

**Responses to the Go-Op Co-operative Limited, Section 17 Application,
Taunton – Swindon/Weston-super-Mare**

Respondent	PDF pack page number
1. Transport Focus	
2. Transport for Wales	
3. CrossCountry Trains response to Go - Op	
4. Goop GWR response 30 06 22	
5. GBRf	
6. Go-Op to GBRf)	
7. DfT response to NR July 2022	
8. (Go-Op to XC) Fw Go-op feedback	
9. (Go-Op to GWR) Go-op GWR acknowledgement	
10. (Go-Op to DfT) Go-op DfT acknowledgement	

From: Martin Clarke
Sent: 28 May 2022 12:43
To: Gianmaria Cutrupi
Subject: Re: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Hi Gian

Thanks for this - we're happy to support this application in the general sense that additional choice from open access operators is good for passengers, but I don't wish to comment in detail about the specific deliverability of Go-Op's proposals. I'd encourage them to work with us to ensure the service is focused on the needs of passengers, if their proposals are progressed.

Best regards

Martin

Martin Clarke
Rail technical advisor
Transport Focus

From: Gianmaria Cutrupi
Sent: 27 May 2022 13:42

Subject: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

OFFICIAL

Dear All,

Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Go-Op intend to submit an application to the ORR under Section 17 of the Railways Act 1993 for a new Track Access Contract (Passenger Services). In line with the Industry Code of Practice for Track Access Application Consultations, Go-Op requested Network Rail to conduct the industry consultation. We are therefore consulting you on the proposed agreement.

The proposed Track Access Contract (Passenger Services) outlines the Go-Op plan to provide up to 9 trains per day from Taunton to Swindon and to Weston-super-Mare from May 2023. Services would be calling at Taunton, Bridgwater, Highbridge & Burnham, Weston-super-Mare or Taunton, Castle Cary, Bruton, Frome, Westbury, Trowbridge, Melksham, Chippenham, Swindon. The requested length of the Track Access Contract is 12 years, to reflect the planned Go-Op investment in the infrastructure.

Please find attached the following documents:

- Form P

- Draft Track Access Contract (Passenger Services)
- Proposed May 2023 SX timetable

The documentation will be published shortly on our [website](#) in the *Current Track Access Consultations* folder. Please note that the full Go-Op business plan, project implementation plan and financial model will be available upon request from 13 June by contacting Alex Lawrie via email (Alex Lawrie).

Should you wish to comment the above Section 17 application, please send your response by email to Gianmaria Cutrupi no later than **Wednesday 29 June 2022**. Please note your responses will be copied to Go-Op and the ORR.

If you are no longer the appropriate person to receive industrial consultations on behalf of your organisation, I would be grateful if you could please supply the correct contact details so that we may update our distribution list.

Kind regards,
Gian



Gianmaria Cutrupi
Customer Manager (Aspirant Open Access Operators)
System Operator

From: Chris Dellard

Sent: 03 June 2022 10:58

To: Gianmaria Cutrupi

Subject: RE: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Hi Gian,

TfW Rail notes in Section 8.1 of the Application Form that Go-Op will seek to access Canton TMD on an irregular basis for maintenance work. We must point out that existing maintenance capacity in South Wales is currently at a premium, including Cardiff Canton depot. We would be happy to discuss Go-Ops's requirements in due course.

Regards,

Chris

From: Gianmaria Cutrupi

Sent: 27 May 2022 13:43

Subject: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

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OFFICIAL

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Kind regards,
Gian



Gianmaria Cutrupi
Customer Manager (Aspirant Open Access Operators)
System Operator

28th June 2022

Dear Gianmaria,

XC Trains Ltd.'s response to Proposed Application under Section 17 between Network Rail Infrastructure Ltd and Go-op Co-operative Ltd.

This letter constitutes XC Trains Ltd.'s formal response. XC Trains Ltd currently is unable to support the section 17 application made by Go-op Co-operative Limited, we currently have a handful of questions which need addressing before the further internal discussion can proceed.

