

SOUTHBOURNE GARDENS, RUISLIP – PETITION OBJECTING TO THE INTRODUCTION OF BUS STOP CLEARWAY OUTSIDE NO 28 SOUTHBOURNE GARDENS

Cabinet Member	Councillor Keith Burrows
Cabinet Portfolio	Planning and Transportation
Report Author	Aram Cheraghi, Planning, Environment and Community Services
Papers with report	Appendix A – Plan Appendix B – Route 398 bus timetable

HEADLINE INFORMATION

Purpose of report	This report advises the Cabinet Member that a petition has been received from local residents objecting to the introduction of bus stop clearway No 2 outside property No 28 in Southbourne Gardens, Ruislip.
Contribution to our plans and strategies	<ul style="list-style-type: none">• Transport Strategy• Community Plan• Local Implementation Plan
Financial Cost	The funding for the Bus Stop Clearways has in the past been provided as part of the Transport for London funded, Bus Stop Accessibility Programme; future work will be dependent upon funding being made available by TfL towards such measures.
Relevant Policy Overview Committee	Residents' and Environmental Services

RECOMMENDATION

That the Cabinet Member:

- 1. Meets with petitioners to discuss the concerns they have and to explain the Councils' obligations under the Disability Discrimination Act (DDA);**
- 2. Subject to 1. above considers options to either:**
 - a) Defer the implementation of the bus stop pending further study and consultation with local residents and disabled groups or;**
 - b) Approve the installation of the remaining bus stop, subject to TfL funding.**

INFORMATION

Reasons for recommendation

The Council has responsibilities under the Disability Discrimination Act 1995 ('DDA') (as amended) to promote equality of opportunity for disabled people and consequently it is unlawful for a Council to discriminate against disabled persons in connection with the provision of services. It also allows the Government to set minimum standards so that disabled people can use public transport easily. TfL has identified its required route; officers have installed stops that are compliant with DDA standards.

Alternative options considered

The only alternative which could retain a bus stop here would be to relocate bus stop No 2 to a point outside No 68 Southbourne Gardens; however this option was not considered to be an acceptable option by the Police and London Buses.

Supporting Information

1. The present petition is the second received concerning bus stops in Southbourne Gardens; a previous petition was heard by the Cabinet Member in April 2009. The paragraphs below describe the location and bus route, provide an overview of the previous petition and subsequent events, and then provide advice for the cabinet member to assist him in assessing the current petition.

Southbourne Gardens, Route 398 and obligations under the DDA

2. Southbourne Gardens is situated in Ruislip and runs east/west, and together with Chelston Road forms a link between Victoria Road and Field End Road. Southbourne Gardens is predominantly residential; however there are three community halls located opposite the junction with Coombe Drive. A network of roads served by Mansfield Avenue form a closed estate with no link to the road network or public transport other than via Southbourne Gardens. Similarly Coombe Drive serves a network of roads with only Southbourne Gardens as their link to the wider community and road network.
3. Southbourne Gardens is serviced by the 398 bus route. The 398 bus runs two buses in each direction from Monday to Saturday, 7am to 8pm. The route joins Westway Cross Retail Park to Ruislip Station, Via Eastcote Station. Prior to the work to improve bus stop accessibility in Southbourne Gardens, none of the bus stops in place at that stage had bus cages (clearways) and buses generally had to stop in the middle of the road, causing obstruction to traffic and considerable difficulties for bus passengers who wanted to get on or off there.
4. In relation to bus services, the Council along with TfL share a statutory duty to make public transport accessible to all members of the community. To achieve this, TfL encourages councils to make use of funds it makes available which can be used to improve accessibility at non DDA compliant bus stops. Generally these works involve the provision of a hard standing area, clear of street clutter, with kerb heights greater than 110mm and the introduction of a bus stop cage or clearway. The clearway must be of a length to allow buses to approach the kerb, straighten up and stop within 100mm of the kerb and then pull away without obstruction.

