

**Our Ref:**  
**Your Ref:**

29<sup>th</sup> June 2009

Mike Gibson  
Public Affairs Manager  
Southeastern Railways  
Friars Bridge Court  
41-45 Blackfriars Road  
London  
SE1 8PG

Dear Mike,

**Lewisham station: Proposed closure of platform 4 access ramp**

Thank you for extending the consultation period to 22<sup>nd</sup> June 2009, regarding the proposed closure of platform 4 access ramp at Lewisham station.

As we were asked by yourself to be the 'independent' co-ordinator for all the relevant responses, the purpose of this letter is to give you feedback of the responses we have received and our recommendations on the issues raised by this consultation.

In general terms London TravelWatch accepts and supports the installation of automatic ticket barriers at Lewisham station to support the introduction of the Oyster Pay As You Go on the Southeastern network and the Access for All scheme, however, the proposal as it stands give us a number of concerns. We would also ask that you review the opening hours of passenger facilities such as toilets and re-examine the possibilities for improving passenger safety through better lighting and wider access in underpasses and the extension of closed circuit television coverage.

**Consultation process**

Our initial concern is the weakness of the consultation process itself. In particular, the initial information provided to London TravelWatch failed to outline the full impact of the proposals on passengers of the proposed developments and closures and at later stages we were misled over proposals to create a new entrance/exit to Tesco Car Park.

We were first made aware of the plans when a proposal was received from Network Rail on 25<sup>th</sup> February 2009, regarding the Access for All project currently taking place. We did not object to this proposal given the demand and high frequency of passengers with mobility impairment who use the station on a regular basis. However, we would like to stress that the proposal made no mention of the proposed closure of the platform 4 access ramp and the proposed gating scheme; thus we found Network Rail were not aware of the plan to permanently close the access ramp.

After being informed of the proposed closure of the access ramp, we stated our concern that if this ramp was to be closed permanently this would have a significant impact on passengers, causing major inconvenience especially during peak hours. However, at this stage you also informed us that a new exit/entrance would be constructed to connect platform 4 with Tesco's car park by Network Rail which would allow access/egress to the

Docklands Light Railway (DLR) concourse area via the subway. This was confirmed in your email of 28<sup>th</sup> April 2009 which stated that the current ramp would remain open until the new staircase, lifts and barriers via Tesco's car park were operational.

From the commencement of the consultation, local councillors and local stakeholders were informed that the platform 4 access ramp would be closed permanently. As a result we received a number of complaints opposing this closure, with the majority of these complainants being from residents living to the north of Lewisham Road and west of the railway line.

Initially, we informed complainants that it was your intention to install a new gate line and that an alternative exit/entrance gate line would be constructed with access via the Tesco's car park. We were then informed by the Blackheath Society that in a letter to them you had stated that, in view of budget constraints, the new gate line via Tesco's would not be constructed. However, the project manager (Mike Crane) told us subsequently that it had never been intended to provide an entrance / exit at this location.

It is of great concern to us that having asked us to act as independent co-ordinators of public comments on this scheme that we were given conflicting information and in a number of cases had passed on information to users that were clearly inaccurate.

We received a number of complaints that there had been inadequate publicity about the proposals and that local people had been given insufficient notice of the closure of the ramp. We are pleased that, at this stage, additional publicity was produced and that you agreed to extend the consultation period to 22<sup>nd</sup> June 2009. However, we hope that Southeastern learns lessons from this process about the need to have greater clarity about what is proposed that sufficient time is given to undertake consultation and the need to ensure that publicity is displayed prominently on its stations.

### **Representations & Objections**

To date, London TravelWatch has received 114 email complaints, 14 letter complaints and a petition of 378 signatures all objecting to the proposed closure of the access ramp off platform 4. The majority of objections came from residents who live to the north of Lewisham Road and made objections for the following reasons:-

A number of passengers raised concerns about personal safety as they do not feel safe using the replacement subway either alone or late in the evening.

- The closure of the ramp would significantly increase walking times. In particular, using the existing and replacement subways to walk between Platform 4 and Tesco's or Lewisham Road would take an additional 4-7 minutes to the passenger's journey time.
- While the ramp is not a step-free access to the station, passengers with mobility impairments (e.g. limited walking ability, using buggies or carrying luggage) would be significantly disadvantaged by its closure.

### **Conclusions and Recommendations**

We have concluded that closure of the existing Platform 4 access ramp should only be permitted concurrently to the opening of a replacement entrance / exit gateline at the base of the new stairwell / lift for platform 4 into the Tesco's car park. It appears that your principle reason for proposing the closure of platform 4 access ramp is to protect against revenue loss and whilst this may be laudable aim, the proposal as it stands does not adequately address issues relating to passenger convenience or provide significant passenger benefit. In particular the impact on overall journey times to passengers of the longer alternative walking

routes that you have proposed is not acceptable, given that typical journey times by train from Lewisham to central London are between 10 and 18 minutes (to London Bridge or Charing Cross). An additional journey time of approximately 4 minutes in each direction for users as you are proposing will be a significant deterrent to using the rail network to and from Lewisham, particularly from the Lewisham Road or Lewisham Hill areas.

Southeastern's own passenger count states that the following number of passengers currently use the ramp access:

<b>Morning Peak 06:30-10:30</b>	
<b>Average Passenger count</b>	<b>300</b>

<b>Evening Peak 16:00-19:00</b>	
<b>Average Passenger count</b>	<b>1500</b>

We note that the number using the ramp exceeds the number using the current underpass. We consider that, while the provision of a new improved underpass linked to the DLR is likely to reduce these numbers to some extent, a significant number of passengers will still be significantly inconvenienced by the closure of the access ramp.

We also believe that given the significant developments proposed North and East of the station (and in particular any redevelopment of the Tesco store and car park) that it would be in the commercial interest of Southeastern as well as providing significant passenger benefits if an entrance / exit could be provided via the Tesco car park.

In addition we observed that most trains stopping at Platform 4 currently stop at the "country end" meaning that a large number of passengers have to walk back to use the existing exits from the station. We would like Southeastern to consider changing the stopping position on the platform which would enable passengers to board and alight from trains at the wider part of the platform and nearer to the existing exits.

It is also of concern that the access from the new underpass will channel a significant number of passengers on to Station Road, and that this raises road safety concerns. In particular, the current pathway from Lewisham Road is quite narrow. We note that even at present passengers leaving the station often spill out on to the road at this point in front of buses and taxis in particular. We consider that Southeastern should undertake urgent discussions with Lewisham Council on installing crossing points and widening footways at this location.

We believe that Lewisham as a prime transport interchange in South East London and requires a coherent development plan involving DLR, PCO, London Buses, Lewisham Council and Southeastern. While it is perhaps an historic accident that the main entrance is some distance away from the community it serves, little seems to have been done to seriously look at bus stopping arrangements, walking routes, cycle parking and routes and a route for wheelchairs. The approach to date appears to have been piecemeal and lacking in strategic direction. An example of this is that the former Southeastern booking office is currently boarded up rather than being opened up as a passenger waiting room or let out to commercial tenants, and while gating is introduced by Southeastern, the DLR station remains an open station.

If however, you are unable to provide an alternative access to platform 4 from the Tesco's car park with gateline, we would recommend that a Oyster reader is provided at the entrance / exit to the retained access ramp, and that you also consider placing a Ticket Vending Machine also at this location.

I enclose copies of all the representations that we received. We will shortly be writing to all those who responded to the consultation with a copy of this response attached.

If you have any queries on the content of this letter please do not hesitate to contact me.

Yours sincerely

**Tim Bellenger**

Director - Research and Development

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