

Jonathan Rodgers
Senior Executive, Access & Licensing
Office of Rail and Road
25 Cabot Square
London E14 4QZ

13 June 2022

Dear Jonathan,

**First Trenitalia West Coast Rail Limited new Track Access Contract Section 17 Application:
Comment on Network Rail's updated representations**

Executive Summary

Thank you for the opportunity to provide a further update regarding the First Trenitalia West Coast Rail Limited (FTWCRL) new Track Access Contract (TAC) Section 17 Application. This will enable the continuation of current Access Rights underpinning AWC's services from the December 2022 timetable change, and introduction of additional off-peak Liverpool services from December 2023.

In delivering these changes, we are looking to work with and support ORR with its Business Plan aim of 'focusing on ensuring that Network Rail makes good use of new technology, the additional funding it has been given and the lessons learned from the pandemic to support the production of better-quality timetables'; and on ORR's Strategic Objectives, including better rail customer service and value for money from the railway.

Successful implementation of the re-cast December 2022 timetable is vital to ensuring the recovery of UK rail following the pandemic, as it better reflects emerging customer demand. All industry stakeholders share the strong view that the December 2022 timetable change will be a high-performing timetable that supports future growth, driving revenue socio-economic benefit.

This letter, in response to Network Rail's (NR) 20 May representations on our Section 17 Application, sets out in more detail what we (and the industry) are working to achieve.

Introduction

The Application enables implementation of the December 2022 timetable developed in collaboration with the industry. This will drive significant long-distance and regional connectivity benefits as it reflects how our customers want to travel and use our services as we emerge from the pandemic. It is important ORR has clear information on the readiness of the timetable to inform timely decision making and resilient delivery.

It is therefore of concern that NR's representations of 20 May 2022 are not specific in several key areas, with limited evidence underpinning the positions set out. This includes the formal notification of the proposed cap or 'introduction of services' of 12/13 tph on West Coast South. NR has not clearly demonstrated the parameters to which this applies or contractual status. The reduction in quantum below pre-pandemic levels is also not justified by the modelling undertaken on performance or power supply. NR's representations state the re-cast will improve performance, with the full timetable (including additional Liverpool services) assessed to improve On-Time (T-1) figures increasing by 5.3% vs December 2019.

NR has not been able to quantitatively demonstrate the need for mitigations for power supply resilience risk. We have engaged constructively with NR to understand the nature of the risks and consider operational mitigations to reduce power draw. These discussions continue. For the former, an understanding is needed on whether the phased introduction of additional services, Hitachi rolling stock and proposed GSMR-based operational instructions will mitigate the risk, which applies only during the worst perturbation. For the latter risk, of which AWC were notified on 5 May via a report, further work is required.

With the timetable having been developed over the last two years to learn lessons from other significant changes, it is not acceptable that NR is not yet able to reach a conclusion on which services it can support, and needs to complete further analysis, notably regarding Anglo-Scottish Voyager replacements, a fundamental component of the plan. With the timetable changes to be published in the coming weeks, there is a need for clarity and decisiveness to inform ORR's position and ensure robust delivery of the enhancements. This will protect the introduction of key customer benefits and enable FTWCRL and the Department to plan with certainty. It is concerning NR is not at this stage able to confirm which services it can support, and that clear review points for its position are not set out.

Context

The FTWCRL new TAC application underpins continuation and recovery of the AWC service offer. Crucially, it enables implementation of the December 2022 timetable, less than six months away. It will re-set of the standard hour timetable on the West Coast Main Line (WCML). It better reflects how our customers want to travel and use our services as we emerge from the pandemic, and will significantly enhance connectivity as we look ahead to HS2.

The December 2022 timetable change has been carefully developed by mutual agreement with NR and other Train and Freight Operators, along with key regional stakeholders including Grand Rail Collaboration and Manchester Recovery Taskforce. Building and adapting a concept timetable designed originally as part of our Franchise bid, we have played an active role in the timetable development work and analysis over the last two years, framed by the Industry Planning Group (IPG) and Events Steering Group (ESG) workstreams. See a summary of the changes attached as Appendix A.

