

Responses to consultation on working paper 8: managing change affecting the PR18 settlements

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2 May 2018

Dear Nicholas,

ORR WORKING PAPER 8: MANAGING CHANGE AFFECTING THE PR18 SETTLEMENTS

Thank you for the opportunity to comment on the ORR's proposed approach for managing change affecting the PR18 settlements (Working Paper 8). I am sorry for the delay in sending you this response. DfT welcomes both the consultation and the highly constructive approach that the ORR has taken to engaging with the Department on this issue, given its importance in supporting effective delivery during CP6 and its implications for route devolution and accountability.

At the outset, we thought that it may be helpful to set out some of our guiding principles on this issue, which we consider are important to ensure that the process put in place supports a more effective, devolved and joined up railway¹. In particular:

- We consider that the managing change process should have, at its heart, **the need to support an ambitious approach to route devolution**, enabling Route Managing Directors to have full ownership of and accountability for delivering their business plans.
- That the change control process should support more **effective stakeholder engagement between Network Rail and its customers and support Network Rail transformation**, including effective system operation. This means that where changes are material, there must be an effective and meaningful degree of engagement with affected stakeholders (including, critically, funders) and appropriate protections overseen by the ORR.
- There should be **clarity on the expectations regarding delivery and funding** – helping to efficiently deliver the settlement and the UK Government's High Level Output Specification, including the focus on a safe and more reliable railway in CP6.
- That change control processes should **support contestability and proposals from third party organisations to invest in the railway**, consistent with the Government's support for market led proposals, as well as the process for

¹ These are generally consistent with the Secretary of State's guidance to the ORR in July 2017, and which we ask the ORR to have regard to when developing its policy in relation to managing change.

managing enhancements, as set out in the Rail Network Enhancements Pipeline (RNEP).²

- That change control processes should be **workable and practical**, avoiding undue burdens on NR and stakeholders more generally.

Within that context, the Department generally supports the pragmatic approach the ORR proposes, which, rather than attempting to cover every eventuality, sets out a process that recognises there are three basic levels of change that may affect the PR18 settlement. We also welcome the overall principles for the managing change process which the ORR sets out – those of proportionality, consistency and transparency. We also welcome the clear statement that ORR will be ring fencing the funding settlements for England & Wales, and Scotland, which is an important foundation of the rail funding settlement.

However, we consider that an even greater emphasis should be given, when developing final conclusions, to the opportunity afforded by the managing change process, particularly to embed route devolution (which we think would benefit from an even stronger focus) and to support Network Rail transformation, including, critically, closer and more effective working between Network Rail and its customers, and better joining up track and train, through effective stakeholder engagement. Whilst this is a theme in the document we consider that it would benefit from considerably greater prominence.

Our responses to ORR's specific questions are set out below.

Part 1

1. Do you have any comments on our proposed approach for focusing on changes originating outside of the route (extra-route changes)? How should this concept be adapted for the FNPO or SO, if at all?

DfT understands that the managing change process is intended to isolate the subset of changes that originate outside the route and System Operator businesses, which have the potential to undermine the PR18 settlements, and to assess the extent of their impact. ORR therefore does not intend that the change control process applies within routes (intra-route changes) or for the System Operator. DfT's understanding is that any changes occurring within a route or the System Operator would be subject to monitoring and enforcement by the ORR separately through the existing regulatory process. DfT would note, however, that there may be circumstances where an "intra-route" change could have an impact across other routes. For example, any delivery of core system operator functions, such as timetabling and effective performance analysis outside of agreed outputs are likely to have an impact across all routes. We also want to ensure that the UK Government's very considerable investment in renewals in CP6, as set out in the Statement of Funds Available, is actually spent on renewals to improve asset sustainability and performance. We would therefore expect the ORR to ensure that its monitoring and enforcement was sufficiently rigorous to ensure that the impacts of intra-route changes were clearly understood and appropriate action taken.

Turning to the FNPO, as a "virtual" route which does not manage any physical assets, we note that some of the extra-route changes listed in table 1.1 are not applicable (i.e. route boundary changes, alliances). However, other extra-route changes could have an impact on the FNPO in the same way as to the geographic routes (e.g. organisational changes or

² <https://www.gov.uk/government/publications/rail-network-enhancements-pipeline>

a change in funding). DfT's view is therefore that the managing change process must be robust for all routes including the FNPO, and should ensure sufficient consultation to meet the important and particular needs of freight and national passenger customers.

2. What are your views on our proposed approach for categorising and treating different changes depending on the extent of their impact on the PR18 settlements?

DfT agrees that change controls should apply to both funding and outputs (as set out at Box 1.1). We agree with the approach that different changes should be treated differently depending on the extent of their impact on the PR18 settlement. We also agree that, in practice, only a relatively small number of changes and routes should be impacted by the change control process. Moreover, we agree that the broad categories of changes and the process envisaged is a reasonable and proportionate one.

While, inevitably, there will be various points of interpretation and detail in this area, we do consider that there is a fundamentally important principle in relation to stakeholder engagement for Level 2 and 3 changes, which would benefit from considerably greater emphasis as the policy is further developed. In particular, we consider that the managing change process is a major opportunity to embed and support effective stakeholder engagement between Network Rail and its customers, helping to support a more joined up railway. We therefore consider that it is **critically important for the ORR to set out clear expectations about the principles for stakeholder engagement**, clearly learning the lessons from the process that led to the production of the Strategic Business Plans.³ For the avoidance of doubt, we are not suggesting highly prescribed process, but one which clearly establishes the need for effective, meaningful and informed dialogue between Network Rail and its customers. We consider that it will be important, as part of this process, for there to be a specific passenger voice (such as Transport Focus) or freight shipper input, given the very considerable impacts that Level 2 and 3 could have on outputs which users rightly expect from the railway.

From the Department's particular perspective, we would also additionally highlight the following points:

- Any changes which have a material impact on funding will need to be discussed with DfT, as a primary and majority funder of NR, before being agreed.
- We very much welcome the ORR's clear statement that the change control process "*would not approve or seek to prevent an enhancement project from proceeding*" (paragraph 114) and the clarity more generally with respect to how this process interacts with enhancements.⁴ As you know, as reflected in the RNEP, there is a new process for the approval of enhancements, which means that change control on the impacts of new enhancements will be important (and the new process will necessarily generate a number of "changes" during CP6). In this regard, it is particularly important that the change control process proposed by ORR is appropriately aligned, is supportive of the RNEP, and (to the extent

³ For example, for Level 2 changes, we consider that greater prominence should be given to stakeholder engagement than is currently the case at paragraph 62. We similarly consider, in paragraph 89, that even greater prominence should be given to stakeholder engagement as a fundamental factor in the managing change generic process.

