

Consultation on the implementation of the Railways Act 2005 provisions on closures and minor modifications

Response by Railfuture North East Branch

EXECUTIVE SUMMARY

An objective test of any closure proposal is valuable to the extent that it is supported by reliable data, and that those consequences of service withdrawal and station closure that are not quantifiable are explicitly spelled out.

Securing value for money for taxpayers is a laudable objective, but the financial aspects of running a railway are not the whole story. The contribution that passenger rail services make to accessibility and the environment is alluded to in the consultation draft, but is not given proper weight.

The consultation draft fails completely to understand why many people choose to travel by train even when they have a car available for the journey. Moreover, it gives no recognition to the fact that many people in a household owning a car do not have access to that car for the journey they wish to make, and may have no access to a car at all.

The consultation draft proposes a calculation in which the closure option is the comparator against which other options, including maintenance of existing services, are assessed. Logically, the status quo must be the comparator. This allows those consequences of closure that are not financially quantifiable to be explicitly stated alongside the cost savings attributed to each option.

Many of the parameters used in the calculation are estimates having considerable uncertainty in their value even before they are extrapolated over the 60 year period of the process. Thus many of the values used are at best educated guesses, and to pretend that the result of the calculation has any quantifiable accuracy is totally misleading.

INTRODUCTION

The Prime Minister has stated recently (1) that "Climate change is probably the greatest long-term challenge facing the human race. That is why I have made it a top priority for this government, at home and internationally." We would expect that the closure process proposed in the consultation draft would reflect this commitment from the top.

It is very useful to have a series of objective tests by which closure proposals will be judged. However, a properly objective test must be supported by reliable data. Where there are uncertainties, these must be acknowledged honestly. Where the consequences of closure cannot be quantified, they must nevertheless be spelled out explicitly. A narrow value for money calculation cannot possibly embrace all of the factors involved. The consultation draft lists many of these factors, and a credible closure proposal must examine all of them.

Overall, the consultation seeks to achieve value for money for the taxpayer, something with which no sensible person would disagree. Nevertheless, there is much of the community rail development strategy approach, that of reducing costs by specifying infrastructure appropriate to the nature of the service and increasing patronage by promoting the services available, which could improve value for money without the need for reductions in services.

Seen from the outside, the economics of the railways in this country are impossible to fathom. Nevertheless it is apparent that the imposed costs of running a passenger rail service are often unnecessarily high. The recent restructuring of the industry has left intact much of the fragmentation introduced by privatisation. The number of interfaces between the various parts of a passenger rail operation, all having to be patrolled by expensive armies of lawyers and accountants, is as large as ever. Some parts of the industry, most notoriously the rolling stock leasing companies, are still unregulated. While the Government is making welcome moves to reduce leasing costs, these still drastically reduce the value for money delivered by the railway.

CONTEXT

Railways are an important part of the transport infrastructure in many parts of the country. The consultation draft very sensibly lists the adverse effects of closures and admits that Beeching cuts have left long standing problems. Any rational process for judging the wisdom of closures must not only take these detrimental effects and problems into account but also give proper weighting to the adverse consequences of the withdrawal of services.

It is worth looking at the experiences of towns that lost their rail services in earlier rounds of closures, for example Ripon, Keswick and Caernarfon. Congestion resulting from people driving to work or large numbers of tourists attempting to travel in the holiday season have led to pressure for new roads or bypasses. It is significant that in each of the three towns cited there is an active campaign to have the former rail link restored. These people see at first hand the results of rail closures.

The consultation draft states that the network is not static, and that new lines and facilities are added to meet increased demand. In recent decades, there have been no new lines added in the North East of England; the evolution argument might be supportable if growth as well as cropping were to be pursued with equal vigour. However, we note that as yet, the DfT have not produced a procedure for constructing new or re-opening previously closed railways.

There is an extensive machinery of plans and strategies by which regions, counties and districts set out the vision and policies that will shape their area. It has long been the case that the railway and its authorities have simply ignored these plans and strategies. The North East Regional Spatial Strategy (which has just completed its Examination in Public) prescribes an important role for public transport (2) and an increasing role for rail.

