingham – Milton Keynes – Watford Junction – Kensington Olympia – Clapham Junction – East Croydon – Gatwick and Brighton.

The morning southbound journey could be timed to fill a 73-minute gap in the Milton Keynes – Clapham Junction service in the morning peak and would probably have on board those wishing to travel without a change to Gatwick. No doubt a reverse journey in the same period would find support from those in the south wanting to be in Birmingham by 09.30. There would probably be reasonable take-up of returning journeys in the late afternoon/early evening.

We would ask for this option also to be assessed and appraised, again against the general growth in the demand for rail.

2. Appraisal

The two above shortcomings (inappropriate use of the word 'short' and the omission of Shepherd's Lane Junction) run the risk of (i) an incomplete assessment being made of the present situation, (ii) an inadequate appraisal taken of the potential for rail services along this axis, and (iii) a less-than-optimal set of solutions being implemented.

We do not believe that all the options for re-invigorating this service have yet been considered.

At Section 6 below we have suggested a range of low-cost options in terms of (i) existing and/or planned rail services, and (ii) infrastructure. This relatively modest package of proposals would significantly reinforce national, regional and local policies in relation to:-

- (iv) offering new public transport routes and thus greater travel choices through improved integration and connectivity, thereby enhancing employment and leisure opportunities;
- (v) supporting regeneration and employment in inner London; and
- (vi) easing pressure on the key parts of the Underground.

We believe that the appraisal should be carried out against the background of the above three points, plus central and local government policies towards (and developments within) the rail sector, with especial reference to Olympic and other developments across inner London.

2.1. Suggested Scope of Appraisal

We would contend that the section of rail to be covered in terms of scheduled passenger services since 2008 should be between Ealing Broadway and Brixton and that it is the full potential of this whole route axis that should now be considered when appraising the future options in terms of re-invigorating service provision.

To do so would be to adopt the appropriate forward-looking attitude at a time of continuing, and seemingly unstoppable, growth in demand for rail services, wherever they may be. Moreover, the recommendations arising out of the assessment and appraisal should (i) be commensurate and (ii) where possible dovetail with the excellent progress being made in terms of rail and tube connectivity in the other three quadrants of inner London. We strongly believe that a wider view than that offered by these Proposals should now be taken to realise similar opportunities for development in South London.

2.2 A Destructive Olympics Legacy?

While we note and welcome the extension of ELLX2 via the South London Line to Clapham Junction, this should not be the end of the story. Instead, this should be wound into these Proposals to make a virtue out of a desirability or a necessity.

Moreover, the Executive finds it extremely counter-productive that, while £9.8 billion has been invested in transport improvements in East London, implementation of these Proposals will now completely take out a direct link between south London and West Brompton, which is currently described as an Olympic station (for the Volleyball). However, the thrust ought to be to build on what exists and not take it away, especially at stations that have been so closely linked to the Olympics.

2.3 A Wider Focus

Thus, we feel that a significantly wider focus must be applied in relation to this appraisal, when:-

1. There are four, and not three, sections of line that need to be covered by these Proposals
2. There continues to be a general promotion and exhortation to people to use public, and not private, transport - especially in conurbations such as London

3. Rail travel across all markets, including off-peak usage, is experiencing continual growth, with virtually all new rail openings and recent improvements experiencing usage levels far in excess of initial forecasts
4. Orbital rail travel demand growth appears to be mirroring more closely that of radial demand within many UK city areas. This is most marked in London and especially on the 'orbirail' sections of the London Overground routes
5. Not only has the demand on the re-opened East London Line far exceeded expectations, but other orbital opportunities are being discovered, e.g., West Brompton to Wembley Park via the now direct London Overground trains between the West and North London Lines and the interchange at West Hampstead
6. London Overground has more frequent services on all its routes, plus new trains with much greater carrying capacity
7. In the post-Olympics period, every opportunity should be taken to build on the transport Legacy given to other parts of inner London
8. There is a continuing need to support regeneration and employment opportunities, especially across inner London

Opportunities for greater orbital travel being enjoyed in the other three quadrants of the London Overground network should also be developed for those living and working in south London. The travelling public is waiting to hear how the success that the South London Line ("SLL") will undoubtedly enjoy from melding into the London Overground network is to be built upon.

In this regard, initiatives to strengthen travel options within south London as presented by the Kensington Olympia – Wandsworth Road service should now be taken, especially to counter where possible the downsides of changes to the South London Line.

2.4 Downsides to the changes to the South London Line

Simultaneously cutting the direct links between the SLL and (i) Victoria for the West End employment centres and (ii) London Bridge for the City and Canary Wharf will encourage more local residents on to the already-crowded the Northern Line at such stations as Clapham North with their all-too-narrow and dangerous platforms.

The route for SLL passengers heading for Victoria or Battersea Park will now be via a considerable walk across 8 other platforms at an already-congested Clapham Junction to change on to trains that will already be crowded. We are particularly concerned about the congestion arising from simultaneous opposing passenger movements on the London Overground platforms at Clapham Junction.

2.5 Negative Aspects of the Substitute Bus and Rail services

The present 'substitute' bus between Ealing Broadway and Kensington Olympia provides one return off-peak journey, on only one day a week, offering no intermediate travel facilities as it travels non-stop, i.e., it serves no other rail or tube station or bus stop between its terminals, with no advertised or useful connection at either terminal.

