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Chris Littlewood
Office of Rail Regulation
One Kemble Street
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28th September 2012

Dear Chris,

Network Rail's output framework 2014-19

Thank you for the opportunity to respond to the August consultation on Network Rail's output framework for 2014-19. This response is sent on behalf of Stagecoach and its two train operating companies, East Midlands Trains and Stagecoach South West Trains.

We are supportive of the overarching principles of increasing passenger and freight customer satisfaction, higher economic growth, better connectivity and creating a better environmental impact. Recognising that the framework for Network Rail allows some flexibility to allow them to maximise overall value for money. It is also important to understand what has worked well in CP4 and what lessons can be learnt for CP5.

Please note that ATOC have responded on this consultation and we fully support their response. Our response below is not intended to answer each and every question raised in the consultation but is designed to pick up the salient points from an EMT and SSWT perspective.

Performance

We are supportive of measures that look at average lateness along the line of route and feel this will help NR to improve reliability and overall performance in the longer term. The critical area is not just for NR to publish these details, but how they are brought to account for when performance isn't up to the required level. There needs to be some lessons learnt here from CP4 where performance on some long distance routes was below the required and acceptable level for some considerable time but the action taken to address the poor performance took too long to implement and to deliver the improvement. We would be supportive of AML data being available for TOC and service groups.

We believe that anything that can be done to improve freight service performance will have a substantial benefit for all operators using the network and we would be supportive of such schemes.

Enhancement schemes

With such a huge amount of investment in rail both in CP4 and in CP5, it is critical that not only are the outputs clearly defined, but that the timeliness of delivery of schemes is managed well. As an industry we cannot afford to 'back end load' CP5 as has happened in some cases in CP4. Not only does there need to be a clear timeline for delivery of individual schemes within CP5, but we need to ensure that the overall programme of works across the network is spread throughout the period, so that critical resources are available when required, especially signalling testers and critical plant equipment. Cognisance needs to be taken of franchise proposals so that delivery of service changes and infrastructure enhancements are planned to coincide. This is especially important as the programme for electrification increases, this links directly into rolling stock and depot requirements.

We believe that Change Control Mechanism within the CP4 enhancement delivery plan has generally worked very well and are supportive of this approach continuing. Again it's important that the milestones are realistic in the base plan to begin with.

Safety

There has been a tremendous amount of work done on level crossing safety in CP4 and we are very supportive of any further measures that can be taken to improve safety in this area. This should include a clear understanding of the condition of all NR's assets at LC and the monitoring of usage. There should be an improved risk register for each LC and details of what mitigation measures can be taken to reduce that risk. The work being undertaken on the MML route as part of the LSI scheme is a good example of taking the entire risk away by installing footbridges at a number of locations. Clearly, this approach is only suitable at certain locations but by having a better understanding of the risk at each LC and being able to mitigate the risk wherever possible has to be the right way forward.

Network Availability

The introduction of possessions disruption indicators in CP4 was very helpful as a first step to promote more efficient engineering access.

We believe that there is a need for continued monitoring of access planning and engineering to ensure the right level of access is agreed, that the notice of disruptive access is maximised and that NR deliver what they plan to do against the agreed timescales. Schedule 4 is a useful mechanism but in some cases is not always an effective way of compensating the costs of cancelled services and as such impacts on the trust between operator and customer.

We also believe that there should be a stronger focus on how joint working can deliver industry benefits especially with the new NR devolved structure with more emphasis on sharing the overall risk especially for the larger infrastructure schemes.

We also support the comments made by Passenger Focus on getting a seat and crowding especially when engineering work is taking place and there is limited capacity available for running services. This is going to be critical when the MML route is being electrified. We need to ensure there is sufficient infrastructure on the ground to enable services to run with enough capacity to match customer demand whilst the railway is affected by engineering work for electrification.

Possessions efficiency

EMT have been involved in the case study on the MML route looking at the effectiveness of possessions, both in terms of planning and in delivery of scheduled outputs. However, we are concerned about the slow process on this key workstream. We are supportive of fewer possessions and ones that are more efficient in terms of their outputs. The industry needs to ensure that NR are focused on efficiency within their possessions so that time is not lost in the setting up and giving up of possessions as well as the overall productivity.

The SSWT – Network Rail Alliance is currently undertaking a programme of work looking at what measures SSWT and Network Rail need to take to ensure that possessions are planned and managed in a way that enables them to be utilised more effectively and efficiently on the Wessex route. The project aims to design and implement a series of measures aimed at facilitating improvements in a number of key areas including safety, the passenger experience and cost efficiency.

We would support the introduction by ORR of a measure of the efficiency of the use of possessions but we are adamant that such a measure must influence behaviours rather than simply being a statistical measure to drive the industry to do ‘the right thing for the railway’.

Stations

Within the consultation document there is discussion on the need for further measures including station accessibility indicators, passenger information indicators etc.

We believe that it is important to look at areas that can provide overall industry benefit but have some concerns that some of these potential new measures may be costly to implement and manage. Is this a good use of scarce industry funds at a time where the whole industry is looking to reduce costs? Indeed this may have an impact on front line resources if funds need to be spread more thinly.

With regard to station accessibility we are supportive of improving such facilities at stations. However, would the costs of determining the accessibility at say somewhere like Havenhouse (annual revenue £310) be outweighed by the public benefit?

Environment

With regard to carbon reduction indicators, we are be supportive of such measures / indicators that incentivise NR to invest in energy efficiency measures at TOC leased stations and depots.

Regards

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