The sixty year timeframe prescribed by the consultation draft, and the assumptions of inflation, fare levels and patronage implicitly assume a status quo the maintenance of which is impossible to believe. Patronage of rail services is already growing strongly and there is no reason to believe that this will change in the future; even the DfT now concedes a growth of 30% over the next 20 years, never mind 60 years. The transport system in this country is based on the ready availability of oil and complete disregard for the effect of CO₂ emissions from transport sources on climate change. While there might be disagreement on the exact timing of "peak oil" (the point at which oil production reaches a maximum and then begins to decline), there is no estimate that puts it later than the second decade of this century. The Government's Foresight Programme has recently taken a 50 year look ahead (3), and none of the four scenarios described in its report look anything like the situation today. To make far reaching decisions without serious consideration of the future is short sighted in the extreme.

It is appropriate here to say something about the demographics of the areas affected by a prospective closure. Especially in rural areas the population is aging. Well within the sixty year timeframe proposed by the draft, many who currently drive will be unable to continue to do so. This is both a source of increased patronage over and above the bald 3% assumed by the draft, and an opportunity for passenger rail services to deliver a useful public service not readily

achieved by the alternatives. Another significant group of users not considered by the consultation draft are school, further and higher education students, who rely on rail services to get to their places of study. Insurance costs in particular are making car use unattainable for this age group.

Finally, we believe that serious consideration needs to be given to the transport needs of the nation if the accustomed easy supply of oil is interrupted in the short term. The price of oil has remained at unusually high levels for some time, and given the current balance of supply and demand, may well remain so indefinitely. A recent terrorist attempt on an oil installation in Saudi Arabia resulted in an immediate increase in prices, and the situation in Iran in the last few days has had the same effect. Many other sources of oil are in unstable parts of the world. Should there be an interruption in oil supplies there will be an immediate rush by people to public transport, which at present has nothing like enough capacity to cope. The fuel crisis of 2000 gave a foretaste of this. A standard risk assessment calculation would consider the reasonable probability of an interruption in oil supplies and the severe consequences of national immobility, and conclude that there was a serious risk to be mitigated. Reducing services, or closing stations and lines, is not in the national interest as people may well have to depend on them in the future.

COSTS

As the consultation draft acknowledges, the savings resulting from closure are often illusory, unless the line is closed completely, stations abandoned, rolling stock scrapped and staff made redundant. Very often, savings that accrue to one part of the industry result in increasing costs or reduced payments to another. For example, if a station closes and a TOC saves money in access charges paid to Network Rail, the costs to the latter remain the same resulting in a larger deficit.

In seeking to examine the costs of individual parts of the network, it should be noted that these have not been quantified, nor overall costs apportioned to particular lines or services. The House of Commons Transport Committee enquiry on Rural Railways (4) specifically addressed this issue. In the report it is stated (paragraph 9) that 'As the SRA says "costing community rail operations is difficult as there are few reliable records of local expenditure as almost all routes operate as part of a larger entity". The Community Rail Strategy (5) goes on to note that "both train operations and infrastructure maintenance are generally accounted for at an aggregated level, so there is always an issue of how much of the shared costs should be allocated to any individual route". Track access charges ... are similarly not allocated on a line by line basis. The difficulty in allocating costs will apply to all lines, not just those chosen for designation by the SRA.'

The report goes on to say (paragraph 12) that 'The SRA's consultation document said that "... closures leave huge residual liabilities which have to be managed". We would endorse the conclusion of the committee (paragraph 14) that 'Closing local railway lines will inconvenience the travelling public, reduce patronage on mainlines, and increase pollution as passengers turn to the car. It can only be justified if it is clear that it will make significant savings'.

Overall, the efficiency and cost effectiveness of the railway in the North and no doubt elsewhere is well illustrated by the extensive study carried out by Steer Davies Gleave for the DfT (6). This review was unable to identify any relevant savings which might be made from service cuts or closures but did identify that bus substitution represented poor value for money.

