

GNER Edinburgh – Freightliner response

From: Jason Bird

Date: 13 January 2014 14:46:17 GMT

To: Rachel Gilliland

Cc: Jonathan Cooper

Subject: RE: Industry consultation: Alliance Rail GNER Edinburgh to London services Section 17

Rachel,

We must firmly oppose this proposal.

Whilst we recognise the need for open access operators to have Firm Rights over a long enough period to enable investment to take place, the nature of the rights sought are in some contrast to those generally available to freight operators, with particular regard to maximum journey times (compared with +/- 30 minutes at destination for freight). There is no indication in the application that shows how these new services may be accommodated on the ECML alongside existing Firm Rights, other than a somewhat blithe assumption that a timetable recast can solve the problem of finding space for an additional hourly service, and one that would run at speeds somewhat disparate from existing train slots of all other operators. Similarly, there is no indication as to how the proposed maximum journey time is either possible or sustainable with a reasonable level of performance.

The following we believe to be factually incorrect:

“The current off-peak LDHS service provision on the ECML is 7 trains per hour. CP4 enhancements indicate that they should provide at least 1 additional LDHS path per hour in the off-peak, rising to 9 in the peak. In addition, further funding has been approved for CP5 to further increase capacity and reduce journey times.”

There are not 7 LDHS paths on the ECML every hour, only four hours during the course of the day, and certainly not all the way from London to Edinburgh. This reflects the need to accommodate the Firm Rights of existing operators and a very small level of capacity for growth on some parts of the route (largely north of Newcastle). CP4 enhancements have not delivered any step change in this, and indeed some of them are not yet finished. While CP5 enhancements are planned, no timetable modelling work has taken place (that has been shared with us) to indicate what level of capacity any upgrade will provide, either in isolation or as a whole.

We remain very surprised that Network Rail has not yet declared the ECML as Congested Infrastructure, especially given the problems the applicant has had establishing its existing services due to the availability of suitable capacity on the route.

Regards

Jason