All of these aspects of the bus service militate against its use.

The present 'substitute' rail service comprises one train a day between Kensington Olympia and Wandsworth Road – going one-way, against the main flow, at the end of the morning peak, with a return working, likewise against the reverse flow, at the start of the evening peak. In addition, until recently this service has been plying non-stop between its terminal stations, both of which, compared to other stations on the main WLL-SLL axis as a whole, would only generate minor traffics at any time. Running against the main peak flows also severely limits its use on both its journeys. No attempt has been made to highlight its existence.

Only very recently has this service begun to call at the two intermediate stations at Imperial Wharf and West Brompton in both directions. It also now starts its afternoon run in traffic from Clapham High

Street, yet there is not enough slack in the timetable to allow it to stop either there, at Brixton or anywhere else on its morning return to Selhurst depot.

While it has been somewhat reassuring to find that those responsible have been able to make minor positive adjustments to the rail service, these substitute services have been the absolute minimum, with neither of them organised to meet the greatest potential demand, but rather at the convenience of the respective operator and/or funder.

For nearly four years almost nothing has been done to improve the usefulness to the travelling public of either the weekly bus or the daily train or to raise their profiles. The latter, though stopping at two intermediate points en route, has not been extended to the large traffic generator at Shepherd's Bush (with Westfield within a large commercial centre, with many bus services, plus – and most importantly in regard to these proposed service withdrawals – interchange with the Central Line, that does provide a frequent daily service to and from Ealing Broadway).

Similarly, it has not, despite repeated requests, been extended to Clapham High Street (for the Northern Line) and, at least on its morning run back to Selhurst Depot, to Brixton (for Southeastern services, the Victoria Line, its own commercial centre and a multitude of bus routes). It also passes through Herne Hill; if it stopped there it could provide a connection with Thameslink services.

2.6 Implications of these Negative Aspects on the Appraisal of the Proposals

Care should now be taken to avoid the present negative nature of these aspects of these skeleton substitute services influencing the assessment and appraisal of their future. It is not adequate in any way to base the future potential of replacement services on present results. A range of different options should now be investigated pro-actively to determine the cases for the retention and development of these services.

We would strongly urge that the approach to be taken should go beyond that taken in the Proposals which looks only at Options 0 (“do nothing”) and Option 1 (“a new service between Ealing Broadway and London Bridge”).

For example, as we suggest below, both rail and bus links between Ealing Broadway and the West London Line could be discontinued, but with a significantly strengthened service on the main WLL-SLL axis (with appropriate terminal points), plus a development plan to meet future local and inter-regional rail demand in the years ahead. This is what we firmly believe clearly falls within the term, “re-invigorating”.

Lessons should be drawn from the successes of other inner-city rail developments, e.g., in Manchester and South Wales, but most especially on the revitalised North London Line and redeveloped East London Line and the results applied to this assessment and appraisal of the Suggested Solutions below.

3. The Strategic Case – Current Provision of Temporary Services

a) Wandsworth Road and Kensington (Olympia)

The wording completely omits to mention the fact that this service is organised solely to run at the current operator's convenience, i.e., only one return journey a day on Mondays to Fridays at slack times of day and against the peak flow each time.

We would not want to lose any link between the West London Line and other destinations, so we would ask for its retention as opposed to its withdrawal and to ask, as a minimum, that it serves all stations between Shepherd's Bush, Brixton and (if possible) Herne Hill inclusive.

We strongly believe that it must be possible for there to be sufficient co-operation between Network Rail and the other rail industry bodies, through marginal adjustments to their respective timetables, to create just two service and any related ecs paths for these journeys.

Moreover, if such can happen for one service, with all operators having clockface timings on a 15/30/60-minute basis, then it should also be possible to replicate this to provide a 30-minute service on a WLL-SLL axis with suitable terminal points.

We would, however, query the assertion on page 10 of the Proposals that the connection via Clapham Junction between the new London Overground SLL service and its present WLL service will provide "...much shorter travel timings from Wandsworth Road (based on Generalised Journey Time) than the proposed new service [between London Bridge and Ealing Broadway via Longhedge Junction]" (our underlining).

The distance between Wandsworth Road and Imperial Wharf stations is 2 miles 42 chains, while that between Wandsworth Road and Clapham Junction (SLL LO platform) is 2 miles 49 chains, plus that between Clapham Junction (WLL LO platform) is another 1 mile and 30 chains.

Both journeys take the Ludgate Lines from Wandsworth Road station to Longhedge Junction, where the new service would diverge alongside on to the Kensington Lines, which, while paralleling the former, enjoy roughly the same curvatures and gradients to the Shepcote Lane area.

Thus passengers travelling via Clapham Junction would be travelling a total distance of 4 miles as opposed to the 2½ miles on the new service (close to a doubling of the distance) and would also be delayed by the station stop. This would be lengthened still further in this instance due to the very slow speeds usually taken by drivers into terminal platforms. In addition, there would be the advertised five minutes to be allowed for changing trains at Clapham Junction.

Given the above, we find it very hard indeed to believe that journeys between Wandsworth Road and stations on the WLL via Clapham Junction are going to have much shorter travel timings than those travelling direct via the Kensington Lines.

