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Dear Brian

East Coast Main Line

I am writing regarding the current applications for additional track access rights on the East Coast Main Line.

Passenger Focus has a presumption in favour of competition because of the benefits it will bring for passengers. By definition, passengers will have a choice and, for some, improved access to services that they did not have before. There is evidence from examples of direct competition between two franchised operators, and between a franchised operator and an open access operator, that consumers benefit from lower prices. This is a good thing and should be encouraged.

The caveats are:

1. That the overall service on the route, i.e. including all the trains of all operators, meets passengers' needs to the greatest possible extent. There must be no significant disbenefit to any existing group of passengers.
2. That the granting of new track access rights does not significantly frustrate the industry's subsequent ability to develop a timetable that maximises capacity and utility to passengers.

Passenger Focus also has a presumption in favour of proposals involving trains to London from towns and cities that are poorly-served by through trains. We know from research that passengers prefer through services to changing trains – indeed, the industry's own demand forecasting models reflect that.

In terms of the applications before you, it is impossible for us to judge whether the timetable that will result will meet passengers' needs. The only timetable produced so far is manifestly 'work in progress', with a number of detriments that it may or may not be possible to address. It is entirely unclear to us which elements of the various proposals could coexist or whether a 'pick and mix' approach would give a timetable that met passengers' needs.



It should be noted that some passengers continue to be disadvantaged by stopping pattern changes introduced in order to accommodate Grand Central's existing trains – the fact of this disadvantage emerged only after the rights had been granted and with no opportunity for passengers' views to be considered. This is not acceptable. To lessen the chances of this happening again, we request that ORR requires the industry to consult publicly about the overall service on the route before the timetable is finalised. As part of that process Passenger Focus should have the opportunity to make representations where we believe the overall service produces disbenefit to existing passengers.

Finally, we suggest that – in future – applicants are required to submit, as a formal part of their application a commonly-structured document that sets out the passenger benefits that their proposal will bring.

We look forward to hearing ORR's decision.

Yours sincerely

Guy Dangerfield
Passenger Link Manager