The consultation draft states that the sale of land released by the closure of a line must be a separate decision to avoid the judgement being biased in favour of the quick sale. The

'desirable' independent check must be made 'essential' to prevent this.

In respect of individual stations or some branch lines, low patronage is a direct consequence of an infrequent or irregular service. The requirement that all rail-based options must be considered must mean that the merits of an enhanced service should be considered. Very often, an enhanced service can be provided by changes to the stopping patterns of trains that already run. There should not be a get-out clause to the effect that the enhanced service cannot be provided with available rolling stock, particularly in view of the increasing amounts of cascaded rolling stock now available. Similarly, current low patronage may be a consequence of inadequate investment in services or infrastructure. A rail based option for consideration must therefore be responsible investment with the predictably positive consequences reported frequently in the community railway literature.

The loss of network benefits can result in passengers abandoning the railway, even if only part of their journey is affected. For example, the withdrawal of some services between Newcastle and Sunderland has resulted in commuters from the Tyne Valley to Sunderland choosing to drive in preference to using the Metro alternative from Newcastle.

REVENUES

There is nothing wrong in principle with local (rail funding) authorities shaping the transport networks for their areas (paragraph 6, p6), but the democratic deficit that results from central government providing the bulk of their funding is widely acknowledged. Only if the responsible authorities have adequate funding to make decisions that truly serve the interests of those they represent is their democratic accountability valid.

Local authorities already have money that they would be prepared to spend on rail schemes. However, they have experienced very much more difficulty in funding or pursuing such schemes, due to the much greater imposed costs involved and the unresponsiveness of the industry bodies, such that they were much more likely to go off and build a road instead (7).

There is considerable scepticism that the passenger numbers used to support changes to services are valid. Ticket sales data gives an incomplete picture due to the well known inability of conductors to sell tickets to everybody who wants one at busy times. Equipment malfunction is another common reason why fewer tickets are sold than passengers travel; further shortfalls result from the arbitrary allocation of journeys made by season ticket holders, zone ticket holders and the many ticket types which force a passenger to buy more than one ticket to complete a journey (for example, advance booking of discount tickets for the main line leg of a journey may result in only the local fare being attributed to the departure or arrival station). It is vital that the revenue available is collected but it is clear that the attribution of this revenue is at best an approximate and underestimating indicator of the financial contribution of the smaller stations.

There is also the prospect of growing patronage and therefore revenue. This can result from promoting the services already available more effectively. This is the main role of community rail partnerships, some of which have been spectacularly successful in this regard. The consultation draft comments that "we [DfT] are not aware of that any long term evidence in demand and revenue terms exists of their [community rail partnerships] efficacy in this respect". This is not borne out by the evidence from several partnerships. (Incidentally, the part of the DfT website that deals with community rail news links to a password protected section of the SRA site for which it is not possible to register.) Moreover this statement is hardly indicative of good faith on the part of the DfT.

METHODOLOGY

The consultation draft prescribes a narrow value for money test to be applied by ORR. This is inconsistent with the statement of Government objectives, listed as environment, safety, economy, accessibility and integration. Serious consideration needs to be given to the alternatives that people will actually use. That very few people choose to use a bus alternative, resulting in its early withdrawal, is well known. Most displaced passengers will elect to drive; the remainder will not travel at all.

Making direct value for money the exclusive focus of any closure proposal neglects the negative environmental consequences of modal shift onto the roads. At a time of unparalleled concern for the global consequences of climate change, and in the light of transport in the UK accounting for a quarter of its CO₂ emissions, we would have expected to see a significant cost attached to such modal shift. It is not “unnecessarily bureaucratic” for the Government to insist that these factors are properly accounted for in the value for money consideration, and even if significant adverse consequences resulting from closure cannot be quantified, they must be explicitly spelled out. We welcome the stipulation that all other rail-based options must first be considered before a closure proposal is accepted.

