



# West London Line Group



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South London RUS Consultation Response  
National RUS Consultation Manager  
Network Rail  
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Dear Sir or Madam

## **WEST LONDON LINE GROUP RESPONSE TO THE SOUTH LONDON RUS**

1. Following my telephone conversation today with Duncan Stevenson from Public Affairs at Network Rail, I am writing on behalf of the West London Line Group in response to the above document.
2. **Our main concern here is that the current West London Line (WLL) service operated by Southern between Brighton and Watford Junction that cuts across the RUS area should not only be retained, but that it should be (i) strengthened in terms of its frequency and (ii) lengthened in terms of the number of key places it should serve.**
3. **It has been this Group's long-held and strong belief that this service should be developed as soon as practicable into a daily, half-hourly service between Brighton and Birmingham.** This would provide an extremely popular, cost-effective, efficient and swift link between 15-20 key centres throughout probably the most prosperous corridor in the Western hemisphere. It would also be a suitable replacement of the Arriva Cross-Country service between Brighton, the WLL and Birmingham/Manchester that is due to be withdrawn as from December 2008.
4. We believe that such a service would quickly achieve a strong profile in the minds of the travelling public and be an attractive facility that would replicate, if not eclipse, the success of other inter-regional routes such as Thameslink, Trans-Pennine Express and the TGV Lille – Lyon.
5. **At this stage of its development, the service should be operated so as to benefit cross-London, Gatwick and other inter-regional rail passengers, encouraging modal change from the congested south east road network and reducing the need to use the Underground between Victoria and Euston, where both tube stations are about to embark on long-term extensive redevelopment that will result in significant additional congestion during much of the RUS period.**

6. We would ask you to bear in mind that, in contrast to virtually all other rail services, the Watford to Brighton service has not yet been fully addressed in its entirety by any one of the past or current RUS documents, apparently because it cuts across several different RUS areas.
7. Thus, purely as a result of seemingly unavoidable geographical circumstance, there is no document within which the full potential of this increasingly popular service can be assessed and proper accommodation made for it.
8. We would ask that the Group's long-term aspiration for this service to run half-hourly between Brighton and Birmingham be accepted and fully taken into account in this and future railway planning documents.
9. Up to now, the service has all too often been sidelined, to its detriment, in the RUS documents concerned, including the West Coast Main Line, Brighton Main Line and Cross London RUS's. We welcome the fact that here more regard has been paid to it, but this is, as yet, still woefully inadequate.
10. For example, the service is not mentioned at all within the RUS's geographic scope (Section 2.2). Paragraph 2.2.4 refers to "analysis of other traffic generators lying outside the geographic area", but no mention is made of those on the WLL such as Empress State (West Brompton), Hammersmith offices (Kensington Olympia), the new Westfield regional shopping centre (Shepherd's Bush), Wembley, Harrow and Watford and the potential of the links with many other key growth centres on the WCML which stretches as far north as Glasgow.
11. Similarly, there is no mention of the option of the interchange at Shepherd's Bush that will provide alternative routes between South London and Oxford Street and new destinations such as Ealing and the A40 corridor, all via the Central Line.
12. We would ask that these deficiencies be rectified in the final version of the RUS.
13. We welcome the comment at the third bullet point at paragraph 2.8.1 that the additional services between the WLL and the Croydon area need to be taken into account.
14. In relation to paragraph 2.9.2, we would also trust that the assumption concerning associated track access rights presently enjoyed by Eurostar can be (i) confirmed, and (ii) extended to cover those on the WLL, given its present role of providing a link between Waterloo International and North Pole, so that such paths may in future be used by WLL passenger services.
15. In relation to paragraph 2.9.4, I attach a copy of the Group's proposal for a Heathrow – WLL – Clapham Junction or direct – SLL – NKL – Ebbsfleet service. With the potentially significant benefits (at minimal cost and relatively minor disruption to other services) that this could bring across a large swathe of London, including part of the area covered by this RUS, and with the advent of Crossrail (that may mean the possible suspension of work by TfL on the ELLX Phase 2 to Clapham Junction), we would strongly urge for this now to be given the fullest consideration within the progression of this RUS.
16. This proposal was previously included as part of our response to the Network Rail RUS Consultation Team on the Cross London RUS. It has since been reviewed by other

interested and experienced parties, including the Railway Forum, whose Chairman, Chris Green, asked for it to be submitted to the Railway Industry Innovation Awards competition in March this year. We have since received additional information underpinning our views on its operational feasibility.

