

Periodic review 2008

- Network Rail's outputs and review of Network Rail's network licence

Andy Burgess / Les Waters

21 September 2007

Introduction - Network Rail's accountability

- Network Rail is subject to safety regulation, economic regulation, and competition law enforcement
- It has contracts with its customers and must comply with industry codes
- It must comply with its licence obligations
- Periodic reviews (usually five yearly) by ORR establish the structure, level and profile of Network Rail's income from users of its network and other sources

Introduction – the Periodic Review 2008

- We are part way through the PR08 to determine Network Rail's funding from April 2009 to March 2014
- The next key stage is publication of Network Rail's Strategic Business Plan at the end of October
- This workshop is about two key projects which are part of PR08 –
 - The structure and form of Network Rail's outputs
 - A review of Network Rail's network licence

Purpose of workshop

- To explain our approach to outputs for Network Rail in the next control period and to our review of Network Rail's network licence
- To seek your views
- To help you respond to our consultations

Schedule

Period Review 2008 - Network Rail's Outputs

- ORR presentation and Q&As 10:10 Andy Burgess / Les Waters
 - ORR's proposals
- ATOC presentation and Q&As 11:00 Alec McTavish
 - Key priorities for Network Rail in CP4

Coffee/tea break 11:30

- Network Rail presentation and Q&As 11:45 Ian Marlee
 - Network Rail's initial reaction to the consultation and the Strategic Business Plan

Network Availability KPIs: update on consultancy project 12:15 Paul Hadley / Tim Griffiths

Lunch 12:45

Summing up of morning discussion and introduction to review of network licence 13:30 Michael Lee

Review of Network Rail's Network Licence

- ORR presentation 13:45 Andy Burgess / Abigail Grenfell
 - Scope and objectives of the licence review
- Network Rail presentation 14:15 Ian Marlee
 - Network Rail's response to the licence review
- Q&As 14:30

Closing comments 15:00 Michael Lee

Presentation: two parts

- Part 1: PR08 framework
- Part 2: proposed outputs

Part 1: PR08 framework

- **network licence Condition 7** is the key licence condition, the purpose of which is to secure:
 - a) the operation and maintenance of the network;
 - b) the renewal and replacement of the network; and
 - c) the improvement, enhancement and development of the network,in each case in accordance with best practice and in a timely, efficient and economical manner so as to satisfy the reasonable requirements of persons providing services relating to railways and funders in respect of:
 - i) the quality and capability of the network; and
 - ii) the facilitation of railway service performance in respect of services for the carriage of passengers and goods by railway operating on the network

Network licence Condition 7

- Condition 7 is key to securing delivery
- we do not currently expect to change the basic purpose or duty in the licence review
- stewardship of the network and the reasonable requirements of customers and funders are enforceable under Condition 7
- we can take enforcement action under section 55 of the Railways Act if Network Rail fails to deliver (or is likely to)
- general process of escalation
- published economic enforcement policy

High Level Output Specifications

- England & Wales (Department for Transport)
 - safety improvements for GB
 - improvements in train service reliability
 - capacity increases, both passenger and freight
 - improvements to stations
- Scotland (Transport Scotland)
 - improvements in train service reliability
 - maintain capability of infrastructure
 - major projects to extend the rail network

Regulated outputs

- top level regulated outputs
 - enforceable under Condition 7
- outputs at a more disaggregated level
 - to include network capacity
 - details for targets to be established by Network Rail
 - targets to be published in Network Rail's 2009 business plan for CP4 (BP09)

Network Rail's 2009 business plan

- BP09 to cover April 2009 to March 2014, acting as the main reference document for CP4
- to include the top level outputs set in ORR's October 2008 final determinations
- Network Rail to set out plans in reasonable detail - for different parts of the network - how it will deliver the top level outputs
- in defined areas, the plans will have the status of reasonable requirements
- clearly identified aspirations will not form reasonable requirements

Changes during CP4

- given that BP09 is the delivery plan for CP4, there needs to be flexibility during the control period
- but with some regulatory control
- objectives:
 - significant changes only, must not catch too much detail
 - must reflect regulatory priorities and the concerns of users and funders
 - must be straightforward and transparent
 - must not incentivise frequent changes which make it difficult to hold Network Rail to account for delivery
 - must not deter Network Rail from adopting the most efficient & effective delivery mechanisms