We believe that provision of a regular frequent service travelling at normal speeds over the Kensington Lines would be accommodated reasonably quickly by drivers and signalmen, to the extent that there would be a distinct time advantage for those travelling between SLL and WLL stations. This advantage would be on top of that arising from not having to change trains in a crowded and possibly confusing environment at the busiest station in the UK.

We would ask that the underlined statement above and its implications on the provision of direct SLL – WLL services be carefully assessed and appraised. Experience elsewhere on the London Overground network has shown good take up of new route options, particularly those offered by direct services., for example, those between the WLL and NLL where a change at Willesden Junction is no longer needed.

b) Bus Replacement between Ealing Broadway and Kensington Olympia

We fully agree with the statement on page 10 of the Proposals regarding the link between Ealing Broadway and Kensington Olympia via the connection between the Central Line and the WLL at Shepherd's Bush. We are prepared to accept that this would enable the weekly bus service between Kensington Olympia and Ealing Broadway to be withdrawn.

However, in the absence of a direct link or good interchange for passengers between the WLL and the GWML (for Heathrow) at Old Oak Common, we would oppose closure of the two relevant rail sections and seek for these to be double-tracked and electrified and otherwise made suitable for regular passenger use throughout their length as soon as practicable. Even if such a direct link or interchange is secured at Old Oak Common, we would like this facility, double-tracked and electrified, to remain to expand capacity and to be used as a diversionary route in times of disruption.

Moreover, if there are major problems or delays in developing an interchange between the West London Line with the other lines at Old Oak Common, then the option to have direct rail services between the South East and Heathrow via Acton Wells should also be developed, with the desired track doubling and electrification in-fill.

In the meantime we welcome the assurance given on this point on page 9 of the Proposals regarding retention of the existing tracks in situ.

4. The Commercial Case

We say again that Options 0 and 1 are not the full range of options available to the rail industry in relation to these Proposals.

We believe, along with our contacts in the industry, that a good frequency is key for a service to fulfil its potential. So it is to be expected that a once-a-day service, against the main traffic flow on both outward and return journeys, between poor traffic generators is likely to have a weak case. However, a service that runs to meet passenger demand frequently enough so that it can be relied upon should be given a much better chance to be tested and developed while an apparently insatiable market has time to learn about it, appreciate and use it.

We are encouraged to learn that at least one TOC (Southern) “have indicated that providing the service daily is little more costly than once per week...” We would hope that other TOCs would agree with this.

5. The Options within the Proposals

Option 0

The Group does not wish to lose any passenger services that do or could link WLL stations with each other and other destinations and does not support the “do nothing” option.

Option 1

The Executive would support this Option in principle, though we are dismayed that only one post-evening peak return journey is possible. Details of which intermediate stations between London Bridge and Ealing Broadway are to be served are not given. The more station calls on (i) the WLL and (ii) elsewhere *en route*, the more the Executive could support this Option.

However, unless the service was run to and from London Bridge via Brixton, Tulse Hill and Crystal Palace (18 intermediate stations) or Selhurst (23 intermediate stations), this Option would still not address the situation of the lack of scheduled passenger services over Shepherd’s Lane Junction.

6. The Executive’s Suggested Options

We have grouped these as follows

Group A Ealing Broadway – Kensington Olympia

Group B Retaining and developing the Kensington Olympia – Wandsworth Road rail service

Group C Other Minor Developments

Options Group A - Ealing Broadway – Kensington Olympia

Option A1

Discontinue the bus service

Option A2

Upgrade the two sections either side of Acton Wells Junction as double-track electrified connections for (i) passenger services to Heathrow Airport in case there are problems with securing adequate links between WLL and Crossrail/HS2 at Old Oak Common, (ii) a diversionary route between the WLL and GWML/Heathrow in times of disruption and (iii) electrified freight trains.

Options Group B – Retaining and developing the Kensington Olympia – Wandsworth Road rail service

We would not want to lose any link between the West London Line and other destinations, so we would ask for its retention, extension and strengthening as opposed to its withdrawal.

Option B1 (minimum solution)

We would be prepared to support as a minimum the present service between Kensington Olympia and Wandsworth Road

Option B2 (minimum strengthening)

However, we would rather have the current service running as at present (once a day Monday-Friday), but – in order for the Shepherd's Lane Junction issue to be rectified and for it to serve larger traffic generators – that it be revised so that it serves all stations between Shepherd's Bush, Brixton and (if possible) Herne Hill inclusive in both directions.

This Shepherd's Bush – Herne Hill service could be provided by either Southern, Southeastern or London Overground, with route learning by Southeastern staff north of Factory Junction and London Overground drivers east of Shepherd's Lane Junction.

The arrangements under Options A and B2 would then conform with the proper procedures in relation to Shepherd's Lane Junction, provide a degree of re-invigoration as the route would now serve two important District Centres with secondary traffic generators between them, and allow the DfT to avoid the expense of the virtually unused bus service.

Options B3 – B5 (medium strengthening)

Moreover, if such can happen for one service, with all operators having clockface timings on a 15/30/60-minute basis, then it should also be possible to replicate this to provide a 30-minute service on a WLL-SLL axis with suitable terminal points throughout each day.