17. **We would, therefore, strongly urge Network Rail to investigate our proposal more vigorously under this RUS, given the number of issues therein on which this proposed service would impact and, we believe, bring additional net benefits in terms of connectivity and modal change throughout an extensive congested corridor right across London and linking this with both of the UK's two premier international transport facilities.**
18. At the first bullet point under paragraph 3.2.1, there is no mention of Southern's service to and from Watford Junction. The WLL is only just outside the RUS area and could usefully be included in Table 3.1. **It is these types of omission that militate against proper consideration of this service's present and future role.** Again, we would ask for these details to be included in the final version of the RUS and be fully taken into account in developing future plans for the network.
19. **On this theme, we note and welcome the comment at paragraph 3.3.6 in relation to Gatwick Airport in that (i) although also outside the RUS area, it is mentioned here, and (ii) it is an important generator of business. We would respond by saying that every effort should therefore be made to ensure that as many Londoners and others to the north as possible (not just via Thameslink) have good direct rail access to and from the UK's second international airport and that this RUS should include sufficient provision for robust cross-Clapham services to effect this.**
20. **In relation to paragraph 4.2.7, we sincerely hope that the Cross London RUS recommendation of an all-day service of 2 tph between Croydon and the WLL will be pursued, but this paragraph should be amended to reflect the growing intention that the Brighton-Watford service will be extended to Milton Keynes as from December 2008/January 2009.**
21. Under paragraph 4.2.9, we welcome the expected increase in step-free routes to stations, and **we would urge that efforts are also made to make the transition between platform and train step-free as well** - as happens, for example, in Japan.
22. **In relation to the comments at paragraph 4.3.4, we trust that this RUS does not support the wholesale reallocation of the WLL's Class 377/2 dual-voltage units to meet the apparent rolling stock requirement for the Thameslink project, if this were to leave insufficient units to run the future Southern WLL service.**
23. **Under paragraph 4.3.10, we trust that resources to be allocated to the improvement scheme(s) for Clapham Junction will be sufficient for the redevelopment of Platforms 16 and 17 to accommodate eight-car trains and their passengers in safety, including any amounts needed for bridge works over Falcon Road.**
24. **We welcome inclusion of paragraph 5.2.8. We trust that the following have been (or, if not, will now be) taken into account in relation to the WLL corridor in addition to the developments at White City/Shepherd's Bush, viz.,**

(i) the likely immediate demand upon opening of Imperial Wharf station with its extensive catchment (with poor public transport) stretching between Wandsworth and Battersea Bridges and the New Kings Road and Kings Road, including the major developments by St George and at Lots Road Power Station and the new Chelsea secondary school, half the intake for which is to come from other parts of London outside the local catchment);

(ii) more Metropolitan Police Authority staff at Empress State;

(iii) possible developments on the Earls Court Exhibition Centre and Lillie Bridge depot sites; and

(iv) the proposed redevelopment of six adjoining sites on Warwick Road between West Brompton and Kensington Olympia stations, plus the Odeon site nearby on Kensington High Street.

