

Rail2014 Transport Scotland Buchanan House 58 Port Dundas Road Glasgow G4 0HF

Transportation & Environmental Services

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Your Ref: Our Ref: JF/TT/PS/PS/12/A

Date 17 February 2012

Dear Sir,

Rail 2014 Consultation

I refer to the above consultation document which was issued in November 2011 requesting comments by the 20 February 2012.

A report on the Consultation was approved at the Fife Council's Environment, Enterprise & Transportation Committee on 19 January 2012.

The respondent information form and response to the set questions are attached to this cover letter as requested.

The key points from the response which Fife Council wish to emphasis are highlighted below:-

Reliability and Performance

Passengers expect a reliable service for a fair price and do not expect to stand for unreasonable periods. Whilst we accept that some standing is inevitable during peak periods the standing time must <u>not</u> be increased from the current limit of 10 minutes. The consultation document states that passenger requirements are central to Transport Scotland's policy considerations and any increase in standing time would be inconsistent with the key aim of Transport Scotland's "*Scotland's Railways*", which is to provide journey times and quality of service that are competitive with car and air. There needs to be more flexible use of rolling stock to address overcrowding of passengers.

The capacity of all peak train services from Fife into Edinburgh will need to be increased in light of the consultation document's assertion (ref Rail 2014 Para 1.5) that passenger growth in the Edinburgh conurbation is expected to increase by between 90% and 115% by 2024/25.

Transportation & Environmental Services Bankhead Central, Bankhead Park, Glenrothes Fife, KY7 6GH

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Services

Interchange between other modes (eg bus and car at strategic park & ride/choose sites) and rail should continue, in order to encourage the use of rail-within-commuter belts into Scotland's major cities. A key issue, however, is the ability to maintain the integration of timetables between modes when operators are allowed to amend services. The ability to ensure acceptable levels of integration following service changes is essential and needs to be included in future franchise agreements.

If rail is to compete effectively with air travel to support the Scottish Government's carbon emissions reduction targets and economic recovery then the suggestion that East Coast trains from London to Aberdeen should terminate at Edinburgh Waverley, meaning that passengers wishing to travel to Fife and beyond would need to interchange at Waverley for onward travel, is surely inconsistent with the Government's aims.

Scottish Ministers need to consider the views of the majority of passengers and do their best to address them. The emphasis on reducing 'end to end' journey times for 'city to city' passengers will only benefit a minority of passengers, and therefore greater effort should go into addressing the views of the majority of passengers, ie commuters into the major cities (eg from Fife into Edinburgh) who are looking for more stopping trains at key stations. This would also be likely to result in a greater contribution to carbon emission reduction targets by making rail more attractive than car for commuter trips.

To ensure that the rail industry in Scotland really does put passengers at the heart of Transport Scotland's considerations as proposed in the consultation document, and also supports the carbon emissions reduction targets in the Climate Change (Scotland) Act 2009, there requires to be greater emphasis on satisfying the demand for rail commuters into the major cities (eg from Fife into Edinburgh) with high quality services to make rail more attractive than the car for the majority of trips during the morning and evening peak periods.

In this regard, an example of the problems associated with not giving sufficient priority to rail commuters into the major cities is the recent withdrawal of the 7:54 service from Kirkcaldy to Edinburgh. Fife Council considers that the requirements of the Climate Change (Scotland) Act 2009 and efforts to support economic recovery can be more readily addressed by satisfying the demands of the majority of rail travellers (who make short to medium distance journeys) rather than achieving small journey time savings for the relatively small proportion of people who travel the entire distances between Scotland's cities.

Fares

There needs to be a balance between fares income and subsidy. Passenger Focus carried out research in 2010 which showed that "value for money of tickets" was the top priority for Scottish (and UK) respondents. The Climate Change (Scotland) Act 2009 sets very ambitious carbon emissions reductions targets for Scotland, and hence

rail fares must be made more affordable and attractive to encourage an increase in modal shift from car to rail. Applying higher increases to sections of the network which have recently been enhanced would be likely to reduce rail patronage and hence weaken the original business cases for those improvements.

Peak and off-peak fares needs to be reconsidered as to times of reaching destinations, ie peak fares in Fife are still paid on services leaving stations on or before 09:15 in the morning when final destinations are going to be after the 9 o'clock peak.