Therefore we would ask for a regular 2tph service between Shepherd's Bush and Herne Hill calling at all WLL and SLL stations en route. Although greater use would be expected in the peaks, if there is not enough stock in the peaks, this could start as an off-peak Monday-Friday service (Option B3), to expand into weekday peak (Option B4) and weekend periods (Option B5) later.

Options B6 – B7 (extensions)

Option B6 is the extension of this service so that it, along with other WLL services, also serves a new station at Westway located beneath the Westway/West Cross Route road intersection north of Shepherd's Bush. Outline details of this initiative are to be produced shortly.

Option B7 is the extension of the service from Herne Hill (which may be necessary if sufficient terminal capacity is not available there), either in service or as ecs to either Kent House (Platform 2 or Platform 4 – the latter would need a new trailing crossover, associated signalling, plus, for trains departing in service, platform monitors), Beckenham Junction (Platform 4) or Orpington.

Option B8 (major expansion)

Option B8 is the further extension of the service to provide a direct link between south London and Heathrow Airport service via the GWML or at the very least a connection at Old Oak Common with as many of the following as possible - Crossrail, GWML, Chiltern, HS2, WCML, Bakerloo and Central Lines.

Taking up Option B3 would need probably need a small increase in staff resource; Options B4 – B8 would need greater staff resource and more rolling stock.

Option B9 (Augmentation of London Overground ELLX2 service with direct trains on the WLL)

This Option involves modifying the London Overground SLL service to include direct services between the SLL and WLL to run between Highbury or Dalston, Canada Water, Clapham High Street and Shepherd's Bush (with later extensions to Westway and Old Oak Common/Willesden Junction).

Options Group C – Developments to improve interchange at Wandsworth Road and/or Clapham High Street stations

We believe that a further set of options to improve inner London connections is available, in conjunction with the Options B1 – B9 above.

Option C1 Additional calls at these stations by Southeastern services

These could be made by Victoria – Dartford services improving connections between this area and areas such as Lewisham (for the DLR to Greenwich, Canary Wharf and Stratford), Eltham, Bexleyheath and Dartford. This could therefore allow one-change journeys between, for example, Lewisham and Imperial Wharf.

Diverting Victoria – Orpington services via the Atlantic Lines to stop at these stations would improve connections between this area and areas such as Penge and Beckenham, solve the issue of Shepherd’s Lane Junction and allow one-change journeys between, for example, West Dulwich and Clapham Junction.

Stopping these services at both stations would restore their direct link with Victoria (but not Battersea Park). Stopping these services at Clapham High Street would also allow interchange with the Northern Line at Clapham North station.

Option C2 Restoration of Chatham High Street and/or Wandsworth Road Chatham Lines - all platforms

The reconstruction of the appropriate accesses and platforms on the Chatham Lines at these stations and for these to be served by the Southeastern Victoria – Orpington service to provide interchange with services using the Atlantic Lines platforms.

Option C3 Restoration of Chatham High Street and/or Wandsworth Road Chatham Reversible Line - single platforms

The restoration of the partially-remaining platform faces on the Chatham Reversible Line to allow the Southeastern Victoria – Orpington service to call at the same platforms in both directions to provide interchange with the SLL London Overground services.

This could also allow the Herne Hill – Shepherd’s Bush service to use the Chatham Reversible Line between Shepherd’s Lane and Factory Junctions.

These arrangements would need careful pathing and care would also need to be exercised in ensuring passengers boarding services on either of these platforms knew which way the train was headed.

However, these Options, plus one of the Options in the range B3 to B9 to secure services on Axis 7 below, would offer the following possible interchanges at Clapham High Street.

Westbound from:-		Eastbound from:-
Axis 1 (ELLX2)		Axis 5 (Grosvenor Bridge)
<ul style="list-style-type: none"> • Highbury & Islington • Shoreditch High Street • Canada Water • Surrey Quays • Peckham Rye • Denmark Hill 		<ul style="list-style-type: none"> • London Victoria
Axis 2 (Bexleyheath Line)		Axis 6 (Ludgate Lines)
<ul style="list-style-type: none"> • Dartford • Bexleyheath • Eltham • Lewisham • Peckham Rye • Denmark Hill 		<ul style="list-style-type: none"> • Clapham Junction

Axis 3 (Chatham Lines)		Axis 7 (Kensington Lines)
<ul style="list-style-type: none"> • Orpington • Bromley South • Beckenham Junction • Penge East • Herne Hill (for Thameslink) • Brixton 		<ul style="list-style-type: none"> • (Old Oak Common for Heathrow, Crossrail, GWML, HS2 – proposed) • (Westway – proposed) • Shepherd’s Bush (for Willesden Junction, Watford Junction and Milton Keynes) • Kensington Olympia (for Kensington and Hammersmith centres and Olympia Exhibition Halls) • West Brompton (for Earls Court and Empress State) • Imperial Wharf

At Clapham High Street via on-street connection to Clapham North		
Southbound from		Northbound from
Axis 4 (Northern Line – S’bd)		Axis 8 (Northern Line – N’bd)
<ul style="list-style-type: none"> • Edgware • High Barnet • Mill Hill East • Camden Town • Bank • Charing Cross • Kennington • Stockwell 		<ul style="list-style-type: none"> • Morden • Tooting Broadway • Balham • Clapham Common

There would in theory be 56 options for travel through a point offering eight axes for travel. We have calculated that, of these 56, there would be up to 33 that would offer new credible journey options.