⁴ In particular, we welcome the discussions that have already taken place on a trilateral basis between the Department, NR and ORR regarding monitoring with respect to enhancements in England and Wales in CP6. We look forward to continuing to work with the ORR on this issue.

relevant) with the change control process for the enhancements programme in England and Wales, helping to avoid duplication and confusion. It would be very helpful for the ORR to consider how the Enhancement Programme Boards may play a role, consistent with the ORR's emphasis on proportionality. In that regard, we consider that it would be helpful for the Department and ORR, working with NR, to agree a set of principles to ensure that the processes work seamlessly together.

- We would wish to be part of the discussion as NR and ORR decide on the data protocol mentioned in paragraph 9. DfT considers it important that NR is only required to report one dataset wherever possible, rather than providing different datasets to different stakeholders.
- As the managing change process is implemented, DfT would welcome close engagement ORR as it handles early change to fully understand the wider implications.
- That change control should be sufficiently flexible to accommodate, and accessible for, third party promoters and investors in the network, consistent with our guidance on rail market led proposals and the ORR's reference to third parties (in paragraph 113 of the working paper).

Finally, our experience suggests that there will be a number of changes coming through the change control process at any one time, especially at the end of the financial year. It is therefore important that the process is able to react and respond quickly and without undue complexity, whilst maintaining rigour. This reinforces the need for a proportionate process.

3. Do you think there should be some exceptional changes that, with reference to Network Rail's licence, we would be able to prevent? If so, what forms of change should this include?

We strongly support there being provision within the Network Licence for the ORR to prevent changes in certain circumstances. Whilst we agree this should be used exceptionally, we consider that this is a vital reserve power, enabling the ORR to act when important principles have not been followed. In this regard, we very much agree that steps to reserve comparability (parallel with the special water industry merger control regime to which ORR refers in paragraph 45) are important to safeguard the benefits of route devolution.

Additionally, as we emphasise above, we consider that it is important to use change control to embed effective and meaningful stakeholder engagement. We therefore see real merit in paragraph 39, where the ORR notes that ORR may want to block change where effective engagement with TOCs & FOCs has not taken place. In particular, we consider that a Level 2 or 3 change where there is not clear and convincing evidence of effective stakeholder engagement would be highly concerning.

Part 2

4. Do you agree with our definitions of levels of change? Can you suggest improvements to these definitions?

We agree with the broad definitions of levels of change.

As mentioned above, DfT's view is that some form of change control may be appropriate for the System Operator given the potential for changes in the delivery of its functions to impact across the network.

DfT also notes that the change control process only seems to be triggered when there is a 'downside' risk. It does not appear to provide the opportunity for ORR to challenge Network Rail on the potential for higher requirements if it transpires, through comparative evidence, that the targets set for a route at PR18 are no longer adequately stretching, or where NR is consistently outperforming but not increasing its internal targets. Whilst we understand the ORR's view that it is proportionate for ORR to focus its attention on managing changes that risk undermining the agreed PR18 settlements (i.e. downside risks), our view is that the process should also be capable of identifying and responding to opportunities.

DfT notes that the change control process will be triggered by NR notifying the ORR when changes are required. DfT notes that, as an arm's length body of the DfT, NR is governed by a Framework Agreement with the Secretary of State which specifies the process for NR's planning of its business. DfT wishes to ensure that there is appropriate interrelationship between that process and (to the extent that it is applicable) the managing change process.

5. How could the managing change process outlined be further improved to achieve its objective of maintaining the benefits of our settlements, while allowing Network Rail as a whole the ability to flexibly manage the business?

The Department has set out further information on the budgetary aspects of this issue in its recent response to the Financial Framework consultation, particularly as it relates to the treatment of the Group Portfolio Fund, where we are clear that supporting route devolution must be a key element of these arrangements.

Conclusion

Thank you for the opportunity to respond to this consultation. We consider that the process for managing change is an important part of securing more efficient and effective railway, and well as supporting route devolution and a more joined up approach between track and train. We look forward to further working with the ORR on the details of this issue following the draft determination.

Yours sincerely,



Conrad Bailey

Network Rail's response to ORR's PR18 working paper 8: Managing change affecting the PR18 settlements

27 April 2018

Executive Summary

Network Rail welcomes the opportunity to respond to ORR's working paper on managing change affecting the PR18 settlements. Our response builds on the points we made in our response to the PR18 overall framework consultation. No part of this response is confidential and we are content for it to be published in full.

In its Final Determination, ORR will determine settlements for each route and the System Operator (SO). We recognise that ORR will want to protect the benefits of individual settlements for routes and the SO. These include the ability to plan in a stable funding environment and to allow ORR to monitor routes' and the SO's performance, including through reliable comparison. ORR will therefore want to understand (and possibly challenge) changes that materially impact the basis on which it determined the PR18 settlements. As ORR describes, such changes could include new enhancements, changes to the funding of individual routes or the SO, and changes to our organisational structure (including changes to the number of routes or changes to the roles and responsibilities of routes and the SO).

The working paper sets out ORR's proposed policy and process for managing changes relative to the PR18 settlements. We welcome ORR's continued support for Network Rail being able to respond to changing circumstances and priorities and we will update our plan annually to reflect these changes. For CP6, this will start when we issue our delivery plan in March 2019 which will be an update relative to the PR18 settlements, reflecting the fact that time has moved on and circumstances may have changed. In CP6 we assume that ORR will monitor routes and the SO against their annually updated plans (providing we have been clear about why they have changed). This aligns to the proposal on reporting financial performance set out in ORR's consultation on its approach for assessing efficiency and wider financial performance in CP6. Therefore, we consider that the policies and processes described in the working paper predominantly relate to managing changes that Network Rail makes to its plan.

We assume that there will be circumstances in which ORR may wish to change the settlements and associated PR18 baselines, for example if there was a change to the number of routes. The paper does not specifically comment on the policy or process to manage changes to the settlements but it will be important to understand the extent to which ORR may want to change the settlements. We would welcome further discussion with ORR about how this could work, particularly given the experience of measuring against the old route structures in the PR13 settlements.

