

Sam Gibbins  
Executive, Track Access  
Office of Rail Regulation  
One Kemble Street  
London  
WC2B 4AN

Whittles House, 14 Pentonville Road  
London N1 9HF

w [www.passengerfocus.org.uk](http://www.passengerfocus.org.uk)  
t 0870 336 6000 f 020 7713 2729  
e [info@passengerfocus.org.uk](mailto:info@passengerfocus.org.uk)  
direct 0870 336 6030  
e [mike.hewitson@passengerfocus.org.uk](mailto:mike.hewitson@passengerfocus.org.uk)

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Dear Sam

**Application to Office of Rail Regulation to run services between Wrexham, Shropshire, Wolverhampton and London Marylebone**

Thank you for inviting comments from Passenger Focus on the above application.

There are clear advantages arising from the WSMR proposals. It will provide additional services for passengers, create additional choice and stimulate the market for rail travel in the area. Moreover it will provide significantly improved rail travel options from an area that currently has no direct links to London while at the same time serving local stations and providing connections with the national network. We are also pleased to see the business case emphasise the importance of attracting new passengers rather than relying on attracting existing passengers from other operators.

These are all things that Passenger Focus supports. We also note the strong support already given by stakeholders in Wales and the region.

However, Passenger Focus's support for this application must be conditional on the proposal not creating an overall disbenefit to existing passengers on other routes.

Chief amongst these is the potential impact on performance/reliability – e.g. Shrewsbury-Birmingham services (particularly those from Aberystwyth) already appear to be regularly delayed by speed restrictions and congestion. Any additional services will, of course, import some additional risk to other operators' performance: what we do not know in this case, however, is by how much. Passenger Focus would therefore seek reassurance from ORR as to the robustness of the mitigating measures set out in WSMR's supporting documentation - e.g. timetable, selection of appropriate rolling stock and the contingency plans designed to deal with disruption – the aim being to reduce this risk to as low as practicable.

Passenger Focus also seeks reassurance that the paths to be used by the five daily weekday services, four Saturday services and three Sunday services do not take up capacity which TOCs would need to accommodate expected growth on core routes and does not create significant capacity constraints in the Birmingham area or on the approaches to London.



One other potential concern is the issue of WSMR's recruitment policy. Any widespread poaching of existing TOCs' train crews could have a detrimental effect on performance levels experienced by passengers using those TOCs. So, whilst recognising issues over restraint of trade, we would ask whether this is something that ORR could address during its deliberations.

Finally, and given the different financial arrangements that WSMR would operate under, Passenger Focus would ask that ORR satisfy itself that the revenue abstraction calculations provided by WSMR (and which we have not seen) are robust and would not result in revenue currently supporting the other TOCs' investment programmes being abstracted.

Yours sincerely

**Mike Hewitson**  
Acting Policy Manager