Fares within Fife should be structured in a way which encourages travel away from Inverkeithing and the Bridgehead area (eg Markinch to Edinburgh fare should be same as Kirkcaldy and perhaps Inverkeithing).

General Points

Scottish Ministers need to consider the views of the majority of passengers and do their best to address them. The emphasis on reducing 'end to end' journey times for 'city to city' passengers will only benefit a minority of passengers, and therefore greater effort should go into addressing the views of the majority of passengers, ie commuters into the major cities (eg from Fife into Edinburgh). This would also be likely to result in a greater contribution to carbon emission reduction targets by making rail more attractive than car for commuter trips.

Communications to provide information on train delays and subsequent cancellations needs to be improved. Passengers need up to date information so they can make informed decisions on how to complete their journeys.

Train services in the 21st Century should be accessible by all with availability for wheelchair access on all services and the same at all stations. Cyclists should also have improved facilities for cycle storage on all trains in order to make active travel at both ends of their journey more attractive.

With current Structure Plans and future Strategic Development Plans it should be clear where development is being focused therefore all opportunities should be supported in these new development areas to use more sustainable modes of transport such as rail and therefore new stations need to be located at key attractors such as areas of housing, employment and education. In Fife the key areas requiring new stations is in the Levenmouth Area, Newburgh and Dunfermline to Kincardine line. There is also freight opportunities on the Levenmouth and Rosyth Port branch lines.

Throughout the life of the franchise there will be investment in infrastructure providing opportunities to increase the number of train paths e.g. the signalling and headway improvements as part of Edinburgh Glasgow Improvement Programme (EGIP) will

create 12 additional paths over the Forth Bridge. There needs to be scope within the franchise to utilise and accommodate new services and improvements.

There should also be support in the future extension of the electrification of the East Coast main rail line and expanding a high speed rail link for Scotland, beyond Edinburgh.

Yours faithfully

Bas mulla

Dr Bob McLellan Head of Transportation & Environmental Services

Copied to:

Councillor Anthony Martin 26 Inchcolm Drive, NORTH QUEENSFERRY, Fife, KY11 1LD

Councillor Ross Vettraino, 27 Ashbank Court, GLENROTHES, Fife, KY7 4TS Liz Box, Committee Administrator, Democratic Services, 3rd Floor North, Fife House

Respondent Information Form and Questions

<u>Please Note</u> this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name Fife Council Title Mr □ Ms □ Mrs □ Miss □ Dr √ Please tick as appropriate Surname McLellan Forename Bob 2. Postal Address

Fife Council			
Transportation & Environmental Services			
Fife House, North Street			
Glenrothes, Fife			
Postcode KY7 5LT	Phone 08451 55 55 55 ext. 444424	Email Bob.McLellan@fife.gov.uk	

3. Permissions - I am responding as...

Please tick as appropriate			
 (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)? (c) The name and address of your organ will be made available to the public (Scottish Government library and/or on Scottish Government web site). 	n the		
(b) Where confidentiality is not requested, we will make your response available to the public on the following basis Please tick ONE of the following boxes	be No		
available, but not my address			
(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?			
Please tick as appropriate V Yes No			

Consultation Questions

The answer boxes will expand as you type.

Procuring rail passenger services

1. What are the merits of offering the ScotRail franchise as a dual focus franchise and what services should be covered by the economic rail element, and what by the social rail element?

Q1 comments:

The dual focus on 'economic' and 'social' services appears similar to arrangements in the bus industry. 'Social' services would be managed for a fee, and 'economic' services would be designed by the operator in response to demand, with the operator bearing the commercial risk.

How would the rail industry ensure that future changes to the 'economic' network did not disadvantage 'social' services? (e.g. by disrupting the train paths already established for 'social' services or reducing the level of integration between the 2)

Unless satisfactory controls were put in place, the subdivision of the network into 2 or more franchises could create problems for passengers. It would probably therefore be prudent to maintain a single franchise rather than subdividing it.

If the network were to be split into economic and 'economic' and 'social' rail services, economic services, should include the Edinburgh & Glasgow commuter services, Highland Mainline services & Aberdeen – Edinburgh/ Glasgow express services.

'Social' rail services, should include, Far North Line, Kyle of Lochalsh line, Aberdeen- Inverness Line, Stranraer Line & Caledonian Sleeper.

