

By email

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## **Consultation on updating the holding Network Rail to account policy for CP7.**

I am responding on behalf of Transport Focus to the above consultation.

Transport Focus is an independent, statutory consumer watchdog promoting the interests of transport users. Our remit covers rail across Great Britain, bus, coach and tram in England (excluding London) and users of the Strategic Road Network in England. Working with transport providers and Governments across England, Scotland and Wales we ensure that the users' voice is heard.

Transport Focus welcomes the emphasis within the document on Network Rail engaging with stakeholders. Our research continually emphasizes the value of involving users and stakeholders. We have recently worked with Network Rail as part of CP7 regional business plan submissions. This included conducting research on passenger priorities ([Britain's railway: what matters to passengers](#)) and via regional stakeholder engagement groups. We believe that this engagement has helped all parties focus on the needs of users.

We also support ORRs commitment to transparency within the policy.

Our discussions on regional CP7 business plans, and the final published documents, make it clear that difficult decisions on resourcing will have to be made. The overall England and Wales plan refers to an increase in the average age of assets and forecasts that this will have a small impact on train performance, particularly in the later years of CP7. Regional business plans also refer to a 'value of service approach' that prioritises renewals and maintenance expenditure on the key revenue generative flows. This could result in performance on some routes declining by more than others – and also in different possession regimes for routes.

If parts of the network are being prioritised over others, then it will be important that performance monitoring regimes are sensitive enough to pick up on these differences – both between regions and on routes within a region. Without this disaggregated data we may not be able to identify the impact of the value of service approach. In the spirit of transparency and accountability we think there is also a strong case for this disaggregated data to be in the public domain.

Yours sincerely

**Mike Hewitson**  
Head of Policy