

To: Mr B Emery
Chief Executive
Office of Rail Regulation
1 Kemble Street
London
WC2B 4AN

Dear Mr Emery

We are writing to request that, in its final determination of the Network Rail Strategic Business Plan, the Office of Rail Regulation (ORR) approves the £19million necessary for the East Midlands Resignalling Scheme - Nottingham Station Area

The Council's understanding is that the ORR has not yet considered this scheme in full detail, nor its effects the full effects of the scheme based on the key HLOS metrics, particularly that of performance. We therefore wish to set out in detail the reasons why the scheme is vital to provide a reliable railway and adequate capacity in the Nottingham area.

Background

The layout at Nottingham station was designed in 1968, at the end of the Beeching era, when it was believed that the railways were in a state of long-term decline. At the time it was introduced (in 1969), 173 trains per day were scheduled to arrive or depart from Nottingham¹, and, with economy in mind, the layout was designed to accommodate only that level of traffic.

Today Nottingham is used by 374 scheduled departures and arrivals per day². This is 221% more than the number for which the layout was designed. Not surprisingly the layout is extremely congested and struggles to cope. When perturbation occurs the layout already cannot cope acceptably, and the layout then causes significant additional delay minutes.

In 1969, the number of platforms for passenger use was reduced to just 4 as this was ample for the level of traffic, and the signalling was designed for this. Platform 5 was retained for parcels trains, with the up goods road through what had previously been platform 6, as the good roads on the south side had been removed. Subsequently, as traffic has relentlessly built up, platforms 5 and then 6 have been re-instated to passenger use, but with no additional track or signals on the approaches. The number of goods trains has reduced since 1969, but is now increasing again, and, in line with the expectations of the White Paper, should be expected to increase over coming years.

Low speed and conflicts

The Permanent Speed Restriction (PSR) in the station itself is 15mph, to facilitate permissive working. All the ladder crossovers at the western throat are 15mph, there is a 25mph PSR over a long section of up slow and 45mph on the down slow. In addition, all the crossovers at Mansfield junction - no less than ¾ mile out of the

¹ Midland Region Timetable December 1969 – June 1970, National Railway Museum Library

² National Rail Timetable summer 2008

station - are 25mph, which slows all trains to/from the north, and all trains which switch between fast and slow lines.

Platform congestion dictates where trains are routed, which means that, although NR does its best to minimise it, conflicting movements are frequent, as are movements across the slow crossovers.

At 25mph it takes nearly two minutes to travel $\frac{3}{4}$ mile for trains accelerating from a stand or decelerating to a stop. Add in time to set the routes, and, at 16 movements per hour, it is clear that the western approaches are intensively utilised now, and will become even more so after December 2008 when movements increase to 20 trains per hour.

The slowest regular movements are for Robin Hood Line trains, half of which, due to platform congestion (see below), depart from platform 1 which is on the north side, and then have to cross the entire throat at 15mph onto the up slow before crossing the entire throat a second time at 25mph at Mansfield junction to effectively regain the line on which they started – a truly ludicrous movement. This movement effectively constrains an earlier scheduled arrival time in Nottingham by the MML fast from St Pancras, which is usually held west of Mansfield junction until the RHL train has passed through.

Trains approaching Nottingham are allocated recovery time. In practice much of this is needed, and is used, simply to accommodate conflicting movements and/or to await access to a platform. It is a standard perception of Nottingham's rail passengers that "your train always gets to just outside Nottingham and then they make you wait for 5 minutes". In fact this is not strictly true - not all trains are stopped, and not all wait for a full 5 minutes, but it is so commonplace to be stopped that the public perception is that it is the norm. And it is not acceptable - nor consistent with the ORR duty "to promote improvements in railway service performance" - for it to be allowed to continue.

Clearly there will always be a degree of delay outside any major station, but it is palpably worse at Nottingham than at most other Core-City stations such as Bristol, Leeds (where the new layout has virtually eliminated it), Liverpool Lime St, or Newcastle, and it is as bad as or even worse than the other bad Core City stations at Manchester Piccadilly (where many £millions are likely to be spent soon on its resolution), Birmingham New St (where the Proof House remodelling was undertaken precisely to ameliorate it) and Sheffield.

