



David Wearing,
Track Access Executive,
Directorate of Railway Markets and Economics,
Office of Rail Regulation,
One Kemble Street,
London WC2B 4AN

17 December 2010

Dear Mr. Wearing,

West Coast Main Line Track Access Applications Consultation:

I enclose the response of the West Coast Rail 250 Campaign to the above consultation. I hope it is acceptable to you.

Cllr. Trevor Roberts
Chairman
West Coast Rail 250 Campaign

West Coast Main Line Track Access Applications Consultation: Response of the West Coast Rail 250 Campaign

1. Introduction

- 1.1. West Coast Rail 250 (WCR250) is a non-party political organisation which campaigns for improved and environmentally sustainable rail services along the West Coast Main Line (WCML) to support the economic development and social cohesion of communities along the WCML corridor.
- 1.2. West Coast Rail 250 has the following comments to make on the track access applications received by the ORR.

2. Comments

2.1. General Comments

- 2.1.1. WCR250 is content with the principle of Open Access operation, noting that in other areas Open Access operators have provided innovative fare offers and effective competition on service quality with the franchised operators. It does have comments to make on the detail of both applications received for operation on the WCML.
- 2.1.2. WCR250 supports the proposals to reintroduce through services between London and Blackpool, noting that applications for these services have been made by the DfT and two Open Access operators. It does not wish to show preference to any one operator for this service, but is concerned to ensure that the overall package of services proposed by franchised and Open Access operators, taken together, best meets the needs of the communities served by the WCML. It would not support the granting of access rights to one operator which prevented the development or implementation of an overall service package maximising the economic or social benefits to communities along the WCML, regardless of the strength of the business case for the individual operator making the application.
- 2.1.3. In particular, WCR250 would oppose the granting of access rights which hindered the implementation of the agreed, cross-industry recommendations made in the WCML RUS and other relevant RUSs or equivalent strategies, such as the Northern Hub Study.

2.2. Department for Transport

- 2.2.1. WCR250 broadly supports the application from the DfT. It notes this application is for access rights to allow implementation of the pattern of long distance services to and from London recommended by the WCML Route Utilisation Strategy (RUS). It also notes that all the access rights sought are for operation with 200 km/h (125mph) tilting trains.
- 2.2.2. WCR250 seeks clarification of the stopping patterns proposed for the additional services between London and the North West, in particular the frequency of calls at Milton Keynes Central, the levels of service to be provided between London and Lancaster, London and Carlisle and between Warrington, Wigan and the north.

2.3. Grand Central

- 2.3.1. As noted in 2.1.2 above, WCR250 supports proposals to reintroduce services between London and Blackpool. It does have serious concerns about the use of 175 km/h (110mph) rolling stock, which could occupy fast line capacity otherwise available for additional services operated by 200 km/h (125mph) tilting trains, and would question whether this is an economically beneficial use of scarce capacity.
- 2.3.2. WCR250 notes that this service does not call at Milton Keynes Central, the largest intermediate station on the southern section of the WCML, or at Warrington Bank Quay or Wigan North Western. It does not provide the additional service recommended by the WCML RUS to link Milton Keynes with the North West and to allow Euston – Glasgow services to be accelerated. WCR250 has concerns that Grand Central's application, if accepted in this form, may hinder or even prevent the implementation of an agreed RUS recommendation, and would seek the ORR's assurance that it will give priority to implementation of a strategy agreed by a cross-industry group of which Grand Central is itself a member.

2.4. Alliance Rail

- 2.4.1. As noted in 2.1.2 above, WCR250 supports proposals to reintroduce services between London and Blackpool. It does have serious concerns about the use of 175 km/h (110mph) rolling stock, which could occupy fast line capacity otherwise available for additional services operated by 200 km/h (125mph)

tilting trains, and would question whether this is an economically beneficial use of scarce capacity. It also notes that Alliance Rail appears more open to the possibility of introducing services with 200 km/h (125mph) rolling stock from the outset than Grand Central.

2.4.2. WCR250 notes that Alliance Rail's London – Blackpool and London – Carlisle services do not call at Warrington Bank Quay or Wigan North Western. In other words, they do not provide the additional services recommended by the WCML RUS to allow Euston – Glasgow services to be accelerated. WCR250 has concerns that Alliance Rail's applications, if accepted in this form, may hinder or even prevent the implementation of an agreed RUS recommendation.

2.4.3. Alliance Rail's proposed services between London and West Yorkshire raise other issues. Although neither was raised as a gap in the WCML RUS, there are no through services between the southern part of the WCML and West Yorkshire stations, or between Stockport and West Yorkshire. Alliance Rail seeks to provide these, but it is debatable whether the granting of rights for the proposed services would optimise the use of scarce capacity in the Manchester area, on the two TransPennine routes and between Manchester and Liverpool. It may hinder or prevent the introduction of additional services proposed in the Northern Hub study. It should be recalled that implementation of the full Northern Hub service package is a recommendation of the Northern RUS, to which Alliance Rail has signed up as a member of the Stakeholder Management Group.

2.4.4. WCR250 would seek the ORR's assurance that it will give priority to implementation of the WCML RUS, Northern RUS and Northern Hub study, agreed by cross-industry groups of which Alliance Rail is itself a member.

2.5. London Midland (21st Supplemental Agreement)

2.5.1. London Midland's Trent Valley Express services between London Euston, Stoke-on-Trent and Crewe have gaps in the timetable at peak times, not because of a shortage of capacity but because of the protection to peak hour Virgin services given under Moderation of Competition. When this is removed LM proposes to operate peak services which will fill the gaps in the Trent Valley timetable. This will give a much more regular service pattern in the Trent Valley and better peak hour services, especially from London in the evening peak. WCR250 supports the introduction of these services.

2.6. London Midland (22nd Supplemental Agreement)

- 2.6.1. When the London Midland franchise specification was originally drawn up it reduced the Birmingham – Liverpool service to an hourly, semi-fast train. WCR250 successfully lobbied for the half-hourly service which was included in the final specification. Since taking over the franchise, London Midland has succeeded in growing the market between Birmingham and Liverpool by over 25%. London Midland has provided its own business case in support of its application, but the financial analysis is redacted from the publicly available documentation. The analysis of the industry business case in the draft WCML RUS found that the costs of this service change were significantly higher than the benefits generated, as the loss in revenue between Birmingham and Liverpool was greater than the revenue gained on other flows.
- 2.6.2. WCR250 notes that the WCML RUS proposes retention of a half-hourly Birmingham – Liverpool service and that the Euston – Crewe semi-fast service should also be diverted from Stafford direct to Liverpool Lime Street via Runcorn, giving three semi-fast trains per hour between Crewe and Liverpool. It demonstrates quite clearly that Liverpool has a much poorer service of long distance trains than other places along the WCML and makes proposals to rectify this, which London Midland has accepted as a member of the Stakeholder Management Group. It does not propose reducing these.
- 2.6.3. In reality the service package proposed for Liverpool in this application exchanges an hourly Birmingham train for an hourly train to Stoke-on-Trent, with all passengers making longer distance journeys having to change trains at least once unless they are prepared to accept the extended journey times offered by the through LM services. WCR250 is concerned that this proposed service package would actually make long distance rail travel to and from Liverpool less, not more, attractive.
- 2.6.4. In conclusion, WCR250 is opposed to this application, and would seek the ORR's assurance that it will give priority to implementation of the recommendations of the WCML RUS agreed by a cross-industry groups of which London Midland is itself a member.