

Hull Trains 27th S22A London – Sheffield

Industry Consultation

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Tel: [redacted]
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14 February 2024

Mark Garner, Customer Manager
by email: [redacted]

Dear Mark,

Industry Consultation – Hull Trains, Section 22A Application, Sheffield-London

Thank you for sharing the above track access application from Hull Trains, and for providing the Department for Transport the opportunity to respond to the industry consultation.

The Department is clear about the important role of open access on the rail network, with improved connectivity and choice key parts of reforming our railway so that it better delivers for passengers and taxpayers. We very much welcome the benefits that can be achieved through increasing open access services, including improved choice and innovation, and particularly support open access services where they grow new markets for rail and effectively use spare capacity.

The Department recognises that the proposals from Hull Trains would bring benefits for passengers, such as new direct links between Worksop and London, as well as introducing greater competition and choice. We continue to welcome Hull Trains' engagement with the open access market and their exploration of new proposals for services. However, the Department has identified concerns over network constraints and the abstraction levels of some of the services in relation to this particular application.

Sheffield station has known capacity issues, with both Network Rail and the Office of Rail and Road (ORR) acknowledging numerous competing aspirations for new services, including from other open access operators. Significant capacity constraints also exist on the section of the East Coast Main Line that this proposed service would operate on.

As with other applications of this nature, the Department therefore asks and expects Network Rail and the ORR to ensure that they have conducted a careful examination of the operational and taxpayer implications of this application as well as Hull Trains' plans to mitigate these impacts.

Thank you again for the opportunity to respond to this consultation. Please contact me if you wish to discuss this matter further.

Yours sincerely,

Joe Hickey
Deputy Director, Policy Coherence and Coordination

To: Andy Wylie
Head of Regulation & Open Access Contracts, First Rail Holdings
8th Floor, The Point,
37 North Wharf Road
London W2 1AF

Mark Garner
Customer Manager, Network Rail
George Stephenson House
York YO1 6JT

CC: Track Access, ORR

(By email only)

2nd February 2024

Dear Andy, Mark,

Re: Hull Trains 27th SA: Section 22A Industry Consultation Sheffield – London Kings Cross

This letter sets out East Midlands Railway's (EMR's) response to Hull Trains' Section 22a industry consultation on the proposal to operate two return trips between Sheffield and London Kings Cross, with an extension to/from Meadowhall on one trip each way from May 2025.

EMR has significant concerns about the proposal.

1. The large majority of any revenue that Hull Trains earns from the services will be abstracted from other operators. Our analysis suggests that the 'Not Primarily Abstractive' (NPA) ratio that the ORR uses in evaluating applications, falls far below the threshold of 0.3.
2. The application is fundamentally flawed as it does not reflect the services that other operators will be running in May 2025. In particular it does not take into account the planned recast of the East Coast Main Line timetable in December 2024 nor the reinstatement of two trains per hour between York/Sheffield and Birmingham by CrossCountry in May 2025. It is also noted that there is a parallel application in for a Cardiff-Edinburgh service making use of this same corridor.
3. Platforming capacity at Sheffield station is heavily constrained and it is evident that the proposed platforming are not workable. There is a lack of detail on the train paths to understand if these proposals are achievable and can be accommodated at Sheffield station. The application provides no assurance that future committed service aspirations can be accommodated.
4. The Nunnery Main Line Jn to Sheffield corridor is heavily utilised and running the proposed additional trains through this area will increase the risk of poor performance across the route and reduce the ability to flex services during times of perturbation.

1. Revenue Abstraction

- Our own MOIRA analysis of the proposed timetable gives a 'Not Primarily Abstractive' (NPA) ratio of 0.15, significantly lower than the threshold of 0.3. We will write to the ORR separately with further details of our concerns in this area.

2. Timetable Structure

- After reviewing the timetable study, we have significant concerns about the deliverability of the proposed paths in the June 2024 timetable. The application does not address how the proposal will work with future enhancements to train services. Also, the lack of information provided is making it impossible to carry out a proper assessment in either a current or future timetable database.
- It is noted that the Hull Trains timetable study was based on the June 2024 timetable. It has made no attempt to demonstrate how future service changes can be accommodated. This does little for the credibility of the application. If Hull Trains have identified paths in the December 2024 timetable, we would expect these to be shared with suitable caveats. Therefore, the application has not demonstrated how the future service changes at Sheffield can be accommodated. This includes:
 - In the new December 2024 ESG timetable structure, there is an additional Leeds – Sheffield hourly fast service. The proposed train paths do not take account of the December 2024 East Coast Main Line recast and would need to be reworked to be in line with the ECML Access Policy.
 - We understand that CrossCountry is intending to reinstate the two trains per hour frequency between York/Sheffield and Birmingham from the May 2025 timetable change with the re-introduction of most of the remaining Newcastle/York – Reading services. Hence, the timetable study needs to be updated and take into account CrossCountry's service aspirations from May 2025.
 - EMR has made significant investment in new rolling stock, which will be used to strengthen Intercity and Regional services. This will result in restrictions on platforming at Sheffield. For example, the 6-coach services between Nottingham and Liverpool cannot use Platform 7. If this application is approved, it is likely to restrict our ability to deliver additional capacity and the associated revenue and benefits from this investment.
- The June 2024 timetable has temporarily removed some train slots that are not being used. Some of these train slots have Firm Rights and could be re-introduced. Could you please confirm what consideration has been given to this during the development of this proposal?
- It is noted that there is a parallel application in for a Cardiff-Edinburgh service making use of this same corridor.

3. Platform capacity

- Platforming capacity at Sheffield station is heavily constrained. For example, platforms 6 and 8 are restrictive with no departure to the north. In addition, the two-track section between Sheffield and Nunnery Main Line Jn north of the station is heavily used with capacity exceptionally scarce to/from Meadowhall or Woodhouse. This is evidenced whenever EMR needs to make use of the Beighton diversionary route which can only operate effectively if services are taken out of the base timetable.

