Consultation Response

System Operation Consultation

Network Rail

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pteg Support Unit
Wellington House
40-50 Wellington Street
Leeds – LS1 2DE
0113 251 7445
info@pteg.net

Introduction

1.1. ***pteg*** represents the six English Passenger Transport Executives (PTEs), and successor bodies such as Combined Authorities, which, between them, serve more than eleven million people in Tyne and Wear, West Yorkshire, South Yorkshire, Greater Manchester, Merseyside and the West Midlands. Nottingham City Council, Transport for London (TfL), the West England Partnership and Strathclyde Partnership for Transport (SPT) are associate members of ***pteg***, though this response does not represent their views.

1.2. PTEs and Combined Authorities are the main strategic transport planning bodies outside London. They plan, procure, provide and promote public transport in some of Britain's largest city regions, with the aim of delivering integrated public transport networks accessible to all.

1.3. This response has been written in parallel with our response to the ORR consultation on the same topic; a copy is appended.

2. Response

Question 1: What importance do you attach to the activities of network system operation as described; are there other elements you would include?

2.1. The first element of the question refers to system operation, which forms the substance of the ORR consultation. We therefore refer you to the copy of that response annexed to this document.

2.2. ***pteg*** acknowledges the importance of the measures discussed in the consultation documents as a means of ensuring that Network Rail (NR) is held accountable for its performance.

2.3. We note also that the proposed measures could provide useful information about the effectiveness of the railway system as a whole. This is to be welcomed provided that the measures are:
   (a) Meaningful;
   (b) Inform on the progress made towards achieving identified outcomes;
   (c) Focused on the performance of the railway as a whole, not just narrowly on activities that fall within the remit of Network Rail.

2.4. In terms of the elements we would wish to see included, we have set out below our comments (see question 4). Our response to the parallel ORR consultation is also in the answer to this question.

Question 2: Besides transparency of information, are there other issues that should be prioritised to support improved network system operation?

2.5. Again, we would refer to our comments on the ORR consultation.

2.6. We believe that transparency of information is a good starting point, but reiterate the need to think more broadly about the wider social and economic objectives which the railways should be trying to achieve. We would also encourage NR to consider the performance of the network as a whole rather than to treat each of its elements in isolation.

2.7. At the same time, this needs to be done in a way such that areas of good performance do not mask poor performance elsewhere. We would suggest that disaggregation of data down to a suitable spatial level is key. In particular, this should take into consideration the on-going

move towards devolution of rail franchising powers to local transport authorities in the North of England and the West Midlands, which is acknowledged in the consultation document.

2.8. Concerns over commercial confidentiality have, on occasion, been used by some stakeholders as the reason for withholding information that would be of value if put on the public domain. We would therefore encourage NR to consider early on how any legitimate concerns could be addressed and overcome.

Question 3: How effective do you consider the dashboard and related information will be as tools to support decisions by industry parties and funders? Can you see any other potential audiences?

2.9. In general, we consider the 'dashboard' to be clear and helpful.

2.10. However, the format could be made more efficient, for example by focussing the right-hand columns just on the most recent and previous year's data. Whether 5% is the right threshold for each measure is likely to depend on the nature of the measure and how much one would expect it to change over time. In a few cases, terms or abbreviations are used that are not universally known – it would be best to avoid these or provide a glossary.

2.11. We would like to see a dashboard version with absolute as well as indexed figures.

2.12. In almost all cases disaggregate measures would be highly desirable, even if they cannot be shown on the summary dashboard. One approach would be to develop an internet-based tool to generate bespoke 'dashboards', or alternatively to provide raw data files of selected statistics.

2.13. An obvious level of disaggregation for many types of passenger-sector statistics would be that of individual franchises. That said, thought would need to be given to how to deal with changes in franchise maps without losing meaningful time series data.

Question 4: Do you support the inclusion of each measure, and its definition, on the dashboard (Annexes A & B) given current data availability? What other measures do you think could be reported now and why do you think they would be useful?

2.14. With reference to the specific measures listed in Annex A, plus the examples in Annex D and the definitions in Annex B:

- Measure 1: Accidental fatalities and weighted injuries (FWI): No strong views.

- Measure 2: Annex D – "measure 2 passenger kilometres passenger kms.pdf": Useful; but the two variants are confusing, and the latest "for franchised operators" number is higher than that for "total" – not clear why this should be the case.

- Measure 3: Freight net tonne km (billion net tonne km moved): OK, but would also want to have *tonnes lifted.*

- Measure 4: Volume incentive: not clear this is meaningful in itself, at least without explanation and context . You would need to know whether the baseline volumes used for VI had changed over the time period in question.

- Measure 5: PPM: A measure of performance is essential, but as discussed in our response to the ORR consultation, there are potentially more meaningful measures.

- Measure 6: Freight performance: looks ok.

- Measure 7: CaSL: see comments above under Measure 5 and below under "Punctuality and reliability (passenger)".

- Measure 8: Average speed: a useful measure. However, there needs to be consistency over km/h and m/h, and there could also be a similar measure for freight.

- Measure 9: Possession Disruption Index Passenger: likely to be useful but need to make it clear what exactly this measures. In particular, suggest it would be useful to distinguish between planned possessions, emergency possessions and possession overruns.

- Measure 10: Possession Disruption Index Freight: no issues.

- Measure 11: Total distance passengers travelled compared to total length of the network: useful measure.

- Measure 12: Freight Net tkm/track km: useful measure.