We are strongly opposed to the use of the same methodology for assessing closure proposals as is used for new projects. The loss of an existing facility cannot be assessed in the same way as the creation of a new one. For example, a new road does not remove a journey opportunity but the loss of a rail service does.

In any event, the methodology for new projects is flawed in the way that it allocates a monetary value to journey time savings and then aggregates small, insignificant individual times into a massive value. If new construction methodology is to be used, the STAG methodology used in Scotland is much to be preferred.

Defining the comparator

The consultation draft proposes a process in which various options are assessed against each other as quantitatively as the availability of data allow. Perversely, the draft then proposes that the closure option be the comparator against which other options can be assessed on the grounds that ‘using retention as the comparator would complicate the application and interpretation of the value for money criteria’. We are adamantly opposed to this. The logic in the last sentence of paragraph 1.5 is tortuous – the task must be to attempt to make a case for closure or staying open, not to make the case for ‘not proposing closure.’

Logically, the comparator must be the status quo. Options for complete closure or partial withdrawal of services can be then be appraised against this. This makes it much easier to see the effect of each option under a range of headings. While closure may bring about cost savings that can be defined by the consequent reduction in staffing, rolling stock and track maintenance, there will be adverse consequences. Rather than attempt to give these a spurious monetary value, these should be recognised explicitly for what they are. Extra road traffic has a considerable adverse impact on the communities that have to live with it, and this is an inevitable consequence of closure. This must be spelled out so that those communities affected can have their say before the event. Attempting to put a monetary value on this serves to disguise the reality on the ground, and is at best inexact economics. On the other hand, setting the cost savings of closure against the consequences in their real as opposed to “monitised” terms allows a real and meaningful comparison to be made.

Similarly, access for some to employment, shops, health services and hospitals, amenities and

leisure may be drastically curtailed by the closure in a way which cannot be given a meaningful, monetised value. Equally, it is impossible to give a monetised value to the loss of journey choice and reduction in competition which the removal of a rail service would cause.

Given the significance of closure and the likely consequences of social exclusion, loss of journey mode choice, increased journey fatigue, reduced safety, etc., it is obviously important that the quality of the analysis and supporting data is high. If “robust” means defensible this must include quantified tolerances on calculated values for the data used to justify closure. Similarly, the analysis must be complete – permitting shortcuts on the carefully worked out methodology is unacceptable simply to ensure that the process is not unduly onerous.

Initial review of options

The consultation draft states that the initial review of options must include a wide ranging review of options to address issues identified with current provision of passenger rail services, networks or stations. We would urge that this initial review does what many studies of individual lines do and look at the needs of the area served and the ability of the timetable extant to satisfy them. What is the population of the surrounding area? Is there a market for commuter travel, and do trains run that would get people to and from work? Are there attractions or amenities that rail could serve? Other questions should also be posed. Has the service recently been curtailed, such that there is significantly more overcrowding or that the new timetable fails to meet the needs of travellers?

The closure proposal or package

The consultation draft proposes that the closure proposal should include details of existing public transport and the ways in which available services might be modified if the rail service was withdrawn. This might be sensible in urban areas that are well served with alternative forms of public transport and where distances are short. Even here, congestion may mean that the rail service is the best way to get around and poor patronage may be the result of widespread ignorance of the rail alternative.

In rural areas, alternative provision is limited to bus services. These may be sparse and may, due to the road network, not provide adequate connectivity. A good local example, which causes major difficulties to the rail replacement bus service, is the Tyne Valley line between Hexham and Newcastle. From Hexham to Prudhoe there is a road adequate to take buses, but to get to the next station, Wylam, there is a long detour. The shortest route involves the Prudhoe – Ovingham bridge which is impassable to buses. A permanent bus replacement service would almost certainly result in loss of direct access to Wylam.

