

Consultation Questions

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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 merits of a dual focus are probably illusory – at least in so far as the incentives for a train operating company are concerned.

There may be confusion in the minds of the authors of the consultation document between a) managing areas of the social part of a network locally (and by implication, more responsively); and b) essentially splitting a network in two.

There is a track record for the former: British Railways did the former with considerable success in cost-cutting and marketing initiatives, notably at Inverness, but the prerequisites were a supportive national network and infrastructure and train operating managers working as a business group with common objectives.

The latter is a very different matter

If the social railway is to be defined and handled differently in some way, then that implies a dedicated management, with attendant expense and – inevitably – new interfaces. This danger is recognised in the general desire for fewer interfaces (Ministerial Foreword and Executive Summary Para 5). If there is only one management, even with a theoretical dual focus, then human nature and the financial imperatives embedded in the current run of franchise-holders will ensure that the commercial side attracts the greater attention.

Furthermore, having created the expense of a dedicated management, it is hard to see how this can avoid the notion of association with a second-class social railway, with a corrosive effect on the quality and morale of management and staff. This would be a major concern with the present generation.

On the “social” side, the possibility of enhanced local responsiveness to the market is, almost by definition, likely to be very limited due to limited potential, other than off-peak in commuter areas.

In operating terms, experience in the past has shown that the pressure for dedicated resources for easier management and accountancy in sub-units, leads to sub-optimisation and increased costs, which were accepted in return for some aspirational and un-quantified benefit of “ownership”.

These are the sort of costs which have continued in today’s railway and which McNulty spotted but did not stress enough.

The foregoing arguments have doubted the value of splitting up the franchise and therefore relate to train operating companies. Where more benefit is likely to be obtained from treating the social railway differently from the economic railway is in respect of the infrastructure owner, Network Rail.

This is where effort would be better addressed. The company recognises the need for different standards on different routes, and needs encouragement to develop these.

- For example, why does it have to fence routes in remote social areas? Other countries don’t.

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

Ten or twelve years.

This is necessary for companies to:

- a) see that they will inevitably reap what they sow;
- b) take a longer view of tackling issues like staff costs, industrial relations, and investment for quality in resources;
- c) invest in staff development and encourage loyalty;
- d) reduce the costs of the franchising process;
- e) smooth out changes of governments and policies.

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

Q3 comments:

I do not feel I can contribute usefully in this matter.

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

Q4 comments:

I do not feel I can contribute usefully in this matter.

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

Q5 comments:

In principle, there should be no need for third parties, if the franchise-holder is encouraged to experiment. A new market is a new market, whoever caters for it. You do not comment on the disadvantages or on the practical difficulty of avoiding abstraction (which you condemn elsewhere in relation to cross-border services).

Terms need to address the facts that third party operations may:

- a) add to confusion for passengers (not to be underestimated. In Scotland we have been largely spared the situation in England, where it is still - after a decade - a daily issue of contention, and it can be experienced by Scottish passengers between Glasgow - Edinburgh and York);
- b) lead paradoxically, to restriction of choice on a route;
- c) open the way to an open-access operator from south of the border not only attacking the present cross-border direct services, but also the associated Internal ScotRail-franchise flows.

The terms under for third parties are therefore likely to be too restrictive to attract an entrepreneur.

However, your comments on how enhanced services may be introduced for evaluation and possible subsequent incorporation are very similar to what I have put forward Q19 in regard to innovative enhancement of train services by the franchise-holder. For convenience, I repeat them here:

"I would guess that the path of innovation would be smoothed by a less rigid application of the timetable procedure to facilitate short term experiments. This would not just apply to local holidays or "spot" opportunities, but also to more profound experiments - for example, a central location such as the Falkirk conurbation lacks direct services to the north (Dundee, Inverness, Aberdeen), and it would be possible to divert experimentally certain trains from Edinburgh - Inverness and Glasgow - Aberdeen services to operate across Central Scotland". To illustrate further, British Rail used such short term processes to experiment at low risk with the "NightRider" (Aberdeen/Dundee/ Glasgow/ Edinburgh - London high-quality seated service), which upon proven success, was incorporated into the permanent national timetable.

