

David Reed
Senior Executive, Access and Licensing
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

20 October 2017

Dear David,

Application for directions: proposed track access contract between Network Rail Infrastructure Limited and First MTR South Western Trains Limited

Further to your letter dated 25 September 2017 inviting comments on Network Rail's ("NR") representations on the above application, an overview of First MTR South Western Trains Limited ("FMSWT") comments are below.

Schedule 5 – the Services and Specified Equipment

In general, it should be emphasised that the rights sought for the December 2018 timetable contain only minor changes compared to the current rights that are being used for the May 2017 and next December 2017 timetables. Furthermore, the rights sought are in line with the DfT Train Service Specification for the new South Western franchise, which was issued to all bidders and now forms part of our Franchise Agreement.

The additions and alterations are all detailed in the proposed December 2018 timetable and stock diagrams that have been previously supplied to NR. FMSWT will have sufficient train crew and stock to operate the December 2018 timetable and as plans are updated throughout the process FMSWT will share these with NR.

The rights sought by FMSWT are consistent with the outcomes specified for the South Western route. This includes those deliverables that are facilitated by the enhancement works being delivered by NR, funded by Government, not least this summer's works at Waterloo and power supply

upgrades to enable 10-car operation on all Main Suburban services, which was a key element of the specification of this franchise.

NR's representations refer to specialist technical reports that were sent to the DfT. However, these reports have not been shared with FMSWT and therefore we are unable to comment at this point.

Engineering Access

FMSWT has proposed changes to the Engineering Access Section 4 times to facilitate the running of early morning/late evening trains. These changes were discussed with NR during the bidding/timetable creation process.

FMSWT fully expect to work with NR to provide rationale for our request for additional early morning/late evening trains and the associated development of proposed changes to the Engineering Access Statement Section 4 times for the December 2018 timetable.

Safety

The timetable and all additional services are compliant with the Train Planning Rules ("TPR") applicable to the route and are consistent with the discussions to date with NR, including during the franchise competition. Using the TPR headways and other published restrictions there is capacity on the routes, notwithstanding the comments from NR, for the following additional trains:

- Portsmouth Harbour to Southampton Central; 13 trains each way per day, spaced hourly;
- Haslemere to Portsmouth Harbour; 8 trains off-peak per day, spaced hourly. 1train per hour additional in peaks;
- Reading to Virginia Water; 2 trains per hour additional off-peak only
- Virginia Water to Staines no increase;
- Feltham to Barnes via Hounslow, 2 trains per hour increase and via Richmond 2 trains per hour increase off peak only;
- Southampton to Redbridge; no extra trains off peak.

NR were aware and engaged with the increase of services on the Windsor lines during the bid process as the DfT Train Service Specification was amended to mandate two trains per hour via Hounslow at NR's request.

NR's representations query the impact of permissive working at Southampton Central, Southampton Up Goods Loop, Portsmouth Harbour, Portsmouth & Southsea and Guildford. Permissive working is allowed and is operationally deliverable at all of these locations and in the FMSWT December 2018 timetable:

- Southampton Central, there will be no material change in permissive working;
- Southampton Up Goods Loop, there will be no permissive working;
- Portsmouth Harbour, there will be a reduction of permissive working with no splitting or joining of fast services. There will be no 'top train working' in the off peak timetable;
- Portsmouth & Southsea, there will be no material change in permissive working;
- Guildford, there will be minimal permissive working as mainline attach and detach moves have been removed.

Train Performance

FMSWT have proposed changes to some dwell times affecting mainline services for the December 2018 timetable. These have been shared with NR but have not been formally requested at this time as the process of consultation on the TPR for December 2018 has not yet started. We expect to commence discussions with NR shortly. There will be no changes to dwell times on Main Suburban services for December 2018 and FMSWT will continue to work with NR on proposals to amend dwell times. These changes do not affect the level of rights that are being sought.

NR refers to firebreaks in their representations. Firebreaks are not detailed in the TPR and the timetable has been constructed to be compliant with the TPR.

Class 442s will be fully introduced to the December 2018 timetable. These units are currently shown as cleared in Table D2B of the Sectional Appendix on various lines (including the Waterloo area) on the Wessex route and are able to operate on the route infrastructure that is already cleared. Additionally FMSWT will be undertaking retractioning of the Class 442 units and will commence such industry processes required for this. FMSWT has already engaged with NR on this proposal.

Traction Power supply

It should be recognised that NR has upgraded the infrastructure for 10 car operation on the Main Suburban and Windsor line services to Reading. These routes have been subject to a Power Supply Upgrade and platform lengthening. Waterloo station has recently had platforms 1 to 4 lengthened as part of the Waterloo and South West Upgrade.

The purpose of Network Rail's Waterloo and South West Upgrade, incorporating major investment schemes such as the recent Waterloo enhancements is to increase the capacity of routes in/out of London Waterloo. This infrastructure capacity investment should help facilitate the additional services FMSWT are seeking through this application.

December 2020 Timetable

FMSWT acknowledges that there is further work to be undertaken on the timetable change for December 2020. However, the rights being sought at this stage are relevant for the December 2018 timetable. These rights will also be required as a baseline for the December 2020 timetable, hence the rationale for applying for a term consistent with the length of the franchise (plus one timetable period, as is normal practice). FMSWT intends to introduce new rolling stock from the 2020 timetable period and will also be seeking to review further TPR changes, all of which were set out within our franchise bid, and discussed with NR. However, we recognise that to achieve the desired outcomes for the franchise further work with NR will be required and we are looking forward to working in partnership with NR on the proposals for the 2020 timetable.

FMSWT has shared the details of this response with NR with further meetings to be arranged with NR to discuss this application. We would welcome ORR's attendance at these meetings if it would be beneficial.

I am copying this letter to David Allsop at DfT and to Chris A'Barrow at Network Rail.

Yours sincerely,



Lee Shuttlewood
Track Access Manager
First MTR South Western Trains Limited