Bus journeys are invariably longer and less comfortable than the rail alternative, a factor that has undoubtedly led to their poor take-up and short life when rail services have been withdrawn in the past. Local examples that support this assertion include the Durham Coast line in late 2000 and the Chathill – Morpeth service during the Arriva driver shortage of 2002. In both cases the rail service was withdrawn and a replacement bus service substituted. Few passengers availed themselves of it, but returned to the rail service when it reappeared.

Given the view of the consultation draft that infrastructure projects should be accounted for over a sixty year period, the closure proposal or package should consider the demographics of the affected area in the long term. While it may be possible for some of those displaced from the railway to drive in the short to medium term, this option will eventually disappear with the increasing age of the population, possibly leading to serious hardship for those affected.

We are strongly opposed to the inclusion of domestic air services as a relevant alternative. Not only would such an alternative be totally unacceptable from an environmental point of view but

with the acknowledged growth in railway patronage and importance, it is inconceivable that any closure proposal would be of such a length or between such destinations that air travel would offer a realistic alternative. Taking into account the inconvenient location of airports, the extended check in times required by effective security measures, the cumbersome airport processing systems and the flying time, the shortest air journey time is effectively three hours. Even at 60 mph, that would equate to a rail journey of some 180 miles!

Assessment against Government objectives (environment, safety, economy, accessibility, integration)

In terms of impact on the environment and safety, modal shift from rail to car will result from a closure. There is plenty of data to show that cars are major sources of pollution. Such modal shift will cause an increase in safety costs, not only because of the increased traffic which will result but also because car travel is inherently less safe.

The accessibility approach outlined in paragraph 2.10 (that access to transport be measured by an assessment of non-car owning households living within a specified distance of the station proposed for closure and without alternative public transport provision) is fundamentally flawed. Many people in households with a car do not have access to that car at the time they need to travel and many others opt not to use their car when rail offers an alternative; some TOCs report as many as 40% of their passengers having a car available for the journey they are making by train. The empirical knowledge of 'option values' is every bit as robust as the use of false quantification to suggest who does not have access.

Impact on rail passengers directly affected by the closure proposal

The consultation draft states that travellers would not have chosen rail if there was a lower cost option. This is simply not true: many people choose rail for a host of reasons other than the cost concept in this document – work, relaxation, fatigue of driving, comfort, safety, window-gazing being just some. Many individuals are also concerned at the environmental impact of their travel and chose rail accordingly. This flaw invalidates the whole paragraph and with it the basis of the pseudo quantification.

We cannot envisage any valid reasons why a proper passenger survey couldn't be carried out as part of the process of assembling a closure proposal. If the cited Transport Research Laboratory report is the source of the standard diversion factors used in the worked example in Annex D, then we would have grave doubts as to their current validity. Moreover, the ways of putting monetary values to travelling time suggested in paragraph 27 may be well established, but there is no evidence that these ways are valid for train travel; time spent driving is time lost, time on a train is for example, productive, recreative or relaxing.

Value for money

The value for money parameters are subjective not objective; they were established to justify road building. The comparison with 'new' is not appropriate as losing a facility is inherently different from gaining a new one. A BCR of 1.5 is irrational and subjective. The only objective, differentiating value of BCR is 1.0 even if this makes closure easier!

Closure requirements

The consultation draft considers the closure requirements that ORR may attach to a closure ratification notice. We consider that these requirements should not be time limited but should be subject to the same process as the withdrawal of the rail service. This decision must not be 'for ORR alone'; ORR must consult with users and others affected.

FACTORS USED IN THE CALCULATION

Annex B and Paragraph 27 of Annex D presuppose a mode-specific cost associated with the alternative car journey. If travellers took a purely utilitarian view of the available options then this might be true. However many studies show that rail travellers frequently have a car available for the journey that they are undertaking. Ascribing a zero dis-benefit to those who drive or no longer travel as a result of the loss of their rail service flies in the face of reality. In addition to the factors mentioned in paragraph 6 (convenience, comfort and safety), rail travellers value the absence of journey fatigue and the ability to read or work on the train. Accordingly, the quoted 20% enhancement in the value of rail travel time saving is pure guesswork and produces a figure that has no qualitative, let alone quantitative, relationship to the thought processes of travellers.