Policy on Managing Change

In part one of the working paper, ORR describes the requirements it has of Network Rail to engage early and report transparently in relation to managing material change relative to the settlements. We recognise that we will need to provide ORR and relevant stakeholders with appropriate opportunities to comment on and challenge material changes to our plan or organisational structure before a decision to implement a change is made. ORR proposes that the types of changes that it will want to be informed about 'ex ante' are those that originate outside a route or the SO. We support these policy points in principle because it sends a clear signal that ORR's focus is on big changes that impact routes and the SO but that are outside their direct control.

We also recognise that when changes are implemented we need to report transparently how these have impacted our plans and our organisation. Transparency is fundamental to creating trust in the new framework for CP6.

In summary, we largely support the policy principles that ORR describes in part one of the working paper, but want to highlight the following key points:

- A key aspect of ORR's policy is that Network Rail engages with ORR ex ante for material changes relative to the PR18 settlements. These would include a reduction in funding below the route/SO plan, a change to the number of routes, a material change in route boundaries, a material change in responsibilities of a route or the SO, or a change that materially impacts outputs. We acknowledge that defining the criteria for a 'material' change is difficult and it is important that we continue to develop a clear, shared understanding and where possible, improve the definitions. The risk is that without a clear and consistent definition, the interpretation of the criteria is dependent on interpretation by ORR and Network Rail and this could change over time.
- We support the principle of ORR's policy to focus on changes originating outside a route or the SO. This can be readily applied for changes that impact our overall organisational structure or funding of individual routes/the SO because these will largely be classified as extra route. Where changes impact outputs it is not always straightforward to categorise a change as intra or extra route. Outputs are impacted by many different changes, and it is not always possible to link an impact to a precise change event. However, we would discuss material changes with ORR.
- When reporting level I changes, we expect to report all changes to the plan regardless of whether the underlying causes of change are intra-route or extra-route.

We include further comment on policy points within our responses to the working paper's first three questions below.

The Managing Change Process

In part two of its working paper ORR proposes a process to manage change based on categorising levels of change in relation to the scale of the impact of a change on outputs, funding and organisational structure. We support the principle of categorising levels of change as 'material' (level II), where Network Rail will be required to engage with ORR ex ante, and 'fundamental' (level III), where ORR would issue a formal opinion of a proposed change. The criteria used to define the different levels of change need to be easily understood so that we are clear when we need to engage ex ante and when ORR would issue a formal opinion. We propose that the levels of change could be summarised as below and we set out more detail in our response to question four:

- A level I change is an extra route change to our plan or organisation that is not a material change. As set out above, we will report all changes to the plan regardless of where they originate.
- We agree that a level II change is a material change relative to the settlements. We will inform ORR and other relevant stakeholders about these changes ex ante.
- A level III change is a more significant change in relation to the criteria for level II. ORR will issue a formal opinion where it considers a change is a level III change.

We would like to clarify with ORR what happens if there is more than one change to the plan. Our proposal is that, if we were to make a material change relative to the settlements, the baseline would effectively be re-set, provided that we have satisfied the requirements of the managing change process. If we were to make a subsequent change, the categorisation of change would therefore be considered relative to the updated baseline.

Where a change impacts the funding of a route or the SO, we consider that the criteria to meet a level II or III change should be more significant than those proposed in ORR's working paper.

We propose to meet ORR's requirements around engagement and reporting primarily through our business planning process. Changes to our organisational structure will occur on an ad hoc basis and where these are material, we will engage with ORR and relevant stakeholders ex ante. Our process to manage enhancements is well developed and ORR is already part of this process.

Question 1: ORR welcomes comments on its proposed approach for focusing on changes originating outside the route and whether this concept should be adapted for the FNPO or the SO

In addition to the points we make on this issue in the summary above, we comment here specifically on changes that impact FNPO and SO plans.

FNPO's plan will need to respond to changes driven by geographic routes as part of the way it operates. For example, a change to the volume of renewals carried out by a geographic route may have an impact on national FDM and FNPO's plan will need to reflect this impact within its normal business model.

The SO plan has been developed to respond to anticipated changes to the funding and specification environment in CP6, and we therefore recognise that the SO plan will need to react to the needs of funders. The SO plan considers a range of potential risks and assumptions, and the provision of both SO headroom and the Group Portfolio Fund is intended to provide the SO with a level of capability to respond to risks materialising.

We would not expect these changes to be treated as extra route changes and would report on changes when we update our plans alongside other intra route changes.

Question 2: ORR welcomes views on its proposed approach for categorising and treating different changes depending on their impact on the PR18 settlements

ORR describes requirements of Network Rail to engage and report that depend on the scale of the impact of change. We support the principle of a proportionate approach and agree that, for material changes to our plan or organisational structure, it is important that ORR has the opportunity to comment on and challenge (where appropriate) the proposed change. When we engage with ORR, we will want to discuss the rationale and business case for change, where this is relevant.

Question 3: ORR would like to know if there are some exceptional changes that it should be able to prevent

The working paper considers cases where ORR may wish to prevent a change being implemented. ORR has significant powers of enforcement under both the Railways Act 1993 and the network licence to investigate potential matters of licence compliance. ORR proposes that these powers

would only apply where there were 'exceptional' changes or where there has been a failure to follow the necessary process. We agree with the examples that ORR suggests in its working paper and that the types of changes that ORR could consider to be exceptional include:

- drastic reductions to the funding available to individual routes or the SO
- changes to the organisational structure, for example, a reduction in the number of routes or fundamental change in responsibilities of a route.

Question 4: ORR welcomes views on its definitions of levels of change and suggestions of improvements to these definitions

ORR's working paper defines levels of change in relation to the degree to which they impact outputs, funding and the organisational structure. As described in our summary above, we think that this approach could be improved to clarify better when Network Rail should engage with ORR ex ante.

Where a change impacts outputs, we largely agree that we would expect to engage with ORR ex ante where we think a change may materially impact the plan. As stated previously it is difficult to define materiality and, as ORR recognises, the impact of a change on outputs will not always be clear at the outset. We would welcome further discussion with ORR to agree how this should work in practice.