5. In the past many routes through residential roads have relied on the principle of 'hail and ride' services or request stops. However, request stops and hail and ride routes can be inaccessible to many disabled people, in particular the visually and mobility impaired.
6. Wheelchair users in particular need a bus to be able to pull squarely alongside the kerb in order for the bus to deploy its ramp; parked vehicles near the stop severely restrict the ability of the bus driver to do this. Those with visual impairments need a bus to stop with some regularity at a defined location, as they may be unaware of when a bus is approaching and so may not be in a position to hail it accordingly.
7. The negative consequence of introducing fixed bus stops in residential roads is inevitably some loss of parking, and the Cabinet Member will be aware from many past proposals of a similar nature that this can be a source of debate within the community.
8. Modern buses, capable of accommodating wheelchair and pushchair users and meeting all current design and use requirements, are somewhat larger than the old "hopper" buses that used to be common on hail and ride services, and so there can be difficulty in ensuring that these newer longer, wider and less manoeuvrable buses can maintain a smooth and effective operation. TfL is working to reduce reliance on hail and ride schemes across London as a whole.
9. As part of the TfL funded Bus Stop Accessibility Programme it was originally proposed to introduce bus stop clearways on the six bus stops in Southbourne Gardens. As part of this exercise, it was also necessary to physically move some of these stops in order to make them accessible. The purpose of a bus stop clearway is principally to ensure that the waiting area by the bus stop is always kept sufficiently clear to allow the bus to pull up square to the kerb, thereby allowing access for people in wheelchairs and other mobility impairments.
10. Although TfL and the Council are not legally required to advertise such restrictions, the council in particular was concerned to ensure that residents were granted an opportunity to influence the process, and so Public Notice was given of the Council's intentions in April 2008.

Previous petition, heard April 2009

11. In response to this public notice, a petition with 55 signatures was received from residents of Southbourne Gardens, Eastcote opposing the changes and in particular the introduction of these bus stop clearways. The petition was accompanied by three letters from residents objecting to the clearways and in addition to this, one resident raised an objection relating to the necessity for the 398 bus route to travel down Southbourne Gardens.
12. The petitioners objecting to the bus stop clearways maintained that in their view, Southbourne Gardens is an unsuitable road for a bus service; for example, some residents believe the buses now in service are too large to travel down this road, which often has parking on both sides of the road. Residents also believe that the current 398 bus service is under-utilised, although this has not been reported as an issue by TfL. The petitioners urged the Council to direct its efforts into relocating the bus route to Elm Avenue.
13. Although the Council work with TfL to establish bus routes that serve the community, TfL is the body with the power and responsibility to determine the path of bus routes throughout London. TfL consider a number of factors when deciding a new route including suitable traffic conditions, links to other forms of public transport, demand and commercial viability.

14. In light of this, when the first petition was heard on 15th April 2009, the Cabinet Member instructed officers to contact TfL and ask them to review this section of bus route 398, including but not limited to, the feasibility of redirecting the bus route to Elm Avenue. Officers were then asked to report back to the Cabinet Member with TfL's decision.
15. In order to fulfil the Council's obligations under the DDA, the Cabinet Member also asked officers to seek to design options for DDA compliant bus stops that would have a reduced impact on parking along TfL's desired 398 bus route whilst still providing full access and meeting essential road safety requirements.

Further investigations and actions

16. Following the petition hearing of April 2009, officers immediately contacted TfL, requesting their reviews on the bus route and TfL's response was received on 28th May 2009 saying:

"We have re-examined the routeing for route 398 in this area and wish to continue serving Southbourne Gardens rather than Elm Avenue.

Rerouting back to Elm Avenue would mean that an unacceptable number of households south of the railway would be more than 400m from a bus stop compared to the current routeing. Residents north of the railway have access to the H13 along Eastcote road (more residents within 400m), whereas residents south of the railway would have to walk to the north-south routes on Victoria and Field End Roads.

Although usage is quite low in this section (40 boarders, 51 alighters), it is still around what we would expect for a half-hourly service in a lower density area.

Elm Avenue also appears to be of a similar width (maybe narrower in some places) than Southbourne Gardens, so there could be similar issues whichever route we take".

