

Our Ref:
Your Ref:

Carew Satchwell, Network Rail

cc.
James Carter, London Midland
Ian Williams, ORR

By email

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Dear Carew

London Midland 5th Supplemental Application

Freightliner Group has serious concerns about the impact of the proposed passenger service on freight services on the Leamington- Coventry corridor.

The consultation for the Supplemental Agreement (SA) is being carried out too late in the process; bearing in mind this involves the introduction of a brand new train service on a very constrained corridor, and the likely impacts on other operators. This is unfair to other industry stakeholders and the ORR. In accordance with the ORR guidelines the SA should have been submitted at the latest to the ORR by 23rd June at the latest, (24 weeks before commencement of the traffic) - see the ORR Guidance on Track Access Applications, paragraphs 101 to 107 refer;

http://www.orr.gov.uk/_data/assets/pdf_file/0005/17591/making-a-track-access-application.pdf

Freightliner is also concerned by the limited stakeholder engagement that has been undertaken to discuss the emerging issues or find more acceptable solutions Freight operators were invited to one meeting to discuss modelling outputs at the offices of SLC Rail (consultants for Warwickshire Country Council) on 27th February 2017; DB Cargo as well as Freightliner attended, and a further meeting was called by Network Rail to discuss Performance Mitigation in Saltley for 09:00 on a Monday morning (5th June). Freightliner made it clear that we could not attend and no alternative times or dates were offered. There has been no other engagement with the freight operators.

Modelling carried out by Tracsis on behalf of the station promoter Warwickshire County Council and their consultant SLC Rail, does show that existing freight services could run alongside the proposed passenger shuttle. However the modelling does show a considerable worsenment of performance on the corridor when the new trains are introduced, and the report itself suggests that this is a problem. This is a particular concern for long distance freight operations, as this route is the main corridor for services from the Port of Southampton to the West Midlands and the North. We note that the performance modelling does not include the wider impact of delay caused this will ripple beyond the West Midlands area, for both long distance freight and passenger services.

The Tracsis modelling used the December 2016 WTT as the baseline. No timetable modelling has been undertaken looking at how longer and heavier freight services and the proposed passenger shuttle could best be accommodated together. There appears to have been a lack of a holistic planning of all the emerging requirements on this corridor, a role which we would have expected Network Rail to lead on.

The Department for Transport has, through the Strategic Freight Network funded circa £75 million with the specific output of enabling longer trains on this corridor, known as the Southampton to West Coast Freight Train Lengthening project.

Network Rail modelling carried out for the Freight Train Lengthening project has then overlay this against the proposed Leamington to Coventry service. This showed that the proposed shuttle timetable would considerably reduce the ability of the freight operators to run 775m long freight trains to run on this route (14 out of the 36 paths identified were lost).

However, we believe that the real impact is likely to be worse. Even before the introduction of the Kenilworth shuttle the timetabling study shows that the timetable between Leamington Spa and Banbury is a major restriction to lengthening freight trains, with 13 paths unable to be lengthened due to constraints in this section. The study does not even consider the impact of the shuttle on services that are unable to run longer within the current timetable, so the impact of the shuttle is likely to be even worse than indicated in the report. In addition many of the longer trains in the northbound direction have identified clashes further south and have not even been reviewed through this section, so again we would expect that there are further impacts on the single line section with the introduction of the shuttle.

If the passenger service runs as proposed many of the outputs and benefits upon which the business case for the Freight Train Lengthening scheme was made would be lost. The Freight Train Lengthening scheme is now forecast to be completed in Spring 2019, (originally it was due to be completed in CP4 - Spring 2014). See attached copy of the Network Rail report.

We understand that the proposed service will be a single Class 153 DMU. On the face of it the economic benefit of this service versus removing significant numbers of lorries from the road network does not appear to be best use of a very constrained railway line. We suggest that the System Operator undertakes a study to evaluate the relative economic benefit of different capacity uses, in order to input into the ORR decision and future timetable design.

We suggest that consideration should be given to an alternative option of stopping the existing Cross-Country service at Kenilworth. This would appear to more efficient use of the available capacity and would also provide greater connectivity to passengers joining at Kenilworth.

The line between Coventry and Leamington Spa was originally funded to be double-tracked throughout in the CP5 HLOS but this scheme was deferred by the Hendy Review. The future commitment to this enhancement is currently unclear, but double-tracking would support additional services, such as those proposed by this application.

In view of the foregoing, Freightliner Group does not support this Track Access Application.

However, we know that in reality that there will now be political pressure to run this service, particularly as the ORR decision will be made very close to the commencement of the proposed new service and the station has been funded, at least in part by the council. We therefore suggest that any access rights granted to this service are for one year only, and that further timetabling work is urgently undertaken to understand the optimal use of this limited infrastructure, and in particular whether the option of stopping existing passenger services would provide a better overall solution, that would also allow the planned outputs from the DfT investment in Southampton train lengthening investment to be realised.

Freightliner has requested that Network Rail set up an Event Steering Group to deal with the introduction of longer freight services from Southampton, in conjunction with the new First MTR Wessex franchise and the proposed introduction of the Kenilworth service. This would enable the corridor to be considered holistically and would support the optimisation of the available capacity.

Yours sincerely

A handwritten signature in black ink that reads "C. D. Wilson". The signature is written in a cursive style. Below the signature is a long, horizontal, slightly wavy line that extends across the width of the signature.

Chris Wilson
Rail Strategy Manager
Freightliner Group Limited