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

Q6 comments:

To my mind, the distinction between cost of inputs and "cost of delivering the outputs" is not clearly made, and remains somewhat elusive.

Your examples of outputs appear to be difficult to measure and essentially subjective, with much

scope for dispute. Additionally, since there is ample evidence of targets being met by unexpected methods and with unintended consequences, I am not comfortable with the somewhat glib "set of contractually binding service measures".

In regard to the specification of inputs:

- a) the public needs protection against franchisees modifying services in their own interests. Therefore there is need for a large degree of specification to safeguard public and government priorities;
- b) anecdotally, some specifications of service appear to have been over-detailed and taken unduly as gospel by weak TOC management. Also, it appears that double-guessing at Government, TOC, and Network Rail levels has led to additional administrative costs and counter-productivity;
- c) I find it hard to accept the argument of ATOC that the present system of closely-specified services precludes innovation;
- d) having matured in the last decade, the industry and government should now be able to conclude specifications in terms of frequencies, average speeds, first and last trains, and connections, which allow adaptation in the course of the contract in the light of circumstances (see Q17);
- e) Network Rail should play a greater role in developing the timetable and associated resources, rather than the TOCs.

In regard to the specifications of outputs, you ask (3.27) what measures you should apply and how you can incentivise the franchisee to achieve these outcomes whilst reducing the cost to the taxpayer.

Taking the examples you offer of outputs, it seems that these are laudable in general terms, but are largely personnel-intensive and/or key elements of the rail service expected by the public. It is optimistic to suppose that the franchisee can cut such fundamental costs without cutting the quality. This is therefore a dangerous, and probably impossible route to follow, leading to inevitable conflict.

I would add that travels throughout the UK have shown me that some franchises have been structured on lowest cost bids, and the dismal results are visible. Scotland is among the best at present, and I do not think this will be maintained unless you re-think your intentions.

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

Q7 comments:

I do not feel I can contribute meaningfully in this matter.

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

Q8 comments:

Public opprobrium for a start, since public money has been used, so the criteria and achievement should be clearly described, probably annually, and publicised.

I support your described aims in avoiding costly bids and protecting the taxpayer. However, risk is inherent in the privatised process, and this can only be reduced in practice by the diligence of the government. Lessons seem freely available from recent case histories, one being the tendency to over-complication and the difficulties in amending the agreements to reflect changing circumstances including improvements.

I cannot be more specific in this detailed area.

Achieving reliability, performance and service quality

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

Q9 comments:

This is not easy.

It ought not to be an issue – any good entrepreneur should be self-motivated to deliver a quality service. An unpunctual service is inefficient and increases costs in terms of overtime, fuel and maintenance.

If Transport Scotland feels it cannot appoint a franchisee with appropriate professionalism and morality, then a stick is more likely to be understood by the public than a carrot.

However, I am personally of the opinion that a mix of incentives and penalties is more likely to build a constructive relationship between franchisee and franchisor.

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:

Service groups are fairly meaningless from the point of view of the public, and indeed even if route-specific statistics are presented to the public these are believed/disbelieved in accordance with people's subjective experiences/prejudices and hearsay.

Managerially, the franchise-holder should require data for each route anyway.

This needs to be aligned with Network Rail's understanding of routes. In terms of train running performance, it has to be combined effort between Network Rail and the various train operators.

Purely for purposes of monitoring a franchise, service groups are probably the most practical compromise between detail and too wide a view. However there may be merit in reviewing the groups, in order to reflect geographical areas rather than routes. This would provide a better focus on where investment or timetable changes are worthwhile.

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

Q11 comments:

The regime at present appears to measure fairly physical things, but should reflect more issues of organisation, which actually impinge on individual journey. It should, for example:

- a) include the maintaining of connections (including those between ScotRail and other operators);
- b) encourage the franchise-holder to underwrite resources to minimise tight inter-relationships which create knock-on effects in minor disruption (should be recouped via appropriate financial incentives);
- c) include arrival times at selected intermediate stations, and key operating junctions, even if no station there;
- d) highlight where operating discipline at intermediate stations needs attention;
- e) encourage the development of timetables which maximise connectional possibilities;
- f) deal with the presentation of information (for example, highlight the confusion from extra columns in the public timetables due to differences as little as one minute between Saturdays and the rest of the week!).