25. **We note and welcome the references to the London Plan and would comment that the WLL service will pass directly below the London 2012 Olympics Volleyball venue at the Earls Court Exhibition Centre and alongside Opportunity, Intensification and Regeneration Areas (such as Imperial Wharf and Shepherd's Bush) and town centres such as Wembley (another Olympics venue), Harrow and Wealdstone (paragraph 5.2.10).**
26. **In view of its current links with Gatwick Airport, curtailing the WLL service at Clapham Junction would be a reversal of a key London Plan transport policy (paragraph 5.2.11 – bullet point 3).**
27. **The proposed combination of services (London Overground, Brighton/Gatwick Airport – Watford Junction/Milton Keynes, Heathrow – Ebbsfleet) on the WLL is directly in line with TfL's Rail 2025 Vision (paragraph 5.3.3 – bullet point 8).**
28. **We believe, however, that TfL should review their South London Route Corridor Plan, as truncating the WLL service north of Gatwick Airport (paragraph 5.4.6 - bullet points 1 and 2) would deprive many areas of London of their present direct links to the capital's second airport. This would also be in complete opposition to the London Plan's policies to improve links to Gatwick Airport (paragraph 5.2.11 – bullet point 3).**
29. **We believe that our proposal for a Heathrow – Ebbsfleet link will radically, yet inexpensively, improve access to Ebbsfleet from an extensive corridor that also links whole areas of West, South West, South and South East London (paragraph 5.2.11 – bullet point 3, paragraph 5.6.4 and paragraph 5.6.11 – bullet point 10 all refer).**
30. **We would also support proposals for station and infrastructure improvements, especially at Clapham Junction (paragraph 5.7.4 – bullet points 5 and 7).**
31. **Given that TfL's T2025 Strategy showed (i) the WLL corridor as one of the four major employment growth areas in London, and (ii) the corridor's proximity to the RUS area, we feel that the analysis underpinning Figures 6.1 – 6.4 should incorporate the WLL corridor and that this should be included in these Figures in the final RUS document.**

32. In Chapter 7, “Gaps and Options”, we have no comments currently on the Assessments for Options 1.1 – 1.8, 2.3 - 2.6 and 2.8.
33. However, we support Option 2.1 as long as its practical implementation would increase and not jeopardise the existing WLL service. We note that this Option can be resourced from existing stock. Presumably this availability will only be single-voltage stock and therefore would not be able presently to serve stations north of Shepherd’s Bush. We would comment, subject to access being agreed with the relevant parties, that such stock could be reversed in North Pole Depot reception sidings, thus relieving capacity for other through WLL freight and passenger services.
34. We do not support Option 2.2, if this would apparently jeopardise the WLL cross-Clapham service.
35. We welcome the inclusion of Option 2.7 and would agree with many of the comments within this assessment.
36. We are much encouraged that, ahead of this RUS, but still accommodated within the present working timetable, the cross-Clapham morning peak service has been partially restored from this May with the introduction of the 0747 East Croydon to Kensington Olympia. Furthermore, this train’s timetabling will, from this December, allow it to call at all intermediate stations between East Croydon and Clapham Junction.
37. In view of the rapidly increasing demand for this train now, before it calls at all these stations, **we would strongly urge that this service is strengthened by earlier and later through workings across Clapham in both directions throughout the morning peak**, with some extended from and, in particular, to Gatwick Airport.
38. If such arrangements can be made during the morning peak – the period of greatest pressure on the London commuter rail network – there should be no reason why cross-Clapham WLL services cannot be provided throughout each traffic day. We would suggest that this be developed in stages; however, we would strongly urge that, as a minimum, the initial phase is marked by the establishment of an hourly semi-fast Milton Keynes – Gatwick Airport/Brighton service.
39. It is important that the lesson of not having stops on this service where they are not wanted is taken to heart. This is clearly demonstrated at present through the intermediate stops between Gatwick Airport and Brighton. These detract from the service’s appeal to longer-distance passengers who do not want a slow stopping service south of Gatwick, while simultaneously alienating users at these stations who want services to and from Victoria rather than Watford. In addition, it is more than likely that these intermediate stops on the Brighton – Watford service contribute significantly to the delays for many of its northbound trains at Balham and Falcon Junctions.
40. Therefore, to avoid such risks to performance and passenger inconvenience, we would suggest that the off-peak service does not stop between Gatwick Airport and East Croydon (except possibly at Redhill), nor between East Croydon and Clapham Junction (except possibly at Balham).
41. For the same reasons, when it is extended in the peak and off-peak between Watford Junction and Milton Keynes, it should not stop at any intermediate

stations (except possibly Hemel Hempstead, Berkhamsted, Tring, Leighton Buzzard and Bletchley during the peaks only). Similarly, peak and off peak journeys to and from Brighton should only call at Haywards Heath.

