

**Response by the West London Line Group on the Earl's Court & West Kensington Opportunity Area SPD
– March 2011**

Aim – to secure the inclusion within the SPD or its associated Transport Study of a feasibility study to determine whether a new interchange, 'Philbeach Interchange', should be built.

The WLLG and H&TT Sub-Group of the ECS have already provided initial thoughts on the SPD, particularly in terms of its sub-regional context and links via the West London Line (WLL) corridor, and recommendations in relation to Philbeach Interchange, a new rail/tube facility that could also serve a new connection between the HS2 and HS1 rail networks. This would allow the OA and its hinterland to have excellent direct rail connections with many key parts of the UK, its two principal airports and the Continent.

These initial comments have now been modified and incorporated in this the WLLG's formal response to the SPD.

A. Sub-regional context

Greater mention should be made in the SPD of the sub-regional context in which the EC&WKO exists, particularly the West London Line corridor and developments along it. These include:-

- (i) Park Royal Opportunity Area
- (ii) Old Oak Common Interchange (OOCI) [GWML, Heathrow Express, Heathrow Connect, Chiltern, WLL (between Willesden Junction and Shepherd's Bush), NLL (between Willesden Junction and Acton Central), WCML, Bakerloo Line (Willesden Junction), Central Line (North Acton), Crossrail1, HS2, HS2-HS1 Link]
- (iii) Kensal (including Crossrail station – funded by RBKC)
- (iv) White City Opportunity Area
- (v) Olympia Exhibition Centre
- (vi) NW Warwick Road sites
- (vii) EC&WKO (including Seagrave Road and EDF building)
- (viii) Crossrail 2 (at Stamford Bridge or Imperial Wharf)
- (ix) Imperial Wharf Area (including Chelsea Creek, St George (Fulham Gasworks?), Lots Road)

B. Outstanding Assessments

Assessments should be made as to the:-

- (i) Likely two-way impacts between this OA and each of the other development areas in the WLL corridor;
- (ii) Likely two-way impacts between all of the other development areas in the WLL corridor;
- (iii) Likely two-way impacts between the WLL corridor and other areas outside it, particularly inner SE London (area of expected highest residential\population growth to 2026 (see TfL's T2025 Document) and Gatwick Airport;
- (iv) Cumulative effects within the WLL corridor;
- (v) Implications for the OA arising from the above;
- (vi) Transportation links and the regional capacity of each that should be provided for the WLL corridor during and after development;
- (vii) Overall transportation capacity that should be provided within the WLL corridor;
- (viii) Infrastructure required in the WLL corridor.

A distillation should be made of the views of both Network Rail and Transport for London as to the future role(s) of the WLL, given that these two organisations may place different emphasis on the different nature, yet joint existence, of the existing and potential local and inter-regional traffics.

C. Options for the WLL corridor

- (a) Existing double track line; and/or
- (b) Insertion of a third track at the same level where possible; and/or
- (c) Insertion of an overhead and/or underground single or double track (e.g., for the link between the Domestic and International High Speed Networks via Merstham (HS2-HS1 Link)).
- (d) Enhanced stations/platforms, for example:-
 - (a) all existing WLL platforms to be lengthened to 12-car trains (8-cars in NR's L&SE RUS);
 - (b) 'islanding' the southbound platform at Kensington Olympia and linking this and the station to NW Warwick Road sites); and
 - (c) Interchange at Imperial Wharf between WLL and Crossrail 2
- (e) New stations/platforms, for example:-
 - (f) WLL platforms at Old Oak Common linked to all the other lines serving Old Oak Common;
 - (g) 'Philbeach' Interchange between District, Piccadilly and WLL lines in NE Quadrant of EC&WKO
 - (h) WLL/HS2-HS1 Link platform(s) at 'Philbeach' Interchange and/or in Kensington Olympia area.

D. SPD Section 7 Public Transport

7.60 Demand for rail travel generally has been increasing, across the country, throughout each day of the week. There has been particular growth on the London Underground and on the West London Line. The prospect of continuing growth is indicated in the push to develop both the Crossrail and HS2 networks, as well as being clearly outlined within Network Rail's series of Route Utilisation Strategies.