Much of my response here makes sense when read with that to Q14.

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

Q12 comments:

The current UK regime is responsible for distortions, which have led to increases in journey time and which conflict with the established wisdom that reduced journey times create extra business. It has compromised capacity of tracks, and has discredited timetables in the eyes of the public.

While these strictures are more relevant in the case of Anglo-Scottish operators, any Scottish regime should endeavour to avoid perverse incentives.

It is hard to understand how an operator can properly manage a service and staff where the facts of actual timekeeping are not used.

If "performance padding", as opposed to a considered contingency allowance, are permitted, then the penalty regime should be tightened. Conversely, if accurate timetables are published, then a more relaxed target can be allowed, and be seasonally adjusted.

There are a variety of ways used by the railways of Europe, and I believe the UIC or ERA recommend a good practice for timetabling. I can see no very good reason for railways in Scotland not falling in line with European practice, rather than the hitherto British practice.

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:

Is a Service Quality Incentive Regime required?

The SQUIRE regime seems to have had a beneficial effect over previous years, and should be continued, particularly if the franchise goes to a company with no experience of such a regime.

However its expense needs to be considered, and I suspect it could be done more economically than now. Provision is needed to update during the franchise the items which are checked, so as to reflect changing circumstances and expectations.

And if so should it cover all aspects of stations and service delivery, or just those being managed through the franchise?

Insofar as the customer is exposed to all aspects of stations and service delivery, the regime must surely cover the whole experience if it is to be of real value.

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

Q14 comments:

There should be scope for members of the public to be more involved in assessment; however this could easily become dominated by people with personal agendas.

Therefore I see this more as a role for selected people with a transport background or interest, who are in a better position to identify the issues objectively. These "informed customers" would not necessarily be retired nor from rail transport, but many should be, so that they can make regular journeys for evaluation, and feel they are continuing to make a contribution.

This is not the place to develop the notion fully, however, but a mechanism to get beyond the easy, tangible issues is required.

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:

You suggest specifying the number of people who can be carried on a train (in acceptable comfort, rather than for engineering reasons, I assume). This seems a recipe for endless dispute, misunderstanding, and measurement and counter-measurement by interested parties and is to be avoided. British Railways dealt with this by specifying in relation to the seating available the percentage of passengers who had to stand and for how long. The limits were more generous in Scotland than in London, and this distinction should stay.

As a rule of thumb, around 10% of the passengers standing for 20 minutes should be assumed in the plan for the main peak trains. By making this, say, the two main peak trains, it should then be

apparent to the passengers that, if they shift their chosen departure time by a few minutes, there is then a much enhanced chance of better conditions.

I accept that there is a limit in terms of resources, infrastructure and costs, but I suggest the passengers understand this perfectly well also. The overcrowding which is worst and causes the deepest resentment is that which arises from a train failure in the peak, and – despite the difficulties – this is the aspect which needs the greatest attention.

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?

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?

In principle, the number of services using interchange stations should not be increased, if only because of the increased complication and need for quality supervision.

Indeed existing interchange stations should be reviewed in regard to the adequacy of information, coordination of connections, and local management, in order to establish and enforce best practice before further interchange stations are contemplated. I have addressed at length elsewhere the virtues of direct services.

You comment, and I agree, that the route structure may mean some peak trains start and finish far beyond the areas of peak demand and may therefore appear lightly loaded at those distant points. Part of this is inevitable and has its origin in overall economies, but equally, ScotRail operates services with multiple-unit trains, the essence of which is the ability to add and subtract en route the number of units forming a train. The operator is in the best position to see where services should be altered to reflect the best use of assets, both staff and rolling stock.

What would be the opportunities and challenges of this?