- EMR has carried out some analysis on platform occupancy at Sheffield for those services being proposed in the application, and some of the times being proposed in the application do not allow for EMR services. More detail on each of these is provided below:

- On a weekday, the proposed 1G03 12:48 Kings Cross - Sheffield service is timed to arrive into Platform 8B at 14:57. Consequently, Hull Trains have proposed to move 1F40 13:02 St.Pancras – Sheffield from Platform 8 to Platform 8A. This service arriving at 15:05 is currently formed of 7 coaches, which will increase to 10 coaches when the new Aurora bi-mode units are introduced. The platform is not long enough to accommodate both EMR and Hull Trains.
- On a weekday, the proposed 1A82 09:20 Sheffield – Kings Cross is timed to depart Platform 5B at 09:20. However, our 1F10 07:02 St.Pancras – Sheffield arrives in Platform 5 at 09:07, and forms 1C32 09:37 Sheffield – St.Pancras departing from Platform 5 at 09:37. There is no detail of Hull Trains' inbound service into the platform to form 1A82, and it is apparent that there is no capacity at Sheffield to accommodate this proposed service. Furthermore, it is not feasible for Hull Trains to share Platform 5 with EMR's long distance London service due to operational constraints such as platform length (SDO 9-car), signal sighting and permissive working.
- On a weekday, the proposed 1G07 19:56 King's Cross – Sheffield service arrives in Platform 6A. It is stated in the application that this service will extend to Meadowhall, but it is not possible to depart Platform 6A to the north.
- There is no indication of how the units will be shunted at Sheffield. All ECS shunt movements should be timed to demonstrate that there is capacity and the plan is compliant with Timetable Planning Rules. We are concerned that turnrounds of 2 hours will result in standage time in either the platform or at a signal. This will have an adverse impact on performance of the network and constraint development of the timetable. Please can Hull Trains provide evidence of how the following units will be shunted:

Days Run	Service	Arr Platform	Service	Dep plat
SX	1G03 12:48 STP – SHF (14:57)	8B	1A86 16:54 SHF - KGX	1
SO	1G03 12:48 STP – SHF (14:57)	5	1A86 16:54 SHF - KGX	1
Sun	1G03 12:56 STP – SHF (15:07)	6	1A86 17:14 SHF - KGX	2B

- There is no detail in the application of the extension to/from Meadowhall on one trip each way. We require details of these paths to understand the impact on platform occupancy and crossing movements that occur in the station throat, particularly in the morning peak. This is critical to determine if the associated paths to/from King's Cross can be accommodated. Please can Hull Trains provide details of these paths and how they are accommodated at Sheffield station.
 - In many instances to accommodate Hull Trains in the June 2024 timetable, it requires platform sharing at Sheffield with EMR. We are extremely concerned that this will frequently prevent EMR from strengthening services for special events, engineering works and service disruption. This could potentially lead to excessive crowding on EMR services and increase safety risks at our stations.
- In summary, it is evident that the proposed platforming are not workable as the timetable study has completely disregarded the formation of train services in the platforms. There is a lack of detail on the train paths to understand if these proposals are achievable and can be

accommodated at Sheffield station. It is essential that there is a fully validated train plan including empty stock movements and platform occupation.

4. Operational performance

- The Nunnery Main Line Jn to Sheffield corridor is already heavily utilised. On time performance at Sheffield for originating EMR Intercity services sits at 68%, below a normal standard for services beginning their journey. This lateness is often carried and further increased throughout the journey, which in turn impacts our T3 performance metric, adding to the risk of conflicts, as services travel south. Additionally, increased train services in the area will impact our on time performance and reduce the ability to flex services during times of perturbation. It is important that any proposals do not impact on EMR's right time operation and the performance of train services in the Sheffield station area, and we request that Hull Trains shares any analysis and performance modelling to demonstrate that these services can be accommodated without any impact on other operators' train services.
- EMR would expect that any approval of this application preserves its capability to operate via Beighton during engineering work/perturbation.

5. Resource and Contingency Arrangements

- It is important that the proposal is underpinned by a robust resource and traincrew plan, and service recovery plans and control arrangement. No information on these points is provided in the proposal. In addition, it is unclear what the rescue and recovery plans are should there be a train failure on this busy route.

EMR looks forward to reviewing any further details Hull Trains could provide which may enable some of these concerns to be addressed.

Yours sincerely,

Lanita Masi
Network Access Manager
East Midlands Railway

To: Andy Wylie
Head of Regulation & Open Access Contracts, First Rail Holdings
8th Floor, The Point,
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Mark Garner
Customer Manager, Network Rail
George Stephenson House
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CC: Track Access, ORR

(By email only)

16th February 2024

Dear Andy, Mark,

Re: Hull Trains 27th SA: Section 22A Industry Consultation Part 2 - 'Amended' Sheffield – London Kings Cross

Thanks for providing EMR with the additional documents (“F3 prints”) for the SX and SO paths for the proposed new Sheffield – London Kings Cross services, and an additional PIF file containing consequential flexes to other operators’ services in the December 2024 database.

As stated in our response dated 2nd February 2024, EMR has significant concerns about the proposal in relation to the June 2024 timetable. While the June 2024 paths remain a significant concern, the December 2024 paths have a far greater impact on the operation of the timetable and performance. EMR can confirm that the additional documents and information provided have not addressed any of the issues we raised in the initial response but have amplified our concerns about this proposal.

With reference to the additional documents provided, we have identified numerous issues with TPR compliance. We have therefore adopted a pragmatic approach, and only highlight issues where there is a material impact that cannot easily be resolved.

Revenue Abstraction

In our initial response sent on 2nd February 2024, we highlighted that based on our analysis the proposals would not pass the “*Not Primarily Abstractive*” test and that Transport UK Group would write directly to the ORR on this point. The revised F3 prints provided by Hull Trains do not change the abstractive nature of the services and in our view, make it even less likely that the services would pass the NPA test. It remains the case that further details on our concerns on the abstractive nature of this submission will be provided directly to the ORR from Transport UK Group.

Timetable Structure

Our previous response highlighted concerns that the proposal had not taken account of the December 2024 ECML ESG recast. The new December 2024 schedules demonstrate that TPR compliant paths cannot be achieved on the ECML, and that capacity does not exist for Hull Trains to operate these additional services. More details on these concerns are provided below.