The RUS for London and the South East reflects this growth, with especial reference to the existing overcrowding on the WLL and the assessment of the need to extend all WLL platforms that are not yet long enough to accommodate 8-car trains. In its response to the RUS, the West London Line Group has urged that these platforms be extended to accommodate 12-cars, so that the WLL can properly serve the growing developments in the WLL corridor and relieve congestion at Euston, Marylebone, Paddington, Victoria and Waterloo by diverting trains from the West Coast Main Line, Chiltern, Great West Main Line, South Central and South Western Main Line networks, nearly all whose platforms are being lengthened to deal with 10- or 12-car trains.

Diverting such trains should also overcome another of the RUS's key concerns, viz., that the WLL may not be able to cope with properly serving either Crossrail or HS2. Another key theme in our response is the potential for the WLL, the Brighton Main Line and the Redhill-Ashford corridor to be used to link the HS2 (Domestic) and HS1 (International) high-speed rail networks.

The problems of overcrowding on the WLL exist now, many of which have no funded solutions. Now a series of additional developments in the WLL corridor will each add significant numbers of new trips to the Underground, Overground and National Rail networks in the OA and that the mixed use nature of the proposals of the OA would generate significant passenger trips in both directions in both the AM and PM peaks.

Moreover, even without any development, significant pressures continue to grow on the parts of these networks that pass through or abut the OA, especially the Wimbledon branch of the District Line (which now needs the curtailment of the District's Olympia service to deal with the rising numbers of morning commuters).

In just 17 years of the WLL's renaissance since 1994, i.e., before either service ran beyond the two unadvertised trains per weekday peak between Clapham Junction and Kensington Olympia, some of its peak trains are now packed. Even with the imminent doubling of the London Overground WLL service from later this month (May 2011), we would expect significant growth still to occur on this service, to be further fuelled from next year by commuters from the SLL extension of the London Overground network changing on to it at Clapham Junction.

- 7.61 We would agree that further work needs to be done to assess the impact of development in the OA on the rail lines that serve it. However, what has to be allowed for in assessing transport needs of this development will not be the levels of demand that exist now or will do so in the immediate future, but those that will pertain from the start of work on, the public opening of, and the completion of the development. The actual timetable will depend on the decision process and build programme, but it could be reasonable to assume that this could start in 2013 and be complete by, say 2017, i.e., at about the same time as Crossrail 1.
- 7.62 We believe, given the present inadequacy of these stations even before any impacts of development of the OA are felt, that all the deficiencies here should be addressed as soon as possible and definitely within this SPD.
- 7.63 What is being created within the OA is the equivalent of another small new town (pop c. 20,000). As such it should have additional station capacity to deal with expected residential and employee passenger numbers. Being an inner city location, the OA should have good access to as many central, inner and outer areas and other efficient rail and air links as possible.

It should be noted that if improvements are implemented elsewhere on the WLL, this will tend to raise rail demand generally along the WLL. Therefore, we would maintain that improvements in rail facilities in the OA on a greater scale than that indicated in the SPD are now called for and these should be brought forward with the inclusion of a new WLL station in the OA.

However, the WLL is an orbital link, or more accurately a facility that accommodates a number of orbital travel routes. To play as full a part as possible in the London rail and tube networks, it should have good interchange with nearby radial routes, and its access points need to deal with four-way flows of commuter traffic in the peaks.

If the new station in the OA is to be an interchange, its development as such would bring greater economies of scale and a higher Benefit/Cost Ratio, while remaining principally for local residents and employees.

However, facilities such as Crossrail 1 and, in due time, Crossrail 2 are likely to encourage demand for them from many quarters and the OA lies between them and relatively close to each. This will put further strain on the facilities at West Brompton. We have given above an extensive list of the other generators of rail traffic on the WLL – these exclude other such areas outside the WLL corridor that may also have an impact on demand for rail and tube services to and from the OA.

Network Rail's London & South East Route Utilisation Strategy (RUS) indicates some fears about whether the WLL will be able to service Crossrail demand on, we assume, its existing service pattern.

However, we believe that it would be ridiculous and short-sighted not to provide both arms of Crossrail and, in due time, HS2 with a north-south connection facility to make these new prime rail projects easily accessible to all areas in the WLL corridor that will benefit from them, be they either the many prosperous districts served by the WLL or those lying next to them that still need regeneration.

We strongly believe that it is not right, by deliberately omitting such interchanges, to plan to deprive many Londoners, such as those who already live in inner West London, plus those who will be living in this and nearby OAs, the easy access to Crossrail and HS2 to which they are entitled, as these Londoners are continuing to pay considerable sums towards these projects. Interchange stations should be built at Old Oak and Imperial Wharf and all the above residents allowed easy access to them.