Questions

- Could Go-op Co-operative Limited please confirm if the proposed class 153 will be fitted with Automatic Train Protection (ATP)?
- Section 6 of the Form P provided outlines some of the recommended measures that will be reviewed, can Go-op Co-operative Limited advise on their initial thoughts regarding the rescue of a failed Go-op Co-operative Limited service on a busy line?
- Has capacity and performance at Bristol Temple Meads and Parson Street been considered in line with Go-op Co-operative Limited's contingent paths please?

Summary

In Summary XC Trains Ltd are currently unable to support Go-op Co-operative Limited's application due to further information being required, however we fully acknowledge the diligence shown in answering our questions thus far and look forward to further discussion.

Yours sincerely,

Scott Turner

Track Access Manager

Redacted version for publication.

**GWR Response to NR's Consultation
re Go-op's Application for a TAC Commencing SCD (May) 2023.**

Dear Gian,

Thank you for this consultation.

GWR objects to Approval of this application.

This is on economic and on operability grounds.

In addition we note that the application is not supported by Network Rail.

GWR's objection is driven by the following:

1: Economic: Ticket revenue abstraction is identified by GWR as being significant and such that the proposal is likely to fail the ORR's Not Primarily Abstractive test. We will provide to the ORR the findings of GWR's moira analysis; and

2: Operability: GWR has not been able to prove the paths. We understand further work is underway to assess capacity and performance. Rolling stock maintenance plans and stabling needs are not yet we believe proven.

This application it is believed is for

(a): an initial service commencing during the May 2023 timetable primarily Taunton - Westbury; and

(b): a service with rights again sought from SCD (May) 2023 primarily for extension of this service to Swindon;

There is also a service mentioned that appears to seek to run more services as well as extension of passenger services onto the heritage railway.

The application is for a contract with duration 12 years due to investment. (5 is the max normally permitted by the ORR unless investment needs to be protected.)

GWR objects to all these aspirations.

We are conscious that a contract commencing May 23 and running for 12 years is intended to run almost completely in CP7 and later control periods (and under GBR umbrella) such that charges throughout and access circumstance need to be made on that basis.

GWR asks that the Department for Transport be consulted, as any loss of revenue to GWR (as well as to some other operators) feeds through.

The ORR has confirmed all things being equal it will Approve only if existing rights (like GWR's) are honoured and assumed to be extended in duration.

GWR has a requirement to increase the frequency of services between Temple Meads and Westbury as part of the wide ranging local authority supported plans to improve fundamentally the services radiating from Bristol.

(redacted)

The application utilises the route through Melksham. This can be congested as it incorporates single line and is used by freight services. GWR has not always been able to expand its service on the route because of this. In addition engineering work (or perturbation) on the Berks and Hants leads to diversion via this route such that at times the GWR local service has had to be lifted to leave reliable capacity for these diverted services.

We would like to know Network Rail's view on the application please.

Will recruitment of crews and other staff threaten GWR establishments?

The application implies that Service Group GO01 will operate from 2023 to 2035 using class 153 rolling stock (with modifications for PRM compliance). All timing loads are therefore 15x. There will initially be two diagrams operated by three units;

SX:	fwd	rev
NortonFW – Taunton	0(+7c)	0(+7c)
Taunton – Weston	2(+2c)	2(+2c)
Chippenham – Swindon	1(+2c)	1(+1c)
Taunton – Frome		1
Taunton – Westbury	3	4
Taunton – Swindon	2(+2c)	2(+3c)

We believe that from this and from the timetable kindly provided (and advice given) the following services are sought:

Firm Right TT

A:		
	Taunton	05.33
06.04	WsM	06.09
06.42	Taunton	06.42 tight or swap with B
08.26	Swindon	08.35
10.15	Taunton	10.58
11.57	Westbury	12.50
13.47	Taunton	14.45
15.46	Westbury	16.08
17.04	Taunton	17.45
18.11	WsM	18.20
18.51	Taunton	18.57
19.41	Frome	xx+xx
xx+xx	Westbury	21.51
22.45	Taunton	

B:

	Taunton	08.49
09.43	Westbury	14.31
15.23	Taunton	16.50
18.28	Swindon	19.30
21.05	Taunton	

Contingent Right TT

A:

	Taunton	05.33	
06.04	WsM	06.09	
06.42	Taunton	06.42	tight
08.26	Swindon	08.35	
10.15	Taunton	10.58	
12.42	Swindon	13.46	
15.23	Taunton	16.50	
18.28	Swindon	19.30	
21.05	Taunton	21.40	
23.28	Swindon	23.35	
23.51	Chippenham	23+52	
23+55	Thingley		

B:

	Thingley	06+24
06+48	Chippenham	06.49
08.17	Taunton	08.49
11.29	Swindon	12.03
13.47	Taunton	14.45
15.46	Westbury	16.08
17.04	Taunton	17.45
18.11	WsM	18.20
18.51	Taunton	18.57
19.51	Westbury	21.51
22.45	Taunton	

I attach GWR's analysis of pathing including likely conflicts with GWR's own services.

Regarding the draft contract itself, we believe there may be an element of rights being sought in Table 2.1 and in Table 2.2 for portions of the same services. Where the firm right is used for one portion, it appears the contingent right for the extension also includes gain a contingent right for the existing firm right element.

The application seeks a firm right for each Passenger Train Slot to commence from and/or terminate at Taunton, Frome, Westbury, Melksham, Highbridge & Burnham and Bridgwater (to/from Weston Super Mare only) if that station is listed in its Calling Pattern, This is an unheard of firm right to capacity, and GWR recommends any right should have the template contingent right to start / terminate short shared by most tocs.

GWR believes consideration of any Firm Right to combine Passenger Train Slots at Taunton and Frome should await timetable modelling.

Ancillary movements are not normally provided firm right other than the general firm right in the template for sufficient ancillary services to enable delivery of the passenger wtt. GWR believes this model clause is all that is necessary.

GWR does not believe a firm right is necessary as sought to go via the Frome avoiding line in order to pass Frome, if Frome is listed in its calling pattern. This in our view is automatic.

The following is contained in the application form:

- Daily refuelling and stabling at Norton Fitzwarren (two sets);
- Stabling at Thingley (two sets plus two more contingent);
- Fortnightly maintenance at Exeter GWR (x 4 or 6 sets);
- Heavy maintenance at Canton Tfw;

- Requires level crossing safety mitigation work;

- Westbury platform zero helps performance;
- Loop at Thingley required for Melksham if calls elsewhere are not to be omitted;
- Loop at Frome and platform aid creation of paths;

- Aspiration for an Oxford service likely to require enhancement; and

- A number of enhancements are quoted as being likely to be made in the first two years.

If any enhancement is required and is not funded and planned then any associated right should in GWR;s view be dependent on that enhancement being funded and planned.

Are there lease and maintenance contracts in place regarding rolling stock?

(redacted)

(I should be very grateful if you would honour the confidentiality note at the top of this email please.)

Yours sincerely,

Rob

From: Ian Kapur

Sent: 01 July 2022 16:14

To: Gianmaria Cutrupi

Subject: RE: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Dear Gianmaria,

Many thanks for permitting GB Railfreight to respond two days after the stated deadline on this Section 17 track access contract application.

GB Railfreight has some concerns with this Section 17 application whereby some justifications and more information are needed. In no particular order:

- This Track Access Contract application is for 12 years. This is far in advance for what is deemed a normally acceptable duration for a track access contract with associated firm rights. What is the justification for applying for a track access contract with firm rights for such an extended period of time, in the first instance?
- GBRf notes that this application is to support the operation of up to 9 trains per day from the May 2023 Timetable. The Advanced Notice of Timetable Change date, required to be submitted to Network Rail at D-55 weeks, has now passed. Can Go-op please confirm whether or not it had bid for services against the expectation of obtaining approved firm access rights at the D-55 date?
- If the answer to the above point is “yes”, on what basis was that possible given Go-op has no track access contract, firm access rights or Train Operating Licence yet in place? If the answer to the above point is “no”, is Go-op not at a disadvantage in the process of obtaining network capacity? Either way, GBRf cannot quite see how Go-op could obtain validated train slots for the May '23 Timetable. I'd be grateful for some on this please.
- GBRf cannot see any entry in the latest 2022 Final Calendar of Events, or the “Changes that are not Events” tab (attached) for these services. May I ask why there hasn't been any visibility of these new services given for the May '23 Timetable?
- The Application Summary states that the Service Group “will operate from 2023 to 2035 using Class 153 rolling stock....”. Will Class 153s really be in use until 2035 and, were other traction to be used during the currency of this track access contract, might said traction perform differently to Class 153s? There needs to be more certainty with regard to specified traction in this application.
- If the significant piece of timetable development work mentioned in Section 3.4 of this application is not completed before July 2022, can you please confirm that there will be adequate time to assess this capacity work, and also assess how this timetable might perform with other passenger and freight services? With a demonstrable increase in new stopping passenger services on this part of the network, it would be useful to understand how existing capacity and performance might be affected. GBRf would be interested to see the results of such studies.

I look forward to hearing from you.

Regards,

Ian Kapur.

Head of Strategic Access Planning,
GB Railfreight Ltd.,
3rd Floor,
55 Old Broad Street,
London, EC2M 1RX.

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Registered Office: 3rd Floor, 55 Old Broad Street, London, EC2M 1RX.

GB Railfreight

From: Alex Lawrie
Sent: 30 June 2022 17:51
To: Gianmaria Cutrupi, Ian Kapur, Clyde Schwartz .
Cc:
Subject: Re: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Fine by me.

On 30/06/2022 14:49, Gianmaria Cutrupi wrote:
OFFICIAL

Hi Ian,

Thank you for getting in touch – no concerns with a 2-day extension from a Network Rail perspective.

May I ask you to cc Alex (alex lawrie and Clyde (clyde schwartz) in your response please?

@Alex @Clyde – is the above ok with you?

Kind regards,
Gian



Gianmaria Cutrupi
Customer Manager (Aspirant Open Access Operators)
System Operator
07730355911

From: Ian Kapur
Sent: 29 June 2022 18:02
To: Gianmaria Cutrupi
Cc:
Subject: RE: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Dear Gianmaria,

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Thank you.

Regards,

Ian Kapur.
Head of Strategic Access Planning,
GB Railfreight Ltd.,
3rd Floor,
55 Old Broad Street,
London, EC2M 1RX.

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GB Railfreight

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Gian



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Registered address: 55 Old Broad Street, London, EC2M 1RX

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--

Alex Lawrie

Director, GO-OP Co-operative Limited and GO-OP Learn Limited

Societies registered with the FCA no.s 30678 and 8463

GO-OP Train registered office 10 East Reach Taunton TA1 3EW

GO-OP Learn registered office The Old Church School, Butts Hill, Frome BA11 1HR

From: Alex Lawrie
Sent: 04 July 2022 12:06
To: Ian Kapur, Gianmaria Cutrupi

Subject: Re: Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Thanks for your response to our consultation; I've provided some additional information inline.

On 01/07/2022 16:13, Ian Kapur wrote:

GB Railfreight has some concerns with this Section 17 application whereby some justifications and more information are needed. In no particular order:

1. This Track Access Contract application is for 12 years. This is far in advance for what is deemed a normally acceptable duration for a track access contract with associated firm rights. What is the justification for applying for a track access contract with firm rights for such an extended period of time, in the first instance?

Our reasons for seeking a 12 year contract are: substantial investment is required in rolling stock, level crossing safety, stabling and depot facilities; the route is intended to serve relatively dispersed market towns, and so may take longer to achieve profitability than an intercity route; it includes contingent rights that may require further investment in capacity enhancements which realistically will take several years to implement; and it coincides with an acknowledged climate emergency that will require a further complex, expensive and disruptive transition to electric traction to begin within a few years.

2. GBRf notes that this application is to support the operation of up to 9 trains per day from the May 2023 Timetable. The Advanced Notice of Timetable Change date, required to be submitted to Network Rail at D-55 weeks, has now passed. Can Go-op please confirm whether or not it had bid for services against the expectation of obtaining approved firm access rights at the D-55 date?

