

South Western Railway Consultation on amended timetable December 2022

Draft response by Epsom and Ewell Borough Council

1. Which category would best describe your organisation?

Local Authority

2. Do you have an interest in a particular station or route? If so, which one?

We are particularly interested in services to Epsom, Ewell West and Stoneleigh.

3. Overall, what do you think of our proposed specification for the Main Suburban routes?

It is Epsom & Ewell Borough Council's (EEBC) understanding that, according to the proposed December 2022 timetable, the frequency of South Western Railway trains stopping at stations in the Borough of Epsom and Ewell (Epsom, Stoneleigh and Ewell West) will remain the same as the current frequency, which has been implemented as a result of changing demand because of the Covid-19 pandemic. In the light of this, EEBC object to what will effectively be a permanent reduction in services from pre pandemic frequencies, even if behaviours of people and working practices return to normal as restrictions are lifted. Our reasons are as follows:

- 1) Epsom and Ewell and the wider region is continuing to grow

EEBC considers that basing the decision to reduce services on the strength of customer surveys during the pandemic and some evidence of estimated travel patterns post pandemic lacks a much-needed strategic perspective regarding planned housing growth in the South East and South West of England, including Epsom and Ewell. In fact, the latest figures from the Office for National Statistics (ONS) show that the South West is the fastest growing region of England in terms of projected household growth.

Projected households for English regions, 2018 to 2028¹

	Mid-2018	Mid-2028	Percentage change 2018 to 2028
South West	2,399,000	2,615,000	9.0
East Midlands	2,002,000	2,177,000	8.7
London	3,495,000	3,769,000	7.8
West Midlands	2,403,000	2,588,000	7.7
East of England	2,560,000	2,743,000	7.2
South East	3,754,000	4,011,000	6.9
North West	3,121,000	3,297,000	5.7
Yorkshire and The Humber	2,306,000	2,430,000	5.4
North East	1,165,000	1,215,000	4.3
England	23,204,000	24,844,000	7.1

The number of households in Epsom and Ewell is anticipated to grow by 4.9% over that same period, from 31,149 to 32,660 (+1511). Household growth is also expected in the other boroughs and districts which the Waterloo to Dorking and Waterloo to Guildford via Leatherhead lines run through.

Borough	Pop 2018	Pop 2028	Increase	% increase
Wandsworth	134,284	141,657	7372	5.5
Merton	79,173	81,381	2209	2.8
Sutton	81,798	86,966	5168	6.3
Mole Valley	36,979	38,311	1332	3.6
Guildford	56,064	56,809	745	1.3
Total	388,298	405,124	16,826	4.3

The Council's housing requirement in line with the national [standard methodology](#) is 577 homes per annum and the Council is preparing a local plan to accommodate development to deliver these new homes. A key determinant of where the homes go is how accessible they are by public transport. Indeed, Epsom is a significant transport hub by virtue of its train station. By reducing services, it is considered that this will diminish the status of Epsom's transport hubs, significantly undermining Epsom's ambition to create places, which have good access to public transport and therefore, its overall growth strategy.

Even now, there are a number of large residential developments being brought forward, particularly in and around the town centre, that have been

¹ Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/householdprojectionsforengland/2018based>

granted planning permission partly because of their ability to be served by public transport.

2) Increased carbon emissions

The Borough has committed in its [Four Year Plan](#) to work with partners to reduce its impact on the environment and move closer to becoming carbon neutral. [Statistics show](#) that 25.7% of residents travel to work by public transport (20.3% by train) which is higher than the national average. The proposed permanent reduction in train services reduces options for travellers and would be a disincentive to use trains, leading residents who are ordinarily well served by Epsom Central, Ewell West and Stoneleigh stations to revert to private modes of transport, such as the car. This would be contrary to EEBC's and South Western Railway's shared desire to contribute positively to sustainability.

3) Region will be disproportionately impacted compared with rest of network

In considering the proposed measures overall, it appears that the impact on the areas served by the Leatherhead/Guildford lines will be compounded by the fact that they will experience reductions in Main Line as well as Suburban services. In addition, the consultation document states that 37% of restrictions could be lifted because of the reduced services. However, it is not clear from the proposal if there is a causal relationship between the Waterloo to Dorking and Waterloo to Guildford via Leatherhead services specifically and those restrictions / mitigating measures. Rather, it appears that the 37% lessening of restrictions has been measured across the whole network. Therefore, EEBC would like to know to what extent the restrictions or "pinch points" on the network were specifically due to the Waterloo to Dorking and Waterloo to Guildford via Leatherhead services and what proportion of the 37% improvement can be attributed to reduced services on those lines. In the absence of that evidence, EEBC will maintain its objection to the proposal.