42. **We would then suggest as early an introduction as possible of a second train per hour throughout each day between Gatwick Airport or East Croydon and Shepherd's Bush or Wembley Central (Platform 7);** serving Gatwick Airport and/or Wembley Central would slightly extend the recommendation in the Cross London RUS.
43. **The present morning and evening peak hour stopping services should continue to run between at least East Croydon and Kensington Olympia, calling at all intermediate stations.** These should be strengthened with additional journeys and all ideally lengthened to serve Shepherd's Bush. One of the morning peak workings should run from East Croydon to Watford Junction and return to Gatwick Airport.
44. We would also welcome extension of WLL trains and all WLL platforms to take eight cars and would hope that even the costs of extending Platforms 16 and 17 at Clapham Junction to ensure passenger safety will be accommodated, including any associated bridge works.
45. We would also support pursuing the option of restoring the southbound freight loop and the former (and still extant) Platform 3 at Kensington Olympia.
46. Under Options 3.1 – 3.3 and 3.6, we would welcome the extra capacity indicated by the longer trains, particularly if their introduction would also allow sufficient pathing for our proposed Heathrow – Ebbsfleet service between Lewisham and the North Kent Line (NKL).
47. We would hope that Options 3.4 and/or 3.5 would also allow our proposed Heathrow – Ebbsfleet service to terminate at Gravesend or Rochester, as these are the first principal destinations east of Ebbsfleet. **This would provide a direct rail link as an alternative to the M25 for journeys between the Medway Towns and the UK's principal international airport at Heathrow.** Only 4-car trains are suggested for this half-hourly service at this stage.
48. We would welcome the extra capacity indicated by the longer trains under Options 4.1 – 4.7, in the hope that this will lead to a fewer number of trains on each line mentioned and thus may allow more WLL services to run across-Clapham. **We would make the point that the South London – WLL link is increasingly well used and its services should not be totally disadvantaged in favour of Victoria or London Bridge trains when this is primarily due to the lack of present platform lengths on the WLL.** We would advise you that (i) many WLL commuters would welcome longer trains, (ii) passive provision has been made at virtually all WLL stations for longer platforms, and (iii) SDO could yet be an option where necessary on the WLL.
49. We currently have no comments on Options 5 and 6.
50. **We would strongly support Option 7 – the acquisition of additional rolling stock - and would maintain that any such programme must include sufficient additional Class 377/2 dual voltage units to ensure at least a hourly Milton Keynes – Gatwick Airport/Brighton service, plus sufficient other units to augment this basic service in both peaks.**

51. **We trust that there will be no difficulty in recommending the securing of such stock given the comments elsewhere in the RUS regarding the acquisition of additional stock for other routes in the RUS area. Implementation of the recommended Options 3.1 – 3.3 and 4.1 – 4.6 would result in an extra 136 vehicles being acquired, with another 20, if further analysis of Option 3.6 is positive.**
52. **In relation to Options 8.1 – 11.2, we would again strongly urge that our proposal for an overground rail link between Heathrow – WLL – Clapham Junction (or direct) - SLL – NKL – Ebbsfleet be considered (see attached). This should be viewed as a parallel to the well-used North London Line (NLL), as it would similarly open up useful cross-London links, with the added two-fold efficiency of its trains also providing a direct service between South East London and Heathrow (presently needing two changes via either the Piccadilly Line or Paddington) and between Eurostar and South West London (probably Eurostar’s most important leisure market in London). Interchange at Shepherd’s Bush would also allow easy access between Heathrow, Ealing and North and North-East London, via the NLL.**
53. We would expect that introduction of such a service would lead to some rationalisation of the current pattern of Victoria – London Bridge, Victoria – Dartford (via Bexleyheath), and Cannon Street – Plumstead services, thereby easing the pressure on such pinch points as Lewisham. We would also hope that the overall service patterns along the SLL corridor could be revised to provide improved links between SLL stations and London termini.
54. Operation of this service by London Overground would ensure TfL’s continued development of SLL services into Clapham Junction, greater spread of the London Overground network, including penetration to, plus exposure of the new branding to London overseas visitors at, Heathrow and Ebbsfleet.
55. We have no views in relation to Options 12.1 - 12.3, save that we would oppose any of these that would obstruct our preferred option below.
56. **We welcome the inclusion of the extensive Options Group 13 and thank you for the detailed attention given at this juncture to the WLL cross-Clapham service through Options 13.1 – 13.7 and their assessment.**
57. **We fully recognise the emphasis being given throughout this RUS document to the problems of peak-time overcrowding and we would strongly support all efforts to improve this service’s commuting capabilities during the peaks.**
58. **Nevertheless, we remain convinced that the service should be viewed primarily as a cross-London inter-regional semi-fast service that only calls at key traffic generators throughout its length.**
59. **We would therefore urge that separate “peak” and “non-peak” views are taken of the service and that there are no rigid constraints that would force this service to adopt only a “weekday peak-hour” led solution which would result in the service not fulfilling its potential and optimising its resources throughout the rest of the week.**
60. **We regret that, in relation to the Options Group 13, at many points the wording is incomplete, unclear or inaccurate and we would strongly urge that these be**