Following a coordinated industry approach with these key stakeholders and DfT, formal Ministerial approval was given to proceed with the timetable change in March this year. A copy of the Ministerial letter we submitted jointly with NR, the Grand Railway Collaboration, West Midlands Rail Executive and West Midlands Trains (WMT) is attached as see Appendix B. Joint stakeholder communications on the timetable change have now launched, taking a coordinated approach. This includes through a successful Parliamentary forum on 7 June 2022, introduced by the Rail Minister.

As we approach implementation, we continue to support NR on validation of our December 2022 timetable bid. This was submitted at D-40 and revised at D-34 in line with the agreed ESG process. This reflects the agreed Concept Train Plan developed under the IPG, designed to include capacity for phased introduction of AWC additional off-peak Liverpool services within the standard hour. Validation is progressing well, however as discussed, timely decision making by NR and ORR will be key to ensuring robust, successful delivery of the change.

The Application and Proposed Track Access Contract

FTWCRL's original application for a new TAC was submitted as part of the Franchise Bid process in November 2019. We provided an updated application on 26 February 2021 to reflect CP6 model contract terms, consolidation of the current TAC to include the 29th Supplemental Agreement,

confirmation of the new Class 80x fleet, and timetable aspiration developments in collaboration with the industry WCML IPG workstream. On completion of the December 2022 timetable under the ESG, we were then able to provide further updated Schedule 5 TAC Tables 2.1, 2.2 and 4.1 in March 2022.

As discussed, we intend to date the Rights associated with the additional off-peak Liverpool services within Schedule 5 of the TAC to be valid from December 2023, when we are looking to phase in the additional services following entry into service of our new Hitachi fleet. There is considerable socio-economic and revenue benefit arising from the introduction of these services. This includes not only growth to and from Liverpool but the resultant improvements to intermediate connectivity, for example by building new markets for regular inter-city train services from Trent Valley stations and enhanced regional interchange opportunities. We are happy to provide more detail on this if required.

This is key to deliver on our Franchise requirements (specifically Train Service Requirement 3) as committed to the Department and reflects the design and use of capacity of the December 2022 Concept Train Plan. This approach will enable AWC to introduce the capacity and customer connectivity benefits and return on investment, including in new rolling stock. This approach is in line with ORR's Track Access Guidance (The Use of Capacity 28 July 2021). DfT supports this approach and this service being introduced as soon as network capacity is available.

As discussed with ORR, the FTWCRL Application is currently dated to expire on the Principle Change Date 2031. It is not clear in NR's representations why it will only support the application to align with any proposed expiry of National Rail Contract (NRC) or December 2030 (whichever is the sooner date). With the timescales of our upcoming NRC confirmed subsequent to the submission of the draft TAC, FTWCRL now intends to adjust this end date to 17 October 2032. This means the TAC expiry will be concurrent with the NRC.

Capacity

The WCML quantum cap/phased introduction was first proposed by NR on 5 May 2022 further to a verbal discussion. We asked for further detail about the proposed quantum cap and how it will be applied. A document 'December '22 WCML South – Fast Lines Service Quantum' was supplied by NR on the 8 June 2022 and is included as Appendix C attached. This does not answer many of the and questions previously raised. The points we are seeking clarification on from NR include:

- Which train slots are included in the proposed cap. Specifically, does it include Postal Trains, National Measurement Trains (NMT), Empty Coaching Stock (ECS), Driver Training, Special Events and alterations made by Short Term Planning?
- When and how the cap will be formally proposed to all Operators via industry planning processes.
- NR state the 'This introduction of service will be up to 12 trains per hour (tph) on the fast lines around Euston, rising to 13 tph if not electric, in specific hours, assumed to be peaks, where passenger demand is expected to require it.' Later in the response NR state, 'Due to these performance concerns, Network Rail maintains the need for a phased re-introduction of services for December 2022 for 12 fast line Euston departures per hour, rising to 13 in specific hours (additional diesel) to maintain existing connectivity.' This does not provide clear and coherent advice about when Operators can run 13 tph, which was communicated originally as applying to all hours. Since the pandemic, we are seeing strong demand recovery in the off-peak periods, and therefore require the flexibility to run 13 tph in the off-peak hours.
- Further information is required about how the review will work, and how Operators will get timely input to ensure operational readiness, including staff training, to commence new services.