The Group, in its response to the RUS, has suggested increasing train capacity on the WLL (allowing 12-car trains to be diverted from expected areas of congestion at Euston, Marylebone, Paddington and Victoria to North Pole/Old Oak and Clapham Junction). However, this will need all WLL platforms, including those at West Brompton, to be extended to accommodate 12-car trains. This proposed expansion in the WLL's carrying capacity would allow enhanced orbital travel to key interchanges with radial routes, such as Clapham Junction, Shepherd's Bush and Willesden Junction.

However, on other radial routes possible to be reached by changing from the WLL, the full District Line Wimbledon branch trains at West Brompton can impede both those starting their journeys here and those interchanging from the WLL. The plans for Crossrail 1 and HS2 do not yet include an interchange for the WLL at Old Oak. Little progress is expected on Crossrail 2 or the mooted interchange at either Imperial Wharf (preferably) or Stamford Bridge.

Other areas of West Brompton station are likely to need additional investment to deal with greater numbers of passengers. However, the possibilities to expand this station may be restricted, given the Listed status of the station and its setting alongside the Philbeach and Brompton Cemetery Conservation Areas.

Dealing with these increases in orbital service will do little to alleviate high levels of crowding on the radial District and Piccadilly Lines at Earl's Court and West Kensington (District Line only). We believe radical and significant new investment should be made at West Kensington and on the Piccadilly and West London Lines in this area and that this should be in the form of a new interchange station.

We believe that in progressing these issues, the assessments must take account of all the factors that pertain to each site, their interaction and cumulative impacts on carrying capacities.

We would urge those responsible to anticipate changes in demand and not to react after the event. We would suggest that the authorities take up opportunities when these become available, especially land for transport projects and that they make good use of airspaces above rail lines, but appreciate their constraints (impacts of 'long barrows' on homes either side of them).

E. The case for Philbeach Interchange

F. A new station on the West London Line, also to be served by trains on the HS2-HS1 Link via Merstham

The proposals for a complete redevelopment of the Earls Court and West Kensington OA is probably an unrivalled and unlikely to be repeated opportunity for linking the OA with all key areas of London, its two principal airports, and almost the whole of the UK and the Continent with just one rail facility. This opportunity should not be allowed to pass without a full feasibility assessment of this facility being undertaken, with the assessment taking into account the impacts of other developments in, or linked to, the WLL corridor. Beyond these developments are the improved service pattern on the WLL London Overground service (as from May 2011), both western arms of Crossrail and the proposed HS2 London terminal, the expected connections with the WCML, GWML and Chiltern at Old Oak, the proposed HS2-HS1 link via Merstham, and the possible additional stations at North Pole Road and Battersea High Street.

G. Population and employment growth in the OA

The number of residential units in the OA is expected to increase from the existing level of 760 to 10,000 units. This is a thirteen-fold increase in just the total number of units; however, the desire to have more family units with three, four or more units is likely to increase the space required to fit all these in by an even higher degree than this.

If it is assumed that the 760 existing units have an average of 2.3 residents each, then the present residential population is approx 1,750 persons.

If the 10,000 new units are split 50:50 between 1-2 person flats and 2 adults, plus children and assuming an average of 1.5 persons per unit for the first 5,000 units and an average of 3 persons per unit for the second 5,000 units, this gives a proposed new total population of 22,500 persons, or a twelve-fold increase on the present level.

In view of the present poor level of facilities at each of three stations in or bordering the OA above, all the improvements to the three tube/rail stations proposed in the SPD should be undertaken, regardless of any growth in residents and/or employees as a result of the planned redevelopment.

If the development goes ahead with only a reasonable proportion of the SPD's projected residential units and jobs to be created in the area, we believe that there will be a need for another tube and/or rail facility, i.e., a new station, within the OA.

If the higher levels of proposed housing units, densities, residential and working populations in the SPD are to be aimed for, then another substantial station would be a pre-requisite. This would not only serve these populations in the OA and those beyond its borders, but also act as an attractor for those seeking jobs and homes within and/or outside the OA, especially if the multiplicity of places near and far that its existing trains now serve were to expand further.

H. Efficient Landtake

The plans in the SPD indicate prima facie that there is space for the efficient insertion of a station at the intersection of the WLL and tube lines within the OA. Although the station would be on the edge of the OA, away from other developments in the OA, it would still be able to serve them all. Together with the fact that all its platforms would be covered or in a cutting close to the OA's northern boundary, this would make this facility extremely efficient in terms of landtake.