The opportunities are few, and the challenges probably are beyond the present franchise system. Where the interchange between rail and other modes does take place, the evidence of rail-ship coordination is dismal, with trains (for example at Stranraer and Gourock) platformed unnecessarily inconveniently, due to no active joint management, while the mismatch of services at Wemyss Bay is well-known. I readily acknowledge the big improvements at St Andrews /Leuchars recently, which begin to approach best continental practice.

Scope for a major interchange for road to (particularly) cross-border rail services might be considered in the vicinity of the Ballieston motorway interchange, on the Bristol Parkway model.

However, I understand the present ScotRail franchisee is statutorily forbidden to cooperate with buses, and if this is the case, then I suggest it must be addressed by Transport Scotland before the next franchise, (which goes beyond your aspirations in 5.18). Indeed this will surely be important in relation to the need to withdraw rail services from some stations.

Much of the concern about interchange stations arises because connections are not held or there are long margins to ensure the trains do connect, not to mention perverse incentives. I draw your attention to the recent withdrawal of through trains from the East Suffolk line, for reasons of better utilisation as you are suggesting, but which has not worked. A respectable lady journalist recently recounted in a quality newspaper how the train service immediately deteriorated, with severed connections at Ipswich, and with passengers rebelling until they got taxis, which now seem to have become accepted practice.

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:

It is wrong to make this an either/or question.

Circumstances of the greater good, even-handedness, or a particular problem area may well warrant direction by the Government of levels of frequency and journey time (and start and finish of service). The franchisee would in that case be reimbursed.

On the other hand, if a franchisee sees a commercial opportunity or perhaps natural disaster, then he should be free to react, taking the financial risk.

As a general principle, however, I see considerable direction by the Government of the level of train services as justified, because the Scottish services cannot be left solely to market forces and still meet

the objectives set out at the start of the consultation document.

Naturally, there should be a proper mechanism for either party to suggest and negotiate changes, as the Government does not have a monopoly of wisdom and imperatives of the franchisee are those of its shareholders.

My concern is that

- a) this mechanism should be able to act as swiftly, when public demand shifts;
- b) double-guessing should be resisted.

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

Q18 comments:

The targeted specification seems the course to pursue.

As to what should be included in the specification, a number of safeguards for the public are necessary, and I suggest the following:

1 - Specify minimum train services as follows:

- a) weekdays and weekends;
- b) routes;
- c) frequency;
- d) first services of the day;
- e) last services of the day; (e) and d) to bear Anglo-Scottish connections in mind;
- f) routes which must interconnect reliably.

2 - Specify minimum station facilities as follows:

- a) Continuous staff presence at all stations equipped with automatic barriers;
- b) High levels of public security and supervision
- c) High levels of train running information to the public
- d) Protection against the weather
- e) Advice of length of trains and stopping points on platforms.

3 - Do not specify catering or adaptation / augmentation of train services for holidays, sporting events, short-notice commercial opportunities, so as to leave room for the Franchisee to respond to the market swiftly.

4 - Specify formal cooperation with other TOCs for bad weather and other emergencies (we cannot have a repeat of the unilateral actions and downright disinformation regarding ScotRail by East Coast Trains, such as occurred in the 2010/2011 winter).

5 - Specify proper supervision of First Class accommodation, where provided, and reliable action against blatant infringement.

6 - Specify that the presence of train staff must be obvious in all accommodation throughout the journey in the interests of passenger security and good order. The arrangements in the Strathclyde services are superior to those elsewhere, and are a good starting point.

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

Q19 comments:

I would suggest potential franchisees are the most likely to know the answer to that.

However, I would guess that the path of innovation would be smoothed by a less rigid application of the timetable procedure to facilitate short-term experiments. This would not just apply to local holidays or "spot" opportunities, but also to more profound experiments – for example, a central location such as the Falkirk conurbation lacks direct services to the north (Dundee, Inverness, Aberdeen), and it would be possible to divert experimentally certain trains from the Edinburgh – Inverness and Glasgow – Aberdeen services to operate across Central Scotland.