- The first review is proposed in early 2023 which is ambiguous. We do not understand if this gives a sufficient period to ensure that the timetable has bedded in, and enough data is available to make an informed response. How does this relate to the production schedule for December 2023?
- An annual review is not sufficient or reasonable, because the Timetable Change is twice a year. This would preclude Operators from bidding new services at certain Timetable Change Dates if an amendment to the proposed cap is necessary.
- The amount of flexibility to resolve problems has not been considered. For example, if there is 13 tph electric services in the Up direction, is it permitted if there is only 11 tph in the Down direction. On the same basis if there is 14 tph in one hour and 12 tph in the next hour, is that acceptable because the average is 13 tph. This could be resolved with pathing time which is not useful or reflect the realistic running of the train.

We are concerned that the introduction of the WCML cap could result in decisions being made that are not in accordance with the objective. For example application to the Fast Lines only which we raised as a concern in response to NR's May 2020 Declaration of Congested Infrastructure on the WCML South. Such as - there are some priority ECS moves from Tring to Euston operated by WMT which use the Fast Line. If that hour was in breach of the proposed cap, then those services could run on the Slow Line. Running on the Slow Line would use the same power supply but increase the performance risk because of the high utilisation of the Slow Line by freight trains, crossing moves to and from Wembley Yard and the Bay Platform at Watford Junction. In this example the longer journey time would reduce the turnround at Euston. Of a similar nature are AWC trains in the Down direction, where it can be very difficult to get a path to Wembley IC Depot because it is more congested than the Fast Line and involves a conflicting movement at Harlesden Junction.

The WCML Feasibility Analysis Overarching Report issued on the 12 February 2021 stated that the Fast Line could facilitate paths for 15 tph, which could increase to 16 tph if Fast Line calls at Watford Jn were removed. This is consistent with the WCML and Trans-Pennine Capacity and Performance Assessment published in October 2013. However, since the October 2013 study the additional capacity has been eroded because of changes to the timetable. Therefore, the West Coast December 2022 ESG has restructured the timetable to accommodate the increased quantum of service, changes to rolling stock, improvements to connectivity, HS2 enabling works at Euston and improvements to performance.

The original objective of the work was to identify additional capacity and assess the performance risks. Despite the capacity being identified and an overall improvement in performance, NR propose restricting capacity to below the quantum of service that operated pre-pandemic and is planned in September 2022. Whilst we support a reduction in quantum of service to improve reliability where a traditional peak train is no longer required, this should not risk overcrowding, which can also affect performance levels. We are extremely concerned that to comply with the proposed cap we will have to remove an existing busy service, with a detrimental impact to customer experience. The affected services were included in the model for punctuality figures without additional identified flows and could be accommodated with 15 platforms at London Euston.

The timetable structure allows for the phased introduction of additional services based on demand from December 2023. Service enhancements are delivered at Milton Keynes, Rugby, Nuneaton, Stafford, and Liverpool South Parkway with existing services. The additional Liverpool service will provide enhancements at Tamworth and Lichfield and fulfil the TSR3 requirements at Liverpool Lime Street. This means the phased introduction will not remove any existing connectivity. Importantly, the additional Liverpool services are on self-contained unit diagrams, to enable their phased introduction without impacting other services. The phased introduction means that in December 2022 most hours are within the proposed cap, and it does not become an issue until December 2023.

In summary we support a phased introduction of services to ensure that the timetable is bedded in before an increase in the quantum of services, as we tailor our resource to demand. Our key concern is that this cap is too rigid and will set a precedent that precludes the introduction of additional services

from December 2023 to support growth, around which the timetable was designed, when evidence highlights capacity exists for these to be phased in robustly. The industry needs to be able to invest with certainty to support growth robustly, and with this proposed cap this will not be possible.

