



**Campaigning by the
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For the attention of John Larkinson, PR13 Programme Director

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18th February 2013

Comments on Network Rail's Strategic Business Plan for CP5

Dear Sir,

Thank you for the opportunity to comment. We are pleased to submit this consolidated national feedback on behalf of **railfuture**, which has been prepared by the Policy Group, with contributions from individual branches and groups. The document has been reviewed and approved by the Group.

Railfuture is a national voluntary organisation structured in England as twelve regional branches, and two national branches in Wales and Scotland.

We campaign for a successful railway, so we endorse the plan and hope that the constructive criticism in our comments will contribute to that goal.

If you require any more detail or clarification please do not hesitate to get in touch.

Yours faithfully

Chris Page

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Comments on Network Rail's Strategic Business Plan for CP5.

A better railway for a better Britain

Railfuture campaigns for a successful railway, so we welcome the approach in 'A better railway for a better Britain' of selling the benefits of the railway. We are also pleased to see the commitment to becoming more open and transparent. This will help the public to support the major investment in the railway proposed in this plan, which is required to improve performance and increase capacity, and which we wholeheartedly support. We would be disappointed if any schemes were de-committed or delayed.

The Brighton Main Line and the West Coast Main Line are identified as the most prominent capacity issues that cannot be solved on existing lines (page 17). We consider that the South West Main Line should be given equal or greater priority to the Brighton Main Line since the capacity gap identified in the London and South East RUS was greater for the South West Main Line than the Brighton Main Line, and no solution has been defined.

Strategic Business Plan for England & Wales

(Page references apply to the Strategic Business Plan for England & Wales unless otherwise noted, and are for the document not the pdf file. Comments also apply to the Strategic Business Plan for Scotland, unless they are specific to locations in England or Wales.)

STRATEGIC DIRECTION STATEMENT

We welcome the reduction in industry subsidy per passenger km (page 11) but would like to understand to what extent this is due to growth in travel rather than efficiency.

A key outcome (page 15) should be that Network Rail is perceived as responsive by its customers.

Improving value for money is a key objective in the Industry Strategic Business Plan for England and Wales for CP5 supporting document (page 2), but value is not identified as a key strategic theme in the Strategic Business Plan (page 16). The railway should be valued by its customers and users, and should provide solutions which maximise value.

Demand

The plan is based on the assumption of a straight-line increase in demand (pages 9 and 11). The increase in demand in recent years has been driven in part by increasing motoring costs, particularly for fuel. Increasing demand for fuel globally will cause the price of fuel to continue rising, and we expect this to cause an increasing modal shift from road to rail transport. The recent RAC survey shows that whilst there are more cars on the road, they are being used less; and if the current economic situation continues we expect the squeeze of inflation on static incomes to cause a reduction in second car ownership, resulting in further demand for public transport. A small percentage decrease in car travel equates to a large percentage increase for rail travel. Demand for rail is therefore likely to grow at an increasing rate (ie an upwardly curved rather than straight line prediction) putting the assumed 10% passenger-km growth (page 72) at risk. In addition, demand currently suppressed by overcrowding will be released as more capacity is provided. The route plans show that predicted growth has been modelled for each route but a better understanding of the factors driving growth and sensitivity analysis of the impact of faster than expected growth are required to identify where it may impact. Strangely, the Performance Plan for CP5 supporting document (page 23) shows an increasing rate of growth in train-km which matches our view of demand growth but contradicts the straight-line increase assumed by the main plan.

Appendix 3 paragraph 2 of the Performance Plan for CP5 supporting document is incomplete: it should identify where the traffic growth on each strategic route section is set out.

TRANSFORMING NETWORK RAIL

Safety

The Wessex Route Plan (page 8) suggests that most of Network Rail's people view safety as a line management responsibility. The safety commitments in the Strategic Business Plan and in most route plans are management initiatives, underlining this relatively low level of organisational maturity. The Wales Route Plan (page 16) also shows a safety maturity model but only the London North Western Route Plan (page 12) recognises the importance of individual and team responsibility, and only the Scotland Route Plan (page 18) and the Sustainable Development Strategy supporting document (page 5) recognise the need for cultural and behavioural change. Whilst it is necessary to ensure that all managers are taking responsibility for safety, excessive management focus on safety can reduce individual responsibility, and so actually increase both risk and cost. The Transforming Safety and Wellbeing supporting document (page 5) does plan to encourage individual responsibility for safety but it is important that this objective is followed up by all parts of the organisation, and embedded in their plans.

We support the work of Network Rail and operators to improve passenger safety: the public need to be made risk-aware and encouraged to accept individual responsibility. We are concerned that station approaches and car parks in the care of local authorities require greater attention.