Changes during CP4

- **examples of changes**
 - Network Rail wishes to defer some specific renewals so that they can take place as part of a capacity enhancement at a later date
 - increased capacity may be delivered by selective door opening on longer trains rather than Network Rail lengthening platforms in the control period
 - Network Rail publishes a route-based delay-minutes target in BP09. It reassesses this following particular events/circumstances and proposes to revise the target

Proposed change mechanism

- no anticipated changes to top level regulatory outputs
- possible for Network Rail to make changes to disaggregated outputs
 - **capacity**: changes to the way in which capacity is delivered or funder-driven changes to capacity specification
 - approval by ORR
 - **customer reasonable requirements**: changes to disaggregated commitments where ORR has specified the commitment is a CRR
 - notification to ORR
- we are developing our thinking on handling of changes in responsibility for delivering aspects of the HLOSs
- Network Rail may change aspirational elements of BP09

Part 2: Proposed outputs

- we have developed these proposed output areas following consideration of
 - the requirements of DfT and Transport Scotland, as expressed in their HLOSs
 - the wider range of priorities for passengers and freight customers
 - the need to strengthen Network Rail's accountability for delivery and the longer term sustainability of its network

Monitoring

- we will continue to use a range of metrics and indicators. Regular reporting currently in the form of:
 - National Rail Review (quarterly)
 - commentary on key recent developments and issues in the industry
 - current edition: Q1 2007-08 (www.rail-reg.gov.uk/upload/pdf/336.pdf)
 - Network Rail Monitor (quarterly)
 - high level KPIs (e.g. delay minutes, asset failures, activity volumes and expenditure) with commentary
 - current edition: Q1 2007-08 (www.rail-reg.gov.uk/upload/pdf/337.pdf)

Monitoring (continued)

- National Rail Trends (quarterly and annual)
 - current GB rail data (e.g. on passenger usage and rail performance) - looking to move to production on a real-time basis
 - current edition: Yearbook 2006-07
(www.rail-reg.gov.uk/upload/pdf/330-rev3.pdf)
- Annual Assessment
 - consolidates our analysis throughout the year, takes into account the Annual Return and Reporter's audit, and gives our views
 - latest edition: 2006-07 (www.rail-reg.gov.uk/upload/pdf/339.pdf)
- we are continuing to develop our thoughts on monitoring for CP4

Proposed output areas (1)

- **safety** – HLOS safety targets are for the industry to deliver – not Network Rail, but
- Network Rail should set out in BP09 how the industry plans to achieve HLOS targets
 - indicators are safety risk model (SRM), fatalities & weighted injuries (FWI) and precursor indicator model (PIM)
 - we propose annual review of data by DfT, RSSB, Network Rail, train operators and ORR – identify problems and agree corrective actions
- **reliability of train performance** – three types of indicator envisaged:
 - top level regulated outputs (annual)
 - customer reasonable requirements (annual)
 - diagnostic indicators

Proposed output areas (2)

	Franchised passenger and open access operators	Freight
<p>Top level regulated output (for each year of CP4)</p>	<ul style="list-style-type: none"> • ScotRail PPM • For England and Wales, sector PPM and significant lateness (franchised and open access operators): <ul style="list-style-type: none"> ○ long-distance services ○ London and South-East services ○ regional services • As above, for franchised operators only • Network Rail total delay minutes for England & Wales • Network Rail total delay minutes for Scotland 	<ul style="list-style-type: none"> • Network Rail total delay minutes per 100 train-km
<p>Customer reasonable requirements (for each year of CP4)</p>	<ul style="list-style-type: none"> • Train operator PPM • Network Rail delay minutes for each train operator <p>(derived though JPIP process where applicable)</p>	<ul style="list-style-type: none"> • Network Rail delay per 100 train-km caused to each individual freight train operator
<p>Diagnostic Indicators</p>	<ul style="list-style-type: none"> • Network Rail delay minutes by the type and location of delay 	<ul style="list-style-type: none"> • Network Rail delay minutes by the type and location of delay

Proposed output areas (3)

- **capacity** - Network Rail to set out in BP09 how it proposes to deliver the capacity required by the two HLOSs and to include key milestones
 - Thameslink
 - Birmingham New Street
 - Reading
 - peak period capacity
 - route capacity
 - Glasgow Airport Rail Link
 - Airdrie-Bathgate Rail Link
 - Borders Railway Link