There is also the more minor potential for this structure (or at least those parts of it that would be above ground) to be an attractor in its own right if designed to be iconic in architectural terms; ideally there should be positive architectural relationships with other structures in the vicinity.

I. A new interchange

Moreover, if this facility were to provide useful interchange between lines, especially where such interchange does not yet exist, e.g., between the Ealing branch of the District Line and the West London Line/HS2-HS1 link, this should lead to increased awareness of, and demand for, connectional possibilities via the interchange.

This interchange capability would thus improve the utility of the station and presumably its economies of scale and benefit/cost ratio, even though such a facility would primarily be for the benefit of local residents and employees.

J. A new interchange including the Piccadilly Line

Such cost-effectiveness would be significantly enhanced, along with the appeal of the OA if, instead of just running straight through it, Piccadilly Line trains also served their own platforms in the Interchange, as this would allow direct travel between the OA and Heathrow Airport, many suburban centres in West London, key central London stations between Knightsbridge and Kings Cross St Pancras, including those in the central West End and Bloomsbury.

We appreciate that there may be significant engineering concerns in creating platforms on the Piccadilly Line due to the curvature and/or gradients of both its tracks under the OA and other sub-surface issues, e.g., new lift/escalator shafts. We also understand that an additional stop may affect performance and journey times for existing users on this section of the Piccadilly Line.

Nevertheless, this facility would also provide the 'missing' interchange between the Piccadilly and West London Lines, thus rectifying a deficiency in connections within the inner west London rail and tube networks.

It would create a 'one-change-avoiding-London' facility between such places as Heathrow and Gatwick and the many important suburban centres that lie between them, thus minimising the pressure on other parts of the tube and rail network, e.g., at London terminals.

We believe that there should be a positive outcome for OA residents and employees, Londoners and others when setting the needs of the OA for a new station together with the desirability of this rectifying a deficiency in tube/rail interchange in inner west London, against the additional capital and operational investment involved in providing a the Philbeach Interchange to serve all three lines and the HS2-HS2 link.

K. Siting and accessing the new interchange

It is envisioned that the primary road access for the Interchange would be via an intersection/roundabout on this section of the West Cromwell Road immediately above it. This road intersection would be designed to maximise positive impacts and minimise adverse impacts for residents in the surrounding Conservation Areas of Philbeach, Barons Court, Olympia and Avonmore and the SW corner of Abingdon Ward. It would be made permeable to allow secure, well-lit pedestrian and cycle access between all the areas above, e.g., between Tesco and the area to the south of the present Ashfield House. The Ecology Park in this area may have to be relocated elsewhere.

L. The beneficial impacts of the interchange on the WLL and vice versa

In addition, (not least to improve the BCR above) one of the key elements within the West London Line Group's response to Network Rail's London & South East Route Utilisation Strategy (2011 – 2040) is use of the WLL corridor for:-

- (i) diverting trains away from the congested terminals of Euston, Marylebone, Paddington and Victoria – thereby providing direct links between the OA and its hinterland to more parts of the country;
- (ii) providing West London's north-south rail links to Crossrail 1 at Old Oak Common and Crossrail 2 at Imperial Wharf; and

- (iii) the alternative or sole link between the Domestic and International High Speed Rail networks, i.e. HS2 (Domestic) – HS1 (International).

In addition, a station on the WLL in the OA would provide:-

- (i) a swift rail link to the UK's third-largest shopping complex at Westfield London at Shepherd's Bush; and
- (ii) direct links for residents in the OA and many other nearby in LBHF and RBKC to a wide range of rail destinations across London and the UK.

M. Advantages of the HS2-HS1 Link via Merstham serving Philbeach Inetrchange

This HS2-HS1 Link would link directly with the HS2 station at Old Oak Common, via the WLL corridor, across the Thames to serve new high level platforms across Clapham Junction and follow the Brighton Main Line south to East Croydon (Clapham – Croydon BML will be at capacity by 2019) and on to Merstham Parkway, a new station alongside the M23/M25 interchange with links to Gatwick, and then east along the existing rail alignments to Tonbridge and Ashford for HS1.

The WLLG believes that boarding and alighting facilities on the HS2-HS1 Link can be also accommodated as an integral part of the Philbeach Interchange in the NE Quadrant of the OA. Save for the platforms' length (18-cars), these would not be on the scale of a major terminal such as St Pancras International or even Ebblefleet IPS, but rather provide a kind of wayside station. The platforms could be shared with local domestic services, although there may need to be limited facilities for customs and passport control and appropriate regimes for segregating overseas and domestic passengers. A possible international service level could be hourly in each direction with a basic pattern of a two-hourly Manchester – Paris service, alternating with a two-hourly Birmingham – Brussels service.