Sustainability

We agree that the railway industry has a role to play in the safe and sustainable custody of our environment. We support the encouragement of modal shift from road and air travel and the use of more sustainable modes of rail travel, to which the planned electrification schemes will contribute greatly. The sustainability plan at page 19 is just 'motherhood and apple pie'. It is only in the Sustainable Development supporting document that specific objectives and metrics are given (the importance of individuals taking responsibility and everyone being involved in delivering is also recognised here). However the metrics are primarily environmental, with a few social. Economic sustainability metrics are also required.

We would like to see less landscaping of car parks with trees and bushes; this will reduce maintenance and increase security for car park users. Action is required to improve the state of the track at some stations, for example the track at Shrewsbury platform is soiled with excreta. We support the retention of historic railway buildings.

Capacity

Capacity is calculated including a standing allowance on services which stop within 20 minutes of the HLOS specified station, on the basis of government policy that standing is acceptable for short journeys of less than 20 minutes (Passenger Capacity Plan for CP5 pages 8-11). However commuter services which have a penultimate stop at just under 20 minutes before the terminus are frequently full and standing for some way before that stop, eg at East Croydon or Woking. On these services passengers are frequently standing for up to an hour in the peak – and this situation will be worsened by the introduction of high-density Metro stock, for example on Thameslink, where it is the primary solution (in addition to lengthening platforms) to meet the capacity targets for London Bridge. This will make the customer journey experience worse not better. Railfuture consider that the use of high-density Metro stock, or 2+3 seating, for medium-distance services to destinations such as Bournemouth, Portsmouth, or Brighton should only be considered as a short-term fix, and that investment is urgently required to provide additional line capacity for these services.

We note the statement in the Passenger Capacity Plan for CP5 supporting document (page 43) that on routes that are becoming 'full', further incremental interventions to provide additional capacity may be poor value for money. We would expect the Development fund to be used to define CP6 programmes for new strategic solutions, for example Crossrail 2 or a 'Thameslink 2' route through Docklands.

More bi-directional signalling installations are required to keep trains running with a reduced service during engineering possessions.

Project Development and Delivery

There is a need to keep rail passengers up to date with NR progress of delivering projects (page 22). Disruptions must be made known well in advance and the dates maintained.

Performance Management

We would like to see the initiative outlined in the Scotland Route Plan (page 25) to measure PPM and RT on the most heavily loaded trains extended to all routes.

We would like to point out that whilst increases in speed can reduce reliability (page 63), they can also reduce cost by improving stock and staff utilisation, and increase capacity by giving the passenger a greater choice of trains which arrive at his destination by the necessary time.

People

There should be a key initiative (page 25) to communicate Network Rail's objectives and priorities, relating them to team and individual roles, to encourage individual and team responsibility.

We note that Network Rail pay is 20-40% higher relative to comparable skills in other sectors. Given the present economic climate we would expect Network Rail to use that advantage to recruit the most productive staff and to weed out under-performing staff.

Transparency and public information

We will welcome the opportunity for stakeholder organisations such as Rail User Groups and ourselves to engage with Network Rail, and to offer our views as well as to request information (page 26). It is important to have a clear system of consultation not just with operating companies, national and local government but also with local communities and organisations which support rail travel, perhaps through area stakeholder meetings. A regular newsletter for each route would be greatly appreciated. There must be a clear system of receiving and responding to complaints and requests from the public.

Funding and affordability

We welcome the commitment not to make short term savings at the expense of long term costs (pages 4 and 27), but would caution against building to higher standards than will be required – each case should be assessed individually to achieve best value and through-life costs for the realistically expected requirement.

A fairer WACC calculation (pages 27 and 80) would be to treat the network grant to NR as a capital injection at a zero cost of capital, and not to deduct the equity surplus from the allowed return, until improvements in efficiency paid for by the investment from NR's equity stakeholder (the government) has moved Network Rail into profitable operation.

ACTIVITY AND EXPENDITURE PLANS

Asset renewal

Plans for renewals and enhancements should be synchronised to minimise rework and cost (page 37).

The concentration of all signalling functions into new signalling centres (page 40) must integrate effectively between centres to provide on time running of services which cross between areas, and must be able to give an accurate description of services at times of disruption.

There is a backlog of maintenance on structures and earthworks (page 41). We consider that there should be more vegetation removal especially where it overhangs pathways and station approaches. There is a considerable amount of litter on non operational railway land which should be removed and also that trackside at stations. We also consider that vegetation should be cut back on scenic routes such the Central Wales line to enhance its attraction to tourists. The growth of vegetation from walls

and bridges must have an effect on the security of these structures and should be removed as part of NR plans.