- Mandatory engineering allowance and adjustment time have been removed from the schedules to accommodate these proposed paths. We note that the engineering allowances are not correctly applied in most of the Sheffield paths and Hull Trains have also removed allowances from the following weekday services:
 1. 1A21LN 10:40 Leeds – Kings Cross - because of being pathed in the Retford area to follow the proposed Hull Trains' path from Sheffield, both [1] approaching Newark Flat Crossing and [1] approaching Peterborough have been removed. Additionally, the {0.5} for acceleration after Fletton Jn because the train is not at linespeed, has been removed.
 2. 1D56LN 20:09 Kings Cross – Leeds - has had the [1] approaching Newark Northgate removed to minimise pathing time in the proposed Hull Trains' path to Sheffield, which follows this service.
 3. 1H08PF 20:18 Kings Cross – Beverley - because of being pathed in the Grantham area to follow the proposed Hull Trains' path to Sheffield, the [1] approaching Newark Northgate and [1] approaching Loversall Carr Junction have been removed.
 4. 1S99GL 20:30 Kings Cross – Edinburgh - because of following 1H08PF at Retford, this train is 2 minutes later passing Retford. To get the schedule back to booked, the mandatory engineering allowance of [1] approaching Loversall Carr Jn and [1] approaching Colton Junction have been removed.
 5. 1N28LN 20:33 Kings Cross – Newcastle - the mandatory engineering allowance of [1] approaching Colton Junction has been removed to compensate for the additional (1) approaching Loversall Carr Jn to follow 1H08PF.
- The approach taken to remove mandatory allowances is not acceptable and will be rejected by Network Rail as part of the timetable validation. Please can Hull Trains explain who it has contacted about removing mandatory allowances, and the reasoning for this?
- As illustrated in the graph in Appendix I, 1A86JH 17:13 Sheffield – Kings Cross is in a nearly identical path to Hull Trains 1A96GA 17:09 Hull – Kings Cross south of Retford. Also, it cannot depart from Platform 2 at Retford to the Up Fast at 18:17:30 because 1N95GC 17:00 Kings Cross – Sunderland passes on the Down Fast at the same time. This cannot be considered a workable path on the ECML. We have compared against a ECML ESG PIF which was taken on 24th January 2024. Considering we are only talking about four paths; we would have expected a significant issue like this with your own services to be rectified before consulting the proposed paths.
- In order to accommodate the proposed service 1G03V2 13:17 Kings Cross – Sheffield, Hull Trains have retimed 1D83GC 13:17 Kings Cross – Bradford Interchange to depart at 13:13. As a result, it now clashes with a Rail Head Treatment Train 3J37GA over the Welwyn Viaduct, which is utilising the standard freight path. This cannot be ignored because it is a RHTT path, which could impact the remainder of the circuit. Furthermore, 1D83GC is no longer headway compliant with 0E47GC at Fletton Jn following the change made by Hull Trains. Again, this is a standard freight path, which fortunately in this hour a Light Engine. If in the future it was a Class 4, the additional Hull Trains path would not work. This demonstrates that the additional Hull Trains path encroaches on freight capacity, which is already limited.

- To accommodate 1G07V2 20:14 Kings Cross – Sheffield, Hull Trains have retimed 6E59GB 17:39 Kingsbury Oil Sidings – Lindsey Oil Refinery at Newark Flat Crossing. This service was originally scheduled to pass at 21:29:30, which made it parallel with 6M87EG in the opposite direction. To accommodate 1G07V2, 6E59GB has been retimed to pass Newark Flat Crossing at 21/32. However, 6M87EG has not been amended and is a direct clash with 1G07V2. What is more concerning is that by flexing 6E59GB, it is now TPR non-compliant with 1H08PF 20:18 Kings Cross – Beverley. Please can Hull Trains explain how it intends to resolve the TPR non-compliances it has created at Newark Flat Crossing, noting the above issues with engineering allowances.
- In order to accommodate 1A86OE SO 17:23 Sheffield – Kings Cross crossing at Nunnery Main Line Jn, Hull Trains have added pathing time to 2B23GA 16:12 Huddersfield – Sheffield. This results in the turnround at Sheffield being reduced from 7 to 5 minutes which is not TPR compliant. Has this reduction been discussed with the Operational Planning Manager for Network Rail LNE route?
- One of the outstanding issues that Network Rail has identified from the ECML ESG timetable is the performance impact of excessive pathing time. In the case of proposed 1A86JH 17:13 Sheffield – Kings Cross, there is approximately 30 minutes additional time in the schedule, which is applied as either pathing time or additional dwell time. This highlights the limited capacity on the network. Please could you confirm whether Hull Trains have assessed this risk with Network Rail?

Platform Capacity

- As Hull Trains have again failed to provide details of shunt moves at Sheffield, we can presume that it is because there is not sufficient capacity at Sheffield or would highlight significant performance concerns. Further evidence of the shunt moves needs to be provided for June 2024 and December 2024. Depending on where Hull Trains are planning to shunt, it will restrict train movements to certain platforms.
- Platform capacity at Sheffield remains a significant constraint and becomes more challenging with the additional Leeds – Sheffield hourly fast service. Of the four proposed weekday services at Sheffield, there is only sufficient platform capacity at Sheffield for one of the proposed paths. More detail on each service is provided below.
 1. 1A82JH 10:37 Sheffield – Kings Cross: the unit cannot arrive in Platform 1 until after 1S37LA 05:25 Plymouth – Edinburgh has departed at 10:22. There is no path from Meadowhall arriving between 10:26 and 10:32 (assuming a 5-minute reversal). Platform 1B is occupied by 2B50GA 10:35 Sheffield – Huddersfield, which is parallel with 1L48GZ 09:17 Lincoln – Leeds arriving Platform 3B at 10:35. Platform 2B is occupied by 1C38EA 10:37 Sheffield – St Pancras. Please can you explain how 1A82JH can be accommodated at Sheffield, as Platform 1A is only 68 metres?
 2. 1A86JH 17:13 Sheffield – Kings Cross: the train has been shown to depart from Platform 1 at 17:13, however, Platform 1B is occupied by 1B84TP with a 17:11 departure to Cleethorpes and Platform 1A by 2N25YA with a 17:15 departure to Leeds. The proposed Hull Trains service clearly cannot use Platform 1, so can you please explain how you intend to accommodate this service at Sheffield?
 3. 1G03V2 13:17 Kings Cross – Sheffield: this service is timed to arrive at Platform 8B at 15:24. Consequently, Hull Trains have proposed to move 1C68EA 15:37 Sheffield – St Pancras from Platform 8 to Platform 8A. This service, which is currently formed of 7 coaches, is increased to 10 coaches when the new Aurora bi-mode units are introduced. Both services cannot be accommodated simultaneously on Platform 8.

- Hull Trains has stated that, “*The trips to Meadowhall are dependent on whether the stock actually goes to / from the maintenance base via Meadowhall because those are the potential paths that will be utilised – in other words, start and end of day.*” This is not a satisfactory reason for not to evidence whether capacity exists between Meadowhall and Sheffield and works with platforming at Sheffield. This is highlighted in the case of 1A82JH 10:37 Sheffield – Kings Cross, which cannot arrive from Meadowhall.

