

promoting quality public transport.....

David Pope
Department for Transport
RLMP Division, Zone 3/18,
Great Minster House
76 Marsham Street,
London
SW1P 4DR

8th February 2011

Dear Mr Pope

**Representation to Department for Transport regarding Mosley Street
Station Closure, Manchester Metrolink**

TravelWatch NorthWest is an independent organisation representing all public transport users in NW England.

We are making this representation to the Department for Transport regarding the consultation on a proposal by Greater Manchester Passenger Transport Executive (GMPTE) to discontinue passenger services at Mosley Street station on the Metrolink light rail network.

Firstly, Mosley Street is one of the busiest stations on the network.

The main criterion justifying the proposal is that through passengers (which are stated to exceed Mosley St users by a factor of between 2 and 3) would benefit from the proposal. This appears to be the overwhelming component of the low cost benefit of keeping the station open. A justification for closure which relies on the benefits to through passengers being substantially higher than the disbenefits to boarding passengers is completely contrary to any historical or indeed ethical principles surrounding passenger railway closures. Indeed it could be applied to justify the closure of most stations on the rail or light rail network as the numbers of through passengers will almost always be higher than the numbers boarding. This raises very serious questions about the form of the evaluation as it could be used as a precedent elsewhere to give serious effects on passenger services.

The Metrolink service to Altrincham comprises two services, Bury to Altrincham and Piccadilly to Altrincham, each operating every 12 minutes during the working day. Mosley Street is the only station in the Piccadilly

Gardens area at which both services call, thus providing a 6 minute service or 10 trams per hour to stations on the Altrincham line.

The GMPTE website states that Mosley Street stop is “Great for boarding the tram home after that visit to China town or shopping visit”. It is the closest tram stop to Chinatown and to the King Street business area of the city.

Closure of Mosley Street will have the effect of reducing the service to Altrincham from a 6 minute service or 10 trams per hour to a 12 minute service or 5 trams per hour. We consider this to be an unacceptable reduction in service to passengers. GMPTE state that they will provide real time passenger information displays in the vicinity of Mosley Street to indicate whether the next departure to Altrincham will be from Piccadilly Gardens or Market Street Stations. We do not consider this to be an adequate replacement for a common platform and such displays tend to be unreliable. In any event we understand that real time information can not be displayed until the new Tram Operating System is fully installed which will not be until some weeks or months after the planned closure of Mosley Street.

Our observations show that it is not unusual for trams to be delayed or missing from the normal operating pattern. On these occasions the real time information display may not accurately indicate the time of the next tram and this will be a major cause of delay and frustration to passengers. It may also result in safety issues as passengers have to cross busy bus and tram lanes to reach either Market Street or Piccadilly Gardens tram stops.

We are aware that Mosley Street is the last remaining profiled platform with a low section requiring the use of sliding steps on the second tram for a two car train. The new M5000 trams are not fitted with sliding steps and it is therefore understandable that GMPTE should wish to change this platform.

However we do not accept that GMPTE have taken adequate steps to design a high platform which could be accommodated on this site. They have adopted design standards which we do not consider to be essential for this location. For example in the ‘Mosley Street Metrolink Station Closure Assessment Revised Final Report for GMPTE’, November 2009, the ramps provided have been designed to rise from rail level to the platform height of 915mm which gives a ramp length of 20.3m (including a 2m level section). However the existing footway is at least 150mm above rail level and over a significant length is about 350mm above rail level. This could reduce the ramp length to 13.3m (including a 2m level section). Two ramps have been provided but one ramp would be adequate for wheelchair and pushchair users. Lower design standards have been accepted at St Peter’s Square tram stop to provide continuous high platforms and we see no reason why the same approach could not be adopted for Mosley Street.

We also have concerns regarding passenger safety. At present Mosley Street platform is heavily used, particularly in the evening peak period. A survey conducted by GMPTE in February 2009 showed that some 1500 passengers

boarded services in the peak 16.00 – 19.00 period. We have noted from our own observations that up to 65 passengers board an Altrincham tram in the evening peak period and over 90 passengers are waiting on the platform at one time. Even in a lightly trafficked hour after the morning peak, the platform is used by over 150 passengers. This usage will increase significantly as the Phase 3 extensions open. (The new service from Central Park to St Werburgh's Road, Chorlton is expected to commence in May 2011). Most of these passengers would have to use Market Street or Piccadilly Gardens platforms, both of which are island platforms, **cannot be widened** and are already heavily used. The resulting crowding could present a serious safety hazard.

We believe that, based on observations from Dr Alasdair Renfrew in his representation to the proposal, the DfT's quoted time saving figure for through passengers of 1.25 minutes is grossly over-estimated. A more realistic figure would have a further significant beneficial effect on the Benefit Cost ratio of retaining the station.

As previously stated, ***Mosley Street is one of the busiest stations on the network.*** We wish to register our strong objection to the closure on the grounds that it will significantly disbenefit existing and future passengers boarding for stations on the Altrincham line and will raise serious safety concerns on overcrowded island platforms.

Yours sincerely,

JOHN MOORHOUSE
COMPANY SECRETARY