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Office of Rail Regulation
One Kemble Street
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28th September 2012

Dear Mr Littlewood,

Nottingham City Council's response to the ORR consultation: Network Rail's output framework for 2014 - 19

We welcome the opportunity to respond and input into a process which has the potential to have a significant and positive impact upon the national rail network. It is therefore extremely important that the rail industry listens to stakeholders and is able to invest in and enhance the customer markets.

Nottingham City Council wants to see an efficient, well run rail network which receives a level of investment that allows the industry to grow, support economic growth and respond to passengers needs.

All of what is discussed within the consultation document is important to a wide range of stakeholders who have a vested interest in improving the rail network. We feel many of the questions are specific to certain sections of the industry and for this reason we have just commented on the areas that relate to Nottingham, our residents and business community.

1. **Do you agree with our proposals for outputs and indicators for passenger train service performance? Should we retain the sector level outputs for PPM and CaSL (for England & Wales)? Is there more we need to do to ensure consistency with franchise obligations?**

The outputs selected need to ensure that the both Network Rail and the Train Operating Companies (TOCs) strive to deliver improved performance, coupled with greater efficiency in order to reduce the cost of running the railways. Nottingham is fortunate to have one of the best performing operators in terms of PPM, however many of the journey times are woefully inadequate and the industry needs to be driven to improve this, whilst maintaining a reliable service.

It is therefore essential that outputs must ensure that the industry is incentivised to provide enhancements as stand alone schemes as well as on the back of any maintenance and renewals that are undertaken.

2. Do you agree with our proposals for an output and indicators for freight train service performance?

Rail freight is very important with great potential to reduce vehicle traffic and congestion. Investment in the East Midlands also means it is a growing sector which is creating jobs. It is however extremely important that the need to run an efficient and fast passenger rail service is not hindered by the growth in rail freight.

The Midland Main Line (MML) has a growing freight market and the investment in the route must ensure that these needs are balanced. For this reason it is essential that as part of the final funding determination, on top of the already agreed investment for the MML additional funding is provided in order to provide freight loops in the Market Harborough area.

3. Do you agree that outputs for Network Rail in relation to named projects, capacity metrics and funds should be project-specific milestones defined in the enhancements delivery plan? Do you have any comments on how useful the enhancements delivery plan has been in CP4? What are your views on indicators to measure the efficiency and effectiveness of the use of the funds?

Outputs need to be clear. There needs to be greater clarity and greater accountability to stakeholders in terms of true deliverables.

For instance on the Midland Main Line journey time improvements are currently being delivered by Network Rail in order to provide line speed improvements. However there is still a question mark as to whether this will translate into real timetabled savings as a timetabling exercise will be undertaken following the works. (This issue is highlighted in paragraph 3.42 with reference to the ARUP report).

4. We propose to define delivery plan milestones to ensure Network Rail delivers a plan to reduce risk at level crossings, and to use certain indicators to monitor Network Rail's delivery of these outputs and its wider legal obligations. Do you agree with this approach?

We offer our full support to a plan which reduces risk at level crossings. But the industry also needs to consider the wider implications of the measures undertaken upon connectivity, in particular in relation to walking and cycling routes and the severance impacts upon communities.

8. We want to improve the definition of the existing station condition output (SSM – station stewardship measure) and introduce a new measure – SSM+ – which provides a clearer disaggregation for

measuring condition and better, value based, weights. Do you agree with this new approach?

This measure could also be expanded further to include reference to the provision of secure cycle parking at Stations as a measure of the general condition of the Station.

12. Recognising that certain indicators are needed to monitor HLOS delivery, and that Network Rail is in the process of deciding on further indicators, do you have views on specific environmental indicators which we should monitor?

Rail is one of the more sustainable forms of transport. In terms if indicators, rail needs to deliver on national carbon reduction targets. This is important as they can help make the business case for investment into rail over road and air and allow the sector to grow and deliver.

We are strongly supportive of the electric spine which will include the electrification of the MML and the carbon savings this will provide.

13. Should we introduce a new indicator of changes in journey times? Do you have views on how this measure should be calculated? Should we also introduce a measure of accessibility to stations?

An incentive for Network Rail and TOCs to improve journey times is something that we are strongly supportive of and have been lobbying for since its omission in the last HLOS. Journey times matter to the business community and rail passengers, by investing in enhancements rail becomes more competitive over other transport modes. It can also increase the value Network Rail can place on schemes. In many cases a scheme which makes the railway more efficient, will also improve journey times and this should be highlighted as a positive achievement from the investment.

A strong focus needs to be on improving the journey times between core cities and from these cities to London. For instance it should not take longer to get to London from Nottingham than York which is significantly further north. Journey times should also be quicker than the car, for example Nottingham to Birmingham at 1 hour 15 minutes or Nottingham to Leeds in two hours is unacceptable and investment should be made to improve the rail offer.

Journey time improvement should be measured by looking at specific routes, between two destinations and not for the whole TOC area. Journey time improvements on routes such as Nottingham to London could be diluted through improvements to less strategically important routes. Infrastructure needs to provide these improvements but this also needs to be delivered into real timetabled journey time improvements in order to be measured. As mentioned earlier it should not just reflect line-speed but the actual timetabled services service that result from the work.

Accessibility to Stations is essential. But this also needs to go beyond the parameters of just the Station. The rail industry needs to work with other

transport providers to ensure the station is accessible by all other forms of transport.

14. Should we introduce a new indicator designed to measure improvements in passenger information provision and how should this be measured?

Provision of information is very important and this needs to be clear, especially with regards to ticketing and timetabling. Information also needs to go beyond just rail to provide information about getting to and from the station by all other modes of transport.

17. Should we have a mechanism to allow formal trade-offs to be made between high level outputs during the control period?

This has potential to disadvantage one set of stakeholders over another. For example if journey time was introduced as an output on one route but traded off against journey time on another this could severely disadvantage one set of stakeholders. If there is an issue with deliverability of a scheme, trade off should be seen as a last resort and would require detailed discussions with stakeholders.

18. What do you think of the idea of a scorecard to provide context to our assessment of Network Rail's performance in CP5? Do you have views on our proposed scorecard, and do you have alternative suggestions?

Network Rail's overall performance is clearly important and needs to be monitored. However in terms of our role as a stakeholder, the key area where we need information is on schemes that directly impact upon Nottingham. There is a need for a good on-going dialogue and updates from Network Rail, so we as a City Council are aware of what work is taking place and is being planned. This enables us to respond and lobby appropriately based on the needs of our Citizens and business community.

We look forward to further scheme specific consultation as Network Rail develops the Strategic Business Plan for the next Control Period.

Yours sincerely,

Chris Carter
Transport Strategy Manager