

Valentina Licata
Office of Rail Regulation
One Kemble Street
London
WC2B 4AN

4th September 2013

Dear Valentina,

Response to the ORR's Consultation on the Draft Determination

Merseyrail welcomes the opportunity to comment to the Draft Determination regarding PR13.

We support the Merseytravel response to the consultation and agree that the main concern is the exclusion of the Merseyrail network from the High Level Output Specification (HLOS) and the difficulties this will present as the network continues to grow at the high levels achieved in the first ten years of Concession Agreement. This growth has been delivered with high levels of train performance and passenger satisfaction as measured through the National Passenger Survey. In recent years Merseyrail has delivered levels of passenger satisfaction that has been the best of all franchised train operators.

The effect of our exclusion from HLOS will be that central funding will not be available to support expansion and upkeep of the network, as is the case for other operators, the outcome of which will be to ultimately restrict growth and discourage use of rail. It is accepted that enhancements of the network, for example new stations, should be funded locally, but essential improvements required to meet demand should be funded centrally. We believe that it is the responsibility of Network Rail to ensure that the network can cope with demand on the network. The Merseyrail network plays an important role in the economy of Merseyside and the wider City Region. Liverpool Central alone deals with approximately 18 million passengers a year and the Liverpool City Region area accounts for 4% of total rail demand in the UK.

In the forthcoming Control Period our specific concerns relate to the exclusion of the Liverpool South Parkway turnback proposal. Passenger numbers using Liverpool Central continue to rise and the turnback represents the best short-term option to deal with the potential overcrowding as recognised by Network Rail, Merseytravel and Merseyrail in the draft Merseyside Long Term Rail Planning Strategy.

Merseytravel and Network Rail have undertaken work at Liverpool Central in the past year, which has improved both the capacity and passenger flow through the station. This work provides an improvement to the capacity of Liverpool Central station, but will only cater for a limited amount of the likely increased demand in the future. The delivery of the Liverpool South Parkway turnback will significantly increase the capacity of Liverpool Central by allowing trains to operate through to Liverpool South Parkway and turn back there rather than at Liverpool Central thus moving passengers from the platform, freeing up more space and providing less platform occupation.

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The turnback was referenced in the London North Western Summary Route Plan as an operator aspiration, however it is much more than that. It is not just an operator's aspiration; it is supported by Merseytravel and Network Rail in the draft Merseyside Long Term Rail Planning Strategy. The proposed improvement is important to the City Region as a whole in order to deal with the continued economic growth. As referred to above rail plays a key role in the Liverpool City Region economy with over 45 million journeys a year made on rail services within the City Region with Merseyrail catering for over 33 million of these journeys. We have been informed that this work will not be funded through HLOS due to the status of Merseyrail as a Concession. We believe, however, that Network Rail should be taking this project forward as part of Control Period 5 as the key measure for the development of the Merseyrail network.

There has been a significant improvement in the process over the previous control period and in general we support the ATOC response to the Draft Determination. We believe that TOCs are central to the process and welcome the increased level of consultation during the review. However the volume and timing of the consultation has not taken into account resourcing and other priorities of TOCs, especially those of the size of Merseyrail. There has also appears to have been a piecemeal approach to consultation, with some elements still in development/consultation, e.g. benchmarks.

If you require any further clarification on the above, please do not hesitate to contact me.

Regards

David Print
Head of Strategic Development and Concession Management