

Your Ref:
Our Ref: AG/ATCO-NRE
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Response to the Office of Rail Regulation Network Rail's Strategic Business Plan for Control Period 5.

1. The Association of Transport Co-ordinating Officers (ATCO) welcomes the opportunity to comment to the ORR about Network Rail's Strategic Business Plan. ATCO was formed in 1974 and represents transport professionals in all areas of transport co-ordination. It has over 600 members in County, Metropolitan and Unitary Councils in England, Wales, Scotland and Northern Ireland as well as from Passenger Transport Executives and other transport related organisations.
2. The comments which follow originate from the ATCO National Rail Executive and are typically generic in nature. It is likely that a number of Councils have already been consulted by NR and have made comments about specific proposals in their areas. ATCO's comments should therefore be seen as complementary to any you may receive from individual Councils and Passenger Transport Executives.
3. ATCO strongly supports NR's plans to expand and invest in Britain's railways. It is important that the total amount of spending which both UK and Scottish governments will finally approve is sufficient to implement the plan. The ORR should in their assessment ensure that a balanced approach is made towards all separate categories detailed in the plan and that the priority of all spending is for the benefit of users of the railway. With this in mind ATCO would not wish to see passenger fares rise by excessive amounts to pay for the implementation of the plan. Local fares are of particular importance for the railway and need to be sensitively balanced against other transport modes. As a guide, ATCO would normally accept annual fare rises to be in the range of the retail price index from the previous six month period.

4. ATCO would wish to see the ORR undertake a careful examination of the major CP 5 projects against smaller projects which may be deferred or withdrawn from this control period because of the spending allocated. A number of these projects were included in NR's Initial Industry Plan and ATCO would not wish to see these lost during CP 5. For example, track capacity increases could be implemented to bring operational benefits in the short-term. It is felt that a number of locations might improve from this approach to ensure that existing train times are more robust than they are now.

5. A similar situation would be with the redevelopment of existing stations or indeed where new stations can be built. The plan reveals a number of large stations as committed projects and ATCO accept these, however a large amount of station infrastructure across the country is tired looking and replacement of buildings and improvement to facilities is urgently required. The importance of the National Station Improvement Programme and Access for All Programme must not be underestimated in determining the funding of schemes at these smaller stations. ATCO is therefore concerned that total expenditure for the Access for All Programme is reduced in CP 5 by £205m to £103m in comparison with current expenditure in CP 4 which will be £308m. The importance of interchange with other modes at stations to ensure a seamless journey experience for passengers is a high priority for ATCO members'. In many situations, Councils and Passenger Transport Executives can be the catalyst to provide start up funding for a project to proceed and there are a number of established partnerships where this is already happening. ATCO consider there is much more scope for this to have wider potential and impact upon NR. The plan therefore should fully recognise the ability of Councils to do this. If the Government proceed with the devolving of train services to Councils and Passenger Transport Executives which in turn would affect the nature of train operating franchises, it would be prudent for the ORR to ensure that the plan reflects this important change.

6. The reduction of maintenance and track staff during CP 5 is noted and can be accepted as long as the overall safety and operation of the railway on trains, track and at stations is not compromised in anyway. ATCO would suggest that the ORR undertake periodic reviews throughout the duration of the plan to ensure this does not happen. ATCO remain concerned about the high accident numbers at level crossings. The plan refers to 30 high risk closures and ATCO supports this and would ask the ORR to endorse this.

7. ATCO support the Strategic Rail Freight Network contained in the plan, however the ORR's Periodic Review of access charges remains a serious

concern. It would be illogical if freight access charges are increased to such an extent that it harms the development of rail freight movement throughout the life of the plan. As an adjunct to this ATCO remain concerned about the ORR's proposal to remove the requirement for NR to offer a 'cap' (currently £5,000) per incident for delay penalty payments on charter trains. If the cap were removed it would create a serious impact upon charter companies by increasing fares and affecting their long-term business plans. ATCO's view is that the mechanism for capturing an element of these costs is best not tinkered with.

8. The plan places a high reliance upon the Rail Delivery Group to develop and deliver a number of NR's proposals through the rail industry. ATCO recognizes that the Rail Delivery Group has an important role to play (although evidence to date of delivery appears to be slow) and would ask the ORR to consider a greater involvement for Councils and Passenger Transport Executives to participate in this process. A new working group to those already listed in the plan would be appropriate to establish sound partnerships to implement proposals. This would impact upon NR's own commitments to deliver the plan and their reference to "Our behaviours (how we need to work)". The ORR should be aware of ATCO members' criticism in the past of how the governance of NR's custom and practice has been undertaken. This has delayed the implementation and increased the cost of schemes, particularly with those partnerships referred to in section 5 above, where substantive funding has come from Councils and private developers. ATCO can see no reason why this situation should not improve now and throughout the CP 5 period, provided the NR organisation can quickly adopt their behavioural issues which are set out in the plan.

Author Andrew Gipson. 18th February 2013.

ATCO title Secretary. ATCO National Rail Executive