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Dear Paul

CONSULTATION ON NETWORK RAIL'S STRATEGIC BUSINESS PLAN (SBP)

London & South Eastern Railway Limited (Southeastern) welcomes this opportunity to comment on the Network Rail (NR) SBP. Throughout the consultation process we have had constructive dialogue with NR which has been appreciated.

At a first glance it would appear that the SBP appears to serve two purposes –

1. proposals for the expansion and development of the rail network and
2. Network Rail's views on the extent of funding that it requires in CP4

We will not make any comments on item 2 as these would appear to be NR's own opinions on what they themselves can achieve.

Regarding item 1, we believe that the SBP is a valuable first step for the development and strategy of the rail industry in CP4. We note the high level objectives that are set in the HLOS and we would like to emphasise that there is still a large amount of work to be done between NR and the operators on precise details prior to the draft Regulatory determination in June 2008.

Capacity and Infrastructure

We support the need to increase the capacity on trains serving the South East but are concerned that there are insufficient details of how this is to be achieved in the SBP.

The SBP indicates that growth in the South East will be in the order of 25% but the graph indicates that this will be passed sometime in 2011. It is a key concern of ours that activities are planned to support this growth.

The plan for lengthening platforms for strategic route 1 does not give clarity that all the stations on the routes from London to Rochester via Dartford will be lengthened at the same time. Failure to lengthen the platforms between Dartford and Rochester at the same time as stations from London to Dartford is totally unacceptable.

The plan would indicate that an additional 140 units are required in Kent but the SBP fails to identify where these additional units will be maintained. There appear to be no additional stabling facilities within the plan.

Although specific projects are included to further electrify parts of the rail network there appear to be no proposals in the SBP to upgrade the current infrastructure to enable regenerative braking on trains. The ability to use regenerative braking should have been available for the introduction of "Networker" trains in the early 1990's but, as yet, this has not happened. It should be noted that the new class 377 units for use on the "Thameslink" project, delivery between December 2008 and February 2009, are required to have their regenerative braking capability turned off. This work should be considered as a priority as it would have an impact on costs and also the environment.

Any proposed increases in vehicle procurement should include involvement of the TOC's and not just be at the discretion of NR and the DfT.

Performance

Southeastern have already had discussions with NR (Kent Route) to find methods to improve the overall performance of our services. Together, we are looking to increase our PPM to 93.74% by March 2014 which is well in excess of the 91.6% that NR feels they can achieve with their expected funding. We feel that this is an area that requires much further work by NR, especially by sharing information between the Routes, before the final targets and funding is set by the Regulator.

Seven Day Railway

We fully support the proposals to provide a "7 Day Railway" which, we feel, may be one area of improving overall performance; however, we would prefer to reserve making further comments on this subject until more details are provided by NR.

Stations

We appreciate the work that NR has done lately on station developments and the innovative idea of modular structures.

One area of concern, however, is that the "Access for all Programme" which is running behind schedule and, it would appear, has no plans in place to increase the maintenance provision for the new lifts above the existing level, which could result in delays in attendance at and fixing of faults.

Although enhancements at stations are agreed they often take much longer to be implemented than should be the case and the costs are often much greater than would normally be expected. This may be a result of the current GRIP process and we would appreciate an investigation into the effectiveness of this system.

The SBP has no specific details of plans to increase the availability of car parking spaces at stations in the South East. We would appreciate more visibility of these plans as they would help to improve the environment by offering easier access to trains than is currently available, thus removing cars from roads which are already severely overcrowded.

We would like to see the inclusion of sufficient funds to ensure that upgrades to platforms and stairs are available to meet the required 3% uplift stated in the Fatality Weighted Index.

We do not support the proposal of including the Long Term Charge into the Fixed Track Access Charge which will reduce the visibility of the franchise station charges.

Charges

Whilst supporting the ATOC response to NR on the proposed charges, especially the need for the Capacity Charge (CC), we would like to make the following additional comments:

- We feel that the 10% discount for Freight Operators on the CC is inappropriate in the South East. Freight services operating during morning and evening peaks, albeit in the contra direction, can cause more congestion due to their length and speed than any passenger train service. A review of this area would be appreciated if the CC is to be continued.
- We would like to see NR paying the discounts for regenerative braking to all TOC's who have vehicles with regenerative capabilities but are unable to use the facility due to the "Network" being unable to accept the returned electricity.

Deliverability

Control Period 4 will see some key schemes being implemented including "Crossrail" and "Thameslink" in the South East. It is important that the technical and project management of these schemes is prioritised. In 2012 London will be hosting the Olympics and our transport infrastructure is the key to moving the visitors and competitors to and from events.

Currently, there are NR projects running behind schedule and this is an area that needs to be addressed in the new Control Period to ensure that target completion dates are met.

Communication between NR and the TOC's are critical to ensuring the successful delivery of projects.

We will be happy to discuss any of the questions raised in this response.

Yours sincerely

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