

10th August 2017

Dear Carew,

I write in response to the industry consultation on the application to amend the London and Birmingham Railway Limited Track Access Contract to introduce rights for the December 2017 timetable for a new service between Leamington Spa and Coventry serving a new station at Kenilworth.

Whilst CrossCountry understand the importance and benefits of introducing services for Kenilworth, we do have concerns relating to this application, particularly around the performance impact the introduction of new services will have on our own services.

Railsys modelling was undertaken looking at impact within the following boundaries:

- Rugby
- Proof House Junction
- Nuneaton
- Tyseley / Small Heath
- Stratford-upon-Avon
- Aynho Jn

As we are a long distance operator, we highlighted at the time that the modelling did not go geographically far enough to give a complete picture of the overall performance impact. Our services that will be affected operate to Manchester and Bournemouth. With the modelling that has taken place, it is not even possible to fully understand the impact of late running on Birmingham New St. The scheme creates potential for CrossCountry services to lose path and create significant knock on delays

The London Midland application states that there is 'a small modelled performance impact to XC services'. Using the modelled delay data (which, for the reasons stated above, is likely to be significantly understated), the annual delay impact to CrossCountry is 6,514 additional minutes (a rise of 1%) which equates to 0.1% PPM. This is not a small impact. We would like to understand from Network Rail what plans they will be putting in place to mitigate this impact so that CrossCountry's performance is held neutral. Network Rail are currently failing their regulatory target for PPM and these new services have been proven to introduce a worsenment in performance.

The modelling was only carried out on the Monday to Saturday timetable.
 The modelled timetable is as below:

Path	Leamington Spa	Coventry	Path	Coventry	Leamington Spa
1	0608	0624	1	0634	0655
2	0700	0716	2	0736	0754
3	0800	0817	3	0835	0852
4	0900	0916	4	0936	0953
5	1000	1016	5	1036	1053
6	1100	1116	6	1136	1154
7	1200	1216	7	1236	1254
8	1300	1316	8	1336	1353
9	1400	1416	9	1436	1453
10	1500	1516	10	1536	1553
11	1601	1617	11	1636	1653
12	1700	1716	12	1736	1752
13	1800	1816	13	1836	1855
14	1900	1916	14	1936	1953
15	2001	2017	15	2036	2053
16	2100	2116	16	2136	2153
17	2215	2231	17	2236	2253

The timetable which has been offered has a number of variances to the modelled timetable.

We have identified the differences and colour coded them **+1**, **+2**, **+3**.

Coventry - Leamington Spa																	Monday-Friday		
Train ID		1 2H66 EL	2 2H68 EL	3 2H70 EL	4 2H72 EL	5 2H74 EL	6 2H76 EK	7 2H78 EK	8 2H80 EL	9 2H82 EL	10 2H84 EL	11 2H86 EL	12 2H88 EL	13 2H90 EL	14 2H92 EL	15 2H94 EL	16 2H96 EL		
From																			
Timing Type		153	153	153	153	153	153	153	153	153	153	153	153	153	153	153	153		
Days Run		[AD]	[AD]	[AD]	[AD]	[AD]	[AD]	[AD]											
Coventry	Dep	06.33	07.36	08.35	09.36	10.36	11.36	12p37	13.36	14.34	15.36	16.36	17.36	18.36	19.36	20.36	21.36		
Kenilworth Jns		06hN 1/2	07/42 1/2	08/41 1/2	09/42 1/2	10/42 1/2	11/42 1/2	12/46	13/42 1/2	14/40 1/2	15/42 1/2	16/42 1/2	17/42 1/2	18/42 1/2	19/42 1/2	20/42 1/2	21/42 1/2		
Kenilworth		06q46	07a44	08b44	09a44	10a44	11a44	12r47	13a44	14.42	15a44	16a44	17a44	18a44	19a44	20a44	21a44		
Leamington Spa	Arr	06.55	07.55 3	08w5 3	09w5 3	10w5 3	11v54	12.56	13w5 3	14v53	15v54	16w5 3	17y52	18.55	19w5 3	20w5 3	21.56		
To																			
Bid/Offer Status		OB	OF	OB	OF	OB	OB	OB	OB	OB	OB								

Coventry - Leamington Spa			Monday-Friday		
Train ID		17 2H98			
From					
Timing Type		153			
Days Run		[AD]			
Coventry	Dep	22.43			
Kenilworth Jns		22/51			
Kenilworth		22a53			
Leamington Spa	Arr	23v02			
To					
Bid/Offer Status		OF			