Because of the volume of trains, platforms 1, 3, 4 and 5 are regularly scheduled to hold more than one train, and this requires a high degree of synchronisation to avoid delay, and is extremely vulnerable to perturbation. No other Core City station has such a high degree of platform sharing - not Bristol, nor Birmingham New St, nor Leeds, nor Liverpool Lime St, nor Manchester Piccadilly, nor Newcastle, nor Sheffield - and this makes Nottingham exceptionally vulnerable to its consequences in times of perturbation.

Perturbation

In its timetabling Network Rail has taken great care to minimise the conflicts as far as possible, and this enables the layout to just about get by when everything arrives on time. But severe problems arise in times of perturbation. These complications arise because any trains arriving late often miss their path, and are then almost certain to conflict with other trains.

Even worse, after so many minutes, late arrivals lose their platform slot. Even if they can still be accommodated on their allotted platform, they may be the wrong side of a train that is scheduled to leave that platform before them. So either the other train's departure is seriously delayed, or a new platform has to be found, which starts of a whole chain of subsequent conflicts and delays

In the most severe instances of perturbation, trains to the west that are stuck at the eastern end of platforms 1,3, 4 or 5, are made to depart to the east, reverse on the running lines outside Eastcroft depot, and run back though the station on the middle roads before finally heading off on their intended route. This only happens in the very worst instances, but it is highly abnormal that it is ever necessary at all. It does not happen at any other Core City station - not at Bristol, nor Birmingham New St, nor Leeds, nor Liverpool Lime St, nor Manchester Piccadilly, nor Newcastle, nor Sheffield, and nor would it be regarded as remotely acceptable at any of those places.

From December 2008

The foregoing sets out in detail just how near to its capacity the station is currently operating. But from December 14th - just 44 days after the ORR publishes its final determination - the situation will worsen markedly because 4 additional trains per hour will start to use Nottingham station, all of them over the congested western approaches. These are the hourly frequency trains to/from Leeds and Matlock.

These trains, particularly the Leeds service, are badly needed to address persistent overcrowding which occurs in both directions throughout the day between Nottingham and Sheffield, and also between Nottingham and Derby. The Leeds service was identified by the MML RUS as having the highest load factors on the MML³ and in the EMT franchise specification⁴ as being most in need of strengthening. Considerable growth has occurred on this route (Nottingham - Sheffield) since these documents were published, making the overcrowding even worse. Recent counts undertaken by East Midlands Trains show an all-day Monday - Thursday average of 101 passengers. Most services are formed of a 2-car class 158, giving an all-day load factor of 73%, with the highest regular load of 198 for a maximum of 138 seats (some units have fewer seats, which makes the load factor higher and the overcrowding even more severe). Average load is 126 on Fridays, making an average Nottingham - Sheffield load factor of 91%. Weekend loadings can be even higher on many trains.

In addition to addressing the severe overcrowding, the Leeds service is needed to connect the regional capitals of the East Midlands and Yorkshire & Humberside, as these are the only two adjacent regional capitals without a direct train service (all the other regional capitals Bristol, Birmingham, Leeds, Manchester, Newcastle, already have frequent direct train services between them).

The HLOS states "In practice, when the average peak-period load factor reaches about 70%, some passengers will be travelling in conditions that are crowded. For this HLOS, the Government has three main goals. Firstly to move average peak-hour load factors down towards 70% where they are currently higher than that. The second is to avoid increases in average peak-hour load factors in any major city or London terminus. The third is to target capacity increases at the services with the

³ MML / East Midlands Route Utilisation Strategy, SRA, March 2004, load factor tables, pages 23 - 27

⁴ DfT East Midlands Franchise consultation document, June 2006, Figure 3, page 19

most serious overcrowding.”⁵ It should be noted that the all-day load factors on the Nottingham - Sheffield service are above the 70% load factor benchmark set by the HLOS as a peak-period trigger for remedial action.

When Network Rail was asked by DfT about these additional services, it said they could be accommodated precisely in anticipation of the enhancement to the layout, but with a recognition that performance would be problematic in the interim. This is in line with the RUS which stated that “the (RUS) strategy recommends the introduction of a direct hourly service from Nottingham to Leeds”⁶, and that “The final determination of the signalling renewal at Nottingham will use the train specification of this RUS as its base”⁷. The Nottingham - Leeds service was also the rail scheme for which the M1 Multi-Modal Study identified the strongest priority along the whole M1 corridor.