**rectified in the final RUS document to ensure that no inappropriate conclusions are reached on each of the different options.**

61. Under Option 13.1, under 'Operational Analysis', for example, the dual-voltage stock is not 'limited'; there are at least 15 dual-voltage units leased by Southern that could be used on this service. The current service needs only five.
62. In addition, under 'Infrastructure Required', given the TfL specified service frequency of 4tph for the London Overground WLL service, Platform 1 will probably have to be reopened anyway and is unlikely to be available for terminating the Watford service. If in addition our proposed Heathrow – Ebbsfleet service is to be pursued with some trains running via Clapham Junction (which could, inter alia, obviate the need for the £100m spend on Airtrack), Platform 1 will almost certainly not be available for terminating Watford trains.
63. **The comment, "There would be an increasing need for passenger congestion relief at Clapham Junction", significantly understates the case. Morning and evening peak hour congestion on Platform 17 and its accesses are already approaching intolerable and dangerous levels and these hazards also exist outside the peaks.**
64. There is significant danger already outside the peaks in that passengers having to use Platform 17 may, in negotiating the inordinately large and hazardous gap between train and platform, seriously injure themselves. This risk is increased for those who are elderly and/or less-mobile, plus those with visual impairments, luggage and/or children (in and/or out of pushchairs). This risk is increased still further if such passengers are travelling in the peaks.
65. The present proposals by Southern, which reflect, we understand, the DfT's forthcoming Southern franchise specification, to terminate all Southern WLL trains at Clapham Junction will increase congestion three- to four-fold on Platform 17 and its accesses as from December 2008. This is right at the beginning of the period of this RUS, before the expected employment growth in the WLL corridor as already given in TfL's T2025 Strategy.
66. **We do not believe that, given the previous interest by the HSE two years ago in the inherent dangers to passengers, even if colleagues in Network Rail have previously agreed the arrangements at Platform 17, they are likely to do so throughout the period of the RUS.**
67. We fully endorse your comment concerning the established, significant and growing demand for through journeys between the WLL and destinations south of Clapham Junction. The WLL is one of the few lines which enjoys high levels of peak commuting and increasing off-peak travel simultaneously in both directions. Some passengers already need to change at Clapham Junction between the Southern WLL service to other Southern and South West Trains services, local buses or because they are local residents. **It should be stressed that, under arrangements as given under Option 13.1, all passengers on this service will now have to change at Clapham Junction Platform 17 to join or leave the service.**
68. **We fully support your conclusion that this option is NOT to be progressed and would ask that this be communicated as forcibly as possible to Southern and the DfT, particularly in the light of both the former's planned changes for the**



**December 2008 timetable and our expectation of the contents of the latter's 2009 South Central franchise specification.**

