



4th April 2007

ORR consultation on 2nd track access application by Wrexham, Shropshire and Marylebone Railway Company Limited – a response by London TravelWatch

Introduction

- a) London TravelWatch has examined the 2nd track access application by the Wrexham, Shropshire and Marylebone Railway Company Limited.
- b) So far as our area of interest is concerned, there is no fundamental difference between the 1st and 2nd applications. This response is therefore issued by way of this covering note to our 1st response, a copy of which is attached.

Comments on the 2nd application

- c) All comments in our 1st response still apply, except where varied below.

Use of the Chiltern route to London

Paras 5 & 10 of 1st response

- d) To update for the record, we note that as from 20th May 2007 no Chiltern train will run non-stop between Marylebone and Leamington, and Chiltern will provide additional calls at Northolt Park during daytimes Mondays – Fridays and Saturdays.

Paras 13 & 14 of 1st response

- e) The revised timing proposals of the 2nd application mean that our detailed analysis of train paths no longer applies, so this section is deleted from para 13 of the attached copy of the 1st response. We have not attempted to update this work. This is partly because of our own resource constraints and also because the 2nd application is for the major timetable change date of December 2007 when Chiltern may alter their timetable so such detailed analysis could prove nugatory.

- f) The first bullet point of para. 14 is deleted, as it related to the deleted material in para. 13. However we still wish to highlight our concern at the possible effects of WSMR services as per bullet points 2 & 3 of para 14.
- g) We note that in their comments on our 1st response, WSMR state that Chiltern Railways have not identified the effect of WSMR on their services as being an issue. They supplement this point by saying that “Laing Rail, Chiltern’s owners, who would be held to account for any ongoing inability to accommodate growth or maintain high performance, are shareholders in WSMR and that Adrian Shooter, the Chairman of the Chiltern Railways Board is also a member of the Wrexham & Shropshire Board.”
- h) However we do not regard this as providing any real reassurance. This is because our concern is not so much with the operation of the present timetable – where we recognise that capacity can be increased as necessary by running longer trains – but the aspiration for frequencies at the London area stations to be substantially increased.
- i) We do of course recognise (with much regret) that this is not a requirement of Chiltern’s franchise, but we are hopeful that well within the lifetime of the franchise it will be possible for such improvements to be negotiated and funded through the forthcoming changes to the Mayor’s powers which the government has agreed in principle.
- j) London TravelWatch would therefore be greatly concerned that if a funding opportunity for more frequent Chiltern services opens, the ability to provide them is compromised by WSMR – or any other operator’s – long distance trains taking up the presently available line capacity.

Coupling with Chiltern

Paras 21 & 22 of 1st response

- k) We acknowledge that the rolling stock now proposed by WSMR would preclude this option. However we still consider that, to avoid the potential line capacity issues discussed above, it would be a better way of running the service and that their rolling stock proposal should therefore be reconsidered.

Any queries about this consultation response should be addressed to:

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12th January 2007

ORR consultation on track access application by Wrexham, Shropshire and Marylebone Railway Company Limited – a response by London TravelWatch

Introduction

1. We have closely studied this application, and in particular the Supporting Evidence paper submitted by Wrexham & Shropshire.
2. London TravelWatch is always mindful of the benefits for passengers of rail providing a wide range of through services to and from London. However where, as in this case, such services involve introducing additional trains through heavily used parts of the London network we have to consider the implications both for existing services and for their future development.
3. In the case of open access services, we are also mindful of possible significant revenue abstraction from franchise operations if the consequence may be to affect the subsidy / premium profile and thereby reduce the funds available to the Department for Transport for investing in the rail network¹, or otherwise adversely affect a franchise to the disadvantage of passengers.

Use of the Chiltern route to London

4. A key element of the application is the use of the Chiltern route to Marylebone. Because this is a long two-track railway with virtually no facilities for fast trains to overtake slower ones, there has been an on-going issue for London TravelWatch about the balance between stopping services at south end of the line and faster trains to the north.

¹ Note that this is not the same as ORR's 'not primarily abstractive' test. The latter is a matter of relativity, thus abstracted revenue may be a small proportion of an open access operation's income and therefore pass the ORR test but it may still be a sufficiently large sum as to have a material effect on present or future franchise subsidy or premium.

5. The conflict between these types of services has intensified as Chiltern's commercial emphasis has focussed increasingly on its services to Birmingham and beyond. The introduction of more and more trains running non-stop between Marylebone and Bicester, Banbury and in the latest timetable even Leamington, inevitably constrains the ability to provide frequent and even-interval services at stations closer to London.
6. Frequency (and in some cases a total absence of weekend services) is a particular concern at the stations within Greater London, viz. Wembley Stadium, Sudbury & Harrow Road, Sudbury Hill Harrow, Northolt Park, South Ruislip and West Ruislip.
7. The context for this issue is the widely agreed aim for National Rail services in London to be of turn up and go standard (a minimum of 4 trains per hour [tph]) in order to make rail competitive with the private car and thus contribute to achieving the sustainable development objectives of the Mayor's London Plan and TfL's strategy for Transport 2025.
8. Over the past few years there has been quiet but steady progress in increasing National Rail frequencies to 4 tph (at least during Monday – Saturday daytimes) at many of the stations that were poorly served in BR days. In some cases this has been done by TOCs on their own commercial initiative, and in others it has been funded by TfL². Also it is a cornerstone of the forthcoming TfL Overground concession for the West, North, East London and Gospel Oak – Barking lines.
9. In the case of Chiltern, by the end of the BR regime the service at their Greater London stations was very poor indeed – in some cases little more than skeletal. Since then Chiltern have introduced improvements³ and plan to do a little more in May 2007. However even then none of these stations will have more than 2 tph⁴, most have no more than 1 tph and the two Sudburys are closed in the evenings and at weekends. Thus there is a very long way to go before this route reaches even a 2 tph standard, let alone the desired 4 tph turn up and go service.
10. The weakness of this service is widely acknowledged, and there is justifiable pressure from user groups, local councils, MPs and TfL for improvements. Until recently Chiltern has maintained that it is limited in what it can do by the combination of infrastructure capacity constraints and their desire to focus on the longer distance markets. However they have acknowledged that the Evergreen 2 project has eased matters and it

² In both types of case, where a franchise has been subsequently re-let the increased service has been incorporated into the new service level commitment.

