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Dear Rachel and Jonathan,

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

Thank you for the opportunity to respond to this proposal for additional services on the East Coast. This response is provided on behalf of FirstGroup and the train operating companies that we operate: First Great Western; First Capital Connect; First TransPennine Express; ScotRail; and First Hull Trains.

FirstGroup welcomes proposals for additional services on the network, particularly where any such proposal offers fair competition and complementary services to the franchised services offer, is in accordance with the criteria and procedures for the grant of track access and does not unduly disturb the economic equilibrium of any relevant public service contracts. However we do have a number of concerns regarding this proposal.

Although the exact details of the proposition are as yet unclear, there would appear to be an issue of capacity, both at the southern end of the route and in the north east. There are competing funder and stakeholder aspirations for capacity on this route and it is not clear, even with infrastructure improvements, that they all can be met. In particular, the interaction between the current and proposed Thameslink service and the intended operation of six trains per hour, with the new IEP trains at the southern end and the same six trains per hour IEP service and the services that will be provided following the completion of the TPE electrification and Northern Hub investments in the north of England.

This may lead to a fundamental issue that the industry has not had to deal with before, the possibility that an existing franchise service may have to be withdrawn to accommodate an open access proposal that provides greater benefit. Whether this service proposal will provide greater benefit is, of course, open to question and will require detailed analysis of the full range of considerations. These may extend beyond purely economic assessment, to include for example social impacts and wider journey implications. Certainly it would appear that if this service were to replace an existing service and result in a reduced calling pattern or loss of journey opportunities, the connectivity for those locations would be affected and could lead to significant customer and stakeholder concerns.

The limited available information and the current constraints from our involvement in franchise competition processes mean that we are not in a position to comment in any detail on the revenue or wider economic benefits. However it is apparent that this proposal will materially affect at least the East Coast franchise proposition and, if this application is approved, challenge the approach to the East Coast offering fast services between London, Newcastle and Edinburgh.

If the new service requires a withdrawal of franchise services or is not substantially revenue generating, it is likely to have consequences for future DfT funding for other existing UK rail passenger services and this will need to be assessed and taken into account as part of the process. This assessment will also need to take account of the level of contribution from access charges from the new service.

Our other major concern is performance. We would be interested to understand how these proposals would fit with the proposed Control Period 5 East Coast PPM trajectory. We also see a need for the East Coast Mainline to become more resilient in this respect and for the timetable to be less forced at key points, which it undoubtedly is currently. That may affect how this and other proposals for additional services can be accommodated but the interaction between fast services of this nature running down or otherwise interacting with slower services must be carefully considered.

We have not evaluated specific constraining issues such as platforming, crossing moves or power constraints as the proposal is, understandably at this stage, not fully developed. However, as it becomes so it would be useful for such information to be made available, both to allay fears and also help develop existing schemes in a complementary manner. It would also further highlight where difficult decisions may have to be taken and help save unnecessary industry expenditure on schemes which may be abortive as a consequence.

There is also the question of deliverability. This scheme seems to be running to a very tight timescale, and would appear to require incremental infrastructure investment, the extent of which is not clear. Our experience of implementing new services with new build rolling stock coupled with new infrastructure would suggest that the timescales envisaged are unlikely to be achieved, and therefore the implementation date of any timetable is likely to be later than December 2016. We would expect that a robust project plan will need to be submitted as part of the approvals process and that mechanisms would be put in place to assure delivery reasonably in line with the commitments.

Finally and related to this last point, we would like to propose that the ORR looks again at its Access Options procedure with a view to incorporating applications based solely or indeed to a large extent on rolling stock investment rather than just infrastructure investment. We feel applications for future access of a medium to long term nature would be far better dealt with in that way.

Yours sincerely

Russell Evans



Policy & Planning Director, FirstGroup Rail Division