

# Summary of Responses to Consultation on Proposed Withdrawal of Scheduled Passenger Services between Wandsworth Road, Kensington (Olympia) and Ealing Broadway – and Department for Transport comments

## Introduction

The Department for Transport proposed, and carried out a public consultation, to discontinue railway passenger services in South and West London. The relevant passenger services are currently provided by a daily Monday to Friday Southern train service between Wandsworth Road and Kensington (Olympia); also by a weekly rail replacement bus service between Ealing Broadway and Wandsworth Road.

## Next steps

Following consideration of the replies, Ministers have agreed to allow the proposed closure to proceed. The closure is now subject to ratification by the Office for Rail Regulation, which is not automatic.

## Replies and response

1. Twenty-six responses to the consultation were received. Two were from organisations representing passengers' interests – London TravelWatch and the Edenbridge and District Rail Travellers Association, one from a Trade Union and two from Local Authorities. The remainder were from members of the public. Although some representations were received after the deadline, they have been taken into account nevertheless. London TravelWatch is the statutory body which represents the interests of passengers in London and its response is reviewed separately at the end of this document.
2. Eighteen responses referred to claimed errors or omissions in the closure proposal. These included: flaws in the costings used in the appraisal; not using the Passenger Demand Forecast Handbook to assess potential expansion of services, and failure to properly take account of options involving services being operated by other train operators; errors in the description of the network involved; and allegations that the e-mail address given for responses was 'invalid' (because it included a '&' character). One response stated that no poster was displayed at Ealing Broadway station.

Comment- When considering the potential alternatives, the Department took account of the likely high cost of operating these against the very small number of current users and the various alternatives provided by Transport for London (including bus services).

Appendix 1 (page 21) of the consultation document notes that the Benefit Cost Ratio ('BCR') for the provision of an alternative service along the stretches on track in question is negative, reflecting the unusually poor proposition of negative benefits; the value of minus 10.095 shows

exceptionally poor value for money. The final paragraph of Appendix 1 explains that costs are over 610 times greater than the potential passenger fare revenues.

Appendix 1 also discussed the assumption of a 19-year period (i.e. the remaining years of the current Southern franchise and then a likely 15-year new franchise) for the operation of such alternative services. We also considered a 10-year period but found that this too would be poor value for money, with the BCR being not just low but negative (see page 16 of the consultation document).

The Department has carefully reviewed the responses and has not identified any errors in the financial appraisal of the proposal.

It is accepted that the description of the network for closure as described in the consultation document was wider than necessary. The stretch of track between Factory Junction and Longhedge Junction will be used by the new London Overground services and therefore will not be affected by this proposal. The route "sub-section" #1 in the Consultation Document is therefore shortened to read "Longhedge Junction to Latchmere Junction no.1".

Anyone who was unable to respond to the consultation by e-mail because of the presence of the ampersand character in the e-mail address had the option to use the alternative postal address that was included in the notice. The fact that eighteen of the responses were received via the e-mail address provided suggests that the presence of the ampersand was not a problem for the majority of those who responded.

London TravelWatch confirmed that the poster was correctly displayed at Ealing Broadway.

3. Fourteen responses referred to inadequacies of the rail and bus services proposed for closure in terms of their usefulness and convenience compared with the through services they replaced, such as interchange at Shepherd's Bush and Clapham Junction, particularly for passengers with a mobility impairment. There were also allegations that the services were poorly advertised.

*Comment - The consultation document acknowledged the unsatisfactory nature of the replacement services. "There was no obvious way in which to provide a rail replacement over the lines in question once the CrossCountry operator had withdrawn its services. No franchised passenger operator has all these routes included in their Track Access Agreement, although Southern has rights to operate trains between Factory Junction and Latchmere Junction. Accordingly there was no franchised passenger service operator that could be required to operate these routes when CrossCountry services were withdrawn in December 2008.*

*In seeking a rail solution the Department (DfT) entered discussions with Southern and a solution to the operation between Factory Junction and Latchmere Junction was quickly found. However no cost effective solution could be found for the operation of a rail service between Willesden West London Junction and Acton East Junction, so a weekly bus service was established instead.”*

4. Thirteen responses put forward proposals for alternative services to be operated or for additional services to be operated on the routes in question. The alternatives included the reinstatement of cross-London services between East Croydon and Reading, Oxford and The North or the operation of shorter distance services such as Bromley South to Ealing Broadway. One response suggested that some existing Greenford-Paddington services could be diverted to Clapham Junction. One response suggested transferring the existing services to London Overground.

The consultation document noted that, in order to keep the route sections open by running a new service, it would be necessary for such a service to start at London Bridge, thus adding a London Bridge to Wandsworth Road leg to the route. Network Rail has indicated that a new London Bridge to Ealing Broadway service could only be scheduled at 20:17, returning at 21:22 each day. Indeed, so intense is the utilisation of the Relief Lines on the Great Western Main Line that the addition of any daytime services is problematic.

The scope of Cross Country services will be re-considered when the Cross Country franchise is re-let but the Department's current view is that any services to/from Sussex and Surrey would be more likely to run on the less-congested North Downs route via Guildford rather than via the West London Line.

