

Paul McMahon  
Deputy Director  
Competition and Regulation Economics  
Office of Rail Regulation  
1 Kemble St  
London  
WC2B 4AN

*By email*

2 September 2008

Dear Mr McMahon,

**Re: Response to ORR's consultation on the periodic review 2008: draft determinations**

In our Growing the Railways campaign, we highlighted to the Government the urgent need to tackle capacity problems on the network. We were pleased to see in the ORR's draft determinations that capacity enhancements – both large and small scale – are planned for the next control period from 2009-2014. However, we were disappointed that a significant number of schemes proposed by Network Rail are not included, and we think these should be reintroduced. <http://www.rail-reg.gov.uk/upload/pdf/368.pdf> (page 368)

The schemes omitted are relatively small-scale, low cost investments which could deliver big social and environmental benefits by improving the capacity of the rail network. There is strong local support for many of the schemes, from local people and local authorities. For example, Gloucestershire County Council has made a convincing case for the Swindon-Kemble redoubling.

<http://www.gloucestershire.gov.uk/index.cfm?articleid=19654>

Similarly, Nottingham City Council has made a strong case for resignalling at Nottingham station.

[http://www.nottinghamcity.gov.uk/news\\_page/news\\_about\\_nottingham\\_-\\_transport\\_and\\_streets/action\\_stations.htm](http://www.nottinghamcity.gov.uk/news_page/news_about_nottingham_-_transport_and_streets/action_stations.htm)

We urge you to reconsider the omitted schemes, and reinstate them in order to provide the step change needed to reduce overcrowding and meet demand on the network.

We recognise that funding is limited, but the capacity increases represented by the schemes put forward by Network Rail are desperately needed. We note that the schemes did not meet ORR's criteria: we are concerned that these criteria underestimate wider benefits, especially in terms of tackling congestion and pollution at the local and sub-regional level by providing alternatives to car use.

We suggest that the ORR should consider two ways to find the extra funding needed to implement these schemes. Firstly, while we welcome the fact that improving Network Rail's efficiency is a high priority for the ORR, we think targets could go even further, to release more funds for investment. Secondly, we would ask

the ORR to reconsider the projects currently excluded from the draft determinations, in discussion with the Government. We are very concerned that the planned reduction in the Government's contribution towards our rail network (described in 'Delivering a Sustainable Railway', July 2007) will, if capacity improvements cannot be paid for, result in passengers facing severe overcrowding as well as unacceptably high fares. The Government must ensure that this does not happen, and the ORR can encourage them to do so. We note that in your draft business plan you propose to take on a new role in tackling longer term issues of capacity, pricing and catering for growth – this is an opportunity to show that you can exercise such a strategic role.

We therefore ask you to reconsider the draft determinations, and to reintroduce the omitted schemes.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cat Hobbs', with a stylized underline.

Cat Hobbs  
Public Transport Campaigner

Copies to: Rt. Hon. Tom Harris MP, Rt. Hon. Ruth Kelly MP, Barry King, Gloucestershire County Council