Scottish rail fares

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

Q20 comments:

There is a case for the present rationale for regulated and unregulated fares, insofar as this meets the purposes set out in your 6.11, which are reasonable and should be applied to the new franchise.

However, within that, your fares policy should endeavour to simplify the descriptions of tickets (this is more important than the actual charges), and it must appear competitive.

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:

There seems a conflict between your intention to use regulated fares as a tool between the four Edinburgh - Glasgow routes, and the proposal to deregulate all inter-city fares. Can I infer that, when electrified, the route between Queen St. and Waverley is to be seen as a suburban route?

Government proposes deregulating all Inter-city fares, but the devil is in the detail. Glasgow, Stirling, Dundee and Aberdeen are cities - could this mean that fares from Dunblane to Montrose might be more expensive than to Aberdeen?

Unfortunately I cannot comment further as this is a complex and specialised area.

I would however suggest that season tickets for large areas would make people more likely to find rail a reasonable alternative to the car. I am aware that the Swiss annual pass has led to problems of capacity, but it is for debate how far this would be the case in Scotland, and the readiness of the Swiss to use public transport seems to accord with the aims of the Scottish government.

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:

How should we achieve a balance between the taxpayer subsidy and passenger revenue contributions in funding the Scottish rail network?

The benefits of the railway extend beyond those who actually travel on it, as you have recognised. The balance is probably about right now, in our circumstances, but there is evidence on the continent of apparently acceptable ratios, which incur a higher contribution from the taxpayer.

At what rate should fares be increased?

Given that the general taxpayer finances so much of the Scottish operation, it is important that the level of fares is not seen by the taxpayer as rising to a level which restricts existing passengers or deters new ones. This seems to be measurable by market research.

Going above RPI or equivalent may be done but cautiously and only with markedly better management of public relations than has been evident so far. In this matter, Perception is All.

How feasible would it be to apply higher increases to Sections of the network which have recently been enhanced?

This has been tried elsewhere, but has overtones of clever sophistry, which can backfire. The most desirable and perceptible enhancement for passengers in many cases is the guarantee of a seat. Unless this is the enhancement offered, the notion of increasing fares on sections which have had recent investment, is difficult to "sell", because

- a) Logically, fares should be progressively reduced on sections which have not seen improvements for some time;
- b) It stores up trouble, in that as the value of the enhancements depreciates, the basic fare upon which future increases are levied, should in honest logic be reduced, as in a), or forced down by competition;
- c) To many passengers the enhancements seem overdue and they should be rewarded for their patience, not penalised;
- d) Enhancements should bring an increase in traffic, and higher fares may deprive the undertaking of this boost;
- e) Finally, many of the investment projects benefit operation but are not actually visible to passengers, so they do not see any clear enhancement (e.g. the new platforms at Waverley certainly permit more trains, but are inconvenient to access and have led to confusion and extra time when trains depart from unusual parts of the station. Same train, same, platform, same times are the desiderata for passengers, and that has not been the result, which I understand, but the average passenger would not see why he/she should pay more for this).

My conclusion is that this policy has potential for only modest increases.

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:

What should the difference be between peak and off-peak fares?

I do not have the means to do any modelling myself, but my instinct is that the difference should be 35-30%. It is a consideration that commuters, who after all are faithful, regular and may rarely get a seat, do not feel they are being exploited.

Will this help encourage people to switch to travelling in the off-peak?

It is unlikely that this will encourage a significant transfer from peak travel, since those who commute on peak services have effectively no choice, due to their work times. The railway and indeed the roads are being asked to solve problems which are not of their making.

What must be strenuously guarded against is confusion, such as finely distinguishing types of off-peak (e.g. shoulder peaks). The Peak/Off-peak concept is now understood by the public, despite examples being difficult to find in other aspects of everyday living, and should not be tampered with, as appears to be happening with train operators in England and Cross-Border.

Scottish stations

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

Q24 comments:

The number and location of stations does not seem to me to lend itself to simple formulae. The lesson seems to have been learned that land-use and town planning cannot ignore rail, and it is important that a holistic view is taken.