Enhancements

Railfuture welcome the major electrification programmes planned for CP5 (pages 46-47) but are concerned that there does not appear to be funding to sustain this momentum with a rolling programme running into CP6. This should be included in the Investment Expenditure supporting document (page 3). The Deliverability Assessment supporting document (pages 5 and 6) should include the risks of being unable to acquire and train sufficient skilled staff for the rolling programme, and the risk of having to disband the teams if funding is not available to continue the rolling programme into CP6.

Whilst we support the devolved route structure (page 22), we are concerned that this could result in latent demand which does not fit the route structure being missed out of the definition of new projects by the Development Fund (page 47). This is particularly likely where no railway service currently exists but there is a heavy traffic flow by road which could be more efficiently served by rail, for example:

- orbital journeys between Heathrow and areas served by the West Coast Main Line, or the Chiltern line, paralleling the M25
- access to Heathrow from the South Western route
- direct access from north or south of London to Docklands

We consider that the Development Fund is not sufficient to start planning new projects for implementation in CP6, for example to extend the 14 Crossrail trains per hour currently planned to terminate at Paddington out on another route besides the Great Western Main Line.

The process in the Enhancements supporting document (page 2) is focussed solely on existing routes. The supporting document 'Capacity and performance planning framework' (page 9) includes a process for stakeholder aspirations and cross-boundary analysis, but only for existing services; it does not consider new journey opportunities that are required to support demographic and employment changes. The rapid growth of traffic on the South London Line, in excess of forecasts, after its transfer to London Overground is an example of this latent demand.

The Journey Time Improvement fund (page 47) will be managed using best case appraisal (Overarching CP5 enhancements plan, page 41), rather than first identifying which areas of the network would benefit most from journey time improvement. This may result in programmes having an 'we can get the money there' approach. From the route plans it appears that journey time improvement is only being considered for long-distance routes (East Midlands route plan page 26, London North Western page 40, Western page 32), when in fact some of the slowest journeys carrying the most passengers are in the Sussex and Kent commuter route areas, so should be given priority for this funding.

One of the ways in which journey times can be significantly improved with limited investment is by improving interchange between 'connecting' stations, ie stations on different lines that are in close proximity. With slightly more investment, new interchange stations (eg Brixton on the London Overground) could also offer significant new journey opportunities and journey time improvement.

The Station Improvement fund (page 47) should be used to promote modal integration, which will also increase journey opportunities and so increase rail use. It should also be used to relieve passenger congestion at stations, for example Cardiff where the subway and entrance gates are not adequate for the safe movement of people for considerable periods of the day.

Whilst we support the Access For All scheme (page 47), we are concerned that it has not always been applied logically. For example at Gloucester the new footbridge does not have a roof (because the old one did not) but should (because the station has a high footfall and high rainfall). At Newport the new foot bridge has made interchange between platforms more difficult because it links areas which have no covered shelter; this creates a high demand for lifts, sometimes causing passengers to lose connections because of lack of capacity.

The current delay to franchising is a risk to the availability of rolling stock in time to match delivery of infrastructure programmes (page 49).

Bottom-up benchmarking

NR have recognised that their comparators have fewer standards and rules, more productive staff and more collaborative contractual relationships (page 57). However the plan does not appear to include the obvious changes required: simplify processes (not just increase commonality), increase individual responsibility (not just skills), and bring about a culture shift in their own staff to trust suppliers more. These changes would significantly increase productivity and reduce unit costs and should be implemented in all areas of Network Rail, but only Asset Management (page 20) recognises this. Of the route plans, only Wessex includes a review of operational standards and procedures. Of the supporting documents, only the Maintenance Expenditure Summary (pages 1 and 11) makes reference to process improvement, eg by identifying depot processes which don't work; whilst the Operations Expenditure Summary (page 8) makes reference to developing process rather than simplifying it, and identifies failure to adopt new processes as a risk. The Efficiency Summary and Project Development and Delivery (page 5) supporting documents should define initiatives to simplify and reduce working practices, processes, standards, rules and procedures, and the 'Risks and uncertainties in our forecasts' (page 73) should include the risks of insufficient process change, and of inability to simplify standards, rules and legal requirements.

Update since IIP

Changes since the IIP have given rise to a shortfall of £3B compared to SOFA (page 58). We consider that this gap should be closed by cost savings from the process and culture changes identified in the previous paragraph, and by reducing project and operational cost contingencies (on the basis that if a contingency is available, it is less likely that an innovative solution will be found to stay within budget). We do not want projects to be delayed or dropped.