Proposed output areas (4)

- **network capability** - Network Rail should maintain the capability of the network as at 1 April 2009, subject to industry change processes and capacity enhancements
 - Network Rail proposing a new definition of capability to include gross tonnage to allow identification of increases in traffic / M&R costs
 - ORR considering whether the proposals are appropriate – will inform decision on outputs for CP4
- **network availability** - consultants to identify a measure of network availability to show the extent to which engineering work disrupts services. We propose to include a target and make this a top level regulated output
 - presentation on the availability project follows

Proposed output areas (5)

- **asset serviceability and sustainability** – unlike other areas which relate only to CP4, treatment of assets in the period affects sustainability in the longer-term
- no simple measure of the sustainability of Network Rail's assets over the longer-term
- we propose to measure against a 'dashboard' of indicators
 - asset policies
 - asset age
 - asset management activity levels
 - current asset condition
 - track, signalling, electrification, civil engineering, earth structures, drainage, telecoms, operational property

Proposed output areas (6)

- **stations** - as a baseline, Network Rail to maintain the average condition of stations (to be determined by a new stations condition index) and reflecting HLOS requirements. ORR reviewing how Network Rail might spend the extra £150 million for station improvements included in the England & Wales HLOS
- **depots** - Network Rail should continue to maintain the condition of its light maintenance depots so that their long-term sustainability is secured. ORR to review what Network Rail says in BP09 about its depot activities and costs in CP4 and the new M19 target and trajectory

Proposed output areas (7)

- **customer satisfaction** - we are consulting on the possibility of an output to reflect the satisfaction of train operators since
 - the company does not always deal satisfactorily with customers' needs
 - Network Rail's own surveys of TOCs and FOCs give disappointing results
- but we are also interested in any initiatives that Network Rail may take to address this
- **other areas: train planning & environment** – no proposals for outputs

Summary

We are considering a structure of outputs which consists of -

- top level regulated outputs set by ORR
- disaggregated outputs and targets established by Network Rail and detailed in its 2009 business plan (customer reasonable requirements)
- a suite of monitoring indicators and diagnostic tools to act as leading indicators and to understand trends in higher level outputs
- We are considering a change process
- All supported by the ongoing requirement for Network Rail to comply with its network licence, and in particular its stewardship of the network under Condition 7
- Consistent with our review of Network Rail's network licence and our aim of a more purposive approach. Presentations on this subject in the afternoon session

Periodic Review 2008: Network Rail's outputs

www.rail-reg.gov.uk/upload/pdf/338.pdf

Questions or views



PERIODIC REVIEW: NETWORK RAIL'S OUTPUTS

Presentation by ATOC

NETWORK RAIL OUTPUTS

- We welcome the consultation and in particular the objective of disaggregating outputs to a level that makes sense to a train operator.
 - “We are considering a structure which consists of
 - Disaggregated outputs and targets established by NR ... which would be regarded as customer reasonable requirements, and so will be potentially enforceable under the Network Licence.”





THE NEED TO DISAGGREGATE

- “We also believe that there should be in future a greater degree of disaggregation so that rail users can see what NR is committed to deliver on different parts of the network. This would be in line with the expectations of many of its stakeholders.”
- We agree that the method of delivering the local outputs should not be hardwired.



DISAGGREGATION HELPS EVERYONE

- There is sometimes seen to be a tension between disaggregation of outputs and having sufficient degrees of freedom to efficiently manage a business.
- We do not accept this.
- Its worth contrasting two examples:
 - Performance
 - Stations



CASE STUDY: PERFORMANCE

- Performance in earlier control periods was an aggregate number. No individual TOC knew what it was entitled to expect.
- This changed first both LOCs and then with JPIPs.
- The disaggregation of commitment provides focus and the ability to hold each party to account at local level.)



PERFORMANCE

- This policy is supplemented by an ORR enforcement policy (see letter 15 March 2006).
- It delivers local commitment, local accountability, and local enforcement.
- The HLOS targets take this further and will in effect lead to all operators performance converging on 92-93%.
- In future bidders for franchises will have a much clearer view on the performance they can expect from NR. Less risk equals better vfm for government.

CASE STUDY: STATIONS

- We spend £200-400m a year on stations and yet the outputs is poorly defined.
- Aggregated station condition tells us nothing about what an individual TOC can expect.
- The result is an area which by common consent is not well managed.
- Perhaps moving to a "JSIP" with local outputs and plans to deliver these outputs would improve vfm.