The working paper also considers how a change impacts the funding of individual routes or the SO. ORR has proposed criteria relative to the impact on the confidence levels (e.g. P50) of delivery of routes' or the SO's plan. Given the degree of subjectivity around assessing confidence levels, we propose that these confidence levels are expressed as financial thresholds in the Strategic Business Plan (updated to reflect the final determination). We propose that the criteria for the levels could be defined as follows:

- Level I change: any reduction in funding below the route/SO plan including the route/SO specific allocation from the Group Portfolio Fund (GPF) included in the SBP (which was based on a P60 confidence level)
- Level II change: any reduction in funding below the route/SO plan excluding Group Portfolio Fund (which was based on a P50 confidence level)
- Level III change: a material reduction in funding below the route/SO base plan.

We have suggested that a level II change is a reduction in funding below the route/SO base plan, excluding any re-allocation from the GPF. We consider that a level III change should be set at level that is materially below the base plan in the SBP (or ORR's final determination). If it is set at the level of the base plan, the threshold would be at a P50 level which means that there would be a significant risk of 'fundamental' change compared to the agreed baseline. We believe that the level that triggers a formal opinion should be set at a lower threshold and would like to discuss this further with ORR.

It is also important to note that a reduction in overall funding of a route or the SO could be as a result of a reduction in the cost of a national function, for which costs are allocated to routes.

Where changes impact our organisational structure, the types of changes that we think would signal that we need engage to with ORR ex ante are those that result in significant change including:

- a change to the number of routes (increase or decrease)
- a material change to route boundaries that impacts the funding and outputs of a route
- a material change to the responsibilities of the routes or the SO, or our governance framework as specified within our Business Performance Management Framework.

It would be helpful to discuss with ORR what a 'material' change represents recognising the difficulty of defining the criteria in this area.

Question 5: ORR would welcome any suggestions to improve the managing change process such that the objective of maintaining the benefits of the settlements can be achieved while allowing Network Rail as a whole the ability to flexibly manage the business

We agree with the principles that ORR sets out for the managing change process to be proportionate, consistent and transparent. In addition to these principles, we consider that the process needs to be straightforward so that it can be widely and consistently understood over time and by colleagues across Network Rail and ORR.

We describe below how we will use our existing process to meet ORR's requirements to engage early and to report transparently. This is largely framed around our business planning process. Where changes occur outside the business planning process (for example, the decision to fund an enhancement or a proposal to significantly change our organisational structure or strategic direction) we also describe how we would meet ORR's requirements.

How we will meet ORR's requirements with respect to changes to our plans

The business planning process is an annual process to update and agree our medium term plans. Accountability for managing this process is with our Business Review Team (BRT). The business planning process comprises a series of steps:

- issuance of guidance and planning assumptions to routes and national functions
- initial submission of plans by routes and national functions
- internal assurance and Executive review
- a final submission of plans that reflect the key points of feedback from our internal assurance and Executive review process.

At the beginning of the planning process, guidance and planning assumptions are issued to routes and national functions by BRT. This provides the framework and the constraints within which routes and national functions update their plans. The planning assumptions will provide an indication of where and how we consider changes will impact the funding available to individual routes and the SO before the decision to implement is taken. It will also update planning guidance for volumes and the programme of enhancements.

We propose to engage with ORR about the planning assumptions as they emerge. When the guidance is issued, we would then share and discuss the guidance and planning assumptions with ORR. This will create opportunities for ORR to review and comment on changes to our plan

originating outside a route or the SO, ahead of a decision to implement through the submission of plans.

Routes and national functions will submit updated plans and scorecards to BRT in line with the planning cycle. At this stage, the full impact of a change is crystallised and evident in the funding and outputs of the plan. The changes to route and the SO plans will reflect decisions taken outside these business areas as well as changes driven by a route or the SO. Following our internal assurance and Executive review, we would share and discuss these submissions with ORR and relevant stakeholders. This would create a further opportunity for stakeholders, including ORR, to comment ahead of the final plan submission. It would also be at a point in time when routes and the SO will have engaged with their stakeholders and we would expect routes and the SO to describe what engagement has taken place and what stakeholder views are of the proposed changes.

If there was a significant change to funding outside the business planning cycle, we would discuss this with ORR at our regular business planning liaison meetings and with relevant stakeholders and communicate material provided to Network Rail's Board.

We will transparently explain and report changes to our plan. This will include commentary on why the change to the plan has taken place, what stakeholder engagement has been carried out (where this is appropriate) and what stakeholder views are. It will also point to the evidence base that stands behind the change. The detailed approach within the annual business planning cycle (including the frequency and the materiality threshold) is still being developed. We will discuss in more detail with ORR how we propose this will work in upcoming business planning liaison meetings.

How we will meet ORR's requirements with respect to changes to scorecards

Changes to scorecard trajectories will fall within our business planning process outlined above. Where we are considering changes to the definition or calculation methodology of a measure on the route comparison scorecard, we agree that ORR will need to consider our proposals ahead of implementation. We will create this opportunity through the regular business planning liaison meetings between ORR and Network Rail ahead of a decision being taken. Relevant supporting evidence for any change, the proposed impact, alongside relevant stakeholder engagement and views would be discussed at these meetings.

How we will meet ORR's requirements with respect to changes to our organisational structure or the strategic direction of Network Rail

Examples of these changes could include a change in the number of routes, a significant change to a route boundary or a significant change to the responsibility of a route or the SO. This type of change will be rare and, where this is material, we will discuss with ORR ex ante at the appropriate forum. Where relevant a business case would be discussed, and we would expect routes and the SO to provide supporting evidence of how they consider they may be impacted.

How we will meet ORR's requirements with respect to changes to enhancements

Where impacts on the plan are driven by a decision to fund a new enhancement or make changes to an existing enhancement, ORR is already part of these processes (including the enhancements change control process). In CP6 the impacts of an enhancement scheme on Network Rail's route businesses and the periodic review settlements will be assessed as part of the preparation of a Final

Business Case for the enhancement and through Network Rail's and the funder's internal and joint processes to agree and commit to an enhancement. These impacts would be considered as part of the joint decision making process for enhancements to which the funder, the SO and affected routes will be a party.

We would therefore anticipate that the role of the regulatory change control process would include seeking to confirm that this analysis had taken place and been appropriately incorporated into decision making. As the working paper notes, the role of the regulatory change control process should not be to approve or seek to prevent an enhancement from proceeding. We anticipate that the ORR's forthcoming Monitoring and Enforcement Policy consultation will provide more detail on how ORR wishes to assure itself of this process. It would also be helpful to understand what issues ORR would be considering if it issues a formal opinion in respect of plan changes as a result of enhancements.

