



Consultation on ORR's proposed approach to track access and the future operation of High Speed 2

October 2017

1. The Associated Society of Locomotive Engineers and Firemen (ASLEF) is the UK's largest train driver's union representing approximately 20,000 members in train operating companies and freight companies as well as London Underground and light rail systems.
2. ASLEF appreciates the opportunity to respond to this consultation and highlight some of the issues that we feel are important. Given that operators wishing to run trains on Britain's rail network need ORR approval for their track access agreements, ASLEF is pleased that ORR is looking ahead now and planning for track access rights when HS2 begins operating. Construction of Phase 1 of HS2 is scheduled for completion in 2026, the extension of the new high speed line for Phase 2a should be complete in 2027, and Phase 2b is not expected until 2033. Nevertheless, this consultation is timely because even though HS2 services will not start running for some time, the ORR is likely to begin receiving applications very soon for access contracts which could be up to 10 years in duration and could therefore be affected by HS2.
3. ASLEF has opposed the fragmentation of the railway system under privatisation and we campaign for an integrated network because this is the most efficient way of running the railway system. The majority of trains using HS2 will also use the existing rail network so it is crucial that plans are made with the network as an integrated whole in mind. The current franchise operated by Virgin Trains West Coast runs from London to Glasgow and Edinburgh, primarily on the WCML but also through North West London, Wales and Scotland routes. From 2019 a new rail franchise, the West Coast Partnership (WCP), will combine the current

InterCity West Coast services with the introduction of HS2 Phase 1 and 2A services. The new franchise will be responsible for operating services on the WCML and also for operating new high speed services using HS2 and Network Rail infrastructure from 2026.

4. On the southern part of the WCML some long distance services will be moved over to HS2 infrastructure, creating opportunities for additional services to be introduced where capacity has been released. The DfT anticipates that the WCP will use all available capacity on the new track infrastructure for high speed rolling stock so we understand that the ORR expects to only approve WCP access contracts to HS2, in line with the existing statutory framework for the regulation of the railways (e.g. the Railways Act 1993 and Railways Regulations 2016). As a union we wish to see maximum use made of all track. Where new paths are available, if there is capacity on the high speed lines and shared access is possible, we would expect that to be taken advantage of and access to be granted to other operators. Where there is released capacity on existing infrastructure, paragraph 29 of the consultation paper suggests that this could create opportunities either for additional passenger or freight services or for breaks in the timetable to support good performance. We would advocate the introduction of additional services to alleviate the problem of overcrowding on busy services, assuming that new Digital Railways technology will assist in resolving the challenge of congestion on these routes.
5. On the northern part of the WCML, HS2 services will replace intercity services on the existing network and there are places - such as sections of line between Crewe and Manchester Piccadilly or Weaver Junction - where access rights will be more complicated because of constraints on capacity for all services to run. It is important that competition for access does not undermine access to the network for some service operators in favour of others and that the introduction of HS2 does not lead to a trade-off withdrawal of any services on parts of existing routes.
6. Specifically ASLEF would object to any proposals which would have a negative impact on rail freight services in favour of passenger traffic and would damage the predicted growth rates in rail freight. Network Rail's Freight Market Study has projected an annual growth in total rail freight volumes of about 3% per annum to 2043 but closing lines to freight would be devastating to the rail freight sector and would push freight onto the roads. Rail freight produces 76% less CO2 emissions than the equivalent HGV journey and a gallon of diesel will

carry a tonne of freight 246 miles by rail as opposed to 88 miles by road. Moving freight on roads rather than rail would therefore be detrimental to the UK meeting climate targets. Instead, ASLEF encourages the ORR, along with the DfT and Network Rail, to look into providing capacity for the growth of the rail freight sector. ASLEF is pleased that in paragraph 35 the ORR consultation expressed favour for the extension of current access rights to freight train operators and we hope that opportunities do arise for freight train operators to benefit from additional access on any freed up capacity on the southern WCML.

7. We look forward to hearing more about proposals for dealing with capacity constraints on the Northern part of WCML, and to working with the ORR, DfT, Network Rail, the rail operator and other partners to ensure the smooth integration of HS2 services and delivery of improved rail services across Britain.

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