Performance

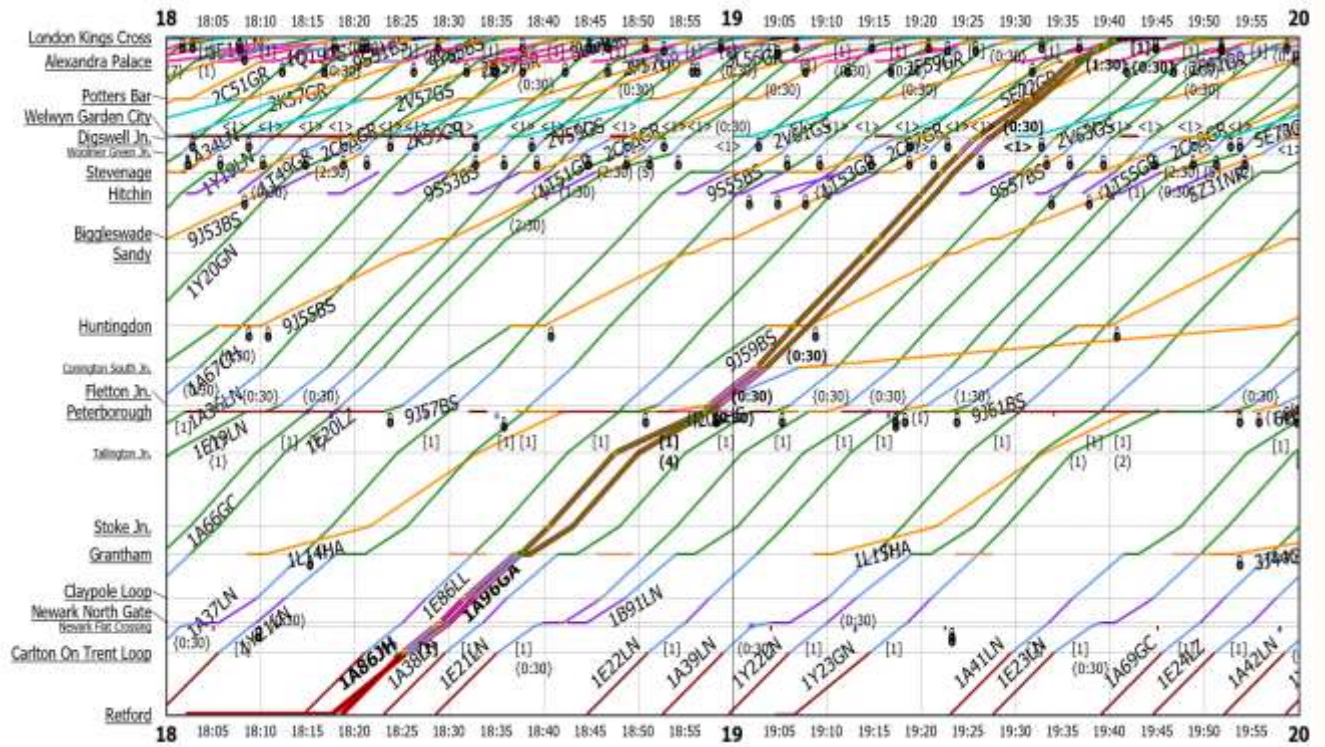
- In our response dated 2nd February 2024, we requested that Hull Trains shares any analysis and performance modelling to demonstrate that these services can be accommodated in the Sheffield area without any impact on other operators’ train services. However, we would now like to request the performance modelling to also cover the ECML given that Hull Trains’ proposed services based on the December 2024 timetable are not compliant with the TPR as outlined earlier in this response.
- We note that the Form P states, “*No detailed performance analysis has yet been carried out but as all paths are TPS compliant and are not “forced”, we anticipate minimal impact.*” We assume there is an error, and TPS should be TPR. However, there is now evidence that the December 2024 paths are not TPR compliant and have been “forced” on the ECML. Therefore, we would expect a comprehensive performance modelling to be carried out to understand the impact of these new services. The view of Hull Trains is that the Sheffield paths, “*don’t exactly cover a lot of geography that EMR operate over.*” Whilst EMR may only directly interact at a relatively small number of critical locations, it is also the potential impact from an increase in reactionary delays which we are keen to understand.

In summary, EMR formally objects to the proposal. Despite issuing an entirely new set of train paths at the very end of the 4-week consultation period, Hull Trains has provided no evidence to show that the required capacity to run these services exists. The proposed train paths are not compliant with TPR and would have a significant impact on performance on both the ECML and MML. The December 2024 paths on the ECML illustrate that these services are “forced” into the timetable by wholesale removal of mandatory engineering allowances and adjustment times. It is also evident that in both the June 2024 and December 2024 timetables the proposed platforming at Sheffield is not workable as the timetable studies have completely disregarded other operators’ services, and the formation of those services. Further information is still required, including a fully validated train plan with ancillary movements and platform occupation.

Yours sincerely,

Lanita Masi
Network Access Manager
East Midlands Railway

Appendix I – Weekday Train Graph: Retford – Kings Cross



From: Andy Wylie

Sent: Wednesday, March 6, 2024 11:30 AM

To: Lanita Masi ; Mark Garner **Cc:** Track Access; Simon Pready

Subject: RE: EMR Response Part 2-Re: Hull Trains S22A industry consultation - Sheffield <> London the 27th SA
- responses by 05 February 2024 please

OFFICIAL

Dear Lanita,

Thank you for your response to the consultation.

We seem to be comparing “apples and pears” here as the databases used to base the comparison on are not identical. Our paths were done on a moment in time situation which has subsequently moved on and is continuing to move as I write. With every iteration of the December 2024 database, it seems we are having to alter our paths to suit.

Your comments about the ECS moves at Sheffield are unworthy and your presumption is wrong. We just haven't bothered to plan these moves and for good reason because until we have fixed the basic paths into and out of the Sheffield area, it would be a complete waste of time to attempt to do this work, especially as our maintenance base is still to be determined. We acknowledge that this is an area that requires work, especially if the potential XC pathing issues in the Sheffield area are eventually resolved.

Indeed, such is the current state of the December ECML ESG 2024 timetable and the severe problems that remain with the basic proposition, let alone any outstanding ECML platform validation or off route interface clashes, it is debateable as to whether this timetable will be taken forward, hence our continuing work on the June 2024 timetable structure. We, as an industry, cannot afford another 2018 situation.

The timetables we produced were indicative and we have stated that because there is no way they could ever be considered the final definitive version. We certainly haven't disregarded others services but it is an impossible task for any operator to undertake what NR is having to do and resolve the tens of thousands non-compliances that currently exist in the NR database.

Finally, thank you for pointing out the allowances issue. How these have slipped off the input is something we are still looking into but we are now checking at every iteration re-working that we are fully compliant.