Whilst it can be seen that Network Rail was effectively under instruction from the RUS to accommodate the new services, the Councils believe that Network Rail is to be strongly commended for the ‘can-do’ attitude that it has adopted, in seeing that the long term benefit should not be spurned because of short term performance difficulties that will be caused. However, as well as the effects on passengers, it would be grossly unfair on Network Rail to deny it the means to deliver the required performance arising from the services which it has been obliged to accommodate.

Past experience.

It is impossible to say exactly what effect squeezing in an extra 4 trains per hour will have on the station and its western approaches. It should be noted that Network Rail’s ‘Appraisal Summary’ of the enhancement specifically excludes the effects on “*services which are not currently operating but being introduced in December 2008: Nottingham to Leeds and Nottingham to Matlock services. Passengers using these services, particularly the Leeds service, will also experience AML savings, as modelled by RailSys, so the total scheme benefits are understated due to this factor. The project is intended to allow these new services and future new services to operate reliably in and out of Nottingham station.*”

These services are excluded because they have no current PPM figures against which the beneficial effect of the enhancement on PPM could be quantified.

However, the likely effect of squeezing in an extra 4 trains per hour is known from direct past experience. Prior to 2004, there were 4 more trains per hour than at present - Nottingham to/from Coventry, and Skegness - Nottingham - Crewe (and vice versa).

That made 20 trains per hour (10 each way) through the western approaches⁸. The SRA MML/East Midlands RUS stated that “around Nottingham station has a CUI (Capacity Utilisation Index) of between 70% and 90%”⁹, which was confirmed at a RUS stakeholder event as being 88%. The RUS itself stated that “performance problems on the route [which were then running at a 2003/04 PPM of 52.5 on the MML] are partly a result of the considerable number of services each hour (at Nottingham)”¹⁰, and proposed withdrawal of the Nottingham - Nuneaton/Coventry

⁵ DfT Delivering a Sustainable Railway, July 2007, para 4.20, page 43.

⁶ MML / East Midlands Route Utilisation Strategy, SRA, March 2004, para 9.6.2, page 48

⁷ MML / East Midlands Route Utilisation Strategy, SRA, March 2004, para 9.6.10, page 53

⁸ 2 x MML, 2 x RHL, 2 x New St, 1 x Coventry, 1 x Leicester, 1 x Liverpool & 1 x Crewe

⁹ SRA MML & East Midlands RUS Consultation document, June 2003, page 12

¹⁰ SRA MML & East Midlands RUS, March 2004, page 53.

services, as a result of which “it is expected that platform capacity (at Nottingham) and consequent performance will be ameliorated”.¹¹

No other service anywhere in the East Midlands was proposed for withdrawal by the RUS.

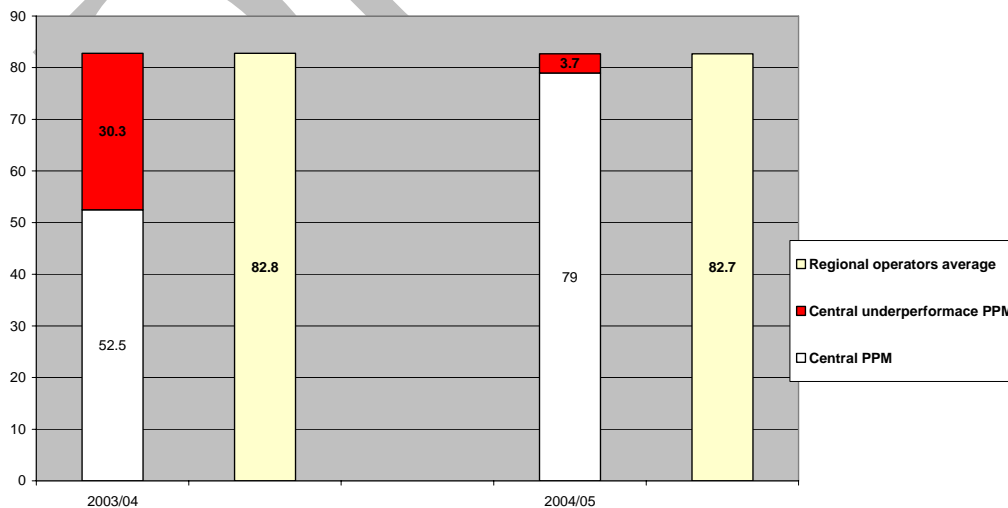
At the final stakeholder event, it was explicitly stated that the reason for the withdrawal was the performance difficulties at Nottingham. The final RUS stakeholder event also referred to the light loading of the Nottingham - Coventry service, but confirmed that, whilst this was (quite understandably) the reason it was being chosen for sacrifice, it would not on its own have been reason for the withdrawal.

