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A public transport co-operative  
owned by users and workers

Emyl Lewicki  
Track Access Manager  
Office of Rail and Road

25 November 2022

Dear Emyl,

We found the representations from Network Rail of 1<sup>st</sup> November a constructive and comprehensive assessment of the development of Taunton – Swindon services to date.

They do raise some significant concerns, some of which remain relevant and merit further information and undertakings by ourselves. We will address these under four headings: level crossing risk, limited investment specification, rescue arrangements and operational constraints.

#### Level Crossing Risk

Network Rail seem to say that 'the ALCRM tool showed the level crossing risk introduced by Go-op [in their draft contract for May 2023] would have a significant impact on safety'. This is not the case.

The ALCRM tool was applied in January 2022 to some train service numbers supplied by ourselves and clearly marked as approximations. As no further corrections were applied, they had the effect of comparing Go-op services in both directions with pre-existing services in two directions. The result was an exaggerated degree of responsibility for risk elevation.

Since then, the increase in service levels on the route has further diluted our impact, and on the 13<sup>th</sup> October this year we requested a recalculation based on the actual service level figures that had come out of the Westbury Advanced Timetable study, only just completed. Having heard nothing, we repeated our request two weeks ago stressing the significance of today's deadline. At the time of writing we have had no response.

We do appreciate the pressure that Network Rail capacity is under which is why, earlier in October, we offered to take on the work of applying the ALCRM algorithm ourselves; however, we were told that this would not be possible. So in relation to our current track access application it would be more accurate to say that Network Rail has not treated the proposed services as being of sufficient consequence to be worth assessing using the ALCRM tool..

In any event, we have treated the January 2022 output as a 'worst case scenario' for the purposes of financial modelling and project planning. We are glad that NR have 'welcomed the minor improvements... such as handrails and retained decision points'; however, they might also have noted the budgets allocated for three OMSL warning light systems, which they advised us would be the appropriate mitigation for the highest risk level crossings and we immediately included in our budgets.

For the avoidance of doubt, the alternate budget we provided relating to footbridges was not intended to cover the cost of a footbridge, but rather a contribution we might make to a mixed-use development that included footbridge provision – a preferable outcome, but one we readily admit cannot be relied upon. OSML mitigation, in accordance with price estimates provided by NR, is clearly present in our business plan as the default option.

It is fair to say that there is at this stage no 'robust delivery plan'. It is not realistic for a startup business that has yet to secure any rights to paths to be able to secure commitments and undertakings for infrastructure improvements. Project planning can only commence after the contract is awarded, and we accept that means at least some works will be undertaken after the commencement of services (but before the use of any of the contingent rights that we are seeking, and that contribute significantly to risk levels in the ALCRM analysis).

In lieu of such a delivery plan, we would propose the addition of a clause in the contract addressing this point and requiring no aggregate increase in risk on level crossings on any track section over the life of the contract. Should there be any increase in risk in the early months of operation, it must be balanced by mitigations later in the contract that exceed the requirement to a corresponding degree.

### Investment Specification

Network Rail have recognised the five substantial areas of Network investment that we are targeting and 'would like to understand the timescales involved and funding requirements'. Realistically, this is not possible for an aspirant operator in our position. We have had productive discussions with Wiltshire, Swindon and Somerset Councils, as well as with town and parish councils and LEPS in the area, with a view to mobilising working groups made up of a coalition of the willing to address each of these issues. However, there is no way for any participants to justify the time and resources until there is a train operator leading the effort; and paths allocated that would justify the investment.

We have to insist that investment plans should be limited at this stage to desired outcomes and budgeted funds, without unrealistic expectations of fully specified works. There is no other way that an aspirant operator entering the market for the first time can approach it. As noted above, we are willing to make this a binding commitment in the contract.

Network Rail say 'there are no clear funded plans for these items'. This is not the case – our financial model clearly highlights the size of the budget for network investment and the timescale over which those funds will be deployed.

Network Rail further claim 'it is unclear as to what extent the longer term growth in Go-op services is reliant on these schemes'. This too is addressed in our business plan – the growth we project is based on some or all of access to Bishops Lydeard on the WSR, additional rolling stock to exploit contingent rights, and the opening of a station at Langport / Somerton. These are all part of proposals funded elsewhere, and they are not included in our network investment strategy.

### Rescue Arrangements

Network Rail note our commitment to implementing the recommendations made by Tracsis, including contingencies for assistance of disabled units. However, they say that such contingencies need more work given the 'scarcity of other compatible units in the area of operation'.

We have consulted with GWR on this point, and we have established that there are, and will continue to be for the foreseeable future, numerous 15x units in the Westbury area. In addition, for most of the day in the Taunton area, we have our other diagram that could be diverted to provide rescue for a disabled unit within a reasonable timeframe. Finally, in the Chippenham / Swindon area, for most of the year our spare unit will be available to conduct rescues.

However, we are persuaded that this alone may not contribute sufficient resilience. We have reviewed our financial model and tested it with the addition of a further class 153 – one that has not undergone PRM conversion but is used solely for rescue, extra capacity in multiple formations, and driver training and route learning. The additional expense is modest and does not require additional early-stage Capex nor significant reduction in overall profitability. We are happy to amend our proposal in this way to ensure consistent performance.

### Operational constraints

We believe that the reference to Thingley Junction requiring regular groundframe operation is an error – the groundframe exists for switching on to another part of the sidings which is no longer in existence, and access from the mainline is governed by the local signalbox. We are also unclear why there is expectation of conflict with cyclical maintenance at Thingley; this would have been noted in the Advanced Timetable Study, and no such conflicts arose.

We note that Network Rail conclude that ‘operational constraints could be addressed in TCAG meetings’. We would concur that this is all that is required.

Network Rail state that ‘the Advanced Timetable Study indicates that there are performance concerns for Go-op at Westbury [arising from platforming]’. The attached copy of the Study states ‘there are no major concerns with platforming at Westbury’. We have been present at every one of the Westbury Performance Review meetings held this year, and few if any of the performance risks identified there even involve Go-op trains. None are considered to be hard or impossible to resolve.

We have agreed that the need for strong performance at Westbury particularly does justify some alterations to our planning. In particular, we are amending our business plan to include:

- more staff based at Westbury to assist customers and provide extra maintenance and driver capacity to prevent blocking of paths.
- new header codes consistent with others in the area to make signalling easier and more self evident.
- additional measure to address cybersecurity, and early adoption of ECTS where possible.

Yours sincerely,

Alex Lawrie  
Director  
Go-op Co-operative