

14 January 2013

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Dear Les,

**Consultation on ORR's Regulation of Land Disposals by Network Rail 30 November 2012**

Thank you for the opportunity to provide comment on the above consultation.

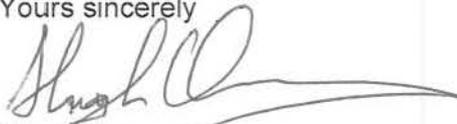
Historically, disposals have appeared to be protracted. It is therefore welcoming news to see that the Office of the Rail Regulator (ORR) are considering further improvements to streamlining and improving Network Rail's (NR's) disposal obligations. The reduction in the ORR casework turnaround timescales from ten to four weeks is also commended.

Regarding the general consent clause 1(q) to be added to Condition 7 of Network Rail's network licence, this is also welcomed. Removing NR's prior notice obligation to dispose of land for public transport use is a positive move.

Our only concern is that should the land be transferred into private ownership, the public transport use may later be readily removed. Protection to avoid this occurrence is not expressly stated in the new clause.

I hope the above is of benefit and I confirm that this reflects the position of all FirstGroup train operating companies.

Yours sincerely



Hugh Clancy  
Commercial Director, Rail