17. Officers reviewed the proposal to minimise the impact on residents, as far as possible, but mindful still of the requirement to provide DDA compliant bus stops. The council then wrote specifically to frontagers in Southbourne Gardens in October 2009 and January 2010, (those who were affected directly by the proposals), informing them of the detail of the revised proposals and attaching a copy of the revised drawing.
18. The Council received objections from No 93 & 95 Southbourne Gardens concerning one proposed bus stop (Option 2 Stop 3) near the junction of Southbourne Gardens with Coomb Drive, suggesting that it would unreasonably obstruct visibility at the junction.
19. Following a site meeting attended by Council officers, the Police and London Buses to review the location of this bus stop, the design was slightly revised to minimise the impact on local residents as far as possible. The location and layout of the proposed bus stops can be found in Appendix A.
20. All interested parties (The Police, London Buses and the Council) agreed in principle to the location of bus stops due to their close proximity and officers carried out two alternative designs for route 398 in Southbourne Gardens.

21. In order to improve visibility at the junction of Southbourne Gardens with Coombe Drive, Council officers proposed additional double yellow lines as shown in Appendix A.
22. The proposed bus stop previously located outside 93 & 95 was successfully relocated to a point outside No 91 so that the bus stop is positioned on the exit side of the junction. The situation therefore is that accessibility at the majority of bus stops in Southbourne Gardens has been significantly improved, but this still leaves the matter of the remaining bus stops, including one proposed for a location near 24-28 Southbourne Gardens.

Proposals for bus stop outside No 28 Southbourne Gardens

23. To comply with the TfL Specification in terms of the distance between bus stops, TfL, The Police and the Council considered that the only viable compromise from service, safety and technical considerations would be to locate bus stop No 1 and 2 outside, respectively, No 3 and 28 Southbourne Gardens.
24. The drawback in implementing this scheme is the loss of parking space and it is acknowledged that residents might have difficulties in finding a parking space in the evening; however, on the other hand they will be permitted to park on the bus cages overnight between the hours of 7:00 pm and 7:00 am, as parking is only restricted during bus operation hours from 7:00 am to 7:00 pm. (see bus table times in Appendix B)
25. Following the consultation with the Police and TfL, the design proposal was finalised. Despite the fact that TfL has the Authority under the legislation to introduce bus stops within the public highways and there is no statutory obligation to consult with the residents, the council values residents' views and accordingly insisted upon notifying those who would be particularly affected by the proposals, and so distributed letters to the most directly affected residents, notifying them of the proposal and potential implementation programme.

Present petition against proposed bus stop outside 24/28 Southbourne Gardens

26. In response to this, the present petition which is to be heard now by the Cabinet Member was subsequently submitted by a landlord representing the interests of tenants living in 6 Southbourne Gardens. The petition, signed by 46 residents, objected specifically to the proposed stop outside 24/28 Southbourne Gardens and the lead petitioner stated that he had not in his view been adequately consulted. In particular, the petitioner stated:

“this proposed bus stop no 2 will take at least three residents’ parking spaces in an area which is already short of parking spaces. The existing bus stop is outside No 52 Southbourne Gardens and is a request stop and cars are allowed to park on it. The No 398 bus is not used enough to warrant a fixed bus stop.

A fixed bus stop outside No. 24 is unsafe due to the restricted visibility of cars exiting Green Lawns. If a fixed bus stop is thought necessary then this should be placed outside No. 62 Southbourne Gardens which is outside the residents’ parking zone and an area with semi-detached houses rather than the flats of 6 to 60 Southbourne Gardens.

The entrance to the block of garages adjacent is not heavily used. Although the front gardens of Nos. 64 and 66 have been paved, they do not have dropped kerbs and cars park in front of these properties, so there is room for a boarding area there. A fixed bus stop outside No. 60 Southbourne Gardens would also be a safer option and being a similar design to that proposed outside No. 24 would also take 3 residents’ spaces”