See attached.

3. If the answer to the above point is "yes", on what basis was that possible given Go-op has no track access contract, firm access rights or Train Operating Licence yet in place? If the answer to the above point is "no", is Go-op not at a disadvantage in the process of obtaining network capacity? Either way, GBRf cannot quite see how Go-op could obtain validated train slots for the May '23 Timetable. I'd be grateful for some on this please.

The ORR is very clear that rights should be not sought too early (ie on a speculative basis). We have been advised that the licence in particular cannot be awarded more than a few weeks before the commencement of operations. So it is simply a consequence of the process for a new open access operator entering the industry that the advanced notice must precede any contract or licence. As to whether that will lead to our being disadvantaged in the process of allocating capacity is I think for others to answer.

4. GBRf cannot see any entry in the latest 2022 Final Calendar of Events, or the "Changes that are not Events" tab (attached) for these services. May I ask why there hasn't been any visibility of these new services given for the May '23 Timetable?

Again, these are I think not questions for me to answer.

5. The Application Summary states that the Service Group “will operate from 2023 to 2035 using Class 153 rolling stock....”. Will Class 153s really be in use until 2035 and, were other traction to be used during the currency of this track access contract, might said traction perform differently to Class 153s? There needs to be more certainty with regard to specified traction in this application.

It is true that we would hope to be employing battery electric rolling stock by 2035, but as no BEMUs capable of operating our route are on offer from ROSCOs at present it's hard to see what choice we have but to proceed on this basis. It is also the case that the design life of the 153s will be reached before 2035, but that doesn't necessarily mean it can't be extended with an appropriate programme of refurbishment and renewal.

6. If the significant piece of timetable development work mentioned in Section 3.4 of this application is not completed before July 2022, can you please confirm that there will be adequate time to assess this capacity work, and also assess how this timetable might perform with other passenger and freight services? With a demonstrable increase in new stopping passenger services on this part of the network, it would be useful to understand how existing capacity and performance might be affected. GBRf would be interested to see the results of such studies.

The speed of delivery of the advanced timetable development work is not in my power, so I can't really address that point. However, it is certainly true that our application is unlikely to progress from section 17 to section 18 without the work being completed, and that could in turn make it less likely that the ORR will award us track access. So we are most certainly incentivised to contribute whatever we can to the speedy conclusion of this work. In the meantime, I think any views you have now about the thresholds or standards that you would apply to such capacity and performance studies, and that you would take to be evidence that the proposed timetable is robust and viable, would be very helpful.

Yours, Alex Lawrie

for Go-op

7.

I look forward to hearing from you.

Regards,

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3. Proposed May 2023 SX timetable

The documentation will be published shortly on our [website](#) in the *Current Track Access Consultations* folder. Please note that the full Go-Op business plan, project implementation plan and financial model will be available upon request from 13 June by contacting Alex Lawrie via email (Alex Lawrie).

Should you wish to comment the above Section 17 application, please send your response by email to Gianmaria Cutrupi no later than **Wednesday 29 June 2022**. Please note your responses will be copied to Go-Op and the ORR.

If you are no longer the appropriate person to receive industrial consultations on behalf of your organisation, I would be grateful if you could please supply the correct contact details so that we may update our distribution list.

Kind regards,

Gian



Gianmaria Cutrupi

Customer Manager (Aspirant Open Access Operators)
System Operator



7 July 2022

Gianmaria Cutrupi, customer manager

by email:

Dear Gianmaria,

Industry Consultation – Go-Op Co-operative Limited, Section 17 Application, Taunton – Swindon/Weston-super-Mare

Thank you for sharing the open access industry consultation with the Department regarding Go-Op Co-operative Limited's (Go-Op) track access application to provide up to nine services per day from Taunton to Swindon and Weston-super-Mare from May 2023.

