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Richard Eccles
Network Rail
8th Floor
40 Melton Street
London
NW1 2EE

Dear Richard

LANCASHIRE & CUMBRIA DRAFT ROUTE UTILISATION STRATEGY

I am pleased to attach our response to this consultation.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Larkinson', is written over a light blue horizontal line.

John Larkinson



Doc # 319247.01



Lancashire and Cumbria Route Utilisation Strategy

Response to Consultation Draft

1. This is the response from the Office of Rail Regulation to Network Rail's consultation on the Lancashire and Cumbria Route Utilisation Strategy (L&C RUS). Our comments are without prejudice to the approach we will take when considering the final RUS, when you submit it to us.
2. We welcome publication of this draft RUS. We want to see RUSs which are fit for purpose, and meet Network Rail's licence obligations and our guidelines. We also expect RUSs to address the issues raised in our review of the RUS licence condition and guidelines, where we said we wanted to see:
 - Fuller scope RUSs, covering all the issues in the guidelines (performance, rolling stock and engineering access);
 - Deeper assessment of non-enhancement options, including hard timetabling choice analysis;
 - Consultation on a "full draft" RUS, with sufficient detail on both the options and your proposed prioritisation, to allow stakeholders to take a better informed view;
 - More analysis of the Route Utilisation Objective for each route, and demonstration that the RUS has satisfied that objective.
3. The L&C RUS has provided a very useful opportunity to identify issues that particularly affect rural, secondary and tertiary routes that might well have been missed had the area been considered as part of the North West or West Coast RUSs. We note the investigation of issues such as access to tourist destinations and the capacity issues of long block sections, single lines and limited rolling stock resource bases. Some of these points could possibly be picked up in further work in the areas of some established RUSs.
4. We note that various specific issues, as listed in Table 7.2, have been passed on to the West Coast RUS and Yorkshire & Humberside RUS and support this approach.
5. Clearly, the final phases of the West Coast Main Line route modernisation project and the December 2008 timetable change will have implications for the final RUS.
6. Although certain issues (such as the extent of use of the Settle & Carlisle line for weekend diversions or as a more standard freight routeing), may not be entirely clear until the West Coast RUS is completed, we would ask you to consider the maintenance strategy for the route further in the final L&C RUS. The Settle & Carlisle line could be a good case study. The principles for RUS development in the ORR guidelines clearly require a balance to be struck between use of the network, performance and maintenance. So far, in RUSs established to date, the latter point in particular has not been as well developed as we had hoped.
7. We accept that the topics of performance and rolling stock are not such major issues in the L&C RUS as they are in most of the other RUSs.