OUTPUTS

Outputs must avoid giving perverse incentives, be simple to collect and analyse (without requiring new IT development), and be directly controllable by Network Rail. We would prefer right-time to PPM measures (page 64).

Change control for outputs (CP5 Regulatory framework pages 1 and 2, and Performance Plan Summary page 2 supporting documents) should be allowed, but only for exceptional cases of the same significance as a financial re-opener.

Measures for level crossing risk reduction should be based on the reduction in the number of actual accidents or deaths, not a theoretical assessment of risk.

Railfuture considers that there must be better coordination of route closures (page 68) to ensure that the fare paying passenger has a better deal. It is important that routes have greater resilience.

FINANCING AND FUNDING

The DfT intends to transfer some assets from British Rail Residuary Board to NR (page 83). Maintenance costs are included in the plan, but what capital cost will NR incur for these assets and how will their value be assessed?

We note that financing costs include interest at 4.75% on capital.

Railfuture would like the extent of taxes and loan guarantee fees paid by Network Rail to government to be made public (page 84). We understand that this figure is substantial, approaching £1bn per year and set to increase as Industrial Buildings tax is resumed and as rebates on past corporation tax losses run out. Public awareness of this figure would help to allay concerns about the extent of public support for the railway industry.

Industry Strategic Business Plan for England and Wales for CP5 2014-2019

(Page references apply to the Industry Strategic Business Plan for England and Wales for CP5 2014-19 unless otherwise noted, and are for the document not the pdf file. Comments also apply to the Industry Strategic Business Plan for Scotland for CP5 2014-19, unless they are specific to locations in England or Wales.)

The Executive Summary (page 2) refers to improvements to overall industry efficiency and whilst we don't doubt the achievements made, we think the reference points are chosen to produce somewhat skewed statistics. For example 2001/2 is used as the starting year for the reference to punctuality improvements; this was the year after the Hatfield crash when the industry was at a low point of rolling annual average punctuality. We think that clear and effective independent reference setting for these industry measures should be in place so that it is clear what is actually achieved.

We support the belief that the industry, not Government, should take the lead on procuring rolling stock (page 4).

The rapid growth of traffic on the South London Line after its transfer to London Overground, in excess of forecasts, shows that whilst rail share is unlikely to grow on radial routes in London (page 12 paragraph 2.3), there are opportunities for massive growth on orbital routes, where latent demand exists.

Railfuture would be concerned if higher 'superpeak' fares were considered to improve rolling stock utilisation by managing demand (page 15 paragraph 3.1.3).

As a result of electrification, Pacers could be displaced by new electric trains in the North West (page 32 paragraph 5.2.6). Whilst it is not the remit of Network Rail to procure or specify trains, we think that a lead could be given by Network Rail to enable their complete removal from passenger use. Given that Pacers would need substantial costly modification to meet disability access requirements from 2019, a reduction in their use across the network, and their replacement with higher capacity trains following the same paths, is likely to be financially viable and would help in achieving the capacity improvements needed. This is a particular issue for passengers across the UK outside London.

No firm programme has yet been developed for the design and implementation of the East West Rail project (page 42 paragraph 5.4.5); electrification of the route from Bletchley to Bedford will be determined by the timing of the electrification of the Midland Main Line. As this is a committed scheme for CP5, we would expect committed milestones to have been set. NR should also establish a dedicated management organisation for the project.

Route Plans

(Page references below apply to the individual route plan unless otherwise noted, and are for the document not the pdf file).

Anglia

Railfuture support the longer-term planning initiative to increase capacity on the Anglia post CP5 (pages 29-30) and would welcome the opportunity to contribute to firming up the vision, in particular for the Great Eastern Route, where 110mph running and extra tracks north of Chelmsford are required to facilitate regional growth, the new station at Beaulieu Park where major development is taking place, additional trains to reduce overcrowding and to improve reliability of services.

We welcome the inclusion of the following key projects in the Overarching CP5 Enhancements Plan:

- Bow Junction (SE021) upgrade near Liverpool Street to increase capacity and reliability of services on the approach to London
- Lea valley extra tracks on the West Anglia Route (SE022) - to allow better local train service that supports local development, additional services to relieve overcrowding and improve reliability of all services

- Ely north junction (SE027) and other Strategic Freight Network projects - to allow increased use of rail freight for containers to/from Felixstowe and other ports without affecting passenger services.

We consider that funding should also be provided for electrification of the Gospel Oak to Barking line to meet the strategic need for transit of electric-hauled freight across London, and the urgent local need to boost passenger-carrying capacity.