The Declaration of Congested Infrastructure for the Fast Lines between Camden South Junction and Ledburn Junction was made on the 11 May 2020. The ESG has subsequently demonstrated that with a material change to the timetable structure and changes to TPRs, there is spare capacity without significantly impacting overall performance. We therefore do not understand the justification for Network Rail not revoking the Declaration of Congested Infrastructure, further to its commitment to review the position in September 2021, and are keen to establish jointly how this can be progressed.

Performance

NR's representations highlight the significant achievement of the industry delivering a Concept Train Plan and a timetable structure that makes for provision for new non-tilt Class 80x rolling stock to replace Voyager 221 rolling stock. It references the overall performance analysis for December 2022 suggests an On Time figure of 81.3%, above the NW&C regional On Time target for 2022/23 is 70%. However, the focus of the response is on the challenges between Rugby and London Euston.

Undoubtedly there is a relationship between capacity utilisation and performance. The reduction in pathing allowances is having a significant impact on T-1 arrival at London Euston. The fact the impact on T-3 is comparatively lower (-0.1% compared to -5.2%) demonstrates this is not driven by the underlying structure of the timetable. The Simulation Modelling for Dec 22 WCML ESG issued on the 6 April 2022 stated, 'Avanti services have greatly reduced pathing (131 minute reduction) in the ESG timetable when compared to the Dec 19 timetable. Most of the pathing reduction for Avanti services (127 minutes) is on Manchester – Euston services, particularly in the up direction. The reduction in allowances in this direction is distributed across the route, however 67 minutes of the reduction is over the section south of Rugby TV Jn, which has been highlighted as a risk.'

The model uses pathing time as quasi-performance allowance to provide recovery. The model does not reflect that from a timetable planning perspective, it is better to have a timetable with less pathing time to avoid trains running early which increases the time spent running on restricted aspects and stopped at signals which can increase delays and congestion. Subsequent to the modelling, in a further iteration of the December 2022 timetable for the loss of Platform 15, pathing time was added to many schedules and performance improved.

NR's representations highlight that T-1 is 5.2% worse in the Up direction at London Euston but does not consider it of significant importance to reference the many other aspects of the timetable which have been designed collaboratively to improve train performance and learn lesson from May 2019. This includes the following (on which we can provide more detail if required):

- The overall On Time (T-1) figures increasing by 5.3% at all stations, with an 11% increase in Long Distance High Speed (LDHS) miles.
- The timetable has been designed to robustly support the temporary reduction to 15 platforms at Euston from May 2023 for a two year period, and reduction to 14 platforms in the interim to deliver the HS2 programme. Modelling has demonstrated that the timetable structure overall, including additional Liverpool services, continues to deliver a T-1 performance benefit (of 2.8%) compared to December 2019.
- In the Down direction from Euston Avanti T-1 improves by 13.2%. This illustrates that the station working is robust and delays are not transferred to the Down direction despite only 15 platforms being available.

- The new 30-minute pattern on the Coventry Corridor enables WMT to only run 2 tph to Northampton whilst providing better spacing at local stations. This will alleviate some of the performance risks on the Coventry Corridor.
- The average dwell times have been increased for Avanti, WMT, and TFW services at Birmingham New Street to improve recoverability at Birmingham. This encompasses lessons learned from previous timetable changes, including May 2019 as referenced in NR's representations, to minimise spread of delay through the West Midlands.
- Review of Train Planning Rules values and fixes to Sectional Running Times, alongside introduction of new rolling stock, to improve performance.
- A more repeating structure (less variation within service groups) throughout the day for most services which could make it more manageable and less prone to bespoke regulation.
- CrossCountry performs significantly better across the board due to additional allowances and dwell times in the Coventry area, which will benefit the wider rail network.
- Numerous re-timings and small-scale changes to paths have contributed to a more robust and resilient timetable (e.g. Birmingham – Scotland services running slow line from Stafford to Crewe significantly reduces conflicting moves).
- Parallel moves reducing risk at Ledburn Junction where the services cross between Fast and Slow lines.
- The changes on the WCML are coordinated with changes in the Manchester area, where the altered timetable will result in a reduction in average delays of 20-25% compared to December 2019.