All of these would also be available at Wandsworth Road station except those via Clapham North station.

Robust interchange at Wandsworth Road and/or Clapham High Street stations between services on the Atlantic Lines and Chatham Lines would probably overcome the issue of the Shepherd’s Lane Junction omission as both would become interchanges served by appropriate scheduled passenger services.

7. Selection of Suggested Optimal Solution

The Executive believes that the optimal set of solutions is:-

- The discontinuance of the Ealing Broadway – Kensington Olympia bus service
- The double-tracking, electrification and improvement to meet standards for scheduled passenger services be applied to both sections either side of Acton Wells Junction
- Replacement of the existing Kensington Olympia – Wandsworth Road rail service by a regular service between Shepherd’s Bush and Herne Hill. This initially should be as a minimum a 2tph off-peak Monday- Friday service, to be developed into a daily 2tph service between Orpington and Old Oak Common, ideally to be operated by Southeastern or London Overground (if the latter the service should be extended to Willesden Junction).
- A new 2 train-per-day service between Birmingham – Milton Keynes – WLL – Brighton
- Restoration of the platform faces at Wandsworth Road and Clapham High Street on the Chatham Reversible Line
- Restoration of the platform faces at Wandsworth Road and Clapham High Street on the Chatham Down Line

Below is a table showing the features and opportunities offered by a new Herne Hill – Shepherd's Bush service, extended to Orpington and Old Oak Common/Willesden Junction

Station	Rail/Tube Interchange	Key points reachable	Local Traffic Generators
Orpington	Southeastern	Sevenoaks, Tonbridge, Ashford, Folkestone, Dover Tunbridge Wells Hastings	District Centre
Petts Wood			Residential catchment
Bickley			Residential catchment
Bromley South	Southeastern	Sevenoaks via Swanley, Chatham, Faversham, Margate, Ramsgate, Canterbury, Dover	Plans for redeveloping Bromley Town Centre
Shortlands	Catford Loop		Residential catchment
Beckenham Junction	Southern Tramlink	Crystal Palace Croydon	District Centre
Kent House			Residential catchment
Penge East			Local centre
Sydenham Hill			Residential catchment
West Dulwich			Dulwich College
Herne Hill	Thameslink	Sutton/Wimbledon	Local centre
Brixton	Victoria Line	Walthamstow	District Centre
Clapham High Street	Northern Line (at Clapham North)	Morden	Local centre
Wandsworth Road			Close to Nine Elms/Battersea Power Station
Imperial Wharf	London Overground Southern	Clapham Junction Milton Keynes	Local employment sites, new riverside residential developments
West Brompton	District Line	Wimbledon	Earls Court Exhibition Centre Huge mixed-use redevelopments (Earl's Court OA)
Kensington Olympia	District Line	Earl's Court High Street Kensington	Olympia Exhibition Complex District Centres (Kensington and Hammersmith) NW Warwick Road redevelopment sites underway
Shepherd's Bush	Southern Central Line	Milton Keynes Ealing/West Ruislip Marble Arch	District Centre Westfield BBC Media businesses
Westway	Hammersmith & City (at Latimer Road)	Paddington Hammersmith	Imperial College White City OA Links to Sports Centres and Portobello Road and Business Area
Old Oak Common	Crossrail, GWML,	Heathrow	

	Heathrow Express, HS2	Reading West Country South Wales Birmingham	
Willesden Junction	London Overground Bakerloo	Bushey Kenton	Local centre (Harlesden) Park Royal OA

8. Benefits of these Suggested Solutions

We believe that the connectivity of the area and the interchange possibilities between these services, the general transport, employment and regeneration needs of the North Clapham/Wandsworth Road area should be taken into account in this assessment and appraisal, with regard also given to the larger area between Brixton and Battersea Power Station.

9. Future Steps

Successful restoration here could bring forward the missing high-level platforms at Brixton, Loughborough Junction and Brockley, all of which would improve (i) rail access for districts that are by-passed by existing services and (ii) interchange between these and other areas across South London that presently have poor connections between them.

It should also be noted that these all these stations lie on the route of the Group's previous suggestion for a Heathrow – WLL – SLL – NKL – Ebbsfleet link.

The imminent refranchising exercises for Southeastern and Thameslink provide an excellent opportunity, which should not be missed, for including these improvements within the new franchise arrangements.

10. Summary

The Group's approach has been to look at these proposals in a wider context, including the continuing growth in rail demand, how far positive results of rail developments have exceeded expectations, the need to build on the transport investment due to the Olympics, and to produce a set of positive, but hopefully, feasible and low-cost options to meet regeneration, employment, mobility and social needs for this area of inner south London.

Consideration of the whole of the cross- London sections of the withdrawn Cross-Country service

We believe that Shepherd's Lane Junction should be included in these Proposals and that options for re-invigorating the substitute services along the whole route between Ealing Broadway and Brixton should be fully assessed and appraised, along with other minor developments.

