

Gareth Clancy
Head of Access and Licensing



Paul McMahon
Managing Director, System Operator
Network Rail

Copied to:

Charlene Wallace, Director for National Passenger & Customer Experience, Network Rail
Mark Langman, Managing Director, Wales & Western Region, Network Rail
Ian Yeowart, Managing Director, Grand Union Trains

by email only

16 October 2020

Dear Paul,

Grand Union Trains Section 17 Application between London and Carmarthen: Capacity and Performance Assessment

1. As you are aware, Grand Union Trains Limited (GUT) applied in June 2019 for track access rights to run services between London and South Wales, and has been engaging with Network Rail on the availability of capacity between London and South Wales from this date. GUT amended its application in May 2020, halving the quantum of rights requested and extending the service from Llanelli to Carmarthen.
2. GUT wrote to us on 15 September 2020 highlighting concerns regarding Network Rail's engagement with its London-Carmarthen application, the quality of the work completed and the time taken by Network Rail to complete this work. GUT copied this letter to Network Rail.
3. We recognise the need for expediency, accuracy and fairness in identification of capacity by Network Rail. This is to ensure the application process does not present an additional barrier to the already complex task of compiling a viable commercial open access proposition. Prompt and accurate capacity analysis helps all train operators when putting forward proposals. It also helps us produce accurate assessments of applications.
4. Network Rail told us in its representations in June 2020 it planned to submit a capacity analysis of the proposals by the end of July 2020. We requested that this analysis covered a number of detailed questions. We still have not received the final capacity analysis and associated outstanding responses to our questions. We require Network Rail to provide this response in order for us to assess the application in line with our duties. Attached to this letter is the detailed list of questions requiring answers.
5. We require that you provide us with a comprehensive response to GUT's application, including full answers to the attached questions, by Friday 30 October. For question 2, we are willing to extend the deadline to Friday 6 November, if required, noting your ongoing work on performance modelling. We expect that you will engage

appropriately and collaboratively with GUT whilst developing your response. We will treat your response as a formal update on your representations on the application, originally provided to us on 26 June 2020. As such, on receipt of your response we will publish it alongside this letter on our website.

6. Please contact me if you would like to discuss the content of this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gareth Clancy', is written over a light yellow rectangular background.

Gareth Clancy

Annex – GUT London – Carmarthen application operational questions

1. Is Network Rail (NR) able to support the application, or any subset of the application? If NR cannot support the application, or parts of it, please explain with evidence for all areas it cannot support.
2. Please set out modelled performance impacts of the proposed services, in PPM terms. Please provide this per path where possible.
3. Please set out any impacts that NR believes the proposal would have on existing services (this should include all services that currently hold access rights, even if they are not running under the current reduced timetable). If NR is willing to support a subset of the application, please set out the impacts of this subset.
4. In discussions with ORR, NR agreed to forward further documents. Please forward all relevant documents that remain outstanding, including the performance report and platforming assessment.
5. Please provide full detail on the underlying and existing performance issues NR has identified in the draft performance work shared with ORR, with particular reference to the evening period in the Didcot area. How will the GUT proposal “exacerbate” these issues?
6. Is NR content with the ability to platform GUT services at Cardiff Central in Phase 1 and Phase 2. We note platforming analysis was not conducted as part of the Capacity Analysis. If any outstanding concerns remain regarding this, what are they and how do NR plan overcome them?
7. Please provide the Paddington Platforming analysis. What is the current position on the ability to accommodate GUT services in Paddington station?
8. Please provide evidence of how the proposed services increase reactionary delay and new services “amplify” delay. Please refer to operations and performance issues, not ticket acceptance and other commercial issues.
9. Please provide updated Train Graphs, as included in the 7 May 2020 timetable evaluation in a legible format.
10. What impact do the revised timescales for the introduction of GUT services have on timetable planning process?
11. What is the status of the additional GWR Bristol services?
12. What is the latest progress on the Western Train Planning Rules Forum?
13. What is the current position on the Rules of the Depot work?
14. What progress has been made on reviewing technical headways between Didcot and Cardiff? Are there any initial conclusions? How do these compare to planning headways?
15. Please provide answers to the questions below:
 - a. How is the service recovery process anticipated to be undertaken/amended at both the Western and Wales Route Controls following any introduction of an additional operator?
 - b. What policies are in place on this route regarding the Sale of Access Rights? Are there dates beyond which these will not be sold?
 - c. Will HS2 construction at Old Oak Common have an impact upon capacity? If so, what will the impact be on existing and potential future services?
 - d. Will Western Rail Access to Heathrow construction and any subsequent introduction of services affect GUT services? What is the anticipated impact/effect of these on the GUT proposals?



- e. Stakeholders have expressed concerns that PAD-RDG, DID-SWI and STJ-CDF are all operating at capacity. Please confirm if this is the case, providing supporting evidence. Please link to other points regarding TPRs
- f. SWA: is there capacity at the station for GUT services? If required, is there capacity to shunt trains to and from depot (both Maliphant and Landore)?
- g. A recent Network Change has been published relating to reinstating SWA platform 4 to full length. What impact does this have on accommodating GUT services?