

Your ref:

Our ref: L-ORR-SF290513

29<sup>th</sup> May 2013

Mr Stuart Freer  
Executive, Stations & Depots  
and Network Code.  
Office of Rail Regulation  
1 Kemble St.  
London WC2B 4AN

Dear Mr Freer,

#### Woodlands Road Station Closure Ratification Request

Thank you for your letter of 10 May 2013 and the opportunity to provide a view on the above matter. Please note, using the Freedom of Information Act, we have now obtained further information, including the 2009 Woodlands Road Passenger Survey, conducted on behalf of Transport for Greater Manchester (TfGM), on how TfGM and the Department for Transport (DfT) have conducted the Consultation.

Our observations are as follows:-

- The Appraisal Report on which the Consultation on the closure of Woodlands Road was based and most importantly objectors to the closure responded, and other documents clearly indicates that for Woodlands Road to be closed, Abraham Moss and Queens Road Stations had to be open. This was supported by utterances made by TfGM at the public meeting on the 19<sup>th</sup> March 2011. Furthermore, if this was not the case and the closure of Woodlands Road only depended on Abraham Moss being open, why was not the full closure process immediately initiated when Abraham Moss opened in April 2011? If the Consultation was conducted on a different premise than everyone understood clearly a new consultation is required.
- The construction of Abraham Moss was funded by a Community Infrastructure Fund (CIF) grant from DfT and the Department for Communities and Local Government. The grant, made in October 2009 was for the Construction of Abraham Moss and Queens Road and the closure of Woodlands Road. Therefore in awarding the grant DfT was exhibiting, at best, a pre-disposition to grant a closure long before the Consultation process was initiated as required by the 2005 Railways Act. The enclosed letter, dated 29 Nov 2010, from Mr Norman Baker to our local MP, Mr R Graham Stringer supports this contention. Incidentally, there are question marks as to the legitimacy of how the grant was eventually used in that it then did not fulfil the original CIF criteria.
- Responders to the Consultancy pointed out significant demonstrable errors and omissions in TfGM's application for closure yet these errors and omissions were perpetuated in DfT and TfGM utterances following the Consultation. These errors and omissions are listed in the enclosed document.
- One significant omission was any significant examination of alternatives to the closure as required by the 2005 Railways Act. Furthermore, suggestions of non-closure alternatives by those objecting to the closure have largely been ignored.

- A further omission was that there was never any consideration given to the negative social impact on the local community, particularly the elderly and/or disabled, that would result from the closure of Woodlands Road.
- Since the Consultation TfGM has produced further inaccurate and/or misleading information. As an example we would cite a letter reference RM/ml/jc/011537 dated 17 August 2011 from TfGM to DfT- Local Capital Programme & Delivery that states “Previously, Woodlands Road was the least used stop on the Bury line and demand at this location has reduced by more than 75% since the opening of Abraham Moss.” *Even if it did reduce by 75% it is hardly surprising since TfGM reduced the service at Woodlands Road by 75% including peak hour services a week after Abraham Moss opened. The fact that only the one week notice was given is perhaps indicative of TfGM’s attitude to “consultation” with its customers.*
- What is of particular concern, as revealed by Freedom of Information Requests, is the willingness of DfT officials to facilitate TfGM’s desires to close Woodlands Road since the Consultation. This includes perpetuation and propagation of the inaccurate and misleading information, particularly to Ministers, whilst making no attempt to verify what were obviously contentious statements. This includes the Baker to Stringer correspondence of 23 May 2013 to which we will be replying. This could easily be done because TfGM itself has on a number of occasions produced data, which contradicts its own case. As an example DfT has described Woodlands Road as “little used” yet the passenger survey conducted by consultants on behalf of TfGM between 7 am and 7pm on Thursday 26<sup>th</sup> November revealed 967 passengers boarded or alighted from trams at Woodlands Road, indicating an annual passenger total in excess of quarter of a million. Other data supports this figure, including the 1300 plus number of signatories to a petition requesting the Station be kept open

We appreciate that ORR’s remit to not allow them to revisit a consultation from first principles, but would politely suggest that ensuring the accuracy of information falls within this. May we therefore, suggest that before ORR contemplate ratification of the DfT’s decision that you ensure that DfT is relying on factual information. We have already proposed to the Under Secretary Of State that we are given the opportunity via a site visit or a presentation in London to set the record straight.

Your Sincerely

CC Mr Graham Stringer MP