Ealing Broadway – Kensington Olympia

We believe that the opening of the West London Line station alongside the Central Line station at Shepherd's Bush now provides an adequate link between Ealing Broadway and the West London Line for Kensington Olympia so that the bus can be withdrawn.

However, the first two sections of route in the Proposals should be double-tracked, electrified and made good for regular scheduled passenger and freight services as soon as possible to provide additional capacity and a direct route between the WLL and Heathrow and the West.

Links between the WLL and south London

We are particularly concerned about (i) the loss of any service that links the WLL with other destinations, especially in the aftermath of the transport investment for the Olympics, (ii) the relative unattractiveness of the planned London Overground Clapham Junction service with the time penalties

due to changing there, and (iii) the congestion arising from simultaneous opposing passenger movements between the two London Overground platforms at Clapham Junction

Much of these negative impacts would be reduced if through services were run between the South and West London Lines to avoid Clapham Junction, thereby keeping this link open to scheduled passenger services.

This could be produced by either a Southern or Southeastern service between South East London and the WLL or a direct London Overground service between Highbury or Dalston, Canada Water, Clapham High Street and Shepherd's Bush.

There are a variety of terminals between which a WLL – SLL service could ply, depending on the operator of the service - details are given in the text

Infrastructure Improvements

Those that might be needed would be minor, extending to restoring up to four platforms and their accesses, a new crossover and associated signalling and platform equipment.

11. Conclusion

With those changes deemed necessary, these services would produce a high degree of rail and tube connectivity in inner south London and should greatly contribute to transport, regeneration, employment and social needs for this area.

MLB
9 August 2012

Tim Bellenger

From: [REDACTED]
Sent: 07 August 2012 19:39
To: South&WestLondon Consultation
Subject: Response to Consultation for Withdrawal of scheduled passenger services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

The consultation paper notes that the weekly replacement bus service between Ealing Broadway and Wandsworth Road attracts "between zero and three passengers per week." However, a very likely reason for this lack of custom is the poor publicity given to this "ghost bus" service.

Another is the poor timings. There is very little point in a once-weekly bus service in a busy capital city when there are so many other transport options; this is not some rural backwater for which a weekly bus service provides a lifeline!

I wonder if you have given due consideration to the possibility of investing in the rail line so that a proper clockface-timetabled service could be provided. This could start at Ealing Broadway and call at Acton Main Line, Shepherd's Bush, Kensington Olympia, West Brompton, Imperial Wharf and Clapham Junction before continuing to Wandsworth Road.

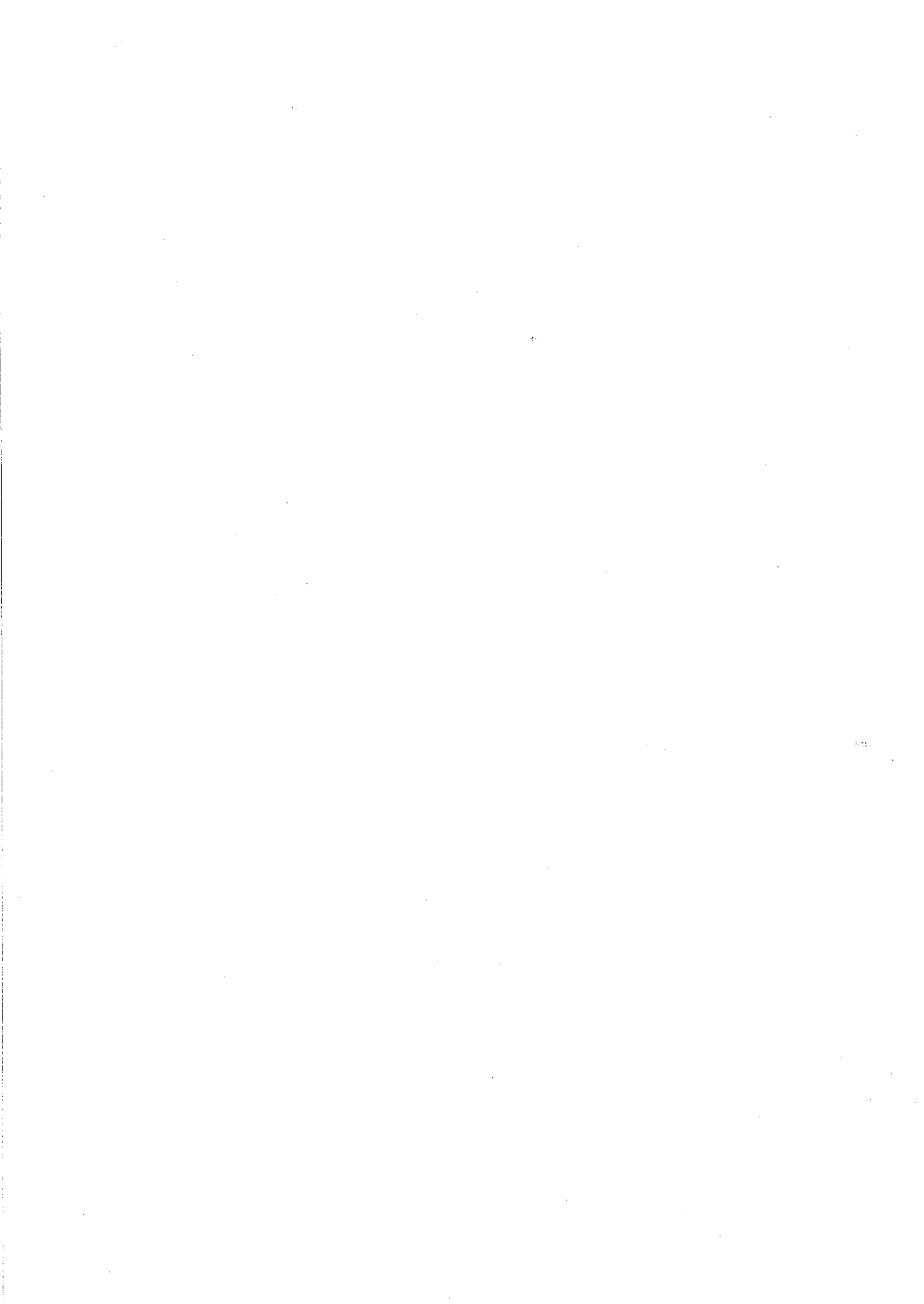
Although you note there are other services, both train and bus, serving these stations and communities, these involve a lot of changes, making it difficult to travel along the route conveniently. A regular (perhaps hourly or even half-hourly) passenger service along the route between Wandsworth Road, Kensington (Olympia) and Ealing Broadway would connect the West London Line to the Great Western Main Line (changing at Shepherd's Bush and Willesden Jn), thereby making the planned London Orbital rail line more useful. It would be possible, for example, to travel by train between local London stations on the GWML and the Watford DC line without going into central London or taking a bus. It would also be possible to travel by train from the GWML to stations in south London (changing at Clapham Jn). Outer London is currently served by many railway lines that have no or poor interchange where they cross. The route between Wandsworth Road, Kensington (Olympia) and Ealing Broadway could fill some of the gaps in the connections.

