

promoting quality public transport.....

Chris Littlewood
 Office of Rail Regulation
 1 Kemble Street
 London
 WC2B 4AN

28th September 2012

Dear Chris,

Network Rail's output framework for 2014-19

TravelWatch NorthWest is an independent Community Interest Company representing all public transport users in North West England. Herewith our response to this consultation.

Q1. Do you agree with our proposals for outputs and indicators for passenger train service performance? Should we retain the sector level outputs for PPM and CaSL (for England & Wales)? Is there more we need to do to ensure consistency with franchise obligations?

Train service performance is a vital issue for passengers. Factors affecting performance are a mix of operator responsibility, Network Rail (NR) responsibility and external elements. Passengers just see the final outcome and in the main do not appreciate the differing roles of ORR and the DfT. Ideally the whole regulatory process should be simplified with the industry having one regulator to award franchises and regulate the performance of the whole industry across the board. The passenger champion role should then be completely independent of this body.

However given the current position we welcome all moves to encourage improved performance with more disaggregation and greater transparency of performance outputs and indicators. Passengers need to relate to their own experience and are not necessarily impressed with average figures that conceal local and time related variations. So measures aligned to routes, peak / off peak services and intermediate stations are all to be commended.

Q2. Do you agree with our proposals for an output and indicators for freight train service performance?

We agree that it is important to monitor freight performance not just for itself but also because of the influence its performance can have on passenger services.

Q3. Do you agree that outputs for Network Rail in relation to named projects, capacity metrics and funds should be project-specific milestones defined in the enhancements delivery plan? Do you have any comments on how useful the enhancements delivery plan has been in CP4? What are your views on indicators to measure the efficiency and effectiveness of the use of the funds?

We think that NR schemes / projects should be closely monitored both from achieving timescales and importantly cost. There is a perception that small scale projects and by inference larger ones have inflated costs and similar work could be undertaken more cheaply if it were outwith the NR umbrella. It would be advantageous to involve stakeholders (including passenger representation) at an early stage in the selection and design of schemes.

Q4. We propose to define delivery plan milestones to ensure Network Rail delivers a plan to reduce risk at level crossings, and to use certain indicators to monitor Network Rail's delivery of these outputs and its wider legal obligations. Do you agree with this approach?

We whole heartedly agree everything possible should be done to minimise risk at level crossings. Many road users are unaware of the potential risks they can present.

Q5. Do you have a proposal for an alternative to the existing network availability (for reducing disruption from engineering works) outputs, which could be viably implemented in time for the start of the next control period? If the existing outputs are retained do you have any proposals to improve them?

Q6. Should we introduce a measure of the efficiency of the use of possessions, and if so how could this be defined?

Disruption to passengers as a result of engineering work is a key issue for passenger satisfaction. ***I am enclosing 2 reports we have done on this for your information.*** Network Rail has promised a 7 day railway for several years but Sunday travel can still be a tribulation. Replacement buses are unpopular, as recently shown by research undertaken by Passenger Focus. A measure of the efficiency of the use of possessions is very necessary as there is anecdotal evidence of little or no work being carried out on some occasions. Improvements here would help towards the goal of keeping disruption to a minimum.

Q7. Do you agree that we should retain the CP4 network capability output? Do you have a view on the usefulness of the indicators suggested, or any further suggestions for improvement?

We agree.

Q8. We want to improve the definition of the existing station condition output (SSM – station stewardship measure) and introduce a new

measure – SSM+ – which provides a clearer disaggregation for measuring condition and better, value based, weights. Do you agree with this new approach?

We would support any measure that results in improved stations. Greater operator involvement would appear to be the right forward. In the North West we have a number of larger stations that are in need of improvement – e.g. Manchester Victoria and Oxford Road and also stations on the WCML such as Preston which hopefully the new West Coast franchise will address. (see also 2 reports on stations on our website)

Q9. Do you agree that we retain the current CP4 measure of depot condition but treat this as an indicator rather than an output?

No comment

Q10. Do you agree with the proposed new approach to strengthen the focus on further asset management improvements? Do you have any specific comments on the detailed measures?

Q11. Which, if any, of the asset management measures do you think should be regulatory obligations (equivalent to outputs), and which should be enablers/indicators?

We have no general comments on asset management issues. However a specific issue which is highly visible to the passenger and often an eyesore is that of vegetation growth on, between and adjacent to tracks. This has been the case for many years and its adverse impact on NR's asset management capability should not be underestimated.

Q12. Recognising that certain indicators are needed to monitor HLOS delivery, and that Network Rail is in the process of deciding on further indicators, do you have views on specific environmental indicators which we should monitor?

We agree with the measures set out here.

Q13. Should we introduce a new indicator of changes in journey times? Do you have views on how this measure should be calculated? Should we also introduce a measure of accessibility to stations?

There could be merit in an indicator of changes in journey times for major passenger flows. Trade-offs between infrastructure/ rolling stock improvements and additional station calls will influence trends in journey times. Accessibility to stations for the mobility impaired is an important issue and progress towards statutory compliance and delivery of enhancement schemes should be monitored.

Q14. Should we introduce a new indicator designed to measure improvements in passenger information provision and how should this be measured?

Passenger information provision is vitally important, particularly at times of disruption. The latter is highly related to specific scenarios and a whole industry indicator of the quality of information provided may be difficult to formulate and conceal local circumstances.

Q15. Should we also consider new indicators for example covering Network Rail's supply chain management and approach to innovation?

No fixed views on this.

Q16. Do you have views on the introduction of a new measure of how Network Rail is developing its capability as a system operator, and what the measure should cover?

It is important to identify where capacity constraints are causing delays and monitor actions taken to remedy these situations. This could of course have implications for service frequency and, related to this, individual train capacity.

Q17. Should we have a mechanism to allow formal trade-offs to be made between high level outputs during the control period?

No comment on this question.

Q18. What do you think of the idea of a scorecard to provide context to our assessment of Network Rail's performance in CP5? Do you have views on our proposed scorecard, and do you have alternative suggestions?

We are broadly in favour of a scorecard for the whole industry with particular reference to passenger satisfaction. This should not detract from regional variations which are important to passengers

Thank you for the opportunity to respond

Yours faithfully,

John A Moorhouse

John Moorhouse
Company Secretary