27. The matter of consultation has been covered previously; the council is not legally obliged to undertake consultations on bus stops and bus stop clearways (the latter have since 2002 become a part of the standard traffic signs and regulations and so no traffic order is required). However, the council has undergone an informal consultation and clearly the responses it has received, including the petition, show that there has been a dialogue.
28. The proposed location of bus stop outside No 24/ 28 Southbourne Gardens will not restrict visibility at the junction; indeed it is common to position bus stops on the exit side of the junction and the "Accessible bus stop design guidance" published by TfL allows for bus stops to be located on an exit side of a junction.
29. An alternative design showing proposed bus stop outside no 62 was considered and was forwarded to the Police and Transport for London Buses for their approval; however the proposal was not considered by either party as a preferred option. For example, the kerb height outside No 62 is low and in order to comply with DDA the kerb height it would need to be raised to 140mm; this would create a 'back fall' drainage issue and hence risk discharging surface water from the footway into the driveways.
30. Bus stop No 2, if located outside property 24/28 would result in the loss of three resident parking spaces in Southbourne Gardens; however officers' observations during numerous site visits suggest that parking is not a major problem during the daytime, as the majority of parking spaces are free between the hours of 8:00 am to 5:00 pm.

The views of disabled Groups

31. There are disabled people living in Southbourne Gardens and they report continual inconvenience with vehicle parking alongside the bus stop, such that buses are only able to pull up in the middle of the road and hence some disabled people are unable to access this bus service. Various bodies are consulted such as the emergency services and local disabled groups, and the implementation of the bus stop has been supported by "DASH", (Disablement Association Hillingdon).
32. As mentioned above, the cabinet member will be aware that lack off street parking in residential roads is often an issue and the introduction of bus stop clearways can exacerbate this issue. Previously when the Council has received petitions from residents objecting to bus stop clearways, they have deferred plans to introduce the clearway until all other stops in the borough are fully compliant with DDA standards.
33. However an e-mail has been received from the Uxbridge Support Group for Visually Impaired People requesting the introduction of clearways in Southbourne Gardens to improve access to the bus service. The issue of principal concern is that visually impaired residents are unable to safely access the bus when it does not pull up close to the kerb. When parked at an angle, such that the entrance in particular is some way from the kerb, then there is a significantly increased risk of tripping and falling. Similarly, the bus driver is unable to deploy the special ramp intended to help wheelchair users, thus denying such residents access to the bus service.
34. The feedback from DASH included the following in support of a visually impaired resident who had raised his particular concerns:

“Following our telephone conversation at the end of last week, as agreed here are the reasons why I agree with [resident] that a bus cage should be set down alongside the request stop close to where he lives.

The reason is that [the resident] and other disabled people are constantly inconvenienced as a result of vehicles parking alongside this stop, and meaning that buses are only able to pull up in the middle of the road, or on many occasions do not stop at all. As a result of this, [the resident] is unable to access this bus service”.

35. To meet their obligations under the DDA, the Council and TfL/ London Buses are all under a duty to properly consider this request.

36. As residents have raised their petition objecting specifically to the proposal for Bus Stop No. 2 being situated outside No 24/28, and the Uxbridge Support Group for Visually Impaired People are lobbying for this bus stop improvement, it is suggested that the Cabinet Member invites the petitioners and other interested parties to one of the special petition evenings that he sets aside in order that he may listen to their various concerns and consequently decide on the most appropriate course of action.

Financial Implications

Annual TfL funding is provided for Bus Stop Accessibility Schemes within the Bus Priority Corridors package. Should the cabinet member decide that the bus stop proposals be taken forward, officers will need to seek the necessary funding from TfL for this scheme.

EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES

What will be the effect of the recommendation?

The recommendations aim to make it easier for disabled people to utilise public transport easily, in accordance with the Council’s duties under the DDA.

Consultation Carried Out or Required

No Further consultations have been carried out as a result of this petition.

CORPORATE IMPLICATIONS

Legal

The Council has a duty under the Disability Discrimination Act 1995 (as amended) to promote the equality of opportunity for disabled people and consequently it is unlawful for a Council to discriminate against disabled persons in connection with the provision of services. The Act also permits the Secretary of State to make regulations where minimum standards are set, so that disabled people can use public transport safely and without unreasonable difficulty.

As already set out in the report, the bus cage and bus flag do not require the imposition of a TRO, however the bus lane can only be achieved by exercising powers under the Road Traffic Regulation Act 1984 and Highways Act 1980. On the basis of the information contained in this report, it does not appear there are special legal implications for this particular matter. The client will be required to be mindful of the statutory procedures imposed upon the traffic authority for the making of Traffic Management Orders which spring from the Road Traffic Regulation Act 1984. Officers are familiar with these procedures.