69. In relation to your comments regarding freight trains, as terminating all WLL in Platforms 1 and 2 is almost certainly not practical given the planned London Overground frequencies, let alone our proposed Heathrow – Ebbsfleet service, there may be capacity problems in handling such trains. We therefore support restoration of the southbound freight loop (and the former Platform 3) at Kensington Olympia to provide greater capacity for such freight trains.
70. Under Option 13.2, the comment under ‘Passenger Impact’ omits any reference to the removal of established through peak travel between the Norbury Line and the WLL.
71. Under Option 13.3, we would question the blanket statement, “there is no spare capacity to terminate trains at East Croydon”, since this is precisely what happens in both the height of the morning peak with the e.c.s. arrival from London Bridge leaving East Croydon in service for the WLL at 0747 and in the evening peak with the arrival of the 1729 ex-Watford Junction.
72. However, although we would welcome the principle of South or East Croydon – WLL (and vice versa) trains in the peaks, we do feel that a full daily service pattern of Milton Keynes – South Croydon is an unsuitable one as it would neither appeal to passengers as a concept, nor meet their already-established needs.
73. Indeed, it would cause unwelcome disruption to existing journeys, thereby encouraging adverse modal change, with little expectation of generating new demand in compensation.
74. We also note that Option 13.3 would require capital and revenue outlay in new track, signalling and associated infrastructure.
75. However, unlike other selected recommendations in the RUS, this Option does not presently carry a financial or economic analysis.
76. Neither the intended frequencies for this service, nor its northern terminal(s) are given at any point in this document. Therefore, no conclusions can be drawn from the information given as to the rolling stock types and numbers of each that will be needed. Nevertheless, this RUS document blithely states that additional rolling stock will be required if the service extends south of South Croydon (Options 13.4, 13.6 and 13.7). More information must be given on this point so that this part of the RUS document can be properly assessed and to allow stakeholders to respond accordingly.
77. **In view of the deficiencies cited in the above paragraphs, we strongly believe that the grounds for the recommendation given in relation to Option 13.3 may be flawed and that this recommendation should be reviewed in full, especially in relation to the off-peak service on the WLL.**
78. Under ‘Passenger Impact’ for Options 13.4 and 13.6, we would contend that the majority of passengers arriving at a London terminal normally want to continue to other areas in Central London by Underground. However, no mention is made of this, nor of the potential for passengers to use WLL trains to reach Central

London by changing to the Underground at West Brompton or Shepherd's Bush, instead of Victoria. This deficiency should be rectified in the final RUS document.

79. **Of the options given, we would most prefer Option 13.7.** However, we would comment that, if there is a lack of spare capacity at Gatwick Airport to terminate this service, then we would suggest that this should be overcome by extending the service to run to and from Three Bridges. We would also welcome the retention, if feasible, of the service to and from Brighton, with only one intermediate stop at Haywards Heath.
80. Again, the second comment under 'Operational Analysis' is prima facie misleading as (i) WLL trains currently run south of Croydon and north of Shepherd's Bush. There are enough dual-voltage trains in existence (15) for the service to run under this option (even assuming a frequency of 2tph between Milton Keynes and Brighton!), without the need for any more dual-voltage rolling stock. **Other routes may be lacking stock, but not the WLL. The comment as given is inaccurate and must be deleted and ignored in the assessment of this option.**
81. Under 'Passenger Impact', the wording should be revised to reflect the fact that this option would also allow direct links between Gatwick Airport, the Norbury Line, West and North West London and the South Midlands, plus good connections with West Coast Main Line services.
82. We would also respond in relation to the comments on the potential for conflict between airport passengers and commuters by returning to our preferred and, we believe, workable option of a basic semi-fast Three Bridges/Gatwick Airport – Milton Keynes hourly service each day (using existing dual-voltage stock that should still be available) and that is augmented by 2 or 3 peak hour stopping trains in each direction between East Croydon and Kensington Olympia/Shepherd's Bush/Watford Junction in both weekday peaks. Again, we would welcome retention of the service to and from Haywards Heath and Brighton.
83. Although we welcome the assessments so far for an extensive set of options, we are NOT convinced, due to the fears we have expressed above, that Option 13.3 should be adopted as the full week-long solution. We would strongly urge, (i) on the grounds of fairness to all WLL passengers and (ii) to ensure that the full benefits of this WLL service can be realised, that a comprehensive and accurate assessment of Option 13.7 (amended as we have suggested) be undertaken before proceeding.
84. Options 14.1 – 18. We have no comments on these options.
85. Options 19.1 – 19.2. We would ask that our Heathrow – Ebbsfleet proposal be considered in relation to these options.
86. Options 20.1 – 20.5. We would ask that sufficient dual voltage units are retained for the WLL services as outlined in our preferred option and that any reduction is re-instated as soon as possible.
87. Option 21.1. We have no comments on this option, although we have commented on Option 3.4 above.