For example although Grangemouth has a railway line, and trains appear to have spare time to serve a reopened station at Grangemouth, this would be wrong, in terms of location, of opportunities foregone in the use of rolling stock, and of the use of Falkirk for modal interchange.

A number of stations should be closed, because of low use and low potential, and especially if in addition reduced journey times leading to savings in train resources arise.

While the present formalities, such as STAG, seem to have generally worked well, it is important in future to ensure the nature of railways is understood and built upon. Since railways have their greatest potential in their speed to escape quickly from the congested conurbations, it is important that an excess of local calling-points does not debase the fast medium and long distance services by turning them into short-distance "bus-type" services. An example is Carnoustie on long-distance services, or North Gyle on Fife services. This point should be seen in relation to your other questions regarding optimisation of revenue, degree of standing, and utilisation of assets.

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:

The issues are essentially the loss of control by the railway operator, and the distortions of normal commercial decision-making by him which could arise. Overall national or wider objectives policy could be put at risk by those who had bigger budgets to spend than others, perhaps more needful, bodies. Evidence also shows that legal and other similar on-costs will be necessitated in such arrangement.

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:

Should only one organisation be responsible for the management and maintenance of stations?

- a) A bigger problem is surely the existence of too many managers for different companies allegedly looking after the same station, but in fact overlapping and confusing the passengers, while not actually co-ordinating connections and other features (e.g. Waverley or Glasgow Central). And none of them actually apparently controlling train movements, platforming, etc.
- b) As to your specific question on management of stations, the privatisation arrangements in the UK have drawn a dividing line at the platform edge. If changing the management of stations to Network Rail would help to overcome this disconnection between train operation and stations, then unified management should be supported. However, Network Rail has perpetuated this division in the major stations which it administers. Moreover the skills in local managers to handle both passengers and train operation have been lost, both Network Rail and in Train Operating Companies, so that it is hard to see that the present arrangements can now be altered.
- c) As to the maintenance of stations, Network Rail has the continuity, expertise, resources and

long term incentive to maintain the stations. Although it suffers from the overheads of a large company, it has an incentive to use local resources in a dispersed system like Scotland. It also offers the possibility of greater co-ordination of jobs and greater experience.

The above logic points therefore to one organisation looking after stations.

If this was the franchisee how should that responsibility be structured in terms of leasing, investment, and issues relating to residual capital value?

As you can see, I do not think that this question arises. The very fact that you raise sub-questions in this question indicates complications, which will surely add to costs in the way that has arisen in several aspects of privatisation. This is a lesson from which we should learn.

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

Q27 comments:

Evidence of third parties operating stations in Scotland is presumably Prestwick Airport. I have personal experience of third party involvement in infrastructure elsewhere. These situations seem to increase the interfaces, and this introduces in turn extra complication, costs, lack of real ownership, blame-shifting, and labour conditions. Indeed, issues of communications can impinge on safety.

You mention specifically local communities. I do not have any comments other than that the station must appear to be a worthwhile cause to associate with, and that means the trains and station must be attractive, which comes down to the franchising arrangements. The factor of What's In It For Me seems relevant.

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

Q28 comments:

Your proposal interestingly gets away from Small, Medium, Large, but is this distinction so wrong?

I am not fully in agreement with your proposed categorisation, and would prefer

- a) Standard (i.e. basic facilities);
- b) Enhanced (i.e. better facilities due to certain levels of use, or status for the tourist industry, importance as interchange with ferries or other modes; civic involvement – essentially this category is flexible according to the circumstances);
- c) Prestige (i.e. main city stations, major interchanges, airport stations).

I do not think it is necessary or desirable to be prescriptive regarding the features to be provided in each of these categories, as each location will vary. For example, foreign languages are desirable in large as well as some small stations. Over-prescription risks leading to unnecessary or mis-directed expense.

However, features in this country must always include adequate shelters against the weather. In the case of commuting stations these must be extensive and distributed along platforms (i.e. b) Enhanced Category). Alternatives to steps for passengers with luggage, push chairs, disablement, are desirable (at Falkirk High for example, a time-consuming alternative exists but is not indicated).