In cases of doubt Legal Services will be instructed. The decision maker must balance the relevant considerations in order to properly discharge the statutory duty to secure the expeditious, convenient and safe movement of vehicular and other traffic.

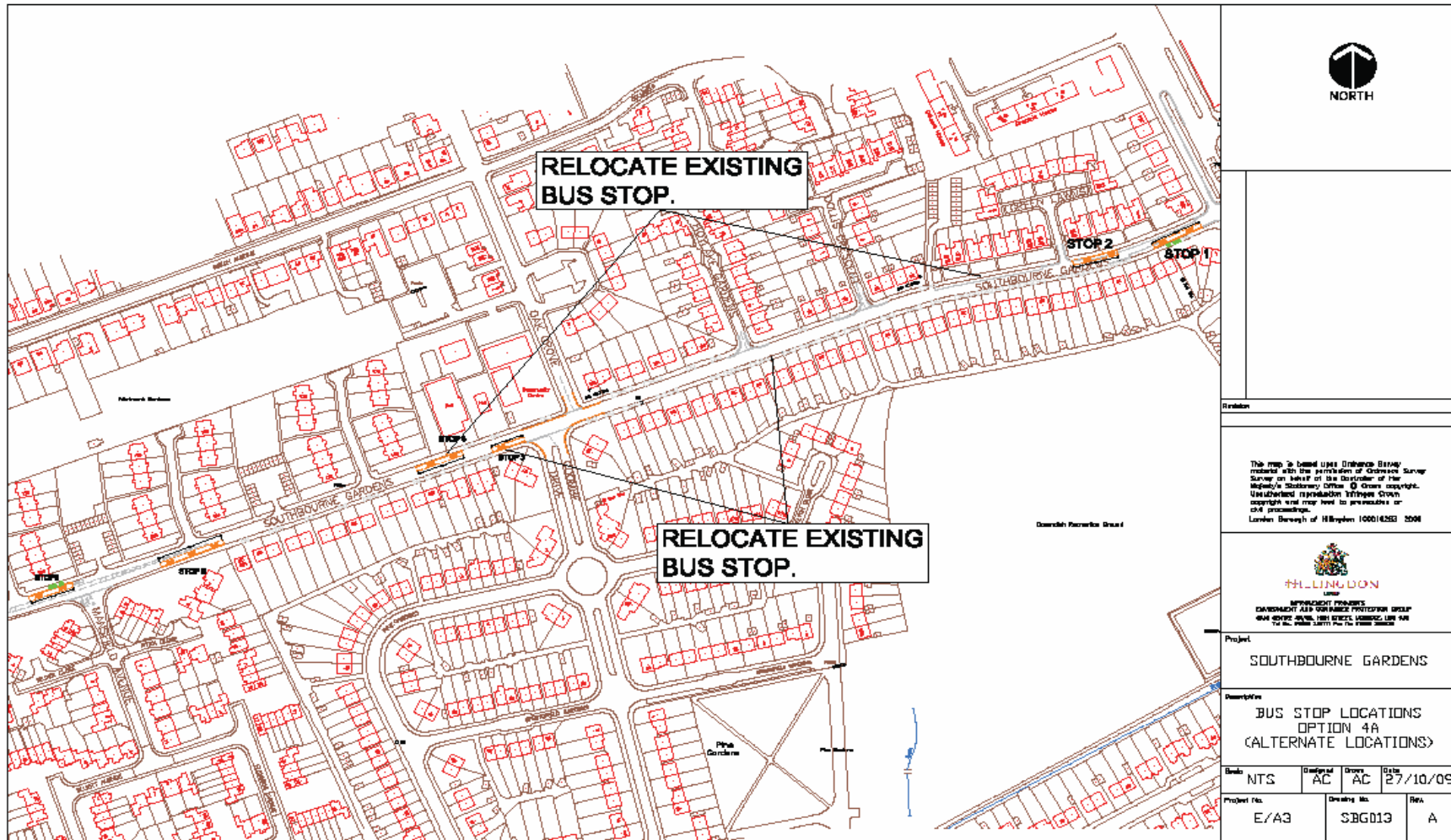
In considering any consultation responses, decision makers must ensure there is a full consideration of all representations arising including those which do not accord with the officer recommendation. The decision maker must be satisfied that responses from the public were conscientiously taken into account in finalising the officer's recommendation.