The funder, Network Rail System Operator and Network Rail routes will commit to the delivery of an enhancement at a Final Investment Decision, at which point Network Rail will commit to a cost and schedule for delivery of the enhancement. This would incorporate all impacts on the routes of delivering the enhancement and implementing and operating the proposed service changes. Where ORR expresses views these will need to be incorporated into the existing processes ahead of the Final Investment Decision being taken to proceed with the scheme.

Rail Delivery Group

Response to

ORR's Working paper 8: Managing change affecting the PR18 settlements

Date: 27 April 2018

Rail Delivery Group response to ORR's Working paper 8: Managing change affecting the PR18 settlements

Organisation: Rail Delivery Group

Address: 200 Aldersgate Street, London EC1A 4HD

Business representative organisation

Introduction: The Rail Delivery Group (RDG) was established in May 2011. It brings together Network Rail and passenger and freight train operating companies to lead and enable improvements in the railway. The purpose of the RDG is to enable Network Rail and passenger and freight train operating companies to succeed by delivering better services for their customers. Ultimately this benefits taxpayers and the economy. We aim to meet the needs of:

- Our Members, by enabling them to deliver better outcomes for customers and the country;
- Government and regulators, by developing strategy, informing policy and confronting difficult decisions on choices, and
- Rail and non-rail users, by improving customer experience and building public trust

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Introduction

1. This document outlines the key points from industry members in response to the ORR consultation on managing change affecting the PR18 settlements.
2. RDG confirms that we are content for this response to be published on the ORR website.

Comments on the principles and proposals

3. RDG supports the need for a process that allows Network Rail flexibility to manage changes that might be needed to its plans, and this response should be read in conjunction with our response on the financial framework where we highlight the importance of budget flexibility.
4. We agree that the regulatory change management process should only consider changes that have the potential to undermine the PR18 settlements and agree that this should apply to the geographic Routes, the freight and national passenger operators' Route and the System Operator (SO).
5. We also agree that the type of change likely to undermine the PR18 settlements are those involving a substantial change in responsibilities of Routes or the SO, significant boundary changes, a change to the number of Routes, reductions in Route or SO funding, or material changes in the outputs a Route is expected to deliver including the impact of new enhancements.
6. Having several levels of change is helpful to indicate a proportionate approach and a focus on larger changes. For the managing change process to work effectively it is important to have well understood definitions of the levels of change so they can be consistently interpreted.
7. As an example, we think the way that the funding impact is described in paras 63 to 75 could be simplified to remove subjectivity and help achieve a consistent understanding of different levels of change.
8. The RDG supports route devolution with local ownership of plans and better engagement between Network Rail Routes and operators in the business planning process. This started with the preparation of Route Strategic Business Plans this year, and we anticipate that this will continue with the preparation of the Delivery Plans next year and then the ongoing annual business plan updates. This helps align the industry behind shared local plans. We consider that the managing change process should therefore be focused on changes relative to the plans and predominantly be based on Network Rail's existing business planning processes rather than any separate arrangements. Thus, there would be communication with ORR (and of course across the industry to consider the impact on end users) about changes during the development of the plans; this would provide transparency about any changes and allow for challenge if necessary.



April 2018

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**ORR WORKING PAPER 8: MANAGING CHANGE AFFECTING THE PR18 SETTLEMENTS
RESPONSE FROM THE RAILWAY INDUSTRY ASSOCIATION (RIA)**

1. INTRODUCTION

1.1 This submission constitutes the response from the Railway Industry Association (RIA) to the above working paper published on 28 March 2018.

2. BACKGROUND TO RIA

2.1 RIA is the trade association for UK-based suppliers to the UK and world-wide railways. It has over 200 companies in membership covering all aspects of rolling stock and infrastructure supply and covering a diverse range of products and services. As well as the vast majority of the larger, multi-national companies, 60% of RIA's membership base is comprised of SMEs.

2.2 The recently launched report from Oxford Economics shows that the UK rail sector contributes annually over £36 billion Gross Value Added (GVA) to the UK economy, employs 600,000 people and generates £11 billion in tax revenues. It is also a growing industry with the numbers of rail journeys expected to double in the next 25 years along with significant growth in rail freight traffic. The full report can be accessed via the following link:
https://www.riagb.org.uk/RIA/RIA_new/Press/Oxford_Economics.aspx

2.3 RIA provides its members with extensive services, including:

- Representation of the supply industry's interests to Government, Network Rail (NR), TfL, HS2, ORR and other key stakeholders
- Providing opportunities for dialogue and networking between members, including a number of Special Interest Groups
- Supply chain improvement initiatives
- Provision of technical, commercial and political information every week
- Export promotional activity, through briefings, visits overseas, hosting inwards visits
- Organising UK presence at exhibitions overseas.

Executive Summary

- **RIA share the ORR's view that the managing change process should relate to changes that undermine the PR18 settlement.**
- **RIA agrees that the managing change process should be proportionate, consistent and transparent and clearly shows the reasons for a change and explains the basis for decisions taken in relation to it.**
- **RIA's view is that, in line with other regulators, the ORR should have legal recourse to prevent exceptional change through a licence-based mechanism.**
- **It will be important to keep the managing change process under review so that it can be revised, if necessary, based on experience of its operation.**

3. RESPONSES TO QUESTIONS

Q1 Do you have any comments on our proposed approach for focusing on changes originating outside of the route (extra-route changes)? How should this concept be adapted for the FNPO or SO, if at all?

- 3.1 RIA shares the ORR's view that the managing change process should relate to changes that undermine the PR18 settlement, as in practice these changes would also demand significant changes to relevant business plans.
- 3.2 RIA agrees with the ORR's subset of changes that have the potential to undermine the PR18 settlements, namely:
- Substantial organisational change, in particular in the form of a substantial shift of responsibilities of the routes or the System Operator (SO)
 - Route boundary changes
 - Reductions in funding for individual routes/the SO
 - Changes to what a route is expected to deliver as a result of e.g. an enhancement decision.
- 3.3 Focusing on the extra-route changes set out above appears, on balance, to be the right approach. It might, however, be worth the ORR reflecting further on whether there are some intra-route changes that could not reasonably have been factored into the route's PR18 strategic plan, such as the cancellation of an existing enhancement project that has not been required to go through the new enhancement guidance process.
- 3.4 The devolution to routes, which RIA supports, means a stronger role for the SO; changes to the SO could therefore, in turn, have significant impacts on the devolved routes and their ability to deliver their business plans successfully.
- 3.5 The examples of extra-route changes set out in table 1.1 of the working paper appear to cover the main such changes that could occur and provide a helpful illustration of the scope of the managing change process.
- 3.6 Adapting this concept to the Freight and National Passenger Operators (FNPO) and SO would equally follow the underlying principle that the managing change process would apply to changes that are mostly 'done to' the FNPO and/or the SO rather than with them. However, some changes that are developed with the SO could result in a material impact on geographic routes, and thus should be required to follow the managing change process.