Leamington Spa - Coventry																	Monday-Friday		
Train ID		1 2C65 EL	2 2C67 EL	3 2C69 EL	4 2C71 EL	5 2C73 EL	6 2C75 EL	7 2C77 EL	8 2C79 EL	9 2C81 EL	10 2C83 EL	11 2C85 EL	12 2C87 EL	13 2C89 EL	14 2C91 EL	15 2C93 EL	16 2C95 EL		
From																			
Timing Type		153	153	153	153	153	153	153	153	153	153	153	153	153	153	153	153		
Days Run		[AD]	[AD]	[AD]	[AD]	[AD]	[AD]	[AD]											
Leamington Spa	Dep	06.08	07.00	08.00	09.00	10.00	11.00	12p01	13.00	14.00	15.00	16p01	17.00	18.00	19p01	20p01	21.00		
Kenilworth		06a16	07a08	08a08	09a08	10a08	11a08	12pa0	13qa1	14a08	15q10	16pa0	17a08	18a08	19pa0	20.08	21a08		
Kenilworth Jns		06/17 1/2	07/09 1/2	08/X1 01/2	09/09 1/2	10/09 1/2	11/09 1/2	12/10 1/2	13/11 1/2	14/09 1/2	15/11 1/2	16/10 1/2	17/09 1/2	18/09 1/2	19/10 1/2	20/10 1/2	21/09 1/2		
Coventry	Arr	06v24	07.16	08.17	09.16	10.16	11.16	12.17	13.18	14.16	15.18	16.17	17.16	18.16	19.17	20.17	21.16		
To																			
Bid/Offer Status		OB	OF	OF	OF	OF	OF	OB	OB	OF	OF	OB	OF	OF	OB	OB	OF		

Leamington Spa - Coventry			Monday-Friday		
Train ID		17 2C97			
From					
Timing Type		153			
Days Run		[AD]			
Leamington Spa	Dep	22.17			
Kenilworth		22a25			
Kenilworth Jns		22hN 1/2			
Coventry	Arr	22w3 8			
To					
Bid/Offer Status		OB			

We would like to understand what impact these amendments will have on performance. Have these been modelled?

There are also variances between the times stated in the Form P and those that have been offered.

We would like to ask whether the TPRs are compliant as some services seemingly fall short of the minimum turnaround times at both Coventry and Leamington.

We have worked closely with TOC and Network Rail colleagues over many months to develop contingency plans seeking to minimise further performance impact. The following demonstrates the regulation policies that will need to be implemented Mon to Sat.

Event	Risk	Intervention Proposed
DN 1MXX running up to 7" late		<ul style="list-style-type: none"> Run in timetabled sequence from COV
DN 1MXX running 8-13" late	Train out of sequence from COV towards BHI leading to further delay to 1MXX and PPM failure to. Possible further impact to 9SXX	<ul style="list-style-type: none"> 1MXX to run out of booked sequence from COV, and follow 1WXX/2YXX 1MXX to use platform 3 at COV to allow Shuttle to return to platform 4 right time 1MXX to pass 1WXX/2YXX at BHI. 1WXX/2YXX to use platform 1
Down Kenilworth Shuttle up to 8" late	Delay to 1MXX at COV	<ul style="list-style-type: none"> Freight to remain in loop as booked (if running) ECS move from platform 4 to Engineers Siding at COV and return to be caped – Shuttle unit to remain in platform 4 1MXX to use platform 3 at COV

These are the mitigations for individual trains running late and would need to be adhered to in every single instance of late running. However, it must be noted that significant disruption would be difficult for the Coventry work station to manage.

The Sunday timetable was not part of the modelling undertaken and therefore we have no visibility of the performance risk it will introduce. We have met with London Midland to discuss the options and currently there are 17 potential regulation policies for Sundays.

Due to the infrastructure constraints, some contingencies will be very difficult to manage. Trains can turn round from Leamington at Kenilworth, but they cannot from Coventry as there is no signal to return from Kenilworth in the Coventry direction.

We believe the Sunday service would be very difficult to operate with any perturbation on the day and are concerned that the performance impact has not been assessed. We would therefore find it difficult to support the introduction of this timetable and would suggest that more work is required before granting the rights for services on Sundays.

I trust that all of the above will be factored into the decision making process.

Yours Sincerely,

Pauline Rawlings

Head of Planning and Performance