BACKGROUND PAPERS

Previous petition heard April 2009


Petition received 12 April 2010.

Letters from Residents received April 2010




 NORTH

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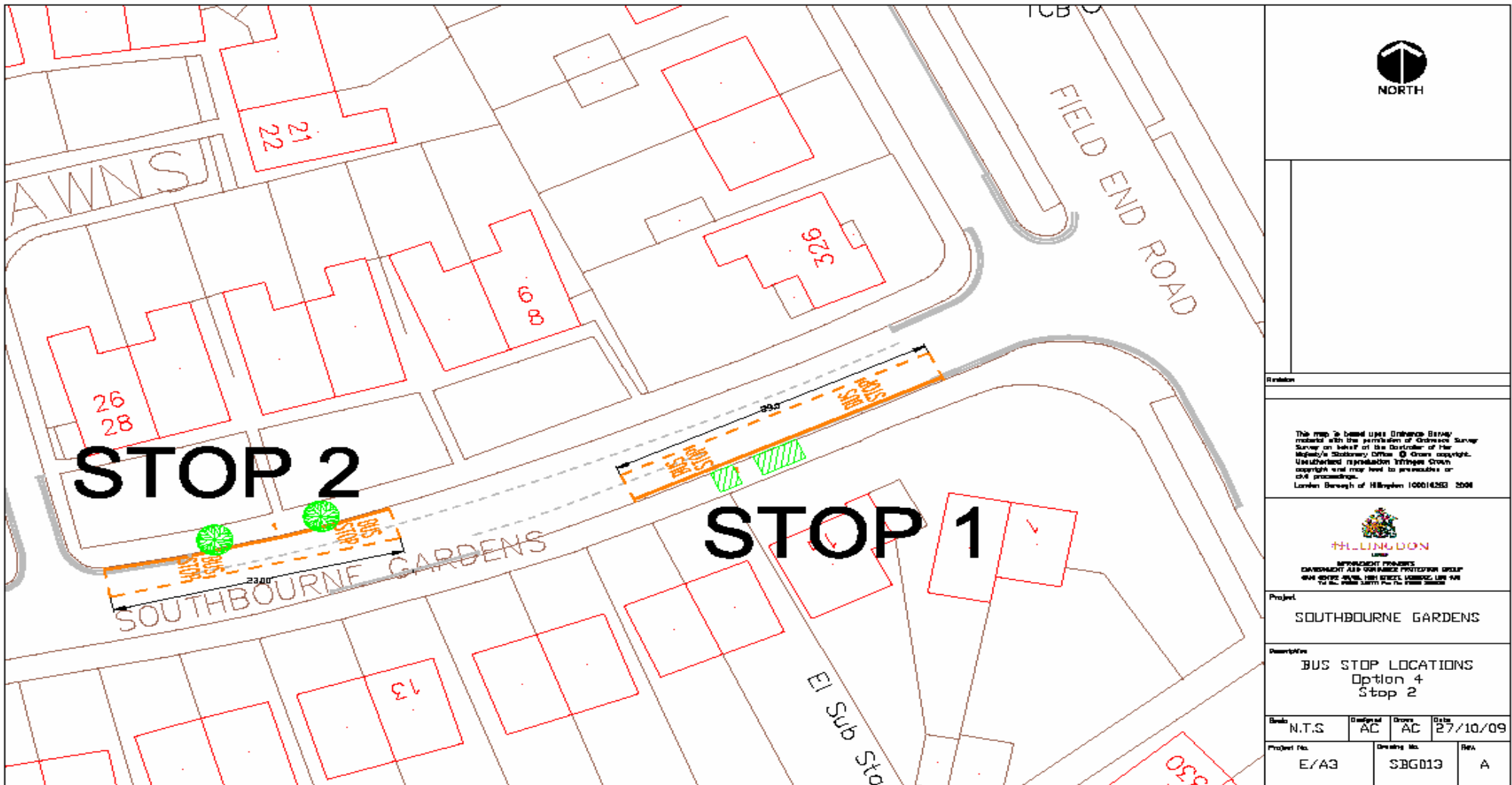