Regards,

Andy Wylie

From: [Ian Kapur](#)
To: [Mark Garner](#); [Andy Wylie](#)
Cc: [Track Access Managers](#)
Subject: RE: GBRf response to Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA
Date: 05 February 2024 22:53:36
Attachments: [image001.png](#)

OFFICIAL

Dear Andy and Mark,

GB Railfreight is grateful for the detailed accompanying information provided with this Section 22A application such as the list of suggested flexes with the June 2024 timetable offer.

However, it isn't clear from this application if the current ECML ESG development timetable (possibly for implementation from the December 2024 Timetable) would be able to satisfactorily encompass these firm access rights. At present, GB Railfreight has at least 25 outstanding train slots that require "more complex solutions" for them to be compliantly fit into the ECML ESG timetable and that is before the suggested timetable goes to the capacity planning team for full validation. It is GB Railfreight's expectation that the number of issues is likely to increase, with even more freight train slots (and, consequently, probable passenger service re-timings) requiring differing validation than that to date.

With at least 25 outstanding GBRf schedules to solve, I believe it would be premature of GBRf to support additional firm access rights along the ECML at this stage. Once the capacity planning team has carried out clear and compliant validation, GBRf would be happy to re-evaluate this proposal.

Regards,

Ian Kapur | Head of Strategic Access Planning

3rd Floor, 55 Old Broad Street | London | EC2M 1RX

GB Railfreight Limited | Registered in England number 03707899

Registered Office: 3rd Floor, 55 Old Broad Street, London, EC2M 1RX.

From: Andy Wylie
Sent: 14 February 2024 15:18
To: Ian Kapur; Mark Garner
Cc: Track Access Managers
Subject: RE: GBRf response to Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA

OFFICIAL

Ian,

Thank you for your comments and the position regarding the proposed December 2024 timetable is noted and with every iteration of the December 2024 database, we are updating our paths to suit. However, as you aware, the currently incomplete nature of the December 2024 ESG timetable validation process, at such a late stage, does give us concerns.

We simply cannot wait for this process to be completed because we need to procure the necessary rolling stock to be in a position to start the service. As there are other potential users of this stock, we are keen to obtain the track access rights to enable us to secure the stock.

Regards,

Andy W.

From: Rob holder

Sent: 08 January 2024 08:50

To: Mark Garner

Subject: Re: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

We have no objection thank you Mark,

Rob

Robert Holder | Network Access Manager | Great Western Railway
1 Milford Street | Swindon | SN1 1HL

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Andy Wylie
Head of Regulation and Open Access Contracts, First Rail Holdings
8th Floor, The Point,
37 North Wharf Road,
London, W2 1AF.

Cc: [ORR]

16th February 2024

Dear Mark

First Hull Trains – 27th Supplemental Agreement

Thank you for the opportunity to comment on the Hull Trains' 27th supplemental agreement to introduce services between London King's Cross and Sheffield.

LNER wishes to make the following points on this proposal:

1. We note that this proposal has only partially supplied the relevant paths for the proposed services under the ESG timetable as it stands. Given the outstanding development work to take place as part of the normal timetabling process, we do not believe that is sufficiently mature to demonstrate capacity exists for these services. Notwithstanding the points below, we believe the application should be dismissed on this basis.
2. Hull Trains have not demonstrated the existence of paths for a Sunday. Unlike other routes, where service levels are reduced on Sundays, at King's Cross station and on the ECML south of Doncaster the frequency of services is slightly greater than on weekdays (in ESG, LNER run the same frequency as weekdays, but there are the almost the same number of Open Access services which need to fit within a shorter operating day. Additionally, there are at least the same frequency of GTR services at King's Cross on Sundays. The proposed paths contain two crossing moves from the down slow to the up main at Retford. Assuming these moves are possible, we do not believe this is an effective use of scarce capacity on the East Coast mainline.
3. LNER has significant concerns on the performance implications for the introduction of the two conflicting moves on to what is already an extremely busy part of the network. These moves will take place on a section of track with a 125mph line speed. The performance impacts of a train making such a move could be significant. Based on the supplied information of unvalidated paths within the ECML ESG timetable, the southbound services will dwell at Retford station for an extended period. Retford is one of the few locations on the lengthy two track section of the route where regulation of passenger trains is possible. These trains will compromise that ability and the investment that has been made elsewhere (e.g. Werrington) to remove such conflicts.

4. Overall, we believe that should these paths be granted, they will import performance issues affecting the core customers across Yorkshire, the North East and Scotland, without generating any benefits for those customers.
5. LNER aspires to operate and has rights for 6.5TPH in both directions. At an early stage of the ESG development, LNER was told that there was no capacity for additional services for beyond the 6TPH in the current version of the ESG timetable. We fail to see how additional paths can be granted until Network Rail has fulfilled its existing contractual obligations to LNER.
6. In the ESG timetable, given the number of different operators using the ECML south of Doncaster, and the increased utilisation of the ECML, platforming capacity at King's Cross is extremely constrained. Open Access Operator traincrew will need provision for rest breaks, and this requirement significantly constrains the flexibility for timing Up and Down workings at King's Cross and we note their indicated paths include only 30 minutes turnaround time for these proposed new services which would have significant consequences when services are delayed.
7. The proposal refers to the use of class 221 or 222 rolling stock. These units are diesel powered only and will operate for a total 554 miles per day where overhead power is available. LNER is working to improve air quality at King's Cross Station, and we do not believe the regulator should be allowing the additional use of diesel rolling stock where overhead lines are available, and we would also question the environment sustainability of such an option. It should be noted that similar Applications – (e.g. London to Carmarthen) have all come with the use of bi-mode or electric rolling stock. DfT along with RSSB have just published in January 2024 the "Sustainable Rail Blueprint". This strategy describes the important role rail plays in firstly developing industry-wide air quality targets for all rail locations accessible by the public, such as stations. The ambition is to meet these targets by 2030; their objectives are to protect public health and drive changes that make improvements in specific locations, where required. This new diesel service on an electrified route is not compatible with the industry commitments and strategy.
8. LNER has further concerns about the use of the class 220 / 221 on the route. The only other operator of such rolling stock is Grand Central. In the case of unit failure, the rescue of any failed set will be compromised by the lack of availability of similar rolling stock to assist with rescue. This has the potential to cause significant performance issues on the route.
9. Based on the timetable information provided relating to the ESG timetable, LNER has used this to undertake revenue modelling. From our results, we request that ORR undertake the Not Primarily Abstractive (NPA) test, as we believe that this proposal is indeed primarily abstractive. PDFH guidance which relies on MOIRA 1 modelling has technical limitations when considering the Sheffield-London Market, where some of the opportunities to travel are dominated by EMR services. However, it would still be possible for Hull Trains to take a considerable and highly abstractive market share by offering competitive fares, where the PDFH/MOIRA 1 methodology is constrained to multiples of zero. LNER also note that some of the indicative paths provided by Hull Trains for the proposed Sheffield-London King's Cross services are overtaken by EMR services between Sheffield and London St Pancras International. Were faster paths or paths which are not overtaken to be used instead, the levels of abstraction from the Sheffield-London market would substantially increase; and we would suggest that it would be reasonable to make this a sensitivity test. We would be happy to share our findings with ORR if that would be helpful.
10. Given the current funding position of the Railway, we would also ask the ORR to consider the impact on the funds available to the Secretary of State.
11. Finally, we note that First Group in its [half-year results](#) reported an operating profit of 33.9% for its open access services (£15.7m operating profit from £46.3m revenue) which equates