The results referred to by NR as without additional identified flows, contain 15 tph in the am peak and 14 tph in the pm peak. The pm peak already reflects a reduction compared to pre-pandemic, where there was 15 tph increasing to 16 tph on a Friday. No modelling work has been undertaken to remove existing peak hour trains from the Concept Train Plan. Therefore, we cannot see any clear justification on performance grounds to remove proposed trains which operated pre-pandemic to comply with the WCML cap.

The table below illustrates Fast Line paths modelled in both options and trains planned to operate in December 2022. It is not going to be clear to all parties which services NR will support until the end of

Time	Planned to Operate from Dec 23	Planned to Operate Dec 22	Performance Model without additional identified flows	Planned to Operate from Dec 23	Planned to Operate Dec 22	Performance Model without additional identified flows
06:00 - 06:59	4	4	4	10	9	10
07:00 - 07:59	15	14	15	12	11	11
08:00 - 08:59	15	13	15	13	12	12
09:00 - 09:59	15	13	13	14	12	14
10:00 - 10:59	13	12	12	14	12	12
11:00 - 11:59	14	13	12	13	12	12
12:00 - 12:59	14	13	13	13	12	12
13:00 - 13:59	13	12	12	14	12	12
14:00 - 14:59	14	12	12	13	12	12
15:00 - 15:59	14	12	13	13	12	12
16:00 - 16:59	13	12	12	15	13	14
17:00 - 17:59	14	13	13*	15	14	14
18:00 - 18:59	14	13	13*	15	13	14
19:00 - 19:59	14	12	12	13	13	13
20:00 - 20:59	11	10	10	13	12	13
21:00 - 21:59	10	9	10	12	11	11
Total	207	187	191	212	192	198
* Tring - Euston ECS moves not in model						

June but complying with the WCML cap there are only two hours where a specific issue exists, and a number of hours where there is scope to increase the service level.

We equally see the phased introduction of our additional Liverpool services as an opportunity to add resilience. As such we are committed to continuing to work with NR to review performance and refine the timetable as the plan embeds to drive further improvements.

The Specified Equipment

As noted, the Application seeks introduction of new Specified Equipment. This is to enable FTWCRL to exercise Firm Rights using new-build Hitachi Class 807 Electric, and Class 805 Bi-mode units. In addition to realising the benefits of our Line Speed Improvement Project with NR, to operate at 125mph utilising MU Differentials without the requirement to tilt, the December 2022 timetable takes advantage of the superior acceleration characteristics of these fleets. The new fleet also offers enhanced seating capacity, particularly on the Chester and North Wales services.

AWC formally submitted our Vehicle Change application for the new fleets in March 2021. This was then sent out for internal NR consultation on 8 April 2021 with a deadline for responses of 22 April. As soon as the majority of questions received had been answered, the VC was sent out for external consultation on 18 June, with a deadline for responses of 16 July. By September 2021, we had provided answers to all questions raised and NR were discussing whether it could be established. Despite numerous requests from AWC for the Vehicle Change to be established, we are waiting for this process to be completed.

Based on rolling stock deliveries and driver training roll out, we are currently looking at introducing the first of our new trains into service on the Birmingham and Liverpool routes within the duration of the May 23 timetable. Note Class 805 units are likely to be introduced onto the North Wales service, prior to the Bushey upgrade coming online in Spring 24. Before the Class 805s are introduced, at least 1tph into and out of London Euston will continue to be operated by Class 221 diesel stock.

The December 2022 timetable structure has been designed, through application of standalone diagrams and use of the new trains' timing loads, to enable resilient transition and cutover to the new fleet, without changes to the plan itself.

Power Supply

FTWCRL have engaged closely with NR regarding Power Supply, initially in the Acton Lane Feeder Station area between Euston and North Wembley, and more recently in the Penrith-Scotland northern section of the WCML.

Acton Lane:

In respect of Euston-North Wembley power supply, review commenced in October 2021 on the supply of NRs Navitas report. This was attached as an appendix to NR's representations. FTWCRL raised issues including the application and interpretation of applicable standards to categorise voltage, however accept the general principle that mitigation is needed in the very infrequent N-1 scenarios.