- Measure 13: Train Km/Track Km: useful if sufficiently disaggregated.

- Measure 14: Train Planning Satisfaction: the numbers and the resultant chart suggest this is of limited value.

- Measure 15: Access Planning Satisfaction: of limited use.

- Measure 16: Strategic Route Planning Satisfaction: not clear whether this will produce any more meaningful measures than 14 and 15 above.

- Measure 17: Staff costs of key NSO activities: this needs further explanation as it is not clear what it refers to.

- Measure 18: Capacity Charge Receipts: probably not very valuable in isolation.

- Measure 19: LTPP documents established by ORR: no strong opinion.

- Measure 20: Compliance with congested infrastructure timescales: no strong opinion.

- Measure 21: Successful joint track access applications submitted to ORR: not clear what this measures.

- Measure 22: TOC/FOC contribution to timetable development: No strong views.

- Measure 23: Timetable conflicts due to planning error: useful.

- Measure 24: Timetable production schedule index: not clear what this is really measuring

- Measure 25: Successful path allocations (freight only): seems useful.

- Measure 26: Annual Railway Operational Code review: is this the right way of measuring contingency planning?

- Measure 27: Long Term Planning Process review: no strong opinion.

- Measure 28: Industry Access Programme: no strong opinion.

- Measure 29: Timetable Rules Improvement Programme: no strong opinion.

2.15. In general, we feel that there are a lot of measures here, and that the focus should be on those that are factual and most likely to provide useful comparisons and indicators of best practice or areas for improvement.

2.16. Turning to other potential measures that could be added either now or in future:

(i)   From Annex C:

- Safety: we are not sure much additional is needed here at present.

- Output – volume: peak station usage is an attractive idea, but care is needed regarding the way that this is measured to ensure accuracy.

- Output – train performance: see comments below and above. Comments on GJT-weighted approach to average speed are interesting – a measure which can pick this up is desirable.

- Output – availability: we agree with both comments given here.

- Output – capacity utilisation: we agree with these comments.

- Output – operator satisfaction: no views.

- Output – costs: this seems a fair comment; in isolation, however, measuring Schedule 8 might potentially be misleading and/or give rise to perverse incentives.

- Process: no further comments to add.

- Transformation: we agree with the comments.

(ii)   Other proposed measures that could be valuable:

- Major infrastructure renewal/enhancement delivery schemes: is there scope for a clear headline measure of the percentage of such schemes, measured in number of schemes and in value, that are delivered to time, to specification and to budget?

- Delivery of enhancements, such as:
  - The number of single-track-km electrified?
  - Similar measures in terms of new rail infrastructure could be considered, such as the construction of new or upgraded track, the number of track-km where permanent/ruling speed limits have been raised.

- Renewals, such as:
  - Signal-head equivalents renewed.
  - Km of plain line and/or points/crossings renewed.

- Measures related to maintenance that can be linked to specific network outcomes, such as weed-killing and the clearance of vegetation. Possessions requiring bus replacement services, in absolute terms and as a proportion of all possessions.

- Possession overruns (and their impact).

- A measure of *how* network capacity is provided – seat capacity, quantum of trains and service frequency are a start but it would also be good to have an idea of how regular the timetable. This could be measures for example, by the standard deviation of the interval between successive services. .

- Timetable planning: the extent to which specifiers'/operators' requirements for interval and JT protection and similar are incorporated successfully (preserving clock-faces, connections, key flows…). One could measure any instances where such requirements were *not* granted. One might also measure the quality of paths in timetables, i.e. avoiding poor-quality paths for passenger trains that include excessive allowances (e.g. due to pathing conflicts) and for freight that include being recessed in loops.

- A measure of the extent of diesel usage on electrified tracks.

- A measure of intermodal interchange: how might one measure integration with the wider transport network? Possibly the proportion of rail timetables developed in coordination

with other (non-rail) operators? The proportion of rail pax shown by NRPS to be accessing/leaving rail network by PT and/or other non-car modes?

- How does rail perform against alternative modes? One option would be to compare Generalised Journey Times (GJT) from national surveys or modelling frameworks.

- Unplanned disruption: recovery from major perturbation. It would be desirable also to measure what percentage of unplanned disruptions resulted in line closures, for examples of more than one hour.

- Performance: This theme is linked to the wider need to reform performance measures (and the Schedule 8 and linked regimes) to reflect passengers' actual journey experiences and freight customers' requirements. Punctuality and reliability measure which might be useful in the passenger sector include:

  - Right-time (all arrivals) %;

  - Significant delays (>5/10 minutes or where connections missed);

  - Cancellations (all or part of journey);

  - Trains skipping stops due to delays;

  - Primary and secondary delay (possibly measure total secondary delays minus those caused by holding connections?);

    - With all punctuality measures applied throughout a train's journey, and not by reference solely to its terminating point.

Question 5: Which measures would you like to be shown in comparison with each other in the data supporting the dashboard, and why?

2.17. Our relevant comments on this theme have largely been picked up in the previous sections.

2.18. In general, a web-based tool for producing bespoke datasets would allow a wide range of comparisons to be selected by users, providing a powerful analytical tool.

Question 6: Which of the potential future measures listed in Annex C do you think should be prioritised for development, and why? Can you see any other information that it would be useful to develop for inclusion?

2.19. Please see our answer to question 4 above, which picks up this point.

2.20. As a general note, we would like to see factual measures prioritised, so those relating to the delivery of enhancements and renewals are valuable, as well as bus replacement.