to an operating profit of £12.07 per passenger journey. Such a high level of profit is unprecedented for the passenger TOC sector. Given the level of abstraction and lack of contribution to NR network costs, we would suggest that the Infrastructure Cost Charge be set higher for inter-urban open access operators so there is more of a benefit sharing between the taxpayer who funds the network and First Group's shareholders.

Based on our revenue assessment for the ESG timetable and the partial information supplied for the proposal, the performance implications and the impact on environmental sustainability, we formally object to this application.

Yours sincerely,

Malcolm Knight
Head of Operational Planning

From: Andy Wylie

Sent: Wednesday, March 6, 2024 11:30 AM

To: Malcolm Knight; [Mark Garner](#); [Track Access](#);

Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

Dear Malcolm,

Thankyou for your final response.

A number of the operational issues that you have raised will, of necessity, be ironed out in the timetable development phase because matters have moved on since our indicative timetables. In particular, the current state of the December 2024 timetable means that we are having to re-work our paths with every version issued by NR. Whether the ESG timetable is actually taken forward is now up for decision, such is the surprisingly incomplete nature of this timetable and the many conflicts remaining within it. Obviously, no one wants a repeat of the 2018 debacle.

We agree with you that your contractual track access obligations should be realised and, given what was said at the last ECML related hearing, we are surprised that you accepted there is no capacity beyond the 6 TPH to achieve 6.5 TPH paths for LNER services on the ECML, providing you are able to operate them, of course.

We would also like to be able to operate electrically out of Kings Cross but given the lack of availability of new 125mph electric stock either now or in the immediate future, it would be unreasonable to expect applicants to wait for, perhaps, 3 or so years to operate before such stock could become available, especially as there is no network restriction on the use of diesel 125mph stock.

As we are already competing in the Sheffield to London market and as we are only proposing to operate 2 return trips a day, and not at peak times, the effect on the Secretary of State's funds will be fairly minimal and we are sure the ORR will analyse this point in some detail, as they usually do.

The ORR has opined on the ICC for CP7 and will no doubt look at it again for CP8 but suggesting that FirstGroup shareholders should be penalised for the financial risks they are taking, including funding Hull Trains fixed costs right through the COVID period (and recovering those costs afterwards through their revenue), is truly bizarre. Partial analysis of a short period in the entire life of an ORR approved business plan is not any basis for imposing "windfall" charges on private sector operators.

Regards,

Andy Wylie



Mark Garner
Customer Manager
Network Rail
George Stephenson House
York
YO1 6JT

Northern Trains Limited
George Stephenson House
York
YO1 6JT

(By email only)

02nd February 2024

Dear Mark,

**Northern Trains Limited (NTL) formal response to Hull Trains Section 22A Application
– Sheffield to London Kings Cross**

With reference to the above application shared by Network Rail on 05th January 2024, this letter constitutes NTL's formal response to the consultation.

NTL are not able to support this application at this time. There is insufficient data provided in the application for us to properly assess capacity utilisation and interfaces with current and future workstreams in the Sheffield area.

Please can Hull Trains (HT) provide further details as to their expectations of what will happen at Sheffield between arrival and departure? NTL note that there is a dwell in excess of 2 hours between the first down arrival and the second up departure. NTL do not believe that this can be accommodated within Sheffield station without the requirement to shunt to another location. East Midlands Railway (EMR) previously used to shunt to and from Woodburn Jn, however this regularly caused performance issues. NTL also note that the SX plan involves platform sharing with an EMR service in platform 8. Is this based off of EMR using a 5 car 222 or a 5 car 810, noting that a class 810 is longer?

No details regarding ECS moves at the start and end of day have been provided in this application. Please can HT supply further information such as indicative train paths for ECS moves and the intended stabling and maintenance location of the additional units required to operate this service.

Please can HT provide details regarding the extension to/from Meadowhall, including the proposed moves to reverse there if that is the intention, as these details have not been provided with the application?

www.northernrailway.co.uk

NORTHERN TRAINS LIMITED
GEORGE STEPHENSON HOUSE, TOFT GREEN, YORK, ENGLAND YO1 6JT
Company No. 03076444

Has cognisance been given to how this service will interface with current and future workstreams that will impact upon the Sheffield area? Specifically, how will these paths, particularly ECS moves to/from Sheffield, interact with other TOC services on diversionary routes relating to TransPennine Route Upgrade (TRU) works? How does this proposal interact with NTL's additional Leeds to Sheffield (fast) service that appears in the ESG timetable for December 24? This service is of particular importance as it will alleviate current overcrowding between Leeds and Sheffield as well as generating over 800k additional customer journeys per year.

This proposal does not take into account the Restoring Your Railways (RYR) scheme for the Barrow Hill Line, with these paths being in direct conflict with some of those contained within the concept timetable for the RYR scheme. Whilst NTL accept that this scheme is not at the maturity stage required to apply for access rights, it has a large backing at a local and national stakeholder level as well as from the DfT and Network Rail. The scheme will see up to 5 new stations built between Woodhouse and Chesterfield on the Barrow Hill Line, generating between 500-800k in additional customer journeys per year and c.£2.5m in industry revenue. Appended to this response is a letter from the Rail Minister announcing the funding for this scheme.

To summarise, NTL do not support this application on current and future capacity, performance and commercial grounds.

If you require any further information, please do not hesitate to contact me.

Yours Sincerely,

Kate Oldroyd

Track Access Manager

www.northernrailway.co.uk

NORTHERN TRAINS LIMITED
GEORGE STEPHENSON HOUSE, TOFT GREEN, YORK, ENGLAND YO1 6JT
Company No. 03076444

From: SMB - Track AccessConsultations - Northern
Sent: Wednesday, February 14, 2024 11:08 am
To: Mark Garner
Cc: SMB - Track AccessConsultations
Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

Hi Mark,

The additional information supplied does not answer our questions/concerns raised in previous correspondence (attached) therefore we are still unable to support this application.

