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Dear Ian

SECTION 22A APPLICATION FOR DIRECTIONS: PROPOSED 73rd SUPPLEMENTAL AGREEMENT BETWEEN NETWORK RAIL INFRASTRUCTURE LIMITED AND ARRIVA TRAINS WALES/TRENAU ARRIVA CYMRU LTD

I refer to your letter of 15th January 2016 and your direction to furnish you with the written representations of Network Rail in response to this Section 22A application and proposed 73rd Supplemental Agreement.

Network Rail does not support this application as it does not consider it to be aligned with its future plans for the route nor is it satisfied that its concerns regarding service performance have been met. These points are discussed in more detail below:

Consistency with Route Utilisation Strategies

The Access Proposal submitted by Arriva Trains Wales (ATW) in respect of the associated train services stems from works resulting in the opening of a fourth platform at Manchester Airport for operational use prior to the May 2016 timetable change date. The work forms part of Northern Hub Phase 1, with an output to enable a new service to run between the Calder Valley route and the Airport, via the Ordsall Chord. This is not properly reflected in the application form submitted by ATW which states in section 4.9 that

“The relevant RUSs are the Freight RUS, North West RUS and Wales RUS. Arriva Trains Wales believes that the proposal is consistent with those RUSs.”

Clear reference is however made to such a service within the more recent Northern RUS of May 2011. The Northern RUS (page 112) states

“The Northern Hub project aims to improve connectivity between the Calder Valley and Manchester and beyond including the potential opportunity to run trains direct to Manchester Airport via the Ordsall Chord and west of Manchester.”

As ATW has noted in Section 3.2 of its application form, Network Rail considers that Arriva Trains Wales' requested rights could not be accommodated alongside those that would be required to facilitate a Calder Valley service. As it expected that the Ordsall Chord will be completed prior to the expiry of the ATW track access contract on 14th October 2018, Network Rail does not consider the application to be consistent with the RUS as stated by ATW.

Performance Concerns

Network Rail has not received visibility of any performance analysis undertaken by ATW to review the impact of its proposal. We note ATW's previous consideration of the impact to its own services based on analysis over 5 Periods.

We do not consider this to represent suitable consideration of the wider impacts to passenger performance as it focuses solely on ATW services and is based only on the current timetable. A wider performance assessment undertaken by Network Rail shows the impact that ATW services would have upon an already busy part of the network, with particular focus upon Northern Rail and First Transpennine Express services.

Network Rail's performance analysis is attached as Appendix 1. In summary Network Rail believes that:

- Current trends indicate worsening TOC on TOC performance between ATW and TPE
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- An increase in services between Manchester Piccadilly and Manchester Airport will only worsen this position.
- This will increase the propensity for delay to radiate across the network to a greater extent than currently.
- This will reduce the PPM MAA of Northern Rail by between 0.2% and 0.8%.
- It will also reduce the PPM MAA of TPE by an unquantified amount.

An example of the risk that this proposal introduces originates from analysis undertaken by Network Rail which assessed the likelihood of exporting any delay on the Manchester – Manchester Airport corridor onto the Stalybridge – Leeds and Stockport to Sheffield sections.

To focus upon this point, ATW currently affect LNW (and consequently) LNE route performance due to the delays that occur at Chester, along the North Wales Coast and the 'Chat Moss' line towards Manchester. These delays can therefore be assumed to have a greater impact upon LNW and LNE route performance through causing a 'ripple' effect emanating from the network between Manchester Piccadilly and Manchester Airport. This is shown in Diagrams 2 and 4 in Appendix 1.

The higher utilisation of capacity on this already busy route, combined with reduced turnaround times brings significant concern – particularly when considering the lessons learned by the industry from other, recent increases in services, notably the introduction of a 5th path per hour on the north Transpennine route. This step change in the timetable was predicted to affect PPM by 1%, and this formed part of the CP5 planning and target process, however the results were actually compounded by a further 1% worsening of PPM MAA. This is discussed in detail in Appendix 1. As the circumstances of this application might be considered somewhat similar, a commensurate effect could be expected, however in this instance as the proposal did not form part of CP5 planning targets the impact would be unmitigated. There would be consequential effects on primary and reactionary delay, CaSL and Right Time running, Right Time arrivals and Right Time departures to all services operating in the vicinity and further afield.

Having identified the risk of late running of the ATW services, we have looked at more detail at the likely impact of late running ATW services on other operators by looking at the proportion of ATW trains that currently arrive at Manchester Piccadilly late. The PPM MAA for ATW service group HL08 is currently 88.6% and therefore it could be assumed that (given the 3-4 minute headways at which it has been necessary to timetable the services that circa 1 in 10 ATW services will impact on other services through movements which are made at less than the planning headway. Although these paths are timetable planning rules compliant, the likely performance impact in reality is identified as a key risk to ATW and other Operators operating in the area in and around Manchester.

The impact of the proposed ATW services reduces the turnaround time at Manchester Airport for TransPennine Express (Blackpool North to Manchester Airport) services from 14 minutes to 8 minutes. On consultation with the central Performance team, a simple analysis of TPE services shows that on average, 7.4% of these services arrive between 8 and 14 minutes late. Therefore it could be assumed that this indicates the proportion of trains that could be directly affected by these proposed additional services i.e. the number of services that currently arrive late but are able to start back up on time, which would be changed to late. The route operational contingency plan currently documents a method of service recovery for ATW's Manchester Airport services by cancelling them short at Manchester Piccadilly. Although an understood method of recovering services during significant incidents is documented and achievable through the route's contingency plan, this will not always be possible or palatable for operators and passengers during non-severe perturbation, and would likely hamper the Signaller/controller's ability to implement service recovery – particularly with the tighter headways. It is felt that the proposed increased service level and associated reduced headways would magnify make small delay/lateness and permeate outwards more so than is currently experienced.



Conclusion

For the reasons stated above, Network Rail does not support the sale of these rights.

In the event, however, that ORR should decide to direct the parties to enter into this agreement, Network Rail would request that the rights should apply for a limited period only and that any future rights should be considered on the basis of emerging performance.

Yours sincerely

Ian Messner
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Network Rail

Enclosed – Appendix 1