Indeed, Annex B is fundamentally flawed as passengers demonstrably do not put the same value on all modes of travel.

Paragraph 26 of Annex D gives hypothetical survey results for passengers using stations on the line. The quoted figure of 32% prepared to use a rail replacement bus service is incredible. Rail replacement bus services are the best examples of carting fresh air around the country, either when they are put in place temporarily during track work or to replace withdrawn rail services. The assertion in option 2 that financial savings will result from the replacement bus service operating profitably is similarly inconceivable.

Many of the other parameters used in the calculation are estimates having considerable uncertainty in their value. For example, surveys are usually carried out using a sample of passengers, and the process of generalising this to all train travellers is fraught with difficulty (as opinion pollsters know all too well). Likewise, some of the costs and benefits in time and money are subject to significant error in the present day, let alone extrapolating this data sixty years forward. Even order of magnitude results would be treated with caution. It is considerably disconcerting, therefore, to see figures quoted to six significant figures. This implies a degree of precision that is simply not there.

RESULTS OF CALCULATION

We have tried to go through the worked example, but the consultation draft is not sufficiently clear about where some of the numbers come from. As we have commented earlier, some of the estimates can never be better than order of magnitude or educated guesses, and are certainly not as precise as the number of significant figures quoted would suggest.

The quoted result might be tabulated thus:

Option	Detail	Benefit cost ratio (BCR)	Net present value (NPR) £M
Comparator	Close A3 – A8, retain some passenger services A1 – A2, freight between A7 and A9		
1	Keep existing service (hourly service, two diagrams)	3.4:1	149
2	Rail replacement bus service along the whole route serving all stations		25
3	Retain A1, A2, A6 and A9, reduce frequency to 90 minutes, one diagram	6.1:1	128
4	Keep existing service (hourly service, two diagrams), but apply community rail principles	5.0:1	

We would like to see the tabulated results include the factors that seem to us to be significant. These would include the amount of extra road traffic generated by the closure (and a discussion of where this traffic would go, including additional congestion), and an estimate of the extra CO₂ emissions, the cost of the safety disbenefit, the value of time lost by driving instead of working/relaxing on the train etc etc.

If tabulated, such a comparison might look as follows:

Option	Detail	Extra car journeys	CO ₂	Time	Safety
Comparator	Keep existing service (hourly service, two diagrams)	–	–	47	–
1	Close A3 – A8, retain some passenger services A1 – A2, freight between A7 and A9	756		52	
2	Rail replacement bus service along the whole route serving all stations	460		54	
3	Retain A1, A2, A6 and A9, reduce frequency to 90 minutes, one diagram	235		49	
4	Keep existing service (hourly service, two diagrams), but apply community rail principles	–	–	47	–

We have used the figures from Annex D for the numbers of extra car journeys and time (despite our reservations), and have declined to wade through the TAG tables for the CO₂ emissions and safety data.

The values for number of extra car journeys and CO₂ emissions for the comparator (keeping the existing service) could be negative if the service was promoted or other enhancements calculated to appeal to prospective passengers were introduced. This would apply to option 4 (community rail principles) too.

For options 1, 2 and 3 (where some or all of the services are withdrawn), the analysis would

need to specify where the extra traffic might go. This would be of concern to the local highway authority and/or the Highways Agency, which would have to deal with the adverse consequences, as well as residents of the towns and villages en route that would have to put up with it.

QUESTIONS

The questions have been dealt with at appropriate points in the text, but the answers are repeated here for ease of reference.

Closure

Do you agree that the objective test to be contained in the guidance should relate only to the rail funding authority's calculation of the quantifiable benefits and costs of closure? The ORR would review this assessment only.