East Midlands

We note that the timescale for electrification of the Midland Main Line (MML) route has been extended to 2020-21, in Control Period 6 (Page 26), but would expect the MML capacity and line speed improvements to be completed earlier. We are concerned that several MML capacity schemes are shown as 'still in development' and listed as possible 'options' (page 31). These affect the critical sections of route between Sharnbrook and Wigston (which is a mix of two and three tracks) and Kettering and Corby (which is single line). Provision of an additional line between Sharnbrook and Kettering, re-doubling between Kettering and Corby, and re-alignment in the Market Harborough area are essential for the medium and longer term capacity requirements of the MML.

The option 'loops or realignment in the Desborough/Market Harborough area' should be more clearly defined. Re-alignment at Market Harborough is desirable to eliminate the 60 mph speed restriction for non-stopping trains, currently the most severe between St Pancras and Leicester. This can be achieved using land already in Network Rail ownership, and would lead to the provision of new straight platforms at Market Harborough station, eliminating the current large platform to train stepping distances. The provision of freight train loops would be more appropriate at Market Harborough than at Desborough, which is too close to Kettering and on a rising gradient. Capacity improvements between Wigston and Syston should also be defined more fully and ideally should include grade separation for east-west freight trains crossing the MML.

We welcome the increase in capacity and frequency of services between Sheffield/Nottingham and London to 10 cars and five to six trains per hour (page 28). However the statement 'Outer suburban services from North Northamptonshire and Leicestershire will be operated by formations of up to three 4-car Class 350 type rolling stock and the frequency will be increased to two trains per hour' is confusing, as these already run twice hourly, alternately from Corby and Nottingham. We appreciate the attempt to segregate the market between outer-suburban and longer distance travel, but believe that outer-suburban services should start no further north than Kettering or Corby. We would expect Market Harborough and stations northwards to retain a mix of fast and semi-fast trains to London.

We note the statement that DfT is examining the conversion of Voyager trains to electric operation (page 28); however recent reports suggest that this is impractical.

An aspiration of the current East Midlands TOC in 2007 was to bring their Nottingham, Sheffield, and Manchester to Liverpool service up to full intercity standards as it serves four of the eight 'Core English cities'. Consideration should be given to cascading some Meridian class 222 sets, with appropriate line speed improvements, on to this route as high speed electric stock displaces them on the MML.

We support the proposals to reduce crowding on the Birmingham-Leicester-Standed Airport route (page 28). We note that the planned completion of enhancements on the Hope Valley route may allow the provision of a new interurban service from Leicester and Derby to the North West. This is highly desirable as Leicester and Derby have no through services to the North West and are the largest centres within 100 miles of Manchester without direct trains.

It is of concern that crowding into Derby from Matlock 'is expected to be severe by 2019 but that there is no value for money case to lengthen services' (page 28). It is therefore difficult to understand the comment that 'strengthening will need to be accommodated from the existing resource base', given the decade old problem of lack of spare rolling stock.

We are concerned that a number of desirable enhancement schemes are shown as not currently funded (page 31). The East Midlands suffers from slow inter-regional rail links and we suggest that the

journey time improvement schemes between Birmingham and Stansted Airport and Nottingham and Leeds should be high priorities for funding.

The Nottingham-Newark Castle-Lincoln line fails to fulfil its potential as an inter-city route due to slow journey times. We therefore support the proposed increase in line speed between Lowdham and Newark Castle (page 31), but this should be funded to achieve 90 mph, as proposed between Netherfield and Allington on the Nottingham to Grantham route.

Kent

Planning for renewals of DC electrification equipment (pages 22 and 63) should be synchronised with the proposed programme for DC to AC conversion, to avoid recently renewed DC equipment being scrapped when AC conversion is implemented.

We note the recognition that major investment to increase line capacity will be required post-CP5 to meet demand (page 30).

We suggest that Lewisham to Barnehurst be considered for conversion to Bakerloo Line as an alternative to the Hayes branch, which has potential as part of a future cross-London link.

Capacity at Victoria (South Eastern) exceeds demand (page 83); schemes to make that spare capacity available to relieve Victoria (Southern) should be considered.

London North Eastern

No comments.

London North Western

We note the introduction of Train Running Controllers to protect PPM by monitoring services running close to failing the measure (page 24). We caution that in some circumstances it is better to allow one train to fail PPM than to have a series of trains all just within PPM but nevertheless late. We encourage greater focus on right-time running.

TransPennine Express Manchester to Scotland service enhancement (page 29) refers to improving capacity and specifically the introduction of 4-car electric train services from Manchester Airport to Glasgow by TPE. However the reference suggests that on weekends and high peak holidays, until suitable electric rolling stock becomes available, this could be with 6 car trains, presumably diesel (2 x 3-car Class 185). If it is already known that these peak services would need extra coaches, extra capacity should have been built into the new Class 350 trains order, as having some new electric services revert to diesel will increase operating costs and acceleration times from station stops, impacting recovery and end-to-end times.