2. What should be the length of the contract for future franchises, and what factors lead you to this view?

Q2 comments:

The current 7 year franchise was originally let in 2004 and Scottish Ministers executed the 3 year extension option in the contract in 2008, so the franchise will terminate after 10 years in 2014.

Train operating companies are calling for franchises to be extended, but it could be argued that particularly in the current economic climate, contracts of 10 years or more may not offer best value for money. The possibility of constitutional change also means that a shorter franchise, e.g. for 5 years with an option to extend for say, 2 years, may be more appropriate.

However on the flipside by offering a longer length franchise (7 - 9 years) it would provide incentives to the train operator to invest in providing Wi-Fi on services and make additional improvements to Rolling stock. A 5 year franchise may not provide an incentive to a train operator to make such large

investments.

There is also a need to incentivise investment and innovation (e.g. getting good leasing deals for rolling stock), and including action to reduce labour costs, mean that contracts of 15 years should be the norm, with extensions where TOCs contribute to infrastructure investment. This will also generally fit better with the time-frames and actions associated with local transport planning, land use planning and economic development, including potential links with property development and the realisation of planning gain.

3. What risk support mechanism should be reflected within the franchise?

Q3 comments:

Risk support mechanisms should be made dependent on whether the franchise is split into 'economic' and 'social' rail services.

Certain 'economic' rail services such as Edinburgh – Glasgow, should take the full revenue risk with no support, but more 'social' rail services and less profitable services, could be subject to a risk sharing mechanism related to factors such as local employment levels and seasonal variation. Any support should be provided on a service-by-service basis tailored to specific potential risks.

4. What, if any, profit share mechanism should apply within the franchise?

Q4 comments:

Depending on whether the franchise is split into 'economic' and 'social' franchises, a profit share should be made on the 'social' franchise element, because if a generous subsidy is handed out, and the franchise begins to make profit, a share should be given back to the Scottish Government.

5. Under what terms should third parties be involved in the operation of passenger rail services?

Q5 comments:

Any involvement of 3rd parties in the operation of passenger rail services should not detract from the level of service of rail services provided directly by the franchisee.

6. What is the best way to structure and incentivise the achievement of outcome measures whilst ensuring value for money?

Q6 comments:

No Comments

7. What level of performance bond and/or parent company guarantees are appropriate?

Q7 comments:

No Comments

8. What sanctions should be used to ensure the franchisee fulfils its franchise commitments?

Q8 comments:

Fines or the reduction by up to 2 years of the franchise length.

Achieving reliability, performance and service quality

9. Under the franchise, should we incentivise good performance or only penalise poor performance?

Q9 comments:

The franchise could be made for a certain length but with a level of flexibility attached to it, where Transport Scotland can reduce or increase the franchise length by for example 20%, depending on poor or good performance.

There are a proliferation of delays and cancellations on certain routes, these should come with greater penalties for the franchisee.

10. Should the performance regime be aligned with actual routes or service groups, or should there be one system for the whole of Scotland?

Q10 comments:

The performance regime for punctuality should be aligned to service groups, as service distance is the biggest bearing on train punctuality. Services have more potential for something to go wrong or delays to incur.

Punctuality report tables could be split into 3 categories, less than 50 miles, 50 - 100 miles and over 100 miles.

11. How can we make the performance regime more aligned with passenger issues?

Q11.

No more than 10 minutes standing, easier to understand ticketing system and higher availability of 'through' ticketing. More for face-to face time e.g. at peak times at unmanned stations.

12. What should the balance be between journey times and performance?

Q12 comments:

Both journey times and performance are important factors as to why people choose to travel by train, but performance would be more important as passengers often make plans around what time a train departs arrives at a certain destination.

Without significant investment like never before seen in Scotland, journey times are unlikely to increase during the next franchise agreement, to such a level that people will feel significant benefits over service reliability.

13. Is a Service Quality Incentive Regime required? And if so should it cover all aspects of stations and service delivery, or just those being managed through the franchise?

Q13 comments:

A service Quality Regime or Charter should be set up by Transport Scotland and the successful Franchisee should have to sign up to this charter, as part of the franchise agreement.

14. What other mechanisms could be used for assessing train and station quality?

Q14 comments:

Reliability of train services (i.e. punctuality). Availability of information, including 'real time' to deal with delays to services, etc.

Scottish train services

15. Can better use be made of existing train capacity, such as increasing the permitted standing time beyond the limit of 10 minutes or increasing the capacity limit? What is an acceptable limit for standing times on rail services?