Philbeach Interchange will bring benefits for both the OA and for the wider area of inner west London, yet with minimal adverse impacts on local residents in terms of visual and aural intrusion. Philbeach Interchange will also benefit those from outside the local area using the Interchange (either by local rail or tube services or by buses/taxis on a new apron above this proposed station next to its intersection with West Cromwell Road. The HS2 – HS1 Link, with all its trains serving Philbeach Interchange, would allow direct trains between the OA and:-

- (iv) the Midlands and the North and, in due time, Scotland (with Wales and the West Country one change away at Old Oak Common);
- (v) virtually all of southern England (one change at either Clapham Junction, East Croydon, Tonbridge or Ashford); and
- (vi) the Continent.

As this is an 'Opportunity Area', the opportunity should be taken at an early stage to determine how far it is engineering and operationally feasible to provide:-

- (i) the Underground/WLL interchange to fill a missing set of connections in this part of London's rail/tube networks; and/or
- (ii) platforms for the HS2-HS1 Link at this point.

However, in view of (i) the general increase in demand for public transport, especially to and from airports, (ii) the size of the potential increase in residential accommodation and employment directly affecting the expected traffic generation and demand for public transport to and from the OA, as well as that arising from other sites in the WLL corridor, the need to accommodate the proposed impact is paramount.

The Group would strongly recommend that the engineering and operational feasibilities of the option to insert another station within the OA that can serve all three lines (District, Piccadilly and West London) and provide interchange between them should be fully assessed. Until such an assessment is completed, the land necessary for the required station/platform boxes and connecting underground and surface passageways and accesses must be safeguarded.

While we welcome the desire to increase movement from west to east across the OA, it should be noted that, in addition to the practical constraints in the unbroken lines of the crescents in Philbeach Gardens and Eardley Crescent, the level of the Counters Creek Linear Park will have to be at least 6 metres above the WLL trackbed in order to clear the tops of the high-box freight trains, as well as the Overhead Line Equipment that may be extended

from North Pole to Clapham Junction, plus the depth needed to accommodate the root systems (and their drainage) of the Park's trees, once they have matured.

Insertion of Philbeach Interchange with platforms on the District, Piccadilly and West London Lines (also able to be served by trains running between HS2 and HS1) with at least three principal entrances/exits that between them would allow comprehensive access to/from all these train services, would also be key and should be considered with the transport authorities involved.

The three principal entrances would be (a) the existing main District Line entrance at West Kensington, (b) in the NE Quadrant above the junction of the eastward extension of the District Line platforms, the Piccadilly Line and WLL axes (to serve local buildings close to the intersection of these routes); (c) at the south end of the new WLL/HS2-HS1 platforms; and (d) possibly others, e.g., to/from those areas north of the West Cromwell Road.

The station should have vehicle (taxi, coach, delivery and servicing) access to and from West Cromwell Road via an apron immediately above the WLL tracks at the northern end of the WLL platforms.

N. Recommendations

At the very least, the feasibility of this interchange needs to be assessed within this SPD, taking into account all the points above and all the attributes of the other actual and potential rail developments in the WLL corridor.

The WLLG and the H&TT Sub-Group of the ECS would recommend the following:-

- (i) The safeguarding of a three-dimensional space large enough for the station and platform boxes, apron and accesses for all the feasible elements within the Philbeach Interchange in the NE Quadrant of the OA.
- (ii) An investigation into the operational and engineering feasibility of the tube/rail and the HS2-HS1 Link elements of the Philbeach Interchange.
- (iii) The incorporation of the proposed Philbeach Interchange as a potential element within the SPD and to re-assess all relevant issues within the SPD (Transportation, Economic Development, Visual Amenity, etc.) following the Philbeach Interchange's inclusion.
- (iv) The proposed Transport Study should be proceeded with and take into account:-
 - the proposed Philbeach Interchange;
 - the recent developments on the WLL and in the WLL corridor; and
 - the proposed enhancements to the WLL and future developments in the WLL corridor.

Taking all these into account would also inform the transportation aspects of the other development areas listed on page 1 above.

A full study should also be undertaken of the WLL and the WLL corridor to ensure that both fulfil their potential.

With many thanks for this opportunity to comment.

Yours sincerely

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