

By Email

Mr Chris Hanks
Head of Development
Alliance Rail Holdings
88 The Mount
York
YO24 1AR

7th Floor, Piccadilly Gate
Store Street, Manchester, M1 2WD

w www.passengerfocus.org.uk

e info@passengerfocus.org.uk

direct 07719 656469

e Robert.samson@passengerfocus.org.uk

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Dear Mr Hanks

West Coast Main Line (WCML) Track Access Rights Consultation

Thank you for sending Passenger Focus details of Alliance Rail Holdings (ARH) applications for track access rights to operate new passenger services to and from London Euston on the WCML. Passenger Focus also attended the consultation briefing held by ARH in York on 18 August 2011. We note that rights are being sought for services to operate from December 2013.

Passenger Focus believes that competition can bring benefits to passengers. By definition passengers will have a choice and some may also have improved access to services that they did not have before. However, we also recognise that 'network benefits' are important and so accept that competition must at times be delivered within a framework of co-ordination. That framework should ensure the overall service on the route meets passengers' needs to the greatest possible extent. There must be no significant disbenefit to any existing group of passengers and the granting of new track access rights should not significantly frustrate the industry's subsequent ability to develop a timetable that maximises capacity and utility to passengers. Similarly, we would expect that any new proposals should not take precedence over the resolution of existing gaps in user needs, particularly where the wider passenger benefits may exist.

The Office of Rail Regulation (ORR) when considering the track access applications should ensure that sufficient flexibility is included in the process that not only allows a co-ordinated review of the applications but also to allow the bidders for the Inter-City West Coast franchise to take a serious look at service patterns as part of the franchising process, the impact of established Route Utilisations Strategies (RUSs) on the WCML and further assess how the applications impact on the forthcoming work of the Network Rail Event Steering Group on the recast of the December 2013 timetable on the WCML.

For example, existing gaps have been identified in the Northern RUS including capacity both on board trains and on the trans-Pennine routes and in the Leeds area. Forecast figures for Control Period 4, indicate urban load factors that show Leeds to have the worst peak crowding outside



London by 2013. It is important that the ability of both local and regional transport authorities to deal with this problem is not jeopardised.

Similarly, the WCML RUS recognised the route as the busiest mixed use route in the country, connecting major cities in Great Britain and that continued and sustained growth is expected in the key passenger markets. It is important that the ability to serve the expected growth is not put at risk.

It is important that all valid aspirations for alterations to current services are not put at risk when the Event Steering Group is considering the December 2013 WCML, for example, the reinstatement of calls at Barlaston. A reinstated service to this station with the existing (but much improved) Trent Valley stopping service would provide an opportunity for passenger revenue and volume growth, thereby alleviating most of the need for ongoing rail replacement buses and simultaneously reducing industry costs.

We note the inclusion of trains, such as the 17.36 London Euston to Milton Keynes, at times which would offer welcome additional capacity. On the other hand, most of the proposed services do not serve locations where the underlying passenger demand for travel to/from London is greatest¹.

The services rely on new, as yet unordered and untested, rolling stock. ARH state that they will be able to introduce new stock within 24 – 36 months, and so can start operations in the life of the December 2013 timetable. We expect such a timetable requires the stock to have been ordered by this December at the latest, and if the full 36 months are required to get the stock into full operational service, starting the proposed timetable in the December 2013 timetable appears to be challenging.

Despite an overall attempt at creating a standard pattern timetable and calling points, the paths so far identified have a noticeable number of variations in days run, stops and even routes. Passengers appreciate the (generally) easy to remember pattern of current inter-city services on the WCML. However, it is recognised that passengers will have an improved choice and some will also have improved access to services that they did not have before

Passenger Focus would like to thank ARH and Network Rail for the work that they have done regarding the applications. However, our support for them can only be conditional on resolving the issues that we have identified above and the applications not having a negative impact on the proposed work of the Event Steering Group. Its work must develop against the background of proposed infrastructure and service enhancements, and deliver, a holistic timetable for the WCML that meets passenger aspirations.

¹ Track Access Rights on the WCML – Passenger Focus Response to ORR Consultation, 7 January 2011



Passenger Focus looks forward to representing passengers' interests, and informing the work of the Event Steering Group.

Yours sincerely

Robert Samson

Robert Samson
Passenger Manager

Copy to: Martin Hollands, Commercial Advisor, Network Rail