The Northern Hub programme (page 29) should also support the extension of all North Wales – Manchester Piccadilly trains to Manchester Airport, which would increase capacity by reducing interchange at Piccadilly.

Whilst a clear timetable is laid for the North West electrification scheme (page 30), no timetable is set out for the Trans-Pennine electrification scheme for which planning should be sufficiently advanced for a date to be specified.

There is no detail of the enhancements to support additional Bromsgrove and Redditch Cross City services (page 31) so Railfuture are concerned that there may be increased potential for delays to the Cross Country services which follow these all-stations stopping services.

TOC aspirations for expansion (page 41) include considerable new electrification in the North West already; however projects such as Crewe-Chester, Oxenholme-Windermere and Bolton-Blackburn seem to have been pushed back on the agenda. These should be included in a rolling programme of electrification continuing into CP6, which will deliver benefits across the network.

Birmingham QX expenditure (page 46) should be recovered from increased retail income.

The Overarching CP5 Enhancements Plan supporting document (pages 60, 64) shows Gibbet Hill Jct to Milverton Jct as a significant interface for the Electric Spine: Nuneaton – Coventry – Leamington – Oxford electrification project DP025. However the Electric Spine: Coventry to Leamington Spa Capacity project WW005 only includes the Milverton Junction to Kenilworth South Junction redoubling; Kenilworth North Junction to Gibbet Hill Junction redoubling is excluded from scope. Kenilworth North Junction to Gibbet Hill Junction should be included in a CP5 project, to make Leamington Spa to Coventry double track throughout, allowing all Cross-Country Reading to Birmingham trains to call at Coventry and Birmingham International.

Scotland

Any change to the current layouts as a result of Carstairs Junction Remodelling (page 33) should not adversely impact local stopping services, as this would severely disadvantage the large rural community around Carstairs, just for the sake of cutting one or two minutes off London – Glasgow journey times.

We have similar concerns about Dunbar, where in the winter of 2010, stops at Dunbar were arbitrarily cancelled for an entire week to allow London-Edinburgh trains to keep to time during bad weather. Hundreds of commuters suffered major delays by being forced to travel on roads blocked by snow. We would not like this to be a precursor to cutting Dunbar services; the same track layout, allowing for local stopping services, should be retained.

Freight capacity should also be retained on these lines.

We want funding and plans to be put in place to allow the CP5 rolling electrification programme (page 33) to continue into CP6, and support the inclusion of funding for Edinburgh suburban line electrification in the Strategic Business Plan.

Sussex

Railfuture support the longer-term strategy initiative to increase capacity by cross-London links and relieving the flat junctions on the Brighton Main Line (page 9) and would welcome the opportunity to contribute to firming up the vision. However it is perverse that the larger capacity gap, identified in the London and South East RUS, of services to London Bridge is being addressed by high-density metro stock (with lengthened platforms), whereas infrastructure solutions are being considered for the lesser capacity gap of services to Victoria.

Planning for renewals of DC electrification equipment (pages 53, 76) should be synchronised with the proposed programme for DC to AC conversion, to avoid recently renewed DC equipment being scrapped when AC conversion is implemented.

The programme for DC to AC conversion which will be planned as part of the Electric Spine Basingstoke – Southampton development programme (Overarching CP5 Enhancement Plan, page 58) should also include the electrification of diesel islands, eg Hurst Green – Uckfield, and Ore – Ashford.

Railfuture consider that the recent decision by DfT and Network Rail to continue running Thameslink trains via the Wimbledon loop after 2018 will create risks to the overall Thameslink service of: reduced reliability by increasing crossing movements at Loughborough Junction; reduced capacity by reducing the number of services that can be more than 8 car because of platform constraints on the Wimbledon loop; and reduced profitability by reducing the level of counter-peak traffic because Wimbledon is more easily reached by other routes and because Sutton is comparatively less attractive than other Thameslink destinations.

Wales

We are concerned that there is an underestimation of passenger growth in the future (pages 2, 78). The 'No Growth' concept for the Wales and Borders franchise created many problems for the Welsh Government and the operator; there is now no little additional stock available to enhance services and

provide for continuing growth. Existing services will continue to be overcrowded, and poor transport facilities will continue to have an adverse effect on the Welsh economy. Growth experienced on Welsh lines in the last five years (eg 59% on the Chepstow line) exceeds both previous forecasts and the assumption of 20% growth on the Valley lines over the five years of the control period.