Significantly, both Nottinghamshire County Council and Nottingham City Council, through their RUS submissions, stated on the record their support for this reduction of service at Nottingham. It is most unusual - possibly unprecedented ? - for local authorities to support service reductions in their area, but such was the benefit of thinning out the congestion at Nottingham.

The Nottingham – Nuneaton service was duly withdrawn from May 2004. The graph below shows the Central trains PPM before and after the reduction in the number of trains at Nottingham, and compares it to the average PPM for regional TOCs.

In an operation as large as Central Trains there will inevitably have been many factors affecting the PPM. Nonetheless, the change to PPM from before and after the reduction in the number of trains at Nottingham could hardly be starker. In the last full year of 20 trains per hour traversing the western approaches to Nottingham, Central Trains PPM was just 52.5, no less than 30.3 PPM points below the average of regional TOCs. In the year after the reduction in the number of trains at Nottingham, Central Trains PPM rose by no less than 26.5 PPM points, so as to be just 3.7 PPM points away from the average of regional TOCs.

Central Trains PPM compared to Regional TOCs average PPM before and after reduction of trains at Nottingham



¹¹ SRA MML & East Midlands RUS, March 2004, page 53

Clearly it cannot have been national factors at work, as they would have affected the national average PPM of all regional TOCs. Whatever the reason, it was specific to Central Trains. And whilst it was undoubtedly a variety of factors, it is difficult to think of a single factor that is prima-facie as significant as the reduction in the number of trains at Nottingham.

Clearly, no one imagines things would go back to how they were in 2003, as that was an acute national crisis for rail. However, if a quarter of the 26.5 PPM points improvement was due to the reduction in the number of trains at Nottingham, its re-introduction would be a massive deterioration. Even just 10% - which would seem low for what was, on the face of it, the biggest individual factor - would be a deterioration of 2.65 PPM points, which would be extremely significant.

East Midlands Trains (EMT's) current PPM

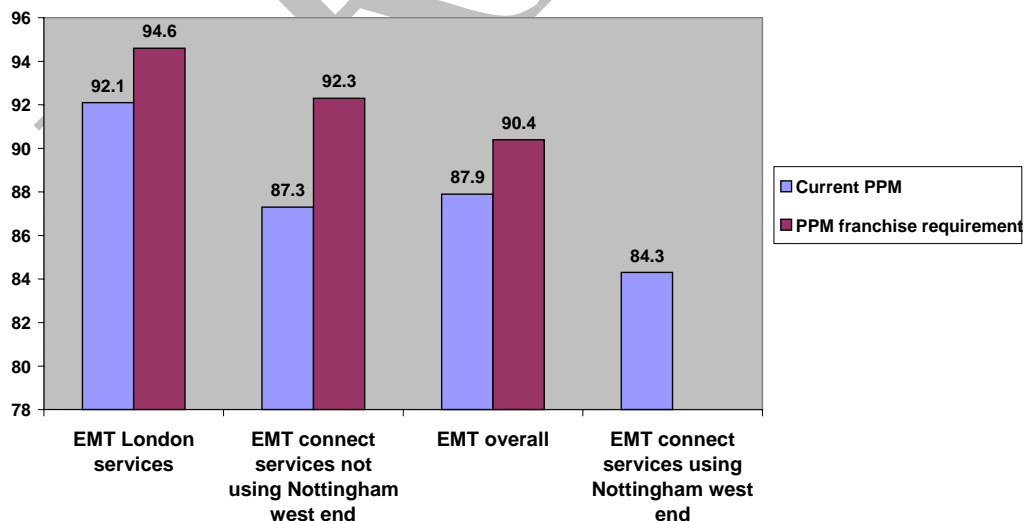
Central Trains had the lowest PPM of any regional TOC¹² since East Midlands Trains took over things have improved markedly. The lowest MAA PPM for EMT's connect services (i.e. those services EMT inherited from Central) is 89.05% overall, which has raised the MAA to 85.85.