Kind regards,

Kate

From: Andy Wylie
Sent: Friday, March 1, 2024 12:47 PM
To: Mark Garner ; Northern - Track Access generic mailbox

Cc: Track Access Managers

Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

Mark/Kate,

Thank you for your response to the consultation.

Meadowhall is a possible opportunity to utilise the start and end of day ECS paths for this service. It is highly dependent on where the stock is maintained overnight and that location has not yet been decided, as indeed has the exact class of 22x stock we will use.

We are working from the published NR timetable databases and as they alter, we alter our services to suit. We acknowledge that the December 2024 database for the Sheffield area is one of the many areas of concern for this regrettably incomplete, for this stage of the cycle, timetable. This is one of the reasons we are validating against both the June 2024 and December 2024 databases, just in case June 2024 rolls over.

We acknowledge the RYR scheme for the Barrow Hill line and we have already pledged our support to SYPTE and will work with industry partners to try and ensure that this scheme is not fatally compromised. However, as you say, this scheme is currently unfunded and track access rights have not yet been sought.

Regards,

Andy Wylie

From: Rachel Sprigg

Sent: 15 February 2024 16:52

To: Andy Wylie ; Mark Garner **Cc:** Track Access Managers

Subject: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA

Good afternoon,

We welcome the interest from Hull Trains to invest in the route between Sheffield and Kings Cross via Woodhouse, Worksop and Retford, especially the increased connectivity and economic benefits for the South Yorkshire region that it will bring. The proposal offers an alternative route for customers between Sheffield and London and a new direct service from Woodhouse to Worksop, Retford and London and vice versa.

While supporting the proposal in principle, we require further clarification on the impact of this service on the rail network and other services in/out and around Sheffield before we can offer our full support for it.

The stakeholder event in Sheffield on 1 February highlighted the multiple benefits of the operation of this service and we appreciate the time spent to come to Sheffield to share the proposal, benefits and choosing South Yorkshire to explore the expansion of Hull Trains. In particular, the benefits will include:

- Opportunity for customers to shop around for competitive rail fares between Sheffield / Woodhouse and London.
- Opportunity for customers to travel with different Train Operators and choose from different services.
- Provides an opportunity to support economic growth within our region:
- A new service direct service from Woodhouse to London serving South East Sheffield. If the proposed Barrow Hill service stops at Woodhouse this would also connect Bighton and North East Derbyshire to this service at Woodhouse.
- Rail Station development for Woodhouse Station (Woodhouse station has no official car park and short platforms – possible opportunity to work with SYMCA and Northern Trains for station improvements)

However, we have some concerns about the rail network capacity around Sheffield Midland Station:

- How will the introduction of this service, including the empty coaching stock movements and stabling of the train between services, become incorporated into the network timetable around Sheffield Midland station without impacting on the performance and current timetables of TOCs and freight services?
- SYMCA's plans for increased rail connectivity, such as our Restoring Your Railway scheme to introduce passenger services on the Barrow Hill Line using part of the Sheffield-Lincoln Line, and the introduction of a new Rail Station at Waverley, could be adversely impacted by the proposed new service.
- SYMCA's request to Cross Country Trains to restore the hourly service Newcastle to Reading could also be impacted by the proposed new service.
- The proposal to extend one train per day to Meadowhall could also impact on our plans for additional services on that line, such as a new fast hourly service between Sheffield and Leeds and development of a new Rail Station at Rotherham. That corridor, and in particular the Sheffield Midland northern throat, is already close to capacity. In particular, terminating a train at Meadowhall could severely impact pathing for other trains.
- How will Hull Trains attract more passengers travelling between London Kings Cross and Sheffield when

- Electrification and new EMR rolling stock is likely to improve journey time via the Midland Main Line
- The journey times proposed via the ECML are no better than those currently offered by EMR.
- How will the proposed track access application impact on the new East Coast Mainline December 2024 timetable?
- We note from the timetable that one of the journeys towards London will have a 15 minute dwell at Retford, which is not likely to be attractive to passengers. Is there any possibility of reducing this dwell in the new ECML timetable?

There are benefits from the introduction of this service for residents and visitors to and from South Yorkshire (as well as north Nottinghamshire) and opportunities for economic growth. However, we have concerns about the feasible operation of this service on the rail network around Sheffield Midland Station and its impact on the performance of other TOCs and freight. Also, the impact on the introduction of future services, including the Restoring Your Railways programmes for the region, development of new Rail Stations at Rotherham and Waverley.

Thank you and kindest regards

Rachel

Rachel Sprigg
Rail Development Manager



www.southyorkshire-ca.gov.uk

South Yorkshire Mayoral Combined
Authority 11 Board Street West, Sheffield, S1
2BQ

From: Andy Wylie
Sent: Friday, March 1, 2024 12:00 PM
To: Rachel Sprigg; Mark Garner
Cc: Track Access Managers
Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA

Rachel,

Thank you for your “in principle” support.

We share your concerns about the timetabling of our services in the Sheffield area. This is one of the many areas of concern in the proposed December 2024 timetable, which is now at a crucial stage of “Go/No Go” discussions. We are having to be very alert to every iteration of the timetable, given that every iteration so far has required a reworking of our proposals.

Our Meadowhall proposals are conditional on the direction of our start and end of day maintenance location because those are the paths we would utilize. At the moment, with the stock type and maintainer still to be determined, we are unable to timetable these paths with any degree of certainty, even in the direction by which those empty trains leave/present themselves in the Sheffield area.

We will, of course, work with SYMCA’s plans for improved rail services in the Sheffield area and we will also support any need for rail infrastructure improvements in the Sheffield area.

Hull Trains has a history of serving communities through its overall service offer, not just being the absolute cheapest option or having the best journey time. Obviously, we will seek to be competitive with other operators and the road options but being a small, more dedicated operator also allows us to tailor our market offer more specifically to the target market for our services.

Regards,

Andy Wylie
Head of Regulation and Open Access Contracts

From: Robbie Gilbody
Sent: 16 February 2024 13:39
To: Andy Wylie; Mark Garner
Cc: Track Access Managers
Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

Hi Andy,

Thanks for the response below – TPT are accepting of the proposals for the introduction of the services.

Kind regards,

Robbie Gilbody
Contracts & Compliance Manager



From: Andy Wylie
Sent: Thursday, February 15, 2024 4:34 PM
To: Robbie Gilbody; Mark Garner
Cc: Track Access Managers
Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

Robbie,

We cannot outline the ECS requirements yet as these are dependant on the stock used and the location of the maintainer, neither of which have been determined yet.