Making value for money the exclusive focus of any closure proposal neglects the negative environmental consequences of modal shift onto the roads. At a time of unparalleled concern for the global consequences of climate change, and in the light of transport in the UK accounting for a quarter of its CO₂ emissions, we would have expected to see a significant cost attached to such modal shift. It is not "unnecessarily bureaucratic" for the Government to insist that these factors are properly accounted for in the value for money consideration, and if the significant adverse consequences of closure cannot be quantified then they must be explicitly spelled out.

It is essential that all the factors taken into account in arriving at a decision are subject to review and indeed, all those factors which were not taken into account. Otherwise ORR is left to decide on the basis of data of unproven accuracy.

It is also essential to consider how well the timetable operating at the time the closure is proposed can satisfy the needs of people who might use the rail service. Removing services that serve the needs of local residents and then claiming that the line is not used has been a well worn path to closure in the past. The possibility that it might be used in the future must be guarded against in the closure process.

Do you agree that the funding authority should retain a broad discretion not to pursue a closure, but should only be permitted to make a closure where the quantifiable benefits exceed the quantifiable costs to a defined value?

We would accept the ability of a funding authority to propose a closure, but only if it was able to prove that the avoidable costs exceeded quantifiable benefits. The data used to back the closure proposal would need to be quantitative and open to public scrutiny.

We believe that the methodology by which environmental and safety aspects are quantified for the BCR calculation is insufficiently rigorous for a decision of such far reaching importance. At the very least, the adverse consequences would have explicitly to be spelled out and brought to the attention of those (not necessarily rail travellers) expected to bear them.

The 'defined value' statement in the question must also be subject to public acceptance.

Do you agree that the guidance should be based on the same methodology and the same monetary values that are used to appraise new projects? If not, what changes would you suggest? And what would you see as the justification for these?

No! the methodology for new projects is flawed, for example in the way in which it allocates a monetary value to journey time savings and then aggregates minute, meaninglessly small individual values to a massive total value. The loss of an existing facility cannot be assessed in the same way as the creation of a new one, for example a new road does not remove a journey opportunity but the loss of a rail service does. If new construction methodology is to be used then the STAG methodology is much to be preferred.

Apart from the detailed considerations in the foregoing text, a key disabling flaw in the process for assessing new projects is the sixty year timeframe and the implicit assumption that the status quo will prevail.

Minor modification

Do consultees agree in principle with any or all of the proposed descriptions of closures eligible to be treated as a minor modification, or do you have any other comments?

None of the scenarios mentioned in the consultation draft are of such a nature that the full closure process would be appropriate. Nevertheless, care is required to ensure that the quality of service experienced by passengers isn't reduced to the extent that they desert the railway. Examples include the relocation of platforms resulting in extra distances to be travelled by passengers, or lengthening of journeys such that connections that were previously met are then lost. Some minor modifications may cause longer term problems. Shortening of platforms to the lengths of trains that currently call may preclude the use of longer stock in the future. Given that the use of longer trains is one of the capacity enhancing measures under active consideration at present, shortening platforms may prove a short sighted step.

Do consultees agree with the criteria that underpin each of the proposed descriptions of closure eligible to be treated as a minor modification?

We would agree that the current bureaucracy should be removed and replaced with a statutory obligation to develop, enhance, improve the facility in consultation and dialogue with all users and others affected.

Consultees are invited to consider if the Secretary of State and Scottish Ministers should set down measures to define whether the closure of a facility may be progressed as a minor modification? For example, should there be maximum distances that facilities such as waiting rooms, footbridges or ticket offices may be moved? What other, or alternative, measures might be specified?

What is required is an objective measure of relevant journey experience (ease of interchange when platforms are moved, likelihood of connections being missed when journey times are lengthened, future use of a station by longer trains when platforms are shortened). Proposals must be adequately advertised in advance and open to challenge from passengers whose journeys would be affected.

Do consultees have any suggestions for other descriptions of minor closures of railway facilities used in connection with passenger services that could be taken forward as a minor modification?

As with the second question, we would suggest a statutory obligation to develop, enhance, improve the facility in consultation and dialogue with all users and others affected.

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