For other features the present standards in Scotland can be taken as an adequate basis, though consideration should be given to the impenetrable logic of the choice of destinations shown on station departure sheets, or the need to spend money on universal notices telling the public what facilities are at a station.

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:

At the outset it is necessary to ask

- why does the question refer purely to current routings north of Edinburgh?
- why is there no reference to cross-border services which go west beyond Edinburgh?
- why does the consultation document seem to imply that if trains do not go north of Glasgow this is satisfactory and accordingly is some sort of model for Edinburgh?

Nor is it irrelevant to point out that ScotRail trains provide services into England via Carlisle to Newcastle. These had origins in the North East of England to Ireland flows, which are now irrelevant, and in economy of resources which is not.

Two facts of history are necessary background:

- a) the removal of services north of Glasgow (e.g. Euston – Birmingham – Stirling – Inverness, and Aberdeen, and indeed Ayr) were expedites, influenced by a restructuring of the BR finances in relation to the PSO and Sector management. These are no longer applicable;
- b) The extension of these trains was primarily for reasons of economy in most cases.

And one fact of current history:

The DTP is developing the IEP train for long-distance services, and the issue of it not going beyond Edinburgh is the same one as it not going beyond Cardiff and other destinations beyond the electrification frontiers, which have particular importance for the Scottish and Welsh devolved governments. Following some disinformation about the alleged difficulties of going beyond the wires, a recent announcement in Westminster implied that a version to go beyond would indeed be developed and changes in Edinburgh would not be necessary.

It is therefore important that the opportunity is not lost to Britain as a whole to develop a train, which – by loco-haulage or self-propulsion – can run beyond the frontiers of electrification without inconvenience to passengers. Scotland in this case should not be undermining a case which is important to South Wales, North Wales and the northern English counties.

And now taking your questions in order:

Should cross-border services continue to go north of Edinburgh?

Emphatically yes.

Not to do so would give seriously wrong messages to people south of the border. It would indicate to them that Scotland was not interested in facilitating travel to the Scotland at large. Indeed it would be a public relations disaster, as it would be all too easy to see it as a "Border", with eventual money-changing and passport controls, to add to the hassles of changing trains.

I do not make the above point lightly.

In operating alongside ScotRail services, how do cross-border services benefit passengers and taxpayers?

- a) By convenience for the passenger, through not needing to change trains. This is a factor for the elderly, families, and those with luggage, but still very important in the competitive situation for able-bodied travellers.
- b) By quality of the coaches for the passenger. These trains give a level of comfort and space for luggage beyond those of ScotRail, not to mention catering. I am very familiar with the early morning train from Aberdeen, which on my last trip was typically busy, and I made the point of noting virtually 100% occupancy in the First Class, essentially business people. There is no doubt whatever in my mind that the clientele in First Class would simply not have taken a ScotRail train. I noted particularly the afternoon Up train from Aberdeen on a recent weekday and found it to be full to Edinburgh at least, with the Guard pleading for passengers to shift luggage (to where?).

It must also be borne in mind that these trains benefit the internal Scottish passengers, such as the business travellers from the north to Edinburgh.

- c) By economy for the taxpayer. To replace the loadings of the essential trains from the north, as I describe above, ScotRail would need to purchase replacement trains at a rate of more than one for each Anglo-Scottish train to carry the loadings.

Following the withdrawal of East Coast trains beyond Edinburgh to the west, increased loadings, is already evident on ScotRail Edinburgh – Glasgow trains, and especially detrimental on already busy peak trains, which coincide with the arrival of long distance trains which have departed London etc. at off-peak times and are much used by leisure passengers.

And to deal with the long-distance luggage, these new trains would have to be of a different design, with all the extra first costs in procurement and costs of operating a sub-fleet. Furthermore, greater amenities, such as tables and improved riding, would be necessary if any attempt were to be made to retain the business clientele.