FRAMEWORK

	Top level regulated output	Customer reasonable requirements	Diagnostics
Performance	<ul style="list-style-type: none">-Sectoral-E&W/Scotland	JPIP	
Network Capacity	<ul style="list-style-type: none">-Terminal capacity-Route capacity-Specified schemes	<ul style="list-style-type: none">-Schemes	
Network Capability			
Network Availability	<ul style="list-style-type: none">-England/Wales/Scotland-Condition index (A-F separately)	<ul style="list-style-type: none">-Route-7 day Railway-“JSIP”-Local actions	



CONCLUSION

- Local accountability for NR outputs is a powerful engine for change and delivery.
- Empowering customers of Network Rail through committed local outputs is a far better way to improve Network Rail accountability, improve delivery and promote efficiency than relying either on member pressure or on bankers.
- We welcome the initiative and look forward to taking it forward.

Periodic Review 2008 Network Rail's Outputs

Ian Marlee – Head of Regulation
and Contract Services

21 September 2007

General Views on ORR Consultation Proposals (1)

- What's needed:
 - Improved clarity of outputs
 - Ability to respond to changing circumstances
 - Incentives to innovate
 - Challenge – with incentive to outperform

General Views on ORR Consultation Proposals (2)

- Output targets need to be considered in the context of overall periodic review package, including:
 - allowed revenue
 - efficiency targets
 - rate of return
 - enforcement regime
 - outputs

General Views on ORR Consultation Proposals (3)

- Network Rail's status provides strong incentives for continuous improvement
- Regulatory targets and enforcement regime important
- Reputational drivers and incentives also important
- Balance of “sticks” and “carrots”

Disaggregated Outputs in our 2009 Business Plan (1)

- Relationship between disaggregated BP outputs, CRRs and top level regulatory outputs
- Impact of statistical variation
- Predictability, e.g. freight performance at a FOC level and impact of particular flow or market
- Implications on CRRs
 - Lower overall targets compared to national targets?
 - Tolerance levels?

Disaggregated Outputs in our 2009 Business Plan (2)

- Important to consider impact “on the ground” and working relationships
- Need to encourage collective ambition and openness
- Clarity needed on relationship between disaggregated BP outputs and top level regulatory targets

Change control mechanism

- Transparency of changes is key
- Any process needs to allow responsiveness (and not discourage innovation or transparency)
- Agree that any mechanism should focus on significant changes only
- Further work needed

Proposed Outputs in our SBP (1)

The main outputs we plan to include in our SBP are:

- Safety – plans to achieve the 3% HLOS target
- Train Performance
 - PPM by operator and sector
 - Delay minutes by operating route
 - Significant lateness and cancellations by sector
- Network Capacity - list of enhancement schemes with current planned milestones (some at early GRIP stage only)
- Capability – proposals for a suite of 8 measures

Proposed Outputs in our SBP (2)

- Asset Serviceability – individual asset measures and our proposals for a new Asset Stewardship Index
- Customer Satisfaction – forecast score
- Access Planning – description of changes to the overall access planning services provided by Network Rail
- Network Availability – description of proposed new measure
- Sustainability – description of proposals for new measures of economic, environmental and social impact

Periodic review 2008 - Network Rail's outputs Availability

Paul Hadley / Tim Griffiths

21 September 2007

Introduction

- ORR and Network Rail jointly commissioned SDG to develop a specification for a Network Availability Key Performance Indicator (NAKPI)
- Aim: *‘to develop a measure (or suite of measures) that gives a fair reflection of the relative impact of disruptive possessions on users’.*
- The need for such a measure arises as a result of:
 - Concern over a perceived increase in disruption due to engineering works
 - Present lack of appropriate metrics for measuring and monitoring disruption
 - Network Rail’s published ambition of moving to a ‘7-day a week’ railway
 - Need to compare alternative availability scenarios for regulatory purposes

Proposed metrics

- Three primary KPI metrics are proposed to measure of the planned impact of possessions on operators:
 - Effect on passenger services
 - Effect on freight services
 - A combined measure
- Supplemented by others addressing related issues (e.g. possessions overruns)

Proposed passenger KPI

- Value of the excess journey time per train-km
- Calculation:
$$\frac{(A \times B \times C) \times D}{E}$$

A = excess journey time derived from S4CS (NREJT and WACM)

B = Busyness Factor

C = average passenger journeys per day for Service Group

D = economic value of time for Service Group passenger profile

E = train-km for Service Group (a normalisation factor)

A, B and C are calculated daily, D and E are pre-determined

- Application of a time of day sensitivity to the passengers affected is being considered.