Please consider the option of expanding the use of the route under consideration for closure for new passenger services.

Thanks

[REDACTED]

[REDACTED]



Tim Bellenger

From: [REDACTED]
Sent: 08 August 2012 02:14
To: South&WestLondon Consultation
Cc: [REDACTED]
Subject: rail closure

I am writing to object to the proposed withdrawal of the bus service between Ealing Broadway and Kensington Olympia. This objection is being submitted as an individual.

The reason for my objection relates to significant inconvenience I recently suffered while making a journey that was in a sense dependent on this route though it did not actually use it. My problem could be cured by changes to ticketing and if these are made I will withdraw my objection.

I was travelling from Belsize Park (I have shown the exact address below) to Devon for a short break and wanted to arrive as early as possible consistent with paying a reasonable fare. (I may say that I hold a Senior Railcard, but do not yet qualify for a Freedom Pass.) The option I chose was to walk to Hampstead Heath, use my Oystercard from there to Clapham Junction, and then catch the 08.27 train to Exeter. The ticket I actually bought was a "not London" ticket to Crediton.

The problem arose with my return journey. I arrived at Exeter in time for the 19.06 to Paddington and used this train as far as Reading. I had planned to continue to Ealing Broadway and touch in my Oystercard there for the journey back to Hampstead Heath using the Central Line to Shepherds Bush then the Overground.

However it occurred to me that this route might not be permitted if the service between Ealing Broadway and Clapham Junction was not a recognised route. The route options involving National Rail services are to use the bus to Kensington Olympia and then catch the Overground, or to go to Acton Main Line, walk to Acton Central and then go to Clapham Junction probably via Willesden Junction.

To find out whether either route was recognised, I was advised to contact ATOC directly, and did so. They referred me to the online National Routeing Guide (NRG). To my surprise this seemed to say that although Ealing to Clapham Junction is a recognised route (it appears on quite a number of the maps in the NRG) it is not a permitted route for the journey I had been making. I found this so startling that I would have tried to find out the appropriate channels for complaint, except that I'd expect a reply on the lines of "the route is disappearing anyway so there's no point in doing anything".

I may add that under the "shortest route" rule going via Ealing would have been permitted had I been starting from Taunton, as the journey from Reading by this route is significantly shorter than via Staines; but from Exeter the shortest route, again by a significant margin, is via Salisbury.

To go back to my actual journey, as a result of my uncertainty regarding the validity of my ticket I had to leave Reading by way of Staines. Due to a mishap the train was diverted away from Richmond and I got back to Belsize Park no earlier than if I'd gone via Salisbury, and about an hour later than if I'd gone via Ealing. As I was very tired I feel this amounts to significant inconvenience -- and the delay would have been even greater had I not paid the admittedly small extra charge required to enter Zone 1 on my return journey. I may add that even if my train had served Richmond I would still have got home about half an hour later than if I'd gone via Ealing.

If the bus service is withdrawn, a valid route from Exeter to Clapham Junction via Ealing could be created in one of the following ways:

(a) Recognise the route involving a walk between Acton Main Line and Acton Central. It is, incidentally, noteworthy that this route is quite close to that used by the very train service between Reading and Clapham Junction that the bus in question was put on to replace.

(b) Allow holders of "not London" tickets to use the Underground or DLR for appropriate sections of their journey provided they do not enter Zone 1, just as holders of "via London" tickets are allowed to use the Underground within Zone 1.

