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by email only

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Dear John,

We are grateful that Fiona Dolman shared with Alliance her letter to you dated 2nd October. I apologise that I did not meet your deadline for responses. However, as others have commented, this was a very limited period to respond to a wide-ranging document.

I summarise here a more detailed response that we have prepared and will share with you at the stakeholder meeting on Wednesday.

Overall capacity on the ECML

It is disappointing to see that Network Rail has moved away from its position in the December 2014 report on ECML Capacity in 2020. Now it cannot confirm that it will be possible to operate 8 LDHS services per hour even when the Connectivity Fund schemes are delivered. It even seems to cast doubt on the ability to run 7 tph although, as we and First Group have pointed out before, there are several hours now where at least 7 LDHS paths are scheduled.

Network Rail appears to be saying that operating 8 LDHS tph requires a timetable recast on the ECML. We would expect this to happen. Network Rail is insisting on greater flexibility in its contracts with operators precisely so it can re-timetable to improve the way capacity is utilised. New contracts will be in place with Northern and TransPennine franchises next year. We should expect Network Rail to have the capability to optimise the use of the network, but they now seem nervous about this.

I am not clear from the letter whether LDHS capacity is only an issue in the London peaks, when there is contention with the proposed level of Thameslink services, or if the caveats apply throughout the day. I also note that Network Rail has taken the Thameslink service level as a given, even though there is no application yet from GTR.

Capacity constraints away from the ECML

Network Rail's analysis of capacity constraints away from the ECML is superficial and, in some cases, misleading. For example it:

- does not distinguish between peak and off-peak constraints (e.g. Micklefield to Leeds)
- includes routes where none of the current applicants is seeking additional services (Temple Hirst to Hull; Bradford to Wakefield via Mirfield)
- omits a route where VTEC is seeking to enhance its service, and where there are potentially significant constraints for trains terminating (Lincoln)
- confuses the two applicants for rights via Micklefield: it is VTEC that plans to operate 9-car IEPs for which there may be no platform at Leeds, not GNER, who will be using 5-car IEPs that can use some of the half-platforms at Leeds.
- completely overlooks the issues of platform length, impact on Metro services and problems with shunting to reverse the VTEC afternoon train at Sunderland
- limits capacity below the service level that currently operates at other times (Grimsby to Cleethorpes on Saturdays has 2½ tph)
- appears to overlook recent or imminent capacity enhancements, including resignalling Leeds to Harrogate (2013?), and Scunthorpe to Cleethorpes (scheduled for Jan 2016)
- mentions performance as the constraining factor (Leeds to Bradford Forster Square) although headway on the route suggests there is capacity.

However, we welcome Network Rail's assessment of the constraints at Middlesbrough, an issue that we raised at the Hearing.

Performance

As noted at the Hearing and subsequently, we are happy with Network Rail's approach to assessing performance. If there are too many unknowns for them to assess capacity reliably, it is clearly futile to attempt an accurate calculation of absolute levels of PPM at this stage.

Power Supply

We are aware that there is some uncertainty over the capability of the power supply between Newcastle and the Scottish border, but we were somewhat alarmed to read that there is a problem in the Doncaster area. This is the first time we have become aware of this. It seems surprising that this was not addressed in ECML Power Supply Upgrade Phase 1, as Doncaster is the first/last point in common between Leeds and York/Newcastle/Edinburgh services. It is also surprising given the number of electric services that currently run through Doncaster in one ½ hour period every morning.

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Network Rail is also using a new (to us) tool for modelling the power supply. Whilst the use of a more modern tool than OSLO is to be welcomed, it would be helpful if Network Rail could give operators, and the ORR, some assurance about the validity and accuracy of the new modelling tool.

Infrastructure schemes

The latest table supplied by Network Rail does not match the latest published CP5 Delivery Plan. We note with concern that many of the Connectivity Fund CP5 schemes have slipped, some well into CP6. From the rising costs of existing schemes it appears that additional funding will be required in CP6 to complete all of these. Given the Hendy review and Treasury constraints, at least some of these delayed schemes must be at risk. Furthermore, if Network Rail's view is now that the totality of these schemes does not deliver more LDHS paths, where is the business case for their funding?

I am sceptical that the remodelling of King's Cross throat is essential to deliver 8 tph LDHS and to deliver a robust timetable. Even with 8 tph in the peak, King's Cross will be handling fewer trains than it does now once the full 24 tph Thameslink core service starts. I understand that Network Rail has not done any performance modelling of the layout under perturbed running and has assumed that the Slow Lines are dedicated to Thameslink trains, even though this is less than optimal use of capacity. I am concerned that, far from being necessary for 8 tph, the scheme may even be detrimental.

There is one serious omission from the list of infrastructure schemes. According to the most recent published plans, ETCS will be installed – and all lineside signals removed – between King's Cross and Doncaster/Bawtry by December 2020. Network Rail claims that ETCS, alongside ERTMS for traffic management, will increase capacity and/or improve performance. If this is the case, why is it not factored into Network Rail's assessment? And if it does not deliver these benefits, where is the business case for ETCS, especially where signalling is not life-expired?

Freight traffic

In your letter to Network Rail, you asked them to be clear where the choice over the level of LDHS services would affect *current* freight service levels and levels required to meet planned freight growth. The letter claims to address the current *traffic* levels, but focuses on the number of *paths* instead. Accepting that the coal market may recover a little this winter, there is still a huge mismatch between the number of freight trains actually running on the ECML on any given day, and the timetabled level quoted by Network Rail in this letter. Between Ferryhill and Newcastle this seems to be different by a factor of 10. I will provide details later to support this view.

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This example highlights that the Network Rail assessment is simplistic. For example, there are differences in traffic levels between the following sections:

- York to Northallerton
- Northallerton to Darlington
- Darlington to Ferryhill
- Ferryhill to Birtley
- Birtley to Newcastle

Yet Network Rail appears to have treated the traffic as constant across all five.

Furthermore, the assumptions about train classes and train weights need further examination as they can have a big impact on capacity. For instance, the majority of trains running through Durham are Class 6, but Network Rail suggests that they are all currently timed as Class 4s (i.e. 75 mph rather than 60 mph).

Freight growth forecasts assume much heavier trailing weights than today. Whilst this may be desirable, I am unclear where the application is for rights to operate these heavier trains, or where the business case is for running these over the proposed infrastructure.

Yours sincerely,



Ian Yeowart
Managing Director