HARINGEY
COUNCIL

REPRESENTATIVE PROJECTS
 ENVIRONMENTAL AND URBAN DESIGN PROFESSION GROUP
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Project:
 SOUTHBOURNE GARDENS

Description:
 BUS STOP LOCATIONS
 OPTION 4A
 (ALTERNATE LOCATIONS)

Scale: NTS	Design of AC:	Drawn AC:	Date: 27/10/09
Project No.: E/A3	Drawing No.: SBG013	Rev.: A	



Revision

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Project
SOUTHBOURNE GARDENS

Description
BUS STOP LOCATIONS
Option 4
Stop 2

Scale	N.T.S	Designed	AC	Drawn	AC	Date	27/10/09
Project No.	E/A3	Drawing No.	SBGD13	Rev.			A

APPENDIX B – ROUTE 398 BUS TIMETABLE

398 Ruislip – Rayners Lane – Wood End

398	Mondays to Fridays																	
Ruislip Station	0630	0700	0730	0800	0830	0900	0930	1000	1030	1100	1130	1200	1230	1300	1330	1400	1430	1500
Ruislip Manor Station	0632	0703	0733	0803	0833	0903	0932	1002	1032	1102	1132	1202	1232	1302	1332	1402	1432	1502
Eastcote Station	0636	0709	0739	0809	0839	0909	0938	1007	1037	1107	1137	1208	1238	1308	1338	1408	1438	1508
Rayners Lane Station	0641	0717	0747	0817	0847	0917	0945	1014	1044	1114	1144	1215	1245	1315	1345	1415	1445	1516
South Harrow Station	0647	0726	0756	0826	0856	0925	0953	1022	1052	1122	1153	1224	1254	1324	1354	1424	1455	1526
Northolt Park Station	0649	0729	0759	0829	0859	0928	0956	1025	1055	1125	1156	1227	1257	1327	1357	1427	1458	1529
Wood End Lillian Board Way	0653	0733	0803	0833	0903	0932	1000	1029	1059	1129	1200	1231	1301	1331	1401	1431	1502	1533
Ruislip Station	1530	1600	1630	1700	1730	1800	1830	1900										
Ruislip Manor Station	1532	1602	1632	1702	1732	1802	1832	1902										
Eastcote Station	1538	1608	1638	1708	1738	1808	1837	1907										
Rayners Lane Station	1546	1616	1646	1716	1746	1816	1844	1914										
South Harrow Station	1556	1626	1656	1726	1756	1824	1852	1922										
Northolt Park Station	1559	1629	1659	1729	1759	1827	1855	1925										
Wood End Lillian Board Way	1603	1633	1703	1733	1803	1831	1859	1929										
398	Saturdays (also Good Friday)																	
Ruislip Station	0630	0700	0730	0800	0830	0900	0930	1000	1030	1100	1130	1200	1230	1300	1330	1400	1430	1500
Ruislip Manor Station	0632	0702	0732	0802	0832	0902	0932	1002	1032	1102	1132	1202	1232	1302	1332	1402	1432	1502
Eastcote Station	0636	0706	0736	0806	0836	0907	0937	1007	1037	1108	1138	1208	1238	1308	1338	1408	1437	1507
Rayners Lane Station	0641	0711	0741	0811	0841	0913	0943	1013	1043	1116	1146	1216	1246	1316	1346	1415	1444	1514
South Harrow Station	0647	0717	0747	0817	0847	0921	0951	1021	1051	1126	1156	1226	1256	1326	1356	1424	1453	1523
Northolt Park Station	0649	0719	0749	0819	0849	0924	0954	1024	1054	1129	1159	1229	1259	1329	1359	1427	1456	1526
Wood End Lillian Board Way	0652	0722	0752	0822	0852	0928	0958	1028	1058	1133	1203	1233	1303	1333	1403	1431	1500	1530
Ruislip Station	1530	1600	1630	1700	1730	1800	1830	1900										
Ruislip Manor Station	1532	1602	1632	1702	1732	1802	1832	1902										
Eastcote Station	1537	1607	1637	1707	1737	1807	1836	1906										
Rayners Lane Station	1544	1614	1644	1714	1744	1813	1842	1911										
South Harrow Station	1553	1623	1653	1723	1751	1820	1849	1917										
Northolt Park Station	1556	1626	1656	1726	1754	1823	1852	1919										
Wood End Lillian Board Way	1600	1630	1700	1730	1758	1827	1856	1922										
398	No service on Sundays or other Public Holidays.																	