Proposed freight KPI

- Track-km available weighted by level of freight traffic
- Calculation: $1 - \frac{(A \times C)}{(B \times C)}$

A = track-km hours unavailable for Strategic Route Section (SRS)

B = total track-km hours for relevant SRS

C = average freight tonne-km for relevant SRS

A and B are calculated daily for each SRS

C is a pre-determined value but updated from time to time to reflect changes in freight traffic

- Modification to reflect traffic profiles over the day is being considered

Proposed unified KPI

- Weighted revenue at risk due to possessions
- Calculation: $A \times \frac{(B + C)}{D}$

A = track-km hours unavailable due to possessions for relevant SRS

B = average daily freight revenue at risk for relevant SRS

C = average daily passenger revenue at risk for relevant SRS

D = total track-km hours for the relevant SRS

B and C are pre-determined average values derived by applying average revenue per passenger train-km or average revenue per freight-tonne-km to the respective train-km/tonne-km for each SRS

- Again, modification to reflect traffic profiles through the day is being investigated

Review of Network Rail's network licence

Andy Burgess

Abigail Grenfell

21 September 2007

Introduction

- The network licence is a fundamental part of Network Rail's accountability
- Licence obligations must create the right incentives and fit with other parts of the regulatory framework
- Our work on Network Rail's outputs is closely linked to our review of the network licence
- Both are being taken forward within the Periodic Review 2008

The network licence

- The network licence granted by the Secretary of State was not perfect at the time of privatisation
- Condition 7 was introduced by ORR later
- The licence has been significantly strengthened at various stages since then
- Earlier this year we made some generally straightforward changes
- Now is a good time to step back and review its structure and obligations

Why we are proposing a licence review

- The licence has evolved over time to address specific problems and we believe that it is time to review these to see if they are still necessary and effective in their current format.
- ORR believes that the industry should take greater responsibility for resolving issues internally, with ORR taking a higher level “overseer” role.
- A number of changes are needed as part of the Periodic Review.
- Seems sensible to review the whole structure and content of the licence in one go to achieve a more coherent licence for the next control period.

Strengths of the current licence

- The stewardship obligation (C7) which leaves the day-to-day management to Network Rail whilst giving ORR a wide scope to investigate potential problems.
- The restrictions on certain activities, which protect Network Rail's income but is tempered by the ability for ORR to give consent for activities where there is a public interest benefit.
- The standard industry obligations

Possible areas for improvement

- The timetabling obligation (C9)
- The stakeholder conditions
- The unstructured nature of the conditions, given the history of the licence

Aims of the review

- To make the licence more coherent in terms of structure.
- To make the obligations more purposive, where feasible, so that Network Rail is free to do the right thing.
- To make enforcement of the licence more focussed and effective

What is a purposive condition?

7.1 *Purpose*

The purpose is to secure—

- (a) the operation and maintenance of the network;
- (b) the renewal and replacement of the network; and
- (c) the improvement, enhancement and development of the network,

in each case in accordance with best practice and in a timely, efficient and economical manner so as to satisfy the reasonable requirements of persons providing services relating to railways and funders in respect of:

- (i) the quality and capability of the network; and
- (ii) the facilitation of railway service performance in respect of services for the carriage of passengers and goods by railway operating on the network.

7.2 *General duty*

The licence holder shall take such steps as are necessary or expedient so as to achieve the purpose to the greatest extent reasonably practicable having regard to all relevant circumstances including the ability of the licence holder to finance its licensed activities.

How we would enforce the licence

- More purposive conditions would allow ORR to focus on serious or systemic problems
- The contractual regime and other established industry procedures should deal with the day-to-day processes and resolve most disputes on these.

Proposed new structure – 6 areas - current thinking

- Core Business
- Scope of Core Business
- Information and Monitoring
- Financial Matters
- Stakeholder Relationships
- Standard Industry requirements

Core business

- Centred around the stewardship obligation in the current Condition 7.
- Likely to include specific obligations on
 - Asset Management
 - RUSs
 - Timetabling and capacity allocation
- Purposive where feasible.