Q15 comments:

Standing time must <u>not</u> be increased. Passenger requirements are central to Transport Scotland's policy considerations. (ref para 2.22 of the Rail 2014 consultation document). Increasing standing time would be inconsistent with one of the aims of Transport Scotland's "*Scotland's Railways*", which is to provide journey times and quality of service that are competitive with car and air". (ref para 2.4 of Rail 2014, 1st bullet)

16. Should the number of services making use of interchange stations (both rail to rail and rail to other modes) be increased to reduce the number of direct services? What would be the opportunities and challenges of this?

Q16 comments:

Interchange between other modes (e.g. bus and car at strategic park & ride/choose sites) and rail should continue, in order to encourage the use of rail within commuter belts into Scotland's major cities.

A key issue, however, is the ability to maintain the integration of timetables between modes when operators are allowed to amend services. The ability to ensure acceptable levels of integration following service changes is essential and needs to be included in future franchise agreements.

Scottish Ministers need to consider the views of the majority of passengers and do their best to address them. The emphasis on reducing 'end to end' journey times for 'city to city' passengers will only benefit a minority of passengers, and therefore greater effort should go into addressing the views of the majority of passengers, i.e. commuters into the major cities (e.g. from Fife into Edinburgh) who are looking for more stopping trains at key stations. This would also be likely to result in a greater contribution to carbon emission reduction targets by making rail more attractive than car for commuter trips.

Also, in order to achieve one of the main aims of Transport Scotland's "Scotland's Railways", which is to provide journey times and quality of service that are competitive with car and air", (ref para 2.4 of Rail 2014, 1st bullet) journeys involving rail to rail interchange need to be the exception rather than the rule.

Para 5.17 of Rail 2014 states that "The franchisee will be required to offer an attractive service to customers, with journey times that are competitive with other modes of transport."

If rail is to compete effectively with air travel to support the Scottish Government's carbon emissions reduction targets and economic recovery then the suggestion that East Coast trains from London to Aberdeen should terminate at Edinburgh Waverley, meaning that passengers wishing to travel to Fife and beyond would need to interchange at Waverley for onward travel, is surely inconsistent with the Government's aims.

17. Should Government direct aspects of service provision such as frequency and journey time, or would these be better determined by the franchisee based on customer demand?

Q17 comments:

Changes to frequency and journey time, whether determined by the franchisee or Scottish Government, must not have an adverse impact on the integration of rail timetables with other rail services, or with other modes. The ability to ensure acceptable levels of integration following service changes is essential to the provision of a quality service which can compete with less sustainable modes, and therefore needs to be included in future franchise agreements. Throughout the life of the franchise there will be investment in infrastructure providing opportunities to increase the number of train paths e.g. the signalling and headway improvements as part of Edinburgh Glasgow Improvement Programme (EGIP) will create 12 additional paths over the Forth Bridge. There needs to be scope within the franchise utilise and accommodate new services and improvements.

18. What level of contract specification should we use the for the next ScotRail franchise?

Q18 comments:

It is agreed that the 'minimum' and 'full' specifications (as defined in para 5.21 of Rail 2014) are inappropriate and that a more balanced approach, as outlined in the 'targeted' specification offers the opportunity to fine tune the services during the period of the franchise to changing circumstances. However, as stated in previous responses, changes to frequency and journey time, whether determined by the franchisee or Scottish Government, must not have an adverse impact on the integration of rail timetables with other rail services, or with other modes.

19. How should the contract incentivise the franchisee to be innovative in the provision of services?

Q19 comments:

Innovation should be encouraged, but this must not be at the expense of safety, integration, or the quality of the passenger experience.

Scottish rail fares

20. What should be the rationale for, and purpose of, our fares policy?

Q20 comments:

The rationale for fares policy should be to make rail as affordable as possible for all, help to encourage modal shift, reduce the impact on the environment, and get more services to operate closer to there capacity during the shoulder peak and off peak times of the day, by offering attractive rail fares on quieter services in the shoulder peak, e.g. before 0700 and between 1600 and 1700.

There should be a consistency of fares for both the East and West Coast travellers, bringing fares across Scotland more into line with each other. Currently certain Strathclyde Partnership for Transport (SPT) fares are far cheaper compared to the same distance of trip on the East Coast rail lines. There needs to be a fairer share in who can access reduced fares, maybe realign all fares to the SPT prices or develop some kind of zoning scheme. 21. What fares should be regulated by government and what should be set on a commercial basis? Do your recommendations change by geographic area (the Strathclyde area example), or by type of journey (for example suburban or intercity)?