We see no evidence in the plan to support the statement that 'both passenger and freight levels remain relatively flat....' (page 78). Faster, more frequent services when electric traction is introduced will increase passenger demand, potentially in the 50% to 100% range over five years. Additional growth is also expected to be generated through investment in the Welsh economy, for example through Enterprise Zones. We therefore agree that coping with this growth is a key challenge and opportunity in CP5. It is essential that future plans for both capacity enhancement and rolling stock provide adequate capacity for future growth. For example, five coach IEP trains will not have adequate capacity for all services west of Cardiff unless additional services are provided by the Wales and Borders franchise.

The definition of markets served (page 6) describes present day services with no indication of how these could be developed to serve future markets, for example long distance travel from South Wales to the Midlands, the North East and Scotland which requires excellent connections at Bristol Parkway; travel from Chepstow and the Forest of Dean area to Bristol; and commuter travel to Bath.

Freight operators (page 9) also Devon and Cornwall Railways which conveys scrap metal from North East England to Cardiff and aggregate from Cardiff to Yorkshire; and GB Railfreight also brings petroleum from Lincolnshire to Cardiff Docks.

Improvements are particularly required for level crossings (page 19) which are used for access to a station platform because there is no footbridge. At Lydney, for example, the barriers are down at least 3 minutes before the arrival of a down train and passengers are known to have crossed the line to ensure catching the train; Caersws has a similar problem. An earlier advertised departure time might help to mitigate this risk. However, the closure of pedestrian crossings can cause great inconvenience to users and we wish to see developments to make them safer to use. The All Wales Coastal Path crosses the railway at a number of locations and increased use of this path should be supported, with adequate safety measures, in the wider interests of the Welsh economy.

To improve performance (page 23) we foresee the need for longer platforms, the ability to split and join trains at an increased number of locations including Port Talbot, the provision of an increased number of bi-directional track miles, and upgrading of freight loop to passenger loops. The Swansea District line should remain as double track to provide an alternative route between Neath and Swansea/West Wales.

Railfuture would like freight capability (page 29) to be enhanced by a new freight consolidation centre on Deeside and the passive provision for mini terminals.

The CP5 access strategy (pages 32 – 35) should restrict closures on the Marches line to shorter distances such as Newport to Abergavenny, Abergavenny to Hereford, Hereford to Craven Arms and Craven Arms to Shrewsbury to avoid excessively long (3 hour) bus journeys. We also suggest that bi-directional working could be used in some cases. When access is required on the South Wales Main Line, we suggest that rather than retiming trains to leave early so that they regain their paths before reaching London, they use their normal path in South Wales and take the next half hour path to reach Paddington with a similar 30 minute earlier start from Paddington to be on time in South Wales. The relief lines between Severn Tunnel Junction and Cardiff should also be upgraded for higher speeds.

Wessex

The 3600 passenger increase in capacity at Waterloo planned for CP5 (pages 26 and 85, and Passenger Capacity Plan for CP5 page 28) relates entirely to train lengthening on the Reading and Windsor lines, whereas the London & South East RUS showed that the primary capacity gap for Waterloo is on the South Western Main Line medium distance/outer suburban services. Whilst the Overarching CP5 Enhancements Plan indicates that a project will be defined for CP6 for the South West Main Line, the effect of not addressing the largest, fastest growing gap first is that the expected 90% end-CP5 peak hour load factor at Waterloo (Passenger capacity plan for CP5 page 40) hides significant overcrowding on South West Main Line trains.

Railfuture welcomes the London Mayor's support for Crossrail 2, and wants planning for infrastructure options such as Crossrail 2 or the fifth track on the South West Main Line to be progressed urgently. However Railfuture are concerned that the Crossrail 2 concept as recently published by London First focuses on inner suburban services, adding to congestion on the South West Main Line, rather than the outer suburban services which have the capacity gap. Additional track capacity will be required between Surbiton and Wimbledon to accommodate both the extra 8tph Crossrail 2 services which will use the South West Main Line beyond Raynes Park to destinations including Kingston and Hampton Court and the additional medium distance/outer suburban services required to address the capacity gap - for which high-density stock would not be appropriate. In addition it is not clear what services would be provided at Earlsfield (footfall 5.4 million pa) and Vauxhall.

We support the plan to increase line speeds (page37) which we would particularly like implemented on the Portsmouth Direct route.

It is unfortunate that the Alliance has turned down an approach for high speed track renewals and ballast cleaning now in use on the WCML, ECML and GW mainlines (page 38), which would require occupation of one line only and so helps to provide a 50% capacity railway during mid-week nights. The reasons cited are reduced structural clearances and the presence of the 3rd rail. The result is that 3 tracks have to be taken out of use on a 4 track railway where much of the work is planned and conventional slower equipment will be used, mainly at weekends. This requires a high proportion of 52 hour possessions, with an adverse impact on passenger satisfaction.