As is emphasised in the Williams-Shapps Plan for Rail, the Department sees a role for open access operators. We want to continue to explore the scope for open access where spare capacity exists to make best use of the network and grow new markets for rail, and innovative proposals such as those put forward by Go-Op, providing new direct services and improved connectivity to communities, can play an important role in realising this goal. The Department is therefore supportive in principle of Go-Op's proposed services between Taunton and Swindon/Weston-super-Mare, which would offer passengers new routes and links from intermediate stations.

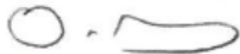
The Department has undertaken initial analysis of the Go-Op track access proposal. This suggests that the proposal meets the 0.3 'not primarily abstractive' (NPA) test. In particular, MOIRA runs with the timetable provided by Go-Op suggested the proposed services could drive increased journeys on the line between Westbury and Swindon, including from intermediate towns such as Chippenham.

As with other applications of this nature, however, the Department asks and expects Network Rail to ensure that it has conducted a careful examination of the operational consequences of this application, most particularly regarding capacity and performance, so that a robust timetable is delivered. We are clear in particular about the importance of the performance implications of the application being carefully considered, and note that the possibility of congestion at Swindon should be fully examined as GWR services through the station increase.

Additionally, I note that while the application references investment in 3.3 of the Form P and goes on to mention contribution to various improvements including of the Melksham branch, it does not give full details and omits any specific information on timescales and outputs. In light of the lack of evidence provided, we consider that an access contract of no more than five years would be more appropriate unless and until further evidence is provided which would justify a longer contract.

Please contact me if you wish to discuss this matter further in the meantime.

Yours sincerely,

A handwritten signature in black ink, consisting of a small circle followed by a horizontal line that curves upwards at the end.

Oliver Mulvey
Deputy Director

cc. Dan Moore, Director, Rail Strategy and Analysis

From: Clyde Schwartz
Sent: 15 July 2022 12:29
To: Gianmaria Cutrupi
Cc: Alex Lawrie
Subject: Fw: Go-op feedback

Hi Gian,
Please see response to Cross Country below.
Kind Regards

Clyde Schwartz
GO-OP Train

From: Clyde Schwartz
Sent: 15 July 2022 11:04
To: Scott Turner, \$UK XC -Track Access

Subject: Re: Go-op feedback

Good morning Scott,
Hope you keeping well.
Apologies for the tardiness in response.
Please see attached a copy of the May 23 timetable development done by Go-Op
Please note that the Advanced Timetable Development for the Westbury area is almost certainly going to lead to extensive changes, and so this is a poor guide to the final outcome.
Kind Regards

Clyde Schwartz
GO-OP Train

From: Scott Turner
Sent: 24 June 2022 13:58
To: \$UK XC -Track Access, Clyde Schwartz
Subject: RE: Go-op feedback

Good Afternoon,

I have added one further question below (in red)

Kind regards,

Scott Turner
Track Access Manager
CrossCountry

Address: 5th Floor, Cannon House, 18 The Priory Queensway, Birmingham, B4 6BS



From: \$UK XC -Track Access
Sent: 24 June 2022 09:38
To: Clyde Schwartz
Subject: RE: Go-op feedback

Good Morning Clyde,

Just a few further questions from us if you don't mind.

- Could Go-op confirm if the proposed class 153 will be fitted with ATP please?
- In addition, section 6 of the Form P outlines some of the recommended measures that will be reviewed, can you advise on initial thoughts on how Go-op would rescue a failed train on a busy line?
- Has capacity and performance at Bristol Temple Meads and Parson Street has been considered in line with their contingent paths please?
- Does Go – op have any pathway information it can provide, this is so we can see in detail interactions with our own planned services please?

Thanks in advance.

Kind regards,

Scott Turner
Track Access Manager
CrossCountry

Address: 5th Floor, Cannon House, 18 The Priory Queensway, Birmingham, B4 6BS



From: Clyde Schwartz
Sent: 20 June 2022 13:05
To: Scott Turner
Subject: Go-op feedback

Hi Scott,

Hope you been keeping well. How is the baby doing? Probably not a baby anymore. Currently Network Rail is conducting a wide-ranging review of timetabling in Somerset and Wiltshire, the present information that we have on platforming and station workings is unlikely to be a reliable guide. For that reason, we have to answer in general terms.