³ Although in the case of Sudbury & Harrow Road, services have been reduced to peaks only (and in the peak direction only) as part of a package to improve the service at Sudbury Hill Harrow.

⁴ Except Wembley Stadium in the peaks.

- is the introduction in December 2006 of an additional hourly Marylebone – Princes Risborough / Bicester off-peak semi-fast train which is enabling them to add an additional hourly Greater London call next May.
11. Clearly this is no more than another small step towards achieving an acceptable service, and London TravelWatch and others will continue to press for improvements. Interestingly (and to our great encouragement) after years of the railway industry saying that turn up and go services are self-evidently impossible on a two track railway which seeks to accommodate fast, semi-fast and stopping trains, work for the DfT's Thames Valley Regional Planning Assessment includes examination of whether and how such services could be scheduled given the extra capacity provided by Evergreen 2.
 12. The need for improved services at Chiltern's Greater London stations is directly relevant to the Wrexham & Shropshire application. Although the constraints of the two-track railway may not be as great as it has suited some to claim, it clearly is an issue which must be examined very carefully.
 13. *Para. deleted – see para. e) of 2nd response.*
 14. This analysis leads us to several conclusions:
 - *Point deleted – see para. e) of 2nd response.*
 - Adjustments to make it workable would interfere – in some cases significantly – with what is basically a regular interval patterned service. This would not be in the interests of existing and potential users of Chiltern's services.
 - Generally the Chiltern timetable is quite 'tight', so operation of additional long-distance trains as proposed by Wrexham & Shropshire would almost certainly make it more difficult – perhaps impossible – to introduce significantly improved services at stations at the London end of the route.
 15. London TravelWatch would be concerned if the introduction of Wrexham & Shropshire services had either of the adverse consequences shown above, particularly if it removed or limited the options for improving the present sub-standard services within Greater London.
 16. Nevertheless we are mindful of the benefits which the proposed new service would bring for passengers in terms of through trains for journeys which presently require interchange. Therefore if the case for its introduction passes all the other relevant tests we would want the industry

to explore all possible ways in which it might be made compatible with our over-arching aspiration for improved London area services.

17. Two possibilities which we would suggest for consideration would be:
 - Operation to Paddington rather than Marylebone
 - Coupling with Chiltern trains south of Leamington or Banbury

Operation to Paddington

18. By avoiding the section of line between Northolt Jct. and Marylebone – where there are four stations plus the Aylesbury line trains from Neasden southwards – this option would reduce conflicts and path occupation at the extreme south end of the Chiltern route.
19. It would not eliminate all the conflicts contained in the present proposed timetable, but it might make it easier to resolve them without too seriously affecting Chiltern trains. Similarly, whilst it would not totally assuage our concerns about limiting the options for improved London area services, it should reduce the potential adverse effects.
20. So far as the Paddington route itself is concerned, we are aware that the industry claims that the London end of the Great Western main line is already fully utilised. London TravelWatch is not convinced that this is entirely true, but in any case the Wrexham & Shropshire application is only for off-peak services. We do accept that even in the off-peak there are some capacity issues on the relief lines; however these relate to freight which uses Acton Yard and not the section between Old Oak and Paddington which the Wrexham trains would use.

Coupling with Chiltern

21. The aim here would be to avoid all conflict on the main part of the route by specifying that Wrexham & Shropshire trains run coupled with Chiltern trains between Leamington or Banbury and Marylebone⁵.
22. Clearly there would be occasions when late running would pose problems at the coupling station, and it would be in nobody's interest for one half of a combined train to be significantly delayed waiting for the other half. We would therefore say that each operator's train should be fully crewed for

⁵ We are aware that Classes 158 / 170 are not capable of multiple operation with Chiltern's Class 165 / 168 units. However our understanding is that this is only a matter of the wiring of the electrical connection studs and that this could be altered to provide compatibility very easily.

the entire journey, so that either half can run independently whenever necessary⁶.

Duration of track access agreement

23. Finally, if ORR is minded to grant the Wrexham & Shropshire application in a form which might limit the scope for improved London area services, then we submit that approval should be limited to five years so that options are not closed down for too long. We recognise that this is only half the duration requested by the scheme's promoters, and that they wish to have sufficient time to recoup their proposed investment in refurbishing 158 or 170 type rolling stock to higher standards than the current norm. However given the rising standards which passengers and prospective passengers expect of rail, we believe that if the paths were to lapse after five years there would be little difficulty in re-letting such stock at rates which reflect its quality.

Revenue abstraction

24. In the Grand Central case London TravelWatch was concerned at the possible effects on DfT funds of revenue abstraction from GNER, with particular reference to the very large flows between York and London. In the current case we do not believe there is any flow of similar magnitude (although it is unhelpful that the relevant figures are redacted from the Wrexham & Shropshire document) so on this occasion we do not wish to register any concerns on this point.

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⁶ There are recent precedents for coupling of different operators' trains; details can be supplied on request. We also recognise that special operational protocols would be needed if Wrexham & Shropshire wished to prevent passengers boarding their unit at intermediate stations south of Banbury.