Q21 comments:

Am peak fares should be remain regulated for travel into Scotland's city centres, and for outbound services in the PM peak. However services travelling out of city centres in the AM peak, e.g. Edinburgh- Perth or Fife circle services are often lightly loaded, research by Fife Council has shown there is a demand for travel from Edinburgh into Fife and Dundee in the morning. Perhaps make services travelling out of Edinburgh in the AM peak off-peak or services before 0700 off peak.

22. How should we achieve a balance between the taxpayer subsidy and passenger revenue contributions in funding the Scottish rail network? At what rate should fares be increased, and how feasible would it be to apply higher increases to Sections of the network which have recently been enhanced?

Q22 comments:

The consultation document states that "passenger requirements are central to our policy considerations" (ref para 2.22) and that Passenger Focus carried out research in 2010 which showed that "value for money of tickets" was the top priority for Scottish (and UK) respondents.

The Climate Change (Scotland) Act 2009 sets very ambitious carbon emissions reductions targets for Scotland, and hence rail fares must be made more attractive to encourage an increase in modal shift from car to rail.

Applying higher increases to sections of the network which have recently been enhanced would be likely to reduce rail patronage and hence weaken the original business cases for those improvements.

Any increase in rail fares must therefore ensure that the predicted growth in rail patronage (ref para 1.5) is not reduced.

23. What should the difference be between peak and off-peak fares? Will this help encourage people to switch to travelling in the off-peak?

Q23 comments:

The consultation document states that "modelling indicates a differential of at least 20% between peak and off-peak fares would be required to have any significant effect on passenger behaviours.

This should be achieved by lowering off-peak fares rather than increasing peak fares, in order to comply with the Scottish Government's sustainable transport policies and the carbon emissions targets in the Climate Change

Scottish stations

24. How should we determine what rail stations are required and where, including whether a station should be closed?

Q24 comments:

Is the question not how to encourage better use of existing stations and encourage commuters to use stations closer to there starting point rather than using stations closer to their destinations?

With current Structure Plans and future Strategic Development Plans it should be clear where development is being focused therefore all opportunities should be supported in these new development areas to use more sustainable modes of transport such as rail and therefore new stations need to be located at key attractors such as areas of housing, employment and education.

In Fife the key areas requiring new stations is in the Levenmouth Area, Newburgh and Dunfermline to Kincardine line. There is also freight opportunities on the Levenmouth line.

25. What are the merits or issues that arise from a third party (such as a local authority or local business) being able to propose, promote and fund a station or service?

Q25 comments:

This would only work in partnership with Transport Scotland/Scottish Government to make sure that a train service actually provided a reasonable service to any new stations.

26. Should only one organisation be responsible for the management and maintenance of stations? If this was the franchisee how should that responsibility be structured in terms of leasing, investment, and issues relating to residual capital value?

Q26 comments:

No comments

27. How can local communities be encouraged to support their local station?

Q27 comments:

Encourage better use of stations, market the train services to the local residents and provide tickets which are affordable for the residents you are trying to target to use the facilities.

28. What categories of station should be designated and what facilities should be available at each category of station?

Q28 comments:

All stations need to be DDA compliant, accessible to everyone. In Fife all stations require to be DDA compliant.

Cross-border services

29. Should cross-border services continue to go north of Edinburgh? In operating alongside ScotRail services, how do cross-border services benefit passengers and taxpayers? And who should specify these services, the Department of Transport or the Scottish Ministers?

Q29 comments:

Yes, see answer to Question 30.

30. Or should the cross-border services terminate at Edinburgh Waverley, allowing opportunities for Scottish connections? And if so, what additional benefits would accrue from having an Edinburgh Hub?

Q30 comments:

There is serious concern with the termination of cross-border services at Edinburgh. Is there available rolling stock to provide the remainder of the journeys for the commuters to their destination further North? (i.e. Fort William, Inverness and Aberdeen)

Also with the predicted passenger increase at Edinburgh by 110% can this facility cope with additional trains starting from this location? Where is the rolling stock to come from for the additional passengers?