5. Five responses felt that the closure would preclude options for future cross-London services, whether longer distance services as operated previously or as part of a London orbital network.

Comment - The consultation document made it clear that no network will be closed as it is used by freight and charter passenger services, so it is not considered that the cessation of scheduled passenger services over the stretches of track in question will jeopardise their reintroduction in the future.

6. Four responses noted that a closure proposal should have been issued at the time the previous CrossCountry services that operated over the network in question were withdrawn.

Comment - The consultation document acknowledged that the withdrawal of the CrossCountry services in December 2008 meant that three short stretches of track no longer had any regular scheduled passenger services on them. It also acknowledged that the current alternative arrangements put in place were inadequate and that this closure procedure was intended to regularise the situation.

7. One response was a request for information about the timing of the bus services between Ealing Broadway and Wandsworth.

[Comment - The timing of the bus service can be found on page 9 of the consultation document.](#)

8. Five responses either expressed positive support for the proposal (or part of it) or raised no objection.

9. The West London Line Group (WLLG) raised a number of issues about our appraisal not considering all the options for re-invigoration of other services in the area.

Comment -the Department as Rail Funding Authority cannot propose re-invigoration of services via these routes for several reasons:

- The Great Western Relief Lines are extremely busy with both freight and passenger trains, and will become more so with the construction works for, and then the operation of, Crossrail. This is the reason for Network Rail denying any application for new access rights that involves daytime usage of the Great Western Relief (or Main) Lines.
- There is a national shortage of diesel-powered rolling stock and any diversion of resources to run new services on these routes would require a reduction in service elsewhere.
- The proposal in WLLG 1.1.3 is unworkable because of a lack of track capacity on the West Coast Main Line (southbound) and the Brighton Main Line (northbound).

### **London TravelWatch Response**

London TravelWatch (LTW) provided two summaries following the close of the consultation; the first dealing with legal and process matters, the other dealing with the train and bus service in question. We provide below a response to the latter. The first point is outside the scope of this specific consultation but will be considered separately by the Department in due course. In summary this point was that the Department should:

- have a mechanism for redress where the Department has failed to carry out closure procedures;
- ensure that either the closure procedures are applied in a timely manner or a replacement service is provided that is appropriate;
- ensure that Network Rail does not frustrate the operation of a passenger service; and
- ensure that redress is available for affected passengers if service patterns are substantially reduced or altered, with particular consideration being given to elderly, disabled or vulnerable passengers

where those changes mean that a direct service is replaced by one requiring interchange.

The specific LTW recommendations relating to the services affected by this closure process are;

“Based on the responses received to date and the consideration of the board of London TravelWatch I am recommending that:-

- “On the basis of no additional cost to the DfT and Southern of providing a train service over the Longhedge Junction and Latchmere No 1 junction section of route: and of the potential detriment to users of the Milton Keynes to South Croydon service of this line as an alternative to its usual route via Clapham Junction to recommend refusal of consent to close this section of route”

Comment- Southern have indicated that they will continue to operate some empty coaching stock (ECS) moves over this route section in order to maintain driver route knowledge. Southern have also confirmed that to continue running both of these as passenger services would require the provision of a Conductor, which would incur additional cost. DfT does not wish to maintain the current very limited scheduled passenger services which may increase costs when the franchise is re-let and for which very little use is made.

- “On the basis that the current bus service is of little or no value to passengers to recommend that the Willesden West London Junction to Acton Wells Junction, and Acton Wells Junction to Acton East Junction (both between Shepherds Bush and Acton Main Line stations) section of route be accepted for closure, but with the proviso that the DfT should investigate the feasibility of providing other services such as those outlined in my attached report. I note that in your latest High Level Output Statement for Control Period Five (CP5), you state your intention to electrify these routes, presumably on the basis of use by freight trains, but which could potentially be used for passenger services also.”

Comment- Whilst the Department welcomes LTW’s support of the proposal to withdraw the current bus service, we wish to reiterate that there are no plans to actually close these sections of route as they will continue to be used by freight and charter passenger trains.

- “That for passengers travelling between stations on the Great Western Main Line and stations on the West London Line and in South London (not in zone 1) fares should be established that give the option of using the London Underground Central line between Ealing Broadway and Shepherd’s Bush. These should be cheaper than current fares via zone 1 and should include all South London stations that have or will have direct train services to Clapham Junction.”

Comment- The setting of fares on these lines is a matter for the TOCs concerned and TfL and is outside the scope of this consultation. However the removal of the direct services to/from Kensington (Olympia) will not change the availability of any current fares, including Travelcard and Oyster Pay As You Go fares which exclude zone 1. It should be noted that Pay As You Go fares from the Great Western Main Line to South London via Ealing Broadway-Shepherd's Bush London Underground / Shepherd's Bush London Overground already exist. This can be checked in the Single Fares Finder on the TfL website.

<http://www.tfl.gov.uk/tfl/tickets/faresandtickets/farefinder/current/Default.aspx>

Season Tickets avoiding Zone 1 are also available, in the form of the Travelcard for the relevant zones. Through single or return cash fares do not exist for travel via this route, but as the majority of travel is now undertaken by using Pay As You Go this route is sufficiently catered for.