However, the 3 EMT connect services with the worst PPM are precisely those which use the west end of Nottingham

- Liverpool - Nottingham - Norwich MAA 82.95
- Leicester - Nottingham - Lincoln MAA 84.71
- Robin Hood Line MAA 85.33

Weighted for the number of trains, these three therefore have an average MAA of 84.31 - **1½ PPM points below the EMT connect average and no less than 3 PPM points below the EMT services which do not use the west end of Nottingham.** This is shown in blue columns in the graph below: -

EMT PPM current & Franchise requirement



¹² ORR National Rail Trends Yearbook 2006, table

But, under its franchise agreement, EMT is required to reach a PPM target of 90.4 by March 2014¹³. This is a net PPM for all EMT services, both MML and connect. The current MAA for all EMT services is 87.90, so this requires EMT to improve by 2.5 PPM points overall.

The normal assumption would be that the improvement would be spread across all services. But it would be an untested assumption - and a real hostage to fortune - to imagine that any operator could improve reliability across the most congested part of its network, after a 25% increase in trains per hour at that already congested location. The likelihood is that performance will deteriorate to some degree, although the Councils have no way of calculating the likely extent of that deterioration. However, it is possible to calculate what EMT would be required to achieve in its other services if the enhancement was not implemented. .

- In all scenarios, it is assumed that EMT will achieve the required 2.5 PPM points improvement on its London services, taking their MAA to 94.6. It should be noted that that is higher than any Inter-city operator has ever previously achieved.
- If EMT could manage no deterioration in performance in its connect services using the west end of Nottingham, then its other connect services (i.e. those which do not use the west end of Nottingham) would need to rise by 5 PPM points to 92.3. It should be noted that this is above the level ever previously achieved by any regional operator, except the self-contained, and hence unique, Island Line.

It would of course be possible for EMT to alter the precise mix of London and connect services PPM to achieve its franchise target. So, for example, EMT might attempt 96%PPM on its London services, which would mean it would 'only' need to achieve 91.5% PPM on its connect services using the west end of Nottingham. However, 96%PPM on an Inter-City service would be truly remarkable, and 91.5%PPM on any group of regional services would still be far above what any operator has consistently achieved before now.

In fact the precise split between London and connect services does not alter the essential point. **Whatever permutation is taken, the fact that half of EMT connect services will go through a location with markedly worsening congestion, would require an extraordinary - and unprecedented - performance by EMT on every single one of its other services.** It would surely be unrealistic - and irresponsible - to rely on this to achieve national targets. And it would surely be unreasonable - both to EMT and to passengers - to expect this to happen.

Of course, if - as seems likely - performance at the west end of Nottingham deteriorates to any extent, then that would require a compensatory further improvement in some other part of EMT, which would make the position even more unreal.

Similar considerations apply to Cross Country, although the numbers are different.

The effect on Northern Trains overall would be less, as it operates a much larger total number of trains within which any 'Nottingham effect' would be dissipated, and it will operate fewer trains through Nottingham than either EMT or Cross Country. Nonetheless, Northern's Leeds - Nottingham service is scheduled to have short

¹³ DfT Stock Market Statement, 22/6/07,

turnround times, so any delays in accessing Nottingham may well lead to problems running northbound through Sheffield and into Leeds.

The Councils trust that the opportunity to enhance the layout and improve reliability that is offered by the resignalling scheme will be taken. But if it was not, and if it then proved impossible for EMT and/or Cross Country to meet the required standard of performance, then the issue would inevitably arise as to what further action to take.

Consequences

As well the direct effects on the PPM of EMT, Cross-Country and Northern, there is of course the issue of the export of delay to other places. Amongst the places with the most obviously severe consequences, as from December 2008 the following trains from Nottingham will go to

- 4 per hour through Birmingham New St,
- 4 per hour through Sheffield,
- 2 trains per hour right across the throat of Manchester Piccadilly,
- 4 per hour along the Cross Country route between Derby and Birmingham,
- 2 per hour along the Cross Country route between Derby and Ambergate,
- 2 per hour to/from Leeds,
- 2 per hour along the East Coast Main Line (Grantham - Peterborough), and
- 6 per hour through Leicester, intermingling with the Cross Country services there.

From 2012 this will be further compounded by sharing the fast lines south of St Albans & Luton with the new high frequency Thameslink services.

This is virtually a list of the top places to which it would be undesirable to export delays.