Q2 What are your views on our proposed approach for categorising and treating different changes depending on the extent of their impact on the PR18 settlements?

- 3.7 The definition of the levels of change themselves appear sensible. That said, the terminology of the levels of change (i.e. I to III) maybe more readily understood by replacing these with the following categories in ascending order: minor, significant and exceptional (or fundamental).
- 3.8 RIA agrees that the managing change process should be proportionate, consistent and transparent, and clearly show the reasons for a change; and it should explain the basis for decisions taken in relation to it. It is appropriate that for level III changes, the ORR publishes a formal decision on the change prior to its implementation – this is how other regulators operate.
- 3.9 On the treatment and reporting of changes: requiring all in-scope changes to be recorded in a change log is a basic building block of change management and change control. RIA fully

supports this. RIA also supports the proposed approach to the treatment of level II and III changes. In particular, RIA shares the ORR's view that in the case of level III changes, NR should not proceed with such changes prior to the regulator publishing its opinion.

Q3 Do you think there should be some exceptional changes that, with reference to Network Rail's licence, we would be able to prevent? If so, what forms of change should this include?

- 3.10 RIA's view is that, in line with other regulators, the ORR should have legal recourse to prevent exceptional change through a licence-based mechanism. We therefore support the inclusion of a licence condition specifically relating to prevention of the undermining of the regulatory settlements.

While this can be seen as a strong deterrent, such a process is not itself without challenge as, for example, NR could, in extremis, seek judicial review of an ORR decision with which it did not agree; often the test of reasonableness is decided by the courts. Such a step would likely involve significant financial cost and could take some months to resolve, thereby either reducing the benefit of the proposed change or making it ineffective.

- 3.11 Legal considerations aside, it may be preferable not to too-tightly define what constitutes exceptional change, in order to provide the ORR with some flexibility to cover circumstances that are not currently predicted. The possible examples of circumstances whose effects the ORR would not reasonably be able to mitigate, as listed in paragraph 44 of the working paper, appear about right.

Q4 Do you agree with our definitions of levels of change? Can you suggest improvements to these definitions?

- 3.12 RIA would suggest that the definition both of a level II change and above, and a level III change, as set out in paragraph 31 of the working paper, be supplemented/revised with the following definition of what constitutes a material and fundamental change:

'A material change is a change in the business, operations, capital or control of Network Rail relative to the PR18 settlements'.

'A fundamental change is one that involves a major change to the characteristics of Network Rail and would result in a totally different approach or lesser outcome relative to the original PR18 settlements'.

- 3.13 The rationale for the changes suggested above is that they would facilitate wider understanding of the managing change process, and the escalation in the change process and associated reporting requirements as one moves up the change hierarchy.
- 3.14 The key examples of what constitutes level II or level III changes, as set out in paragraph 55 of the working paper, seem sensible. The generic change notification template in Appendix B of the working paper appears to cover the information and evidence needed for this point in the change process. That said, RIA would, in particular, emphasis the need for supply chain engagement, where appropriate, on the change being proposed, and for transparency on how these views have influenced or amended the change as a result.

Q5 How could the managing change process outlined be further improved to achieve its objective of maintaining the benefits of our settlements, while allowing Network Rail as a whole the ability to flexibly manage the business?

- 3.15 It will be important to keep the managing change process under review so that it can be revised, if necessary, based on experience of its operation.
- 3.16 While the managing change governance process (level II and III changes), set out in Box 2.1 on page 28 of the working paper, is a helpful illustration, this could be enhanced by the use of worked examples to help bring the operation of the process to life.

4. CONCLUSION

- 4.1 RIA welcomes the opportunity to comment on the ORR's minded to proposals on the PR18 financial framework.
- 4.2 The welcome SoFA settlement provides an excellent opportunity for the industry collectively to make a step-change to UK rail and its growing number of customers. We must, however, also prove to the railway's funders that we can deliver the substantial volumes of work required, if the industry is to continue to receive such funding settlements in future.
- 4.3 The railway supply chain stands ready to plays its part in a collaborative push to achieve this delivery. In order to do so, however, the points referenced in the Executive Summary need to be successfully adopted.
- 4.4 RIA hopes this response is helpful and stands ready to discuss any part of it with the ORR.

For more information, please contact RIA Senior Policy Manager Damian Testa.

Working paper 8 on Managing Change: response from Transport for Greater Manchester

Thank you for the opportunity to comment on the working paper on managing change for the PR18 settlement.

In principal, the approach set out in the consultation for managing change is a reasonable approach, if change management is required, and there is nothing specific which would cause us any concern. It is worth stating though, that our response to previous ORR consultations on the PR18 settlement remain applicable in terms of ensuring that Network Rail has sufficient funding, that the business plan is achievable and that the ORR enforces Network Rail's performance to ensure it delivers against the business plan in an efficient and timely fashion.

We fully support Network Rail's move towards route devolution and would emphasise the importance of ensuring there is maximum autonomous operation at route level and allowing benchmarking across the routes through the use of individual business plans. However, we believe the benefits will only be realised if the routes are encouraged to operate individually and are not entirely convinced that the change process should be encouraged, as this clearly has the potential to undermine the aims of devolution.

We welcome the fact that this is recognised in the ORR's suggested change process, but are concerned that this will create extra bureaucracy and complexity to an organisation which already suffers heavily from these issues. We would suggest that if sufficiently robust business plans are developed at the route level for CP6, then there shouldn't be any requirement for the change process except in very exceptional circumstances. However, the consultation suggests that there are likely to be regular changes in order to allow for flexibility and efficiency. While this additional flexibility may be seen as a benefit, the need to carry out the bureaucratic change process is likely to undermine this flexibility. It is important that the existence of a change process does not lead to complacency in setting future business plans, problems in delivering them and a failure to allow genuine comparisons if change occurs too frequently.