Scope of core business

- This would set out the restrictions on what Network Rail can do, covering existing conditions on:
 - Ring-fencing and financial restrictions
 - Prohibition on cross-subsidy
 - Restrictions of interest in rolling stock
 - Land disposal
- It is likely that much of this will remain quite prescriptive rather than purposive.

Information and monitoring

- This would consolidate all the current obligations on provision of information for consistency and to avoid repetition -
 - it would retain obligation to provide timetabling information to operators and timetabling bureaux.
 - it would include obligations to produce specific information -
 - **a business plan to cover the whole control period, with a change mechanism**
 - **the annual return**
 - **the regulatory accounts**
 - it would also include the use of regulatory reporters.

Stakeholder relationships

- We are considering a single condition, which applies to Network Rail's relationship with all its stakeholders, with a general purpose not to unduly discriminate
- This might include:
 - an obligation to have a code of practice setting out how Network Rail will achieve the purpose, and to revise the code if required by ORR
 - a definition of "stakeholders" including:
 - funders,
 - customers (including those who connect to Network Rail's network),
 - the main passenger representative groups, and
 - any other person who relies on Network Rail to realise their business aspirations.

Financial management and standard industry conditions

- We are considering consolidating the existing conditions into two new conditions.
- Financial management would include the current obligations on payment of fees, the management incentive plan and corporate governance
- The standard industry conditions would include the insurance, liabilities, safety and standards, and environmental obligations – however, we are not proposing to make any material changes to these obligations.

Timescales and industry input

- We develop our thinking between now and Spring 2008
- We would then mirror the periodic review timescales for the final consultation
 - Formal consultation in June 2008 (3 months) alongside the PR08 draft determination
 - Statutory consultation in October 2008 (1 month), following the PR08 final determination.
- We would welcome any views or input into any of the workstreams between now and Spring 2008.

Reform of the Network Licence

Ian Marlee – Head of Regulation
and Contract Services

21 September 2007

Agenda

- World-class
- How do we achieve this?
- The role of our network licence
- Right time reform
- Delivering on the 'better regulation' agenda
- A world-class network licence
- Possible restructuring and examples
- Conclusions
- Questions and discussion

Our world-class aspiration...

"To become a world-class company, we need **world-class infrastructure and operations**, supported by the **right processes**, delivered by **great people**"

Iain Coucher – Chief Executive, Network Rail



Becoming world class

- Since the establishment of Network Rail we have made major strides forward
- But we are not complacent; there is still much to do
- We want to be recognised as a world-class infrastructure manager
- But recognise that we must earn this accolade by satisfying and delighting passengers and freight users

How will this be achieved?

- Doing the 'right thing' from a whole industry perspective
- Understanding the needs and priorities of our customers
- Delivering on our promises and creating effective accountabilities
- Establishing clear responsibilities between industry parties
- Empowering the industry to make its own decisions with ORR engagement where needed

Our licence will play a key role

- Licence review forms part of the periodic review
- An opportunity to reform current regime
- A chance for increased industry empowerment and accountability
- Challenge the need for regulation where industry is already delivering

Right time reform

- Reform at the right speed
- A 'lighter-touch' approach to regulation
- Does not necessarily mean less regulation
- Requires:
 - Network Rail to behave responsibly
 - Good partnership working
 - Appropriate regulatory prioritisation
- A staged approach to reform

The 'better regulation' agenda

- A timely opportunity to assess the network licence
 - What is each licence condition designed to achieve?
 - Is it effectively achieving that purpose?
 - Is the obligation still needed?
 - Is the structure of the licence right?

A world-class network licence

- A more purposive approach
- Clear, high level expectations
- Delivery (as far as is practicable) with industry
- Establishing real accountabilities
- A proportionate, transparent, consistent enforcement regime
- Clearly drafted

Possible restructuring and examples

- Core business (operating and maintaining the network) built on LC7
 - LC9, an industry mandate to do the right thing
- Stakeholder relationships
 - LC25, not just a focus on ‘dependent persons’ but on all industry stakeholders
- Supporting wider rail industry objectives
 - LC26, a more streamlined approach led by industry

To conclude

- We are at an important cross-roads to deliver real benefits
- This is an opportunity to align the licence and our world-class workstreams
- The right licence with the right incentives can be instrumental in delivering the right railway

Questions and discussion

Ian Marlee

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