Both options would have to be accompanied by correction of the NRG so that Exeter to Clapham Junction via Acton Main Line and Acton Central is a permitted route, unless such validity would be implicit in (b). This should also apply to any other journey that is valid via Reading and Clapham Junction.

I should emphasise that though I'd need one of the above routes to be recognised and valid for the journey I was making, I wouldn't have used my ticket on either of them, as I'd have been using my Oystercard between Ealing Broadway and Hampstead Heath.

Whether or not option (a) is adopted, I believe that there would be significant benefit in adopting (b), as this could apply to many other journeys. In preparing this objection I tried out Basildon to Stevenage and Chelmsford to Dartford, both of which have the following features:

A: They go outside the Oystercard/Travelcard area at both ends, thus avoiding the complications of using these (unless one goes through the rigmarole of buying more than one ticket).

B: They have route options which avoid Zone 1 by using the Underground or DLR, and these options are actually thrown up by the National Rail journey planner.

For Basildon to Stevenage one uses the Victoria Line between Blackhorse Road and Finsbury Park; for Chelmsford to Dartford one uses the DLR between Stratford and one of Greenwich, Woolwich and Lewisham.

C: However, in neither case is there a "not London" fare which enables one to pay less than what most people would probably consider the most straightforward route.

Under my proposal (b) these journeys would have "not London" options which offer a discount on the "via London" fare, thus helping to reduce crowding in Zone 1.

I may add that when I fed Ealing Broadway to Kensington Olympia into the National Rail journey planner it came up with the absurd route of going via Paddington and Willesden Junction, even if I chose the exact time at which the direct bus was running (in which case the bus would get in over half an hour earlier). By contrast the TfL journey planner shows the more sensible and much quicker route via Shepherds Bush (though it also shows longer routes). While journey time by this route is quicker than by the bus, no actual journey option overtakes the bus. Why does the National Rail journey planner "know" about the Underground service between Blackhorse Road and Finsbury Park but not that between Ealing Broadway and Shepherds Bush (nor that of its own bus service) ?

Let me conclude by saying that if there had been an interchange at Old Oak Common, as will probably happen in due course, I could probably have saved an extra half an hour by changing (and touching in my Oystercard) there.



campaigning
by the
Railway Development
Society Limited

London & South East

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8th August 2012

Dear Sirs,

Consultation: Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway.

Introduction

Railfuture is a national voluntary organisation structured in England as twelve regional branches and two national branches for Scotland and Wales.

We are pleased to submit this response to the DfT Consultation on 'Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway', which has been prepared by Railfuture London & South East. A copy of this response has also been sent to London TravelWatch.

Specific Comments

Railfuture is concerned by the delay in making these formal proposals, i.e. that they were not made at the time of the original withdrawal of Cross Country services.

We are also not entirely convinced that the current proposals have been properly thought out. We do, however, note the remark in the text on page 9 to the effect that "*the track will in all cases remain for use by freight services or other passenger services should they wish to do so*". Should this proposal lead to formal 'closure' going ahead, we trust this will be fully reflected in the official notification.

We note that the level of detail in the consultation document could be misleading, in particular to the first section south of the river. In the document it is referred to as Factory Junction to Latchmere Junction No.1. We believe that you are actually referring to the section of track known as the Up and Down Kensington lines bounded to the north by Latchmere No.3 (Waterloo) Junction and to the south by Longhedge (C) Junction.

We are concerned that the loss of service over the Kensington lines by the proposed withdrawal of the 'Parliamentary service' would deprive Southern crews of the necessary route knowledge they need in order to maintain the Milton Keynes to Croydon service if the normal route through Clapham Junction is disrupted.

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www.railwatch.org.uk

Railfuture is also of the opinion that the 'Parliamentary service' over this stretch of line is cost effective and does provide a service of use to the public and for this reason as well; we would oppose its withdrawal.

Given our comments above, Railfuture does not object to the proposals in the consultation in relation to the proposed 'closure' of the two stretches of track between Willesden West London Junction to Acton Wells Junction and Acton Wells Junction to Acton East Junction, with the express proviso that nothing is done to preclude future use by passenger services.

Yours faithfully,

KDyall

Keith Dyall
Chairman
Railfuture, London & South East

Transport for London



Your ref:
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By email only

8 August 2012

Dear Sir/Madam

Withdrawal of scheduled passenger services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway

This letter forms Transport for London's response to the consultation on the withdrawal of scheduled passenger services between Wandsworth Road and Ealing Broadway.

We would like to point out that one of the sections of route proposed for withdrawal of scheduled passenger services is between Factory Junction and Latchmere No. 1 Junction. However, part of this section (between Factory Junction and Longhedge Junction) will be used by London Overground services to/from Clapham Junction which will start at the December 2012 timetable change date, at the same time as the current passenger services are proposed for withdrawal. The section of line proposed for withdrawal of scheduled passenger services should therefore be amended to between Longhedge Junction and Latchmere No. 1 Junction.

TfL does not wish to make any further comments regarding this consultation. Please do not hesitate to contact me if you require any further information.

Yours sincerely

Matthew Rheinberg
Principal Planner – Network Development, London Rail

MAYOR OF LONDON



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