For the benefits of route devolution to be realised there needs to be a real commitment to operating each one as closely as possible to individual businesses. While we understand the differences in funding settlements that lead to the Scotland route being isolated from some of this process, the fact that this is acceptable without any material impact on flexibility and efficiency, suggests that the change process may not be required to the degree to which this consultation suggests.

As TfGM have previously highlighted, it is essential that route devolution does not have an adverse impact on cross-boundary maintenance and investment. Again, it is important that this is fully recognised and reflected within the development of the business plans rather than having to rely on a change mechanism to rescue issues at a later stage. Similarly, although we recognise that the Government's approach to

enhancements investment could have an impact on the financial settlement, we believe this should be considered at the development of the enhancement. When funding is provided, this should take account of the PR18 settlement such that it does not trigger unplanned change requirements, thereby reducing the administrative burden and helping the railway achieve its efficiency targets.

TfGM welcomes this engagement and is willing to offer further assistance in the development of Network Rail's final settlement for CP6.

Yours sincerely,

Peter Walley

Rail Officer



Nicholas Hall,
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One Kemble Street,
London,
WC2B 4AN.

Transport for London
Palestra
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SE1 8NJ

27th April 2018

Dear Nicholas,

Consultation on Working Paper 8: Managing change affecting the PR18 settlements

This letter sets out our responses to the questions raised in the ORR's consultation on managing change affecting the PR18 settlements. We are content for our responses to be published and shared with Third Parties.

1: Do you have any comments on our proposed approach for focusing on changes originating outside of the route (extra-route changes)? How should this concept be adapted for the FNPO or SO, if at all?

Changes within routes should not result in changes to the regulatory settlement. The routes should be required to deliver the commitments they have made and should organise themselves in the most effective manner to do so. Changes to the regulatory settlement for the Freight and National Passenger Operator (FNPO) route and the System Operator (SO) should only occur where the requirements made under the settlement for these two organisations are subject to material change, either in terms of funding or outputs required.

As stated in the consultation documentation it is important that Network Rail proactively manages risks to its business (including cost and delivery risk). Changes to settlements should not be permitted where these stem from inadequate management of such risks by Network Rail.

2: What are your views on our proposed approach for categorising and treating different changes depending on the extent of their impact on the PR18 settlements?

The approach proposed appears reasonable. The retention of oversight by the ORR of all changes to targets and outputs is essential to ensure that Network Rail has the strongest possible incentive to deliver the requirements of the settlement. This oversight should include changes to targets on

scorecards which measure key aspects of Network Rail's performance. The oversight provided by the ORR should include some independent verification of changes proposed by Network Rail rather than pure reliance on outputs provided by Network Rail to ensure that any changes proposed are reasonable.

3: Do you think there should be some exceptional changes that, with reference to Network Rail's license, we would be able to prevent? If so, what forms of change should this include?

It is reasonable that there should be some circumstances where Network Rail's license could be used to prevent change. These should be focused on changes that fundamentally undermine the nature of the route based settlement, such as the centralisation of most route based activity and major changes to funding or outputs that render existing Business Plans obsolete. Under such circumstances the ORR should pay due regard to the reasoning behind such changes and their necessity to enabled the continued delivery of the current level of service provided by the rail network.

A reduction to the number of Routes should not normally be considered as an exceptional change because the settlement can be adapted to reflect changes to boundaries, both in terms of outputs required and funding. This is subject to the proviso that there remain at least four routes to enable effective comparisons to be made between them. The requirement for at least four routes is based on the theory underlying competitive procurement exercises. This states that there should normally be at least four bidders to ensure that there is sufficient competitive tension to deliver an outcome that represents best value.

4: Do you agree with our definitions of levels of change? Can you suggest improvements to these definitions?

The definitions proposed appear reasonable. It is important that Network Rail is required to initiate all requests for changes to the settlement to give them the best possible incentive to deliver. Quantitative guidance should be issued to provide a clear demarcation for the individual levels of change.

5: How could the managing change process outlined be further improved to achieve its objective of maintaining the benefits of our settlements, while allowing Network Rail as a whole the ability to flexibly manage the business?

It is important that the process includes consideration of the overall financial settlement received by Network Rail across all parts of its business. Where responsibilities move between different parts of the business this should not

result in an increase to the overall size of the settlement.

Yours sincerely,

**Alan Smart,
Principal Planner – Rail Development,
Public Transport Service Planning,
Transport for London.**

Office of Rail and Road
1 Kemble Street
London
WC2B 4AN

Date:
30 April 2018

By e-mail

Response to the ORR's PR18 working paper on managing change affecting the PR18 settlements

Thank you for the opportunity to comment on the ORR's PR18 working paper on managing change affecting the PR18 settlements.

We have set out our position below on some of the issues raised, with a focus on: route-level regulation and Scotland's Railways and managing change and route requirements & scorecards, that we wish the ORR to reflect on and take into account. The points raised here build upon previous consultation responses and our continued discussions and engagement with the ORR.

Route-level regulation and Scotland's Railways

As a consequence of executive devolution under the 2005 Railways Act, over the last ten years the Scotland route has had a significant degree of route-level regulation, with the route commanding a greater degree of empowerment than the other Network Rail routes. This operational devolution places Scotland further ahead of the other routes, enabling closer industry working with tailored local solutions to the needs and priorities of customers and funders. As noted in previous responses, we broadly welcome the principle of route-based regulation and increased local decision-making being delegated to individual routes across the GB network with the important caveat. This must respect the integrity of the current devolved settlement for Scotland, the separate funding settlement for Scotland and the well-established principle of a separate Periodic Review determination for Scotland, i.e. there can be no distribution of funds from the Scotland route to any other NR route including the System Operator and FNPO routes without the clear and express agreement of Scottish Ministers. Also, and of equal importance, route-based regulation must not distract from further consolidation of our now mature devolved route structure.

Managing change

We agree at a policy level that Network Rail needs to be able to adapt to changing circumstances and that certainty of funding and outputs alongside an allowance for some flexibility is the optimum outcome. We would note that our HLOS sets out very clearly and coherently Scottish Ministers' requirements for the Scotland route and as such we would anticipate that there should be less change to plan for and manage with respect to Network Rail's core activities and scorecard in Scotland. We would also note that there is inherently a different relationship between the Scotland Route and the System Operator and FNPO routes as there is between the different geographical routes in England and Wales. As such there are

aspects of this working paper that are less relevant for the Scottish Government. For example, as the working paper suggests we would not consider offering comment on implications of route boundary change which ex facie we cannot foresee affecting Scotland.