FTWCRLs position on Power Supply in the Euston-Bushey area is that it is adequate in Normal N-0 operation and that appropriate mitigations are available in N-1 operation.

FTWCRL has separately modelled train operation over this section identifying that the most effective mitigation is to reduce the energy draw in the acceleration of electric trains in the down direction and that the 'Notch 3' reduced power approach that has been in place for some years on WCML high speed services is not sufficient. We have developed and agreed with Network Rail a 'Notch 3 100' approach in which upon reaching 100mph in Notch 3 the train continues at that speed until it has passed North Wembley Neutral Section. This approach recognises the basic physics of the Acton Lane context and

its journey time impact is modelled at around 30 seconds Euston-Watford Jn (so including the acceleration from 100mph to EPS after passing North Wembley Neutral Section) on down Pendolino and Hitachi 80x trains. This process has been drafted and will require briefing to traincrew using the template already in place (since 2013) for 'Notch 3' running initiated by GSM-R advice to drivers. FTWCRL consider that with total Engineering Allowances of 4 minutes south of both Crewe via the Trent Valley or Birmingham New Street via Coventry, of which 2 minutes are south of Rugby, the systemic 30 seconds is not a material risk to our or other Operators' services. We have shared this approach with NR and consider that this contains the issue with a 20% approx. reduction in energy draw by AWC down services modelled on the Acton Lane feeder station, and full power available after North Wembley from the Bushey feeder station.

Penrith-Scotland:

In respect of Penrith-Scotland FTWCRL review commenced in May 2022 on the supply of NR Scotland's report, appended to NR's representations. FTWCRL have requested the modelled timetable or the Technical Notes that the report states should be read with it. FTWCRL have focussed at NRs suggestion primarily upon the Penrith-Carstairs Section 3 of the report.

FTWCRL considers this report flawed in that it sets out through use of Red Amber Green classification to convey the level of problems that exist, but the categorisation is not fully accurate and the actual situation far less non-compliant than suggested. AWC on 19 May provided a detailed response to the Section 3 content including our own corrected RAG categorisations. We believe NR has sought to apply internal standards to parameters that are interface standards and defined in BS EN documents, and that the two sets of standards do not align properly. We have not received formal acknowledgement of this response or its content.

A recent brief inspection of the Section 2 (north of Carstairs) content contains a similar high level of incorrect categorisation of metrics but does suggest there is an issue with voltages at Currie in feeding from Gowkthrapple in N-1 scenarios that may require an operational mitigation pending commissioning of the Currie feeder. We believe this is feasible.

NR has subsequently advised that operation over the area covered by the report is acceptable in Normal N-0 conditions, but we do need to develop and agree mitigations for N-1 scenarios. We are starting modelling the specific feeder and route topography to understand the effectiveness of such as 'Notch 3' mitigations. On the basis of the approach and work at the London end of the route we are confident that an acceptable mitigation for specific feeder section N-1 arrangements can be agreed.

FTWCRLs position on Power Supply in the Penrith-Carstairs section is that it is compatible with high-speed services passing through the feeder sections rapidly and with the exception of initial accelerations and steep climbing, not using full power continually. These train characteristics mean that the passenger services are unlikely to be associated with the prolonged and deep voltage drops at locations such as Penrith and Murthat that NR are reporting.

FTWCRLs position on power supply north of Carstairs is that there is an issue from Gowkthrapple at Currie in N-1 scenarios that may, pending Currie feeder, need an operational mitigation on electric services in N-1 running specific to the Currie-Auchengray section. We continue to work with NR to develop this.

Readiness and Assurance

In addition to the ESG framework, we have worked with industry stakeholders to develop several readiness workstreams to identify and mitigate risks to resilient timetable delivery. The meetings listed below illustrate how AWC and NR are continuing to work collaboratively to learn lessons from previous

timetable changes; and identify and resolve potential risks as early in the process as possible – with a shared objective of a robust delivery of the December 22 timetable.