In order to achieve one of the main aims of Transport Scotland's "*Scotland's Railways*", which is to provide journey times and quality of service that are competitive with car and air", (ref Para 2.4 of Rail 2014, 1st bullet) journeys involving rail to rail interchange need to be the exception rather than the rule.

Para 5.17 of Rail 2014 states that "The franchisee will be required to offer an attractive service to customers, with journey times that are competitive with other modes of transport."

If rail is to compete effectively with air travel to support the Scottish Government's carbon emissions reduction targets and economic recovery then the suggestion that East Coast trains from London to Aberdeen should terminate at Edinburgh Waverley is surely inconsistent with the Government's aims. If anything there should be availability for passengers North of Edinburgh to board direct services to other destinations South of the border without having to interchange at Edinburgh.

Rolling stock

31. What alternative strategies or mechanisms could be used to reduce the cost of the provision of rolling stock?

Q31 comments:

No comments

32. What facilities should be present on a train and to what extent should these facilities vary according to the route served?

Q32 comments:

One to one seating for all users regardless of time of day, boarding ramps, accommodation for wheelchairs, cycle parking for minimum of 4 cycles, toilets and wheelchair accessible toilets, audible and visual station announcements all services.

Commuter services should also have electric socks for laptops, etc, Wi-Fi, improved mobile phone reception.

Passengers – information, security and services

33. How should we prioritise investment for mobile phone provision and / or Wi-Fi type high-bandwidth services?

Q33 comments:

This requires to be part of the franchise and one of the early initiatives in the early part of the franchise, with prime locations in the first instance on the key commuter routes and rolled out to the complete network within 5 - 7 Years.

34. How should we balance the need for additional seating capacity and retain the flexibility of a franchisee to offer first-class services if commercially viable?

Q34 comments:

All passengers should be able to be provided with an affordable seat, i.e. there should be no more than a 10mins standing time on any service.

35. What issues and evidence should be considered prior to determining whether or not to ban the consumption of alcohol on trains?

Q35 comments:

Current problems/issued on services with regards to alcohol consumption.

Abuse to staff trying to enforce current alcohol bans on certain services.

Delays to services through Police intervention to remove passengers.

36. How can the provision of travel information for passengers be further improved?

Q36 comments:

The joined up approach to public transport services to link trains and on ward travel by buses.

Real Time Information of local buses as part of the information provided at all stations should be part of the future proofing of services, with a timetable of implementation within the next 3 - 5 years.

Improvements on the communication of train delays and cancellations so users can make informed alternative arrangements to travel.

Caledonian Sleeper

37. Should we continue to specify sleeper services, or should this be a purely commercial matter for a train operating company?

Q37 comments:

The sleeper service is well used however there is a concern with regards the amount of subsidy which is currently being provided at around £70/passenger which is very compared to other subsidies. The amount of contribution to these services needs to be looked at.

38. Should the Caledonian Sleeper services be contracted for separately from the main ScotRail franchise? Or should it be an option for within the main ScotRail franchise?

Q38 comments:

Option within the main ScotRail franchise.

- 39. We would be interested in your views in the level and type of service that the Caledonian Sleeper Services should provide. Including:
 - What is the appeal of the Caledonian Sleeper Service, and if there were more early and late trains would the appeal of the sleeper services change?
 - What is the value of sleeper services to Fort William, Inverness and Aberdeen and are these the correct destinations, for example would Oban provide better connectivity?
 - What facilities should the sleeper services provide and would you pay more for better facilities?

Q39 comments:

There is serious concern with the termination of the sleeper services at

Edinburgh as is there sufficient carriage and locomotives available to provide the remainder of the journeys for the commuters to their destination North, i.e. Fort William, Inverness and Aberdeen.

There is no airport close to Fort William to provide an alternative to direct train journeys to London.

To improve take up of the existing train services feeder buses from other key destinations not serviced by the trains could be tied into the service provision.

Providing late night services in certain areas. For example late bus Oban – Tyndrum Upper or Crianlarich.

Environmental issues

40. What environmental key performance indicators should we consider for inclusion in the franchise agreement or the High Level Output Specification?

Q40 comments:

Fully agree with the three principles being given priority:

- Reducing our environmental impact
- Being carbon smart
- Being energy wise

However we suggest targets are required for each element which contributes to these principles to be set throughout the length of the franchise. There should also be some form of penalty should they not manage to meet these targets as this will affect the meeting of the Scottish emissions targets for 2020 and 2050.