We don't have any specific platform requirements for most of our services, so they can use either 2 or 3 for southbound, or 4 and 5 for northbound (platform 6 is inconvenient and wouldn't be our first choice for any service. However, it is not impossible as a platform for services to originate in). We have asked for contingent rights such that in future we can extend our services west from Taunton to Bishops Lydeard on the WSR; when we do that, such services will need to depart from, and arrive at, platform 5 at Taunton - a considerable constraint. However, as these will be contingent rights, we will only be able to do this if a compliant solution can be found within the timetabled firm rights. The extension to Bishops Lydeard is also an aspiration and might possibly not go ahead for some time if at all.

Kind Regards

Clyde Schwartz
GO-OP Train



a public transport co-operative
run by passengers and employees

Rob Holder
Network Access Manager
1 Milford Street
Swindon SN1 1HL

15th July 2022

Dear Rob,

Thank you for responding to our consultation on the proposed Taunton - Swindon/Weston-super-Mare service. Can I just take this opportunity to say thank you for the many occasions over the years that you've been able to offer us valuable insights into rail operations in the area, and helped us to develop the best possible approach to this route. However, I do appreciate that despite this you have concluded that this is not something that you can ultimately support.

I've added a few points of clarification and acknowledgement below, in response to specific issues you've raised.

Ticket revenue abstraction

While we will certainly take into consideration any new data you might be able to share on abstraction / generation (it is, after all, very much in our interests to maximise generation) it does seem that the conclusions you have reached differ significantly from both our own modelling, and that carried out recently by the Department for Transport. It may be that the recent disruption to ticket sales from the pandemic, or assumptions about future service patterns, have given rise to unreproducible findings. Clearly if the ORR do conclude that the NPA test has been failed, our application will not be able to proceed, nor will it deserve to.

Further work needed on capacity and performance

We are fully engaged with the current Westbury Advanced Timetable Planning process, and expect that to report in good time for the May 2023 timetable development. In the absence of its findings, Trasis studies have found a compliant timetable and minimal performance disruption for the quota of firm right that we are seeking. We did make ourselves available to participate in the timetable planning process earlier, so that its findings could have been part of this application; but unfortunately that was not possible to achieve.

Duration of contract

We are fully aware that contracts in advance of five years need to be supported by investment. Our investment strategy includes:

- Refurbishment of railcars for PRM compliance: £848,200
- Driver training: £118,747
- Level crossing safety improvements: £190,000
- Refuelling, cleaning, control and maintenance facilities: £428,000



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w: www.go-op.coop

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We remain committed to the earliest possible move to battery rolling stock, and it is likely that without a major change in UK fleet policy we will be obliged to repurpose EMUs to achieve this. Based on our 2021 study, and subject to negotiation with ROSCOs we have budgeted for £1.2M for each of three sets in CP7.

Less precisely budgeted, but nonetheless fully part of our CP6 plans, is investment in aerodynamic fairings to reduce fuel consumption - models prepared for us by Southampton University and Brush suggest 5% fuel savings are available on our route. We also want to investigate emerging technologies for conveying trains using a 'virtual coupling' - an effective way to release additional capacity on congested low-speed lines.

We are also committed to paying a part in line and capacity improvements, as part of consortia including LEPS, local authorities and other operators as well as the network owner. Our priorities are:

- Bishops Lydeard
- Langport and Somerton (proposed new station)
- Westbury platform zero
- Castle Cary platform and accessibility
- Melksham branch capacity enhancements and station facilities

While it is too early to provide detailed budgets for this investment, this is very much a commitment by us to play as full a role as any other operator.

Department for Transport

I'm happy to confirm that the Department for Transport has been consulted and has expressed support for the proposal (though not its duration - see above).

Existing rights

We too expect existing rights to be honoured and are planning on the basis of indefinite extension in duration.

Melksham capacity

We too agree that local aspirations for improved services are constrained by the capacity of this single track section and look forward to working with you to secure capacity improvements.