1. **Joint Virtual Team:** We have a Joint Virtual Team (JVT) with NR to together track December 2022 timetable readiness and risks, with key themes including delivery of the new rolling stock, power supply risk mitigation, the line speed project, Driver training, stakeholder consultation and operational performance. Each area has its own workstream, which is being managed between AWC and NR. The JVT group has met periodically and is imminently moving to fortnightly.
2. **Bi-Weekly Industry readiness sessions:** A bi-weekly industry readiness session was initiated by NR in May 2022 along with other operators to manage readiness for West coast and West Midlands route operations. The forum covers Timetable validation, Performance, Operator readiness (WMT & AWC), Safety (TCRAG), Access Rights, Communications plan
3. **Internal AWC Readiness Meeting:** Weekly working group meeting to cover; stakeholder updates, key actions, timescales, risk management and mitigation, issue escalation. Through this group we have coordinated business cases to support key decisions from DfT/NR and the business to support timetable delivery.
4. **PMO Steering Group:** We engage with the NR Project Management Office (PMO) on an ongoing basis to track readiness and delivery risks associated with each timetable change, including December 2022. This complements our direct work with NR through the JVT, and internal risk assurance processes in place for timetable changes – which will be applied to December 2022.
5. **Timetable Subgroup:** The Timetable Subgroup was set up to create a full week, 7-day concept train plan for the December 2022 train service specification identified by the West Coast Main Line (WCML) Industry Planning Group (IPG). The Concept Train Plan was developed through an industry collaborative approach, with Operators actively involved in the multi-User ATTOne database. Through weekly meetings issues were discussed and resolved at the Timetable Subgroup, to enable successful development of the December 2022 timetable.
6. **Performance Subgroup:** Working collaboratively with the NR NW&C On Time Railway Team, AWC Performance and Planning teams set up a joint working group in Summer 2020 to look at ways in which performance would want to influence the December 2022 timetable recast.
 - Using loss in running, and un-investigated delay information a systematic approach to data and investigation was applied by all involved, regardless of organisation. As part of this it was equally important that the data collection and documents produced were collected and stored in a manner which allowed for conclusions to be referred to, for either the December 2022 recast, or future work that these outcomes may prove useful for.
 - In total 15 sections of the railway were investigated, based on impact or prior knowledge on what happens in the location. The resulting conversation with Train Planning Rules professionals in NR and AWC allowed for 9 points of performance improvement to be built into version 0 of the timetable bid. The remaining investigations concluded in other outcomes not needing a December 2022 intervention. The group oversees mitigations to further improve performance, in addition to initiatives built into the plan.

Conclusion

FTWRCL continue to work extremely closely with the Department, NR, other Operators and key stakeholders on ensuring all necessary assurances are in place to deliver this timetable re-cast robustly. This will be vital to securing continued recovery of UK rail following the pandemic, supporting levelling-

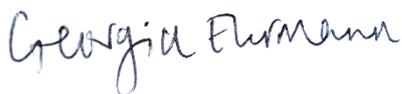
up benefits, and reflecting how our customers wish to travel. Successful delivery of the December 2022 re-cast, and the provision to phase in additional Liverpool services from December 2023, are at the core of this. Both are underpinned by the FTWCRL Section 17 Application.

As set out above, we remain concerned that NR's representations lack clarity and evidence in key areas, that NR is still not at this stage able to confirm which services it can support, and that clear review points for its position are not set out.

It is important to note as we finalise the timetable, we are assured that throughout the development process, all industry stakeholders have and continue to share the common goal that December 2022 will be a high-performing timetable that supports growth. It has been acknowledged that the collaborative way in which the timetable has been developed from concept to refined train plan should be considered as best-practice. As we continue to learn lessons from wider industry changes and build these into our validation and risk assessment processes, it is important to recognise the overall constructive and collegiate way in which December 2022 has been approached.

With the timetable changes to be published in the coming weeks, there is now a need for clarity and decisiveness to inform ORR's position and ensure robust delivery of the planned enhancements. We thank ORR for its support and engagement thus far, and welcome any further questions.

Yours sincerely,

A handwritten signature in blue ink that reads "Georgia Florman". The signature is written in a cursive, flowing style.

Head of Network Development & Planning
Avanti West Coast

Cc. Paul Harris and Michelle Woolmore, Network Rail.