



OFFICE OF RAIL REGULATION

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Paul Plummer Esq
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Dear Paul

WALES DRAFT ROUTE UTILISATION STRATEGY

I attach ORR's response to this consultation. Minor points have been raised direct with the RUS team.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Larkinson', written over a light blue horizontal line.

John Larkinson



Doc # 321150.02



Wales Route Utilisation Strategy

Response to consultation draft

1. This is the response from the Office of Rail Regulation to Network Rail's consultation on the Wales draft route utilisation strategy (Wales RUS). Our comments are without prejudice to the approach we will take when considering the final RUS, when you submit it to us.
2. We welcome publication of this draft RUS. We want to see RUSs which are fit for purpose, and meet Network Rail's licence obligations and our guidelines. We also expect RUSs to address the issues raised in our review of the RUS licence condition and guidelines, where we said we wanted to see:
 - fuller scope RUSs, covering all the issues in the guidelines (performance, rolling stock and engineering access);
 - deeper assessment of non-enhancement options, including hard timetabling choice analysis;
 - consultation on a "full draft" RUS, with sufficient detail on both the options and your proposed prioritisation, to allow stakeholders to take a better informed view;
 - more analysis of the Route Utilisation Objective for each route, and demonstration that the RUS has satisfied that objective.
3. This draft RUS provides a solid analysis of the baseline position and the identification of gaps and options. The maps and charts are particularly good and helpful.
4. It is important that RUSs link with the current initiatives set out in your strategic business plan. We were therefore pleased to see the links starting to be made with IEP and the national stations improvement programme, but this needs to continue with a clear linkage between enhancement schemes contained in the RUS and any matching schemes that appeared in the updated strategic business plan. In a similar vein, although changes to maintenance and renewal methods are being discussed across the industry, especially with regard to the 'seven day railway', there is no mention of this in the RUS. Indeed, the RUS does not really address engineering access, planned track renewals, sea walls and other structures. There appears to be no mention of the strategic freight network, another important national initiative.
5. The RUS proposes growth of 38% over 21 years, which is around 1.5% p.a. We understand that this is based on a Wales RPA growth forecast of 1.2% p.a. with an overlay to reflect recent high growth in commuting traffic to/from Cardiff. To be sure that growth forecasts are robust, it is important that the passenger demand growth continues to be monitored, and if demand growth continues to be high, the reasons for this are identified and reflected in the forecasts if appropriate. It is also important that the RUS distinguishes between constrained and unconstrained demand growth.
6. The performance figures are very out-of-date, and do not match the present split of delay causation, with Network Rail now responsible for over 50% of delays overall. They should be updated.

7. It would be helpful if the final version of the RUS is updated to reflect our determinations of Network Rail's funding for CP4.
8. It is stated that, where schemes have been the subject of independent appraisal by consultants, these have not been reappraised by Network Rail. We would want to be sure that Network Rail has satisfied itself with the methods and outputs they have produced, so that there will be no inconsistency between appraisals, and that the results are therefore "owned" by Network Rail.
9. As the industry develops its medium/long term planning role, the RUSs should support this by also looking longer term. There is a short section on this in the draft, but you may want to consider whether more could usefully be included.
10. The following are detailed points:
 - Figure 8 has no key, which makes it and its purpose hard to understand;
 - Paragraph 3.5.3. It would be helpful to set out the definition of "capacity" used;
 - Figures 32 and 33 do not make clear that they are the position that would apply without the planned lengthening of some trains to six cars;
 - P98, first column, bottom paragraph, and paragraph 7.2.3.2, fourth paragraph, suggest that the HLOS contains specific schemes in these areas; it only contains demand to be met;
 - Paragraph 6.4.1 does not mention the Manchester – South Wales services, but these are important to the service patterns in the RUS area.
 - Paragraph 6.3.4.3 is misleading, insofar as there will only be a positive environmental effect if the improvements attract sufficient users from road.