

promoting quality public transport.....

Minor Modifications Consultation
Department for Transport
Zone 3/33
Great Minster House
76 Marsham Street
London SW1 4DR

5th December 2008

Dear Sir/Madam,

**Response from TravelWatch NorthWest to consultation on
proposed new categories for Minor Modifications under the
Railways Act 2005**

Herewith our response on the above. TravelWatch NorthWest represents the interests of all public transport users in NW England.

Proposal 1 – Station relocation

Introduction

The whole issue of station relocations has been a concern in past years. Often such acts have been directed at closing a large Victorian station, selling off the land for redevelopment including any adjoining goods yards and replacing the station by a smaller unit inconveniently situated some hundreds of yards from the city or town centre. This can detract from the attractiveness of rail travel. A restored and attractive station in the centre of a new shopping development and in the town centre for business visitors could attract more rail passengers and discourage town centre vehicular traffic. One problem is that these developments are often carried out with the active participation of local authorities who gain brown field development funds once the rail site can be declared derelict.

Consultation Questions

1. Should there be a maximum distance between the old and new stations?

This is not straightforward. The distance proposed of 500 metres (and it is not clear how this distance is defined) is not always short. For example at Morecambe (with which closure the author was involved), though the relocation was only a relatively short distance of 400 metres away, there was a significant effect on access to the station because of the constraints of the road network (access was moved from the promenade to a road with a circuitous link from the site of that original access). This scenario could occur with a move of less than 400 metres.

We agree that each case should be considered on its own merits. The key criterion should be access in all forms - walking, bus, taxi, car, tram, etc. Any changes in the location of station access points that affect any of these modal links in terms of travelling time (as well as distance) should trigger the closure procedure. For example a station entrance may only move 200 metres but the car park may then be further away from the new station or the relocation of a station may mean significant changes to bus access (e.g bus stops further away plus a different bus service pattern – bus operators may well not serve a relocated station). The extent to which these changes are significant for passengers will emerge through the closure process – that is what it is there for.

It could be argued that any station relocation (where new platforms are constructed) will result in access changes involving at least 150 metres added distance from the old station entrance(s). It is insufficient to consult with nominated “stakeholders”. It will be difficult to predict/assess the impact on passengers without going through the proper full closure consultation procedure involving local people. We therefore maintain that all station relocations should be the subject of the closure procedure.

If this is not acceptable the 500 metres distance should be changed to 5 minutes walking time, measured from a common point of access currently used - car park entrance, road crossing, or whatever to platform, in excess of current time. Additional walking time can be a big deterrent to many persons and new stations can have extensive ramps, etc which can themselves add to walking time and should therefore be included. Where points of access (car parks, bus stops, etc) are themselves changed in location, any difference in journey times to those points should be taken into account and if necessary added to the walking time to give a total excess access time which should not exceed 5 minutes to qualify for eligibility.

2. Extending eligibility to stations where facilities are reduced. No, we consider this should be the subject of the closure process whatever the cause.

3. Combining two stations into 1. This will depend very much on changes to access and changes to facilities providing the means of access (bus stops, car parks, taxi ranks, etc)

4. How many of the criteria would need to be fulfilled? The effect of a relocation cannot be prejudged therefore the closure procedure should always apply.

Proposal 2 - Reductions in a multiple track railway within a station.

We do have concerns about the removal of facilities which may be needed in the future. There are many recent examples of rail infrastructure cutbacks which have had to be restored at greater cost later.

We would argue that reducing track at a station could have constraints on timetable planning and adverse repercussions on day to day reliability. For example, Lancaster station has 2 main line tracks for non stopping services that avoid platform faces. We are aware of past allusions to the removal of these tracks to allow trains calling at Lancaster a faster approach thus reducing journey times. However such action could lead to the problems referred to in the first sentence of this paragraph. There may well be other locations, where similar rationalisation could have adverse effects on passengers and we oppose this proposed new category for Minor Modification.

Many thanks for the opportunity to comment.

Yours faithfully,

JOHN MOORHOUSE
COMPANY SECRETARY