In line with standard practice, Network Rail's appraisal summary does not attempt to calculate the effect on delay elsewhere of having or not having the enhancement at Nottingham. And it is beyond the ability of the Councils to do such a calculation. Suffice it to say that it is obviously highly undesirable to cause any additional delays at any of these locations - not at New St, nor Piccadilly, nor Leeds, nor Sheffield, nor along the ECML, nor along the Cross-Country route, nor Thameslink, nor Derby, nor Leicester.

The scope for knock-on delays to ripple out from these locations is self-evident or at least platform reallocation and disruption to passengers and Train Operators, e.g.

- late running trains from Nottingham causing delays at New St could effect services to much of Britain,
- late running trains from Nottingham causing delays on the ECML could effect trains anywhere between Kings Cross and Edinburgh,
- late running trains from Nottingham causing delays at Piccadilly, could effect West Coast Mainline trains,
- late running trains from Nottingham causing delays at Leeds could affect Northern or TPE trains, and
- with perhaps the greatest future potential to cause problems, late running trains from Nottingham causing delays at the south end of the MML could cause Thameslink trains to carry delay into much of the London commuter network south of the Thames

In addition to the hotspots listed above, it should be noted that no less than 14 trains per hour (from December 2008) to & from Nottingham - half of all Nottingham's services - have to use sections of single line,

- 2 to/from Matlock (between Ambergate and Matlock),
- 2 to/from Skegness (at Grantham, again between Sleaford and Heckington, and again between Hubberts Bridge and Boston),
- 2 to/from Manchester (at Dore, and again at Hazel Grove),
- 4 on the Robin Hood Line,
- 2 to/from Norwich (at Grantham), and
- 2 Ivanhoe Line (between Syston and Leicester).

This is a far greater proportion than for any other Core City. It adds very considerably to both the vulnerability of Nottingham's services, and to their potential to export delay. It will certainly have been a factor in the PPM problem that caused the 2004/05 reduction in services through Nottingham's west end.

The solution

As explained above, the problems are serious, persistent and structural. The resignalling offers an opportunity to address the cause of the problems.

The 'Base Case' is like for like renewal in modern equivalent form, with any enhancements that can be achieved at no additional cost. This will provide some limited improvement, notably bi-directional signalling, but the crossovers will remain at 15mph, the up slow remains at 25mph, as do the crossovers at Mansfield Junction. Crucially, the number of crossovers is limited - so as to comply with the 'no additional cost' rule - thus retaining much of the current inflexibility.

There are two parts to the potential enhancement. They are complementary, and build on each other. They are designed, individually and collectively, to increase capacity and flexibility so as to reduce conflicts and delays, and thereby improve performance and reliability. They will also provide some capacity for any increases in services that may be required over the next 30 or 40 years. They are

- works in the area immediately around Nottingham station and its approaches, and
- works at Bingham

	Main enhancement features	Benefit	BCR
Nottingham station area	<ol style="list-style-type: none"> 1. Bi-directional working on all approach tracks 2. More & better positioned crossovers to allow more parallel moves /less conflict. 3. Higher speed on exits & approaches. 4. Creation of wing platforms to allow trains independent access & egress where they currently share 	<ol style="list-style-type: none"> 1. Far greater range of movement to minimise conflicts & maximise flexibility, inc 2. quicker through crossovers to increase flexibility of pathing and better accommodate late running. 3. more flexibility when trains currently share platforms 4. relocation of some conflicting movements to the less used east end of the layout 	3.8

Bingham area	Provision of a layover siding, crossovers and associated signalling to allow turnback of trains	Ability to extend RHL trains east of Nottingham, to lessen platform occupancy and so further increase flexibility at Nottingham	2.4
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This paper does not attempt to duplicate the detailed Network Rail assessment of the costs and benefits of the enhancement, which you will be receiving. Rather, we would like to draw your attention to a few key points: -

1. As can be seen, the greatest BCR is provided by the works in the area immediately around the station itself. Indeed this BCR, at 3.8, is far above the standard threshold of 2 for good schemes, and is far superior to many other rail infrastructure schemes which have approved funding.
2. However, the Bingham turnback offers additional benefits, and would provide the greatest total benefit - i.e. the greatest net improvement to reliability for all services is provided by the whole scheme.

It should not be forgotten that, as explained above, these BCRs exclude performance benefits to the new Leeds and Matlock services, because they have no current PPM figures against which the beneficial effect of the enhancement on PPM could be quantified. The true level of benefit, and thus the true BCRs, will therefore be even better than shown.

