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6th October 2017

Dear Pauline,

London Midland proposed 5th Supplemental Agreement – Kenilworth new service

Many thanks for your letter of 10th August 2017 in relation to London Midland's application for access rights for a new service between Coventry and Leamington Spa, to serve the new station at Kenilworth. I would also like to offer thanks for CrossCountry's attendance at the various industry workshops that have been held to discuss concerns about the proposed service, and potential mitigation options. The most recent of these meetings was held on the 25th September 2017 to specifically discuss the issues raised in the industry consultation.

I note that in your letter of 10th August you acknowledge the importance and benefits of introducing the Kenilworth services, and this is welcomed, nonetheless you also raise a number of challenges and concerns which I hope to address here.

With regards to the performance modelling undertaken to support the application, you expressed concerns that the RailSys modelling did not extend far enough geographically to give a complete picture of the overall performance impact, and therefore that the risks may be understated. It is worth noting that the performance modelling for the proposed Kenilworth service has undergone a number of iterations since the first version, primarily to tweak the timings of the shuttle service to make way for CrossCountry, Chiltern Railways and freight services. This explains why the timetable offered by Network Rail for December 2017 has some minor differences compared to the timetable modelled in Railsys, and also shown in the Form P. The RailSys modelling was initially undertaken by Tracsis in 2012/13 based on a Dec 2012 base timetable, and updated in 2014 based on a Dec 2013 base. The modelling was then updated again more recently using an updated May 2016 base to reflect changes to CrossCountry timings (Reading-Birmingham New St journey time improvements), and Chiltern Railways timings to reflect the introduction of their Bicester-Oxford timetable.

I note your concerns and accept that Railsys modelling does have its limitations, particularly because it cannot fully replicate the decisions made by signallers during perturbation, however it should be remembered that RailSys is intended to be essentially a simulation tool to enable a comparison between different timetables, but cannot quantify absolute predictions about performance. For example it measures punctuality in terms of the percentage of trains arriving within a specific lateness threshold, referred to as "time-to" figures, yet one of its limitations is that it is not able to predict PPM (a current industry-standard measure of performance) for the following reasons;

- Punctuality for some trains is not measured at the final destination, but the modelling boundary, whereas in the industry measure it is. This can lead to either an understatement or overstatement compared to PPM, depending on network performance outside the modelling area.
- Severe primary delays are not included in the RailSys modelling, as these tend to require Control room decisions which are outside the scope of a RailSys study.
- RailSys cannot cancel trains, turn trains around short, or swap units between diagrams in service to replicate the decisions of Control teams during disruption.

RailSys can therefore help to compare different timetables or infrastructures, and even though it is probably the most advanced performance simulation tool currently available, its value in the exercise of modelling the impact of a radically new service change should be limited to highlighting the potential performance risks rather than being seen as a prescriptive quantification of the actual performance impact, as it may both under and over-estimate performance risks in different areas. For this reason, once the key risks identified in the Railsys modelling had been highlighted, the focus of the operational workshops moved towards discussing and agreeing potential mitigation options which was considered to be a more productive use of the time.

Also, despite the limitations of the modelling I would contend that the amount of performance modelling undertaken for this service is probably over and above the amount normally conducted to support an access rights application, and at the cross-industry meeting on the 25th September we discussed the performance modelling at length and the attendees agreed that we do not consider that undertaking any further performance modelling at this point in time would add any additional value to the process. We already have a clear idea of the risk areas so we considered that conducting a further refinement to the modelling would add little extra value to the process.

Notwithstanding this, in your letter you highlight the outputs from the RailSys modelling and the quantified risk to CrossCountry performance of 6,514 possible additional delay minutes, and ask what plans Network Rail will put in place to mitigate this impact? You will be aware that a number of performance mitigation measures are either committed or proposed in order to support the delivery of the service. The first and foremost of these performance mitigation measures includes the scheme to shorten the overlaps at Kenilworth loop and make amendments to the layout at Milverton Jn. These infrastructure changes were identified as part of a GRIP3 engineering report as being necessary to support the operation of the new service and involve the following changes and benefits;

- Modification to signal overlaps at Kenilworth Loop to allow faster reoccupation times, and enhance line capacity and performance.
- Installation of a new 40mph Up – Down crossover on the branch line near Leamington Spa, plus signalling changes, to enable services to arrive and depart from Platform 4 at Leamington Spa directly towards Kenilworth.

The December 2017 shuttle timetable assumes that these key infrastructure changes will be delivered to support the robust operation of the service.

Furthermore, you will be aware that at least 5 performance mitigation workshops have been held with affected operators over the past 12 months and attended by your colleague Pete Roberts, who has provided some valuable inputs on behalf of CrossCountry. These meetings were convened to engage with affected operators, discuss risks and concerns, and also to identify practical operational

mitigations to manage the potential impact of any additional delays. In these meetings we have discussed potential contingency arrangements with CrossCountry, which included possible regulation decisions, particularly with regards to the Sunday timetable.

Unfortunately it would be impossible to commit to your challenge of holding CrossCountry's performance 'neutral' following the impact of the Kenilworth service, because this implies an absolutely zero impact. The very nature of adding additional trains onto the network imparts some increased element of performance risk, no matter how small, therefore it would be impossible to commit to CrossCountry's performance not being affected by a single minute. However, with the mitigation work undertaken to date we are confident that every attempt to minimise the impact on CrossCountry has been examined.

On a more positive note it is also worth mentioning that at the meeting on the 25th September, West Midlands Trains Ltd (who will take over the operation of the West Midlands franchise from 10th December) confirmed that the Kenilworth shuttle service would be operated by a Class 172 unit rather than a Class 153, as had been previously assumed. The Class 172 provides a material improvement over a Class 153 in terms of acceleration and braking, potentially offering a 3 minute journey time saving between Coventry and Leamington Spa. As the paths for December 2017 have been offered by Network Rail using Class 153 SRTs then this is likely to offer an element of performance mitigation through the operation of Class 172s in Class 153 paths, which should reduce the performance impact notably.

With regards to your comment about turnaround times at Coventry and Leamington Spa, these have been planned with a minimum 5 minutes for passenger to passenger service workings, which as discussed at the meeting on the 25th September we believe is compliant with the Timetable Planning Rules and the paths have been validated by Network Rail.

Finally with regards to your final concern about the operation of the Sunday timetable, whilst at the meeting on 25th September there was a consensus agreement that the SX and SO timetables could be deliverable (albeit noting the discussions about risks), I cannot disagree with you that the operation of the Sunday timetable will be a significant challenge. There have obviously been a number of operational mitigation meetings between London Midland and CrossCountry to discuss potential regulation policies, but this will still be a challenge for signallers during perturbation due to the complexities of the single line operation and the existing operation of the additional CrossCountry service on a Sunday afternoon. Nonetheless a Sunday timetable is included in the Service Level Commitment for the next West Midlands Franchise so there is a commitment for West Midlands Trains to deliver this level of service, hence this access rights application is for a 7-day timetable.

I hope that this letter can give you some additional comfort with regards to this application.

Yours sincerely

James Carter
Network Access Manager