88. **Option 21.2. We would support this option, especially with its potential for allowing greater capacity on the WLL, with the proposed increases in London Overground and Southern WLL frequencies and in the light of our proposed Heathrow – Ebbsfleet service. We would particularly recommend restoration of the southbound freight loop and the former Platform 3 at Kensington Olympia.**
89. **Option 21.3. We would restate our support in the Cross London RUS for easing conditions at Crofton Road Junction, since this would be traversed by our proposed Heathrow – Ebbsfleet service.**
90. Options 21.4 – 21.8. We have no comments on these options.
91. **Options 22.1 – 22.10. We generally support all such improvements. Under Option 22.2 we welcome the inclusion of the redevelopment of Victoria underground station. Particularly in the light of this, we would again point out the potential benefits to cross-Clapham WLL passengers accessing the West End via West Brompton or Shepherd’s Bush instead of Victoria.**
92. **We welcome the comments under Options 22.3, 22.4 and 22.10 and would support in principle all aspects of the assessments relating to the need for platform and associated improvements at Clapham Junction, East Croydon and Balham.**
93. **We welcome the comments under Option 22.6 and would support in principle all aspects of the assessment relating to the need for platform and associated improvements at Lewisham, as this would be an important interchange on our proposed Heathrow - Ebbsfleet service.**
94. **In relation to Option 23.1, while we welcome in general terms the proposed station to be built by Network Rail at Eastfields, we believe that work should first be progressed on the proposed station at Imperial Wharf (only just outside the RUS geographical area), given the scale of the latter’s catchment area, the poor public transport alternatives in its vicinity and its location of the edge of the Western Extension to the Congestion Charge Zone.**
95. **Under Option 23.2 we would prefer the existing station at Loughborough Junction to be retained with new platforms on the SLL so that this could provide, via our proposed Heathrow – Ebbsfleet service, an interchange between South West and South East London, King’s Cross St Pancras and Luton Airport.**
96. **Under Options 23.3 and 23.4, we would support the construction of new high-level platforms at both Brixton and Brockley that would both be served by our proposed Heathrow – Ebbsfleet service.**
97. **In addition to linking both areas directly with the UK’s two premier international travel facilities, these two developments would take advantage of linking inner south east London (the area with largest expected population growth) to the WLL corridor (one of the four key areas for future employment growth), both as according to TfL’s T2025 Strategy.**
98. **In relation to Chapter 8, “Emerging Strategy”, we would generally accept the comments made, save again we would counsel against imposing a peak-hour led service pattern on the rest of the week for the WLL (paragraph 8.2.4).**

- 99. We would agree with the final sentence of paragraph 8.2.6 and say that the present WLL Southern service should be retained as a semi-fast inter-regional service and not be downgraded into purely a local urban service running on to the NLL.**
- 100. We note the continuing transfer of dual voltage Class 319 units to FCC, but such transfers of Class 319 or Class 377/2 units must NOT be at the expense of the present or future WLL service.**
- 101. In relation to paragraph 8.2.12, this RUS must reject developments which endanger the health and safety of passengers, e.g., the curtailment of all WLL trains at Platform 17 at Clapham Junction. This development will be, we believe, “an unacceptable deterioration” in the services offered by the present rail network.**
- 102. It is therefore regrettable to note that in this chapter there is no inclusion of any of the items that should be taken forward under Option Groups 22 and 23 in either the short- or medium-to-long-term strategies (sections 8.2 and 8.3). This deficiency should also be rectified in the final version of this RUS.**
- 103. Under paragraph 9.1.3 – bullet point 9, the West London Line Group does represent a sizeable number of commuters and others who will be affected by decisions arising out of this RUS process. We would be pleased to attend any appropriate events and to receive further information on the process in the future.**

Thank you for giving us the opportunity to comment on this document.

Yours faithfully

Mark Balaam  
Chairman