Exceptional importance

However, there is one feature of the works in the Nottingham station area that makes them truly exceptional. It is that **the works around the station are a once-in-a-generation opportunity to resolve the problems**. The base case renewal, essentially replacing like for like but with modern equipment, will cost £60million. Just as the old layout will have been there for 41 years when it is renewed (1969 – 2010), so the new layout can be expected to have a life of around 40 years i.e. until 2050. To come back and retrofit the enhancements at any time after 2010 would require nearly all the £60m worth of new track and signals to be completely stripped out, rendering the 2010 renewal abortive. To include the enhancement in the planned renewal would cost £19m. To do the renewal at a later date, as a stand alone job, junking the 2010 renewal, would cost £79m – four times as much. This would be the very antithesis of the efficiency that ORR is meant to engender.

This is the single most important point that the Councils wish to make – that the renewal is the only opportunity to do these works in the station area in such a cost effective way. The Councils therefore regard it as absolutely essential that these works are funded, and it would be completely unacceptable if this golden opportunity was not taken. **It is therefore imperative that at least the funding is provided for the works in the Nottingham station area.**

The Councils also believe strongly that the additional works at Bingham are also justified, as they complement the works in the station area, and the greatest total benefit is provided by doing both parts of the scheme. It should be noted that the overall scheme has a BCR of 2.4, which is well above the threshold for good schemes, and this provides strong justification for provision of the full £19m. However, the Councils recognise that if the works are not done now at Bingham, it would be possible to subsequently do them without rendering the earlier renewal abortive.

Future proofing

In 1969 no one could have foreseen the increase in services that would occur over subsequent decades. Similarly, it is impossible today to predict the future. However,

- rail patronage is currently on a strongly rising trend;
- economic growth in Nottingham is strong, with future developments expected to bring an additional 30,000 jobs focussed in the areas immediately around the station;
- 60,000 additional houses are planned for Nottingham, one of the largest percentage housing increases of any British city;
- permanently higher oil prices seem likely to shift travel to rail,
- the ever increasing need to combat climate change will increase the importance of promoting the rail mode,
- the approval for the extensions to Nottingham's tram system – all of which will serve the station - will boost public transport usage,
- Nottingham City Council's decision to introduce a Workplace Parking Levy will further boost public transport usage.

The likelihood is therefore of further strong growth in the number of passengers at Nottingham station, and the need for a steady increase in capacity over the years – whether by train lengthening and/or additional trains.

The HLOS specifically draws attention to the need to have regard to the future. "Rail investments made in the coming years will have a very long life. New infrastructure will last even longer (than 30 years). This means that the Government and rail industry need to think 30 years ahead."¹⁴

But the station is full with trains now. From December 2008 it will be full and bursting. Quite apart from the reliability problems of running 20 trains per hour through the west end, there will be no capacity for any future increase. The enhancement is the only realistic means to provide increased capacity, and it would be reckless to spurn the opportunity.

Conclusion.

The case for the enhancement is based entirely on its benefits for the HLOS metrics of performance and capacity. It seems to the Council that the effect on performance in particular was not fully considered in the draft determination, possibly because the case had not been fully explained.

This paper has set out how

- The layout was designed for the Beeching era of decline, and is woefully inadequate for modern levels of traffic,
- It is currently almost full, with performance unacceptably below the average levels elsewhere,
- From December an additional four trains per hour will exacerbate the situation in a way that has previously proved to be unacceptable,
- Unless the infrastructure constraints are addressed it will be practically impossible for East Midlands trains to meet its PPM obligations by the end of the franchise, and serious problems would be caused for Cross Country and Northern,

¹⁴ DfT Delivering a Sustainable Railway, July 2007, page 19

- The resignaling provides a once-in-a-generation opportunity to resolve the problems in a cost effective way,
- It has an excellent business case and BCR,
- Whatever layout is installed will last for around the next 40 years, and will either provide solution of the problems or will embed them until 2050.
- If this opportunity is not taken, it would cost 4 times as much to subsequently retrofit the enhancements

To reproduce a Beeching era layout to last until 2050 would be grossly irresponsible, and would be wholly unacceptable to the Councils, and to local MPs, the business community and the public.

We trust that the case has now been conclusively proven, and that ORR will approve the funding in its final determination.

Yours etc

DRAFT