Recruitment of train crew

We are investing in the training of a new cohort of train drivers, and indeed we are committed to training more than can be employed by us - so we are intending to act as a 'feeder' of new qualified drivers to the industry. While we will also need to hire some experienced staff, on the whole we expect our impact on the labour market to be neutral or even positive.

Pathing conflicts

We await the outcome of the Westbury Advanced Timetable study which we believe will fully resolve these issues, and indeed we hope will allow for the introduction of something close to a clockface timetable for Melksham.

Template right to start / terminate

We have not been advised of any restrictions on right to start / terminate, other than as shown in Train Planning Rules. We will of course take any such into account.

Right to combine passenger train slots

We agree that timetable modelling should inform the use of such rights; our argument is for quantum of service only, and the appropriate timings should be subject to an objective assessment of passenger utility.

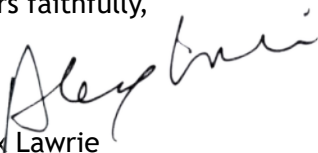
Planning and funding of enhancements

All the necessary investments have been budgeted for realistically, as noted above.

Lease and maintenance contracts

No contracts for lease and maintenance have been signed as we have neither an operating licence nor a track access contract. This application is necessary precisely so that we will be able to sign such contracts.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Alex Lawrie', written in a cursive style.

Alex Lawrie

Acting Operations Director



a public transport co-operative
run by passengers and employees

Andrew Seddon
Policy Team Lead - Open Access, Department for Transport
Department for Transport

15th July 2022

Dear Andrew,

Thank you for responding to our consultation on the proposed Taunton - Swindon/Weston-super-Mare service, and thanks also to your colleague Oliver Mulvey for taking the time to discuss it in more detail subsequently.

I am glad that the approach we've taken to Open Access - perhaps a distinctively different approach that has been used before, given our co-operative culture - has met with your approval. We have certainly sought to be constructive rather than disruptive.

Our goal is to meet needs that have so far been neglected rather than duplicate some or all of another operator's timetable. I think that has been critical in our ability to pass the not primarily abstract test.

I did want to take this opportunity to say a bit more about how our proposal relies on long-term capital expenditure. We are fully aware that contracts in advance of five years need to be supported by investment. Our investment strategy includes:

- Refurbishment of railcars for PRM compliance: £848,200
- Driver training: £118,747
- Level crossing safety improvements: £190,000
- Refuelling, cleaning, control and maintenance facilities: £428,000

We remain committed to the earliest possible move to battery rolling stock, and it is likely that without a major change in UK fleet policy we will be obliged to repurpose EMUs to achieve this. Based on our 2021 study, and subject to negotiation with ROSCOs we have budgeted for £1.2M for each of three sets in CP7.

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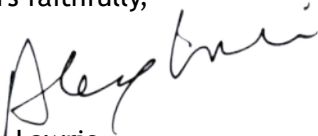
It's true that we are not yet able to detail the nature of the investment and the sums of money involved, it should be clear that the matters we are addressing - capacity on a single track section over ten miles - is not small. Even as part of a much larger consortium, and considering minimal interventions, it is going to take large sums of money for us to realise our aspirations and employ the contingent paths that we are seeking.

It has to be too early to provide detailed budgets for this investment, as critical partners cannot themselves talk in specifics while we do not have the standing within the rail industry that an operating contract would provide. Nevertheless, this is very much a commitment by us to play as full a role as any other operator.

We do appreciate that you - and indeed the whole industry - will be concerned that any timetable proposed by a new operator is designed with performance in mind, including consideration of cascading delays.

The current Westbury Area Advanced Timetable Study is explicitly tasked with optimising capacity and performance and is able to take account of Go-op's aspirations. Although the work is ongoing, it is clear that by putting all the service aspirations alongside each other and pursuing regular, clockface patterns wherever possible, we can deliver significant additional paths without loss of performance or congestion.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Alex Lawrie', written in a cursive style.

Alex Lawrie

Acting Operations Director

alex.lawrie@go-op.coop