There are plans to use modular S&C on up to 33% of the planned renewals for switches and crossings (page38). This seems a low proportion.

Planning for renewals of DC electrification equipment (page 67) should be synchronised with the proposed programme for DC to AC conversion, to avoid recently renewed DC equipment being scrapped when AC conversion is implemented.

The programme for DC to AC conversion which will be planned as part of the Electric Spine Basingstoke – Southampton development programme (Overarching CP5 Enhancement Plan, page 58) should also include the electrification of diesel islands, eg North Downs Line.

Railfuture are supportive of the SWT/NR alliance's alternative suggestion to electrify OHE on the Worting Junction via Laverstock route which will work for freight services, as the Freightliner terminals are the Salisbury side of Southampton and will enable electric trains to run to Salisbury.

The Devon Metro is shown on page 34 of the Western Route Plan but there is nothing in the Wessex route plan to cover improvements required for a more frequent Devon Metro service from Exeter to Axminster and possibly Yeovil Pen Mill.

Western

Flooding is considered as a risk to operation (pages 27, 92) but no proposals are included to prevent flooding, eg by widening the overflow culvert at Cowley Bridge Junction, or to develop diversionary capacity via Yeovil and Honiton. We have published recommendations at http://www.railfuture.org.uk/tiki-download_file.php?fileId=504 showing how this issue might be addressed.

A reduction in scope of the CP4 7 Day Railway programme is proposed (page 30). This should be resisted as growth in rail traffic will require more, not less, route availability if businesses, particularly freight, are to have confidence in the rail mode. The trend towards fewer Signalling Centres controlling larger territories points to a need for greater operational flexibility (eg more diversionary routes and bi-directional running lines) to cope with electronic failures (eg due to weather) affecting large areas of the network.

The predicted growth in passenger demand between Bristol and Birmingham (page 34) will require the congested sections through North Bristol and South Birmingham, the inflexible layout at Cheltenham, and the difficulty of pathing additional GW stops (eg at Ashchurch) around Cross Country services to be resolved. This is necessary so that services can be improved at Gloucester and Worcester, which are

still suffering from the “quick fix” in 2003 which removed most stops by South West to North East Cross-Country services. We would recommend:

- installation of bi-directional signalling at Cheltenham
- more use of the Camp Hill route by XC trains, segregating them from Cross City services.
- upgrading the freight loops at Charfield and Haresfield to passenger standards, to facilitate reopening of Charfield and Stonehouse Bristol Road stations.

The whole of the Henbury loop (Hallen Marsh Junction- Filton Junction) should be included in Phase 2 of the Bristol Metro (page 35) as it would create a circular rail service, maximising cross- Bristol journey opportunities and particularly from West Bristol to the Cribbs Causeway retail complex, businesses in the Filton area and the University of the West of England. The recently disused Tytherington freight branch should be safeguarded for future extension of the network beyond Yate to Thornbury.

We welcome the inclusion of East-West Rail as a committed scheme within HLOS (page 34) but suggest that services be extended to Swindon in addition to Reading, linking the “knowledge/technology arc” (Thames Valley - Oxford – Milton Keynes – Cambridge) with the manufacturing areas of the Midlands and North.

Recent government announcements suggest that electrification of the Berks and Hants (page 34) will extend beyond Newbury and connect with the diversionary route from Westbury via Bradford to Bath and Bristol. We welcome the inclusion of the Henley, Marlow and Windsor branches in the electrification scheme as peak through trains to Henley and Marlow are important, and would suggest that Greenford be electrified also. Development of a rolling programme of electrification continuing into CP6 should include the GWML diversionary route via Kemble.

There is a case for upgrading the route via Westbury, Melksham and Swindon to W10 to provide a diversion avoiding both Basingstoke and Reading during the Electric Spine programme (page 36).

6 track electrification of the 12 miles from Paddington to Airport Junction is shown being complete by the beginning of CP5 (page 41). Currently most of this part of the route is 4 track, so this project needs to be started urgently! More seriously, we would welcome the opportunity to comment on the options for Western access to Heathrow (page 34).

Whilst the requirement that Reading should always be open to rail traffic is entirely sensible (page 47), when the Evergreen 3 programme is complete the Bicester chord will provide a diversionary route avoiding Reading, without reversal at Banbury, for GW Main Line services.

The Low Cost Rural Railway Initiative (page 70) may be appropriate for some branch lines but too broad an application of it may result in downgrading of infrastructure routes unable to accommodate freight or diverted trains in the future.