4) Will harm the local and wider-than-local economy

Epsom's excellent connectivity is also a contributing factor for local businesses and a reason that many chose to base themselves here. By reducing the frequency of services we are concerned that this will make businesses less likely to locate in Epsom and Ewell and other boroughs with a good employment offer.

5) Southern Rail may also reduce their services

EEBC questions how the proposed new timetable is being coordinated with Southern Rail and whether assurances have been sought that this company is not also planning to implement similar reductions, which would further reduce the level of service to Epsom.

6) Reduced customer choice

Whilst it is understood that the justification for reducing services through Epsom is because Epsom station is also served by Southern Rail, Southern Rail only run services into London Bridge and Victoria. Therefore there will be a disproportionate impact on many of our residents who ordinarily travel to Waterloo and other transport nodes on this route, including Wimbledon and Clapham Junction. Furthermore, Ewell West and Stoneleigh are not served by Southern Rail and will be impacted more significantly than Epsom. This is particularly disappointing for Stoneleigh station where the Council has invested significantly in enhanced accessibility measures such as step free access (and for which the Council have been successful in winning Department for Transport funding). It is also at odds with future strategic plans to optimise ambitions at stations, which have the potential to grow as transport hubs. For example, Epsom, Ewell West and Stoneleigh are all on the proposed Crossrail 2 route.²

7) Capacity to respond to increase in demand

It is assumed that any increase in demand post the implementation of the Dec 22 timetable would lead to South Western Railways re-assessing the frequency of services. However, EEBC is concerned about what contingency measures will be in place to increase services in this instance. As the 455 trains are being phased out, will there be a surplus of Arterio trains to take up demand?

8) Capacity of existing services may not increase

Given that the justification for reduced frequencies is because each train will have more capacity, there does not seem to be an assurance from the consultation document that the new trains will operate on the Dorking and Waterloo to Guildford via Leatherhead services specifically. Clarification in this regard would be welcome.

9) Post pandemic travel patterns still uncertain

Whilst EEBC acknowledges that the research drawn on by South Western Railway has concluded that commuting demand will only return to 60% of pre pandemic levels (irrespective of its plans for significant future development), EEBC believe that future workflow patterns are still uncertain and it would be premature to commit to a permanent reduction for December 2022 at this stage. EEBC also understand that these findings were based on commuting patterns into London and questions whether the picture would be different were customers asked about more localised journeys on the network.

With the above in mind EEBC do not agree with the proposed new timetable. Should the changes go ahead, EEBC would like to see a firmer commitment to reviewing the timetable in the event that passenger numbers recover more

² <https://crossrail2.co.uk/route/route-map/>

quickly or at a higher percentage than 60% after December 2022, so that the service can react quickly if demand exceeds that expected. Also, that there will be a continuous review of services in the light of the new development that is being planned for.

4. Overall, what do you think of our proposed specification for the Mainline routes?

No comment

5. Overall, what do you think of our proposed specification for the Windsor routes?

No comment

6. Overall, what do you think of our proposed specification for the West of England routes?

No Comment

7. Do you agree with our strategic approach that seeks to balance future performance with cost control?

See answer to question 9.

8. Do you agree that a return to capacity at 93% of pre-Covid levels is an appropriate target?

Overall, in light of our overall concerns about the network's capacity to accommodate future growth, EEBC do not agree with this..

9. Do you agree with our approach of maximising capacity while running a slightly reduced frequency of service, if that results in better reliability?

Whilst EEBC understands the reasoning for the reduction in frequency of trains and running fewer trains with more capacity, EEBC is not convinced that it is the correct approach to overcome the service problems identified. EEBC would prefer to see resources allocated to improving the operation and functioning of the identified "pinch points" so that they can cope with high demand, rather than remove the demand.

This is partly because, despite post pandemic forecasts, in the longer-term demand on all transport infrastructure will become greater, and EEBC would prefer to see that demand absorbed by rail as it is (as acknowledged in the consultation) the more sustainable form of travel.

EEBC notes that the strategic objectives agreed with DfT do not include the important role rail has to play in shaping communities, not least in influencing

where development (including housing) happens. Therefore, EEBC questions whether future population projections along the railway lines have been taken into account. The Government's Standard Method for calculating housing need shows significant growth expectations for the South East and South West of England. Such growth will inevitably put more demand on the rail service post pandemic. It is a regressive to step to scale down the frequency of services in this context.

10. Do you have concerns at what we are proposing? If so, what are they?

Please see answer to questions 3 and 9.