398 Wood End – Rayners Lane – Ruislip

398	Mondays to Fridays																	
Wood End Lillian Board Way	0650	0719	0744	0814	0844	0916	0947	1017	1047	1117	1147	1217	1247	1317	1347	1417	1447	1517
Northolt Park Station	0654	0724	0749	0819	0849	0921	0952	1022	1052	1122	1152	1222	1252	1322	1352	1422	1452	1522
South Harrow Station	0658	0728	0754	0824	0854	0926	0957	1027	1057	1127	1157	1227	1257	1327	1357	1427	1457	1527
Rayners Lane Station	0704	0734	0802	0832	0902	0933	1003	1033	1103	1133	1203	1234	1304	1334	1404	1434	1504	1534
Eastcote Station	0710	0740	0810	0840	0910	0940	1009	1039	1109	1139	1210	1241	1311	1341	1411	1442	1513	1543
Ruislip Manor Station	0715	0746	0817	0847	0917	0946	1015	1045	1115	1145	1216	1247	1317	1347	1417	1448	1519	1549
Ruislip Station	0718	0749	0820	0850	0920	0949	1018	1048	1118	1148	1219	1250	1320	1350	1420	1451	1522	1552
Wood End Lillian Board Way	1547	1617	1647	1717	1747	1818	1849	1919										
Northolt Park Station	1552	1622	1652	1722	1752	1823	1854	1924										
South Harrow Station	1557	1627	1657	1727	1757	1828	1858	1928										
Rayners Lane Station	1604	1634	1704	1734	1804	1834	1904	1934										
Eastcote Station	1613	1643	1713	1743	1812	1840	1910	1940										
Ruislip Manor Station	1619	1649	1719	1749	1817	1845	1915	1945										
Ruislip Station	1622	1652	1722	1752	1820	1848	1918	1948										
398	Saturdays (also Good Friday)																	
Wood End Lillian Board Way	0654	0724	0754	0824	0854	0920	0949	1018	1047	1117	1147	1217	1247	1317	1347	1417	1447	1517
Northolt Park Station	0658	0728	0758	0828	0858	0925	0954	1023	1052	1122	1152	1222	1252	1322	1352	1422	1452	1522
South Harrow Station	0701	0731	0801	0831	0901	0929	0958	1027	1057	1127	1157	1227	1257	1327	1357	1427	1457	1527
Rayners Lane Station	0706	0736	0806	0836	0907	0935	1004	1034	1104	1134	1204	1234	1304	1334	1404	1434	1504	1534
Eastcote Station	0711	0741	0811	0841	0913	0941	1011	1041	1111	1141	1211	1241	1311	1341	1411	1440	1510	1540
Ruislip Manor Station	0715	0745	0815	0846	0918	0947	1017	1047	1117	1147	1217	1247	1317	1347	1416	1445	1515	1545
Ruislip Station	0717	0747	0817	0848	0920	0950	1020	1050	1120	1150	1220	1250	1320	1350	1419	1448	1518	1548
Wood End Lillian Board Way	1547	1617	1647	1718	1749	1819	1849	1919										
Northolt Park Station	1552	1622	1652	1723	1754	1824	1854	1923										
South Harrow Station	1557	1627	1657	1728	1759	1828	1858	1926										
Rayners Lane Station	1604	1634	1704	1735	1805	1834	1904	1931										
Eastcote Station	1610	1640	1710	1741	1811	1840	1909	1936										
Ruislip Manor Station	1615	1645	1715	1745	1815	1844	1913	1940										
Ruislip Station	1618	1648	1718	1748	1818	1847	1915	1942										
398	No service on Sundays or other Public Holidays.																	