We would advise that the ORR, as regulator with significant experience of rail regulation in GB, is ultimately best placed to critique and advise on approaches to change management within the context of the principles and policies of funders and Network Rail's legal requirements. We agree that it is broadly useful to categorise types of change into different levels and broadly helpful to have the change life-cycle and governance clearly represented. We would agree that Network Rail should not in normal circumstances proceed with 'exceptional' changes that fundamentally undermine the PR18 settlement. However, whether this should be managed through licence conditions or another mechanism is something we would look to the ORR to give considered advice on alongside clear advice on the definition of 'exceptional'.

Our policy on investment in enhancements has been recently articulated in our published Rail Enhancements & Capital Investment Strategy, 19 March 2018. We would note that this new (pipeline-based) approach and framework provides for a rolling programme of enhancements, each stage of which is governed by clear investment decision-making points linked to business case development. We agree that the ORR and the regulatory framework need to respond to this new framework for CP6 as much as for the Scotland Route as for the RNEP published by the DfT.

Route Requirements & Scorecards

We note that in this working paper the ORR have articulated their objective of achieving the balance between flexibility, funding certainty and ensuring that routes are held to account for their performance alongside comparative route measures. Our policy position on route requirements and scorecards has been well documented in previous responses; engagement with customers and funders must be meaningful given the significant emphasis that the ORR is placing on scorecards as a performance measure; comparative measures must be set intelligently with a clear link to the utility of doing so and without compromise to or deflection from the Scottish Ministers' HLOS, and management incentives must be clear and link to delivery.

Specific additional points

In addition to the issues raised above, we would seek clarification on a point in paragraph 64. The ORR state that as funding for Network Rail in Scotland is ring-fenced for CP6 this would not ordinarily be subject to route/ SO funding changes. We would be grateful for your assurance and/or clarification as to whether the ORR expect that this situation is liable to change, and in what circumstances.

Conclusion

We reiterate the importance of improved Network Rail efficiency and wider financial performance in CP6 reflecting the new financial context following reclassification of Network Rail and compelling Network Rail to achieve and sustain the highest levels of best practice for a publicly funded body. We look forward to continued work with the ORR to achieve this.

Yours sincerely,

Fiona Hesling

Fiona Hesling
Head of Rail Planning

PR18 Consultation
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XC Trains Limited Response to ORR's Working Paper 8: Managing change affecting the PR18 settlements

This letter responds to the ORR's Working Paper 8: Managing change affecting the PR18 settlements. The response is provided on behalf of XC Trains Limited (XC) as part of Arriva plc.

XC views the PR18 process as a significant opportunity to ensure that the structure and processes of the rail industry deployed in CP6 are aligned to the delivery of shared industry objectives; particularly safety, efficiency, growth and strong performance. It is also essential that the outputs that the industry delivers meet the needs and expectations of rail users and funders. We therefore welcome the opportunity to respond to this working paper and are pleased to engage in wider industry dialogue to help develop appropriate arrangements for CP6.

Arriva has also played an active part in the Rail Delivery Group (RDG) work on PR18 and supported the preparation of the response provided to this working paper by RDG. Where XC has not responded directly to the questions raised by ORR in its working paper, ORR should refer to the RDG response in that area which Arriva endorses.

As an organisation managing real-time operations and a very diverse asset base including many significant structures where the historical condition may be uncertain and which are also subject to external impacts beyond its control, Network Rail needs to be equipped with appropriate mechanisms to deploy the resources made available to it flexibly. This flexibility should include the ability to:

- Move money (including contingency funds as discussed above) between Routes subject to appropriate control mechanisms as addressed in ORR's Working Paper 8 on managing change affecting the PR18 settlements
- Moving money between years within the Control Period
- Switching expenditure between operating and capital expenditure
- Reprogramming work between years to:
 - align with the resources, possession access and money available,
 - release resources and money to address unforeseen circumstances
 - align activity with the best use of the network to provide train services
 - package work to ensure the best delivery efficiency.

However, deploying this necessary flexibility will involve the need to change some elements of the Strategic Business Plans or even the individual Settlements that make up the overall Network Rail Settlement.

While the ability to make such changes is necessary, there does need to be a change management process put in place to ensure that what is being done is transparent, proportional and that any impact on Network

Rail's customers, funders or end users is addressed. However, the change management process also needs to be proportionate so that appropriate action can be taken in a timely manner and that the diversion of Network Rail's management is not excessive.

Key to achieving these objectives will be transparent communication from Network Rail to ORR, its customers and its funders as to its progress in the delivery of its Strategic Business Plans. This communication should identify areas where change may become necessary early enough to allow proper engagement on the potential steps to be taken in each case where a material divergence between reality and plan is emerging.

XC is of the view that the change management process should cover all the parts of Network Rail which are subject to specific settlements – particularly the Routes (including the FNPO Route) and the System Operator (NSO). In general XC is supportive of the measures outlined within the paper, but is seeking further clarity in future as to the specific detail of how the measures might be implemented.

Having reviewed the proposed categorisation of changes to Levels I, II and III, Arriva finds it difficult at this stage to gather a proper sense as to how this fine gradation process would work in practice. The difference between a "material" and a "fundamental" impact on the settlement is likely to be highly subjective and even situational. However, the immediate sense is this approach may prove challenging to work with. However, the requirement for an increasing level of ORR involvement in scrutinising proposed changes will be necessary as the changes become potentially more impactful. This escalation should culminate in a situation in which ORR should intervene to prevent a change being progressed. It seems likely that such situations may subsequently trigger further interventions including the enactment of the reopener arrangements.

With regard to the focus of ORR's proposed process, XC feels that there should be a focus on the level of impact on Network Rail's customers, funders or end users rather than solely on whether the change is initiated inside or outside the Route or NSO. XC would like to understand more with regards to how the change logs described within the process will be shared with operators (at which forums) and what 'appropriate consultation' will in reality amount to.

XC support the additional measures outlined to assess impacts of enhancement schemes on individual routes, and are particularly pleased to see reference to impact on domestic route renewals within this. Historically delays within enhancement schemes have led to inefficient use of possession access, and loss of planned renewals with inevitable impact to asset condition and network performance through TSRs.

Yours sincerely,



Joanna Davey
Head of Track Access and Possession Strategy

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