The plan for the unit in its' "mid-diagram" Sheffield break is to either stable in a platform or, if that takes up too much time, to lay over in an adjacent siding. Start and end of day will be worked straight off/on ECS or pass via Meadowhall.

Regards,

Andy Wylie.

From: Robbie Gilbody

Sent: 15 February 2024 13:09

To: Mark Garner; [Andy Wylie](#)

Cc: Track Access Managers

Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

Hi Andy

Apologies for the lateness of the response but TPE are wondering if you can outline the ECS requirements for these services and what is the plan for the unit at Sheffield between services? Outside of this we are accepting of the proposal.

Kind regards,

Robbie Gilbody

Contracts & Compliance Manager



From: Martin Clarke

Sent: 08 January 2024 14:16

To: Mark Garner

Subject: Re: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

Hi Mark

Happy to accept this proposal. Offering passengers choice can help drive satisfaction, value for money and ultimately encourage more people to use the train, as shown elsewhere on the ECML.

Best regards

Martin

From: Michael Sasse
Sent: 06 February 2024 15:37
To: Mark Garner
Cc: Andy Wylie; Track Access Managers; Matthew Stoddart

Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

Good afternoon, Mark, and as ever many thanks for including the West Yorkshire Combined Authority in this consultation – and thanks too for the extra info and time extension, both of which were very helpful!

Whilst we would not necessarily object in principle to a new service between London Kings Cross and Sheffield, and we recognise that the connectivity could be of real value to the regions served, we do have some concerns. The main areas on which we would be looking for reassurance would be:

- It is not clear to us whether the services are fully compatible with the structures in the planned December 2024 ECML ESG timetable. It is noted in Section 4.2 of the Form P that the capacity assessments were done using the June '24 database, which implies that this may not have been verified? We are particularly concerned about potential negative impacts on services on the EMCL between King's Cross and Retford, and in particular at Retford itself, given the potential of the crossing moves from/to the Sheffield line to cause conflicts. More widely, we would be concerned if these trains were to use ECML paths that are needed for trains that are assumed in the ESG timetable and/or are widely known operator and stakeholder aspirations, such as an increase in KGX – Leeds services beyond their current 2tph. As such, we are interested both in trains that are assumed in the “base” December 2024 ESG timetable but also in any potential “opportunity cost as regards” services LNER and others wish to develop in the future.
- In addition, we are well aware that Sheffield station and its northerly approaches are one of the most heavily utilised areas in the North. We are concerned in particular that the additional paths proposed (including potential ECS and shunt moves locally) could make delivery of other services, which have wide industry and stakeholder support, more difficult or even impossible; these include the new Northern Leeds – Wakefield W – Sheffield fast service, plus

also the proposed increase in XC services on the Birmingham – Sheffield – Doncaster – York route, and also SYMCA’s new Barrow Hill service, amongst others. Running to and from Meadowhall (with reversal?) could exacerbate this further.

- Is there sufficient spare capacity in and around King’s Cross, including for layovers and any shunt moves?
- Linked to these points, we are not clear how well the performance impacts of the new services are understood, again in particular against the background of the post-2024 ESG timetable, both on the ECML and around Sheffield. Clearly any negative performance impacts could have the potential to cause reactionary delay across a wide geography.

We do appreciate that the application is for only two train paths each way in each direction, but nonetheless, given the heavy utilisation of much of the infrastructure involved, and the strategic importance of the routes, we would be keen to have comfort on these points before we could be content that there would not be significant negative impacts of relevance to WYCA. Until then, we feel it would be best for the Combined Authority to reserve its position.

As such, I would be grateful to receive any further information that exists on these points, and to be kept abreast of developments.

Many thanks
Mick

Michael Sasse
Interim Rail Development Manager
West Yorkshire Combined Authority

From: Andy Wylie
Sent: 14 February 2024 15:32
To: Michael Sasse ; Mark Garner
Cc: Track Access; Matthew Stoddart

Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

Michael,

Thank you for your comments and we have also been updating the paths with every new iteration of the December 2024 timetable database to ensure that they also fit with the ESG assumptions. This is very much a real time process as the timetable has a number of serious issues at this very late stage in the industry validation process.

We do, however, need the ORR to come to a conclusion on our application by the end of June in order for us not only to procure the necessary rolling stock in time for a summer 2025 commencement but also to ensure that rolling stock is not procured by other existing or potential UK track access applicants.

Your point about Sheffield is well made. Currently the December 2024 timetable database is severely non-compliant for Sheffield station, even without these proposed services, but we will work with all industry parties to ensure we all obtain the optimum solution for the services that serve there.

The proposed Meadowhall rights are purely to take advantage of any possible opportunity to use potential start/end of day ECS paths to/from Sheffield, should a particular overnight maintainer be chosen. No reversing at Meadowhall is envisaged.

The Kings Cross working is simple – it's a straight in and out move with no shunting required. There is capacity at the moment - we are also keeping an eye on this and all the other ECML related issues (such as the Retford shunt across) with every iteration of that December 2024 timetable database.

Regards,

Andy Wylie

23rd February 2024

Dear Mark,

XCTL's response to Proposed Application under Section 22 between Network Rail Infrastructure Ltd and Hull Trains.

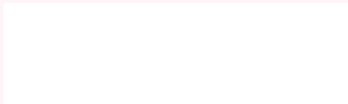
This letter constitutes XCTL's formal response. Unfortunately, XCTL are unable to support this Section 22 Track Access Application at this current time. After reviewing your response to the concerns we raised, we do not believe the proposal you seek is viable due to capacity issues at Sheffield which Hull Trains have identified as a concern themselves. We would need to understand how ECS services work in and around the station to identify performance risks.

We collectively know that the Dec 24 ESG will be a challenging timetable with a number of non-compliances already being reviewed.

Full timetable and performance modelling is required for these services to understand impact in and around Sheffield with a focus on Nunnery Jn which is a known capacity constraint.

XCTL would like Network Rail/Hull Trains to resolve the above before XCTL will be able to support this application.

Yours Sincerely



Martin Haffner
Track Access Manager

From: Andy Wylie
Sent: Friday, March 1, 2024 2:10 PM
To: Mark Garner ; Martin Haffner
Cc: Track Access Managers
Subject: RE: Hull Trains - Section 22A industry consultation - Sheffield <> London the 27th SA - responses by 05 February 2024 please

OFFICIAL

Mark/Martin,

Thankyou for your response to the consultation.

We share your concerns about Sheffield station working but with the challenges that still remain to turn the December 2024 ECML ESG timetable into something that is viable, we feel that the necessary work by all operators and NR to validate workings in the Sheffield area is still very much “work in progress”.

We are also continually revising our proposed services as the databases change.

Regards,

Andy W.