See also 29 b) above. This is a vital point regarding utilisation of assets.

d) The Cross Country services to/from Glasgow are perhaps less important, especially off-peak, since the route is too roundabout to compete effectively with the West Coast for England or ScotRail services under the EGIP programme. Furthermore, after 2014 these still seem likely to remain diesel-operated on an electrified route, which ScotRail could operate more cheaply, using electric trains obtained as part of a bulk EGIP train order.

And who should specify these services, the Department of Transport or the Scottish Ministers?

Who knows more about them? Both have an interest, but the Scots have a greater one because these trains are few, whereas they are simply one of many to the authorities south of the border. They benefit the taxpayers in England as well as the taxpayers in Scotland. So, they need to be specified jointly – the Germans, Swiss, and French can do it cross-border, and if it is put in the "too difficult" basket then that will be an indictment of devolution.

The question of the future of these services seems to arise because of the allocation of money according to a formula, which seems to abstract money from ScotRail and a suspicion that this is not in the right proportion. Since ScotRail is not faced with the costs of running these services, whereas the other TOCs are, then the issue is one of the fairness and transparency of the division of receipts. It would be quite wrong for the passengers to suffer inconvenience and taxpayers to pay unreasonably merely because accountants cannot devise a system. If I may again allude to the continent, there are precedents there, such as countries buying parts of the total fleet.

However, I would like to stress that although companies such as East Coast Trains and their predecessors receive subsidies from the DTP to provide train services in Scotland, in practice Scotland has been treated as a low priority whenever any short-term crisis has arisen, and resources of trains and staff have diverted to sustain services south of the border, despite alternatives there, and ScotRail left to shoulder the burden. This is not something which just arose in the severe weather of winter 2010/11, it is of long-standing. But it is a question of competence of management and delivering what it is paid to deliver, and therefore is not an argument for taking the easy way out of abandoning through services.

I would suggest that the way forward is for ScotRail or the Scottish government to have a share in the Anglo-Scottish franchises. By owning part of them, or leasing some of the trains and leasing them back to the Anglo-Scottish franchise, ScotRail would be able to bring economies to the business, rather than the questionable practice of separate companies maintaining parallel facilities, physical and human for a relatively small number of trains.

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:

Those Cross-border services which at present project beyond Edinburgh should not terminate there in future (but see later remarks regarding Glasgow services).

There are no discernable benefits, let alone additional ones, from having an Edinburgh Hub.

My reasoning is set out below.

Firstly, as background, I would invite you to consider the recent truncation at Birmingham New St. of services from Edinburgh and Glasgow to the West Country and south coast of England, thereby necessitating a change there. This was introduced a few years ago and has been universally deplored (except by Flybe), and the train operators have had to make strenuous efforts to encourage passengers to change at other points to avoid Birmingham New St. The latter station is condemned by all parties as an interchange, and is now subject to huge rebuilding of what was once seen as a modern station, but none of that money is able to enhance the actual railway operating infrastructure.

I might add that although airlines have hub-and-spoke operations, they either consign luggage through, to mitigate the inconvenience, or make passengers check in and re-check in, and state that

their planes do not maintain connections with one another. The railway is not comparable.

The cross-border services should not terminate at Edinburgh Waverley, the possible exception being the CrossCountry ones which run to Glasgow Central, for the following reasons:

- a) The passengers do not trust connections, and with good reason. All the ample evidence is that the different train companies do not respect the integrity of connections, and claim that for contractual reasons they have no intention of doing so. The public knows and fears this, especially when they will be charged extra for being on the "wrong" train for their ticket. Through trains are therefore the passengers' best safeguard that they will be able to make their intended long-distance journey. There is no managerial structure in Waverley at present capable of supervising and enforcing connections, and I can see no evidence that a Hub concept could improve this aspect.
- b) more terminating trains take up more platforms for longer periods and will add to the congestion in a station already deemed to be on the limit of its capacity;
- c) the implication of the Consultation document is that there would be more frequent ScotRail trains to compensate for the changing / lost connections, but in fact that will increase the pressure on capacity even more;
- d) Waverley is not laid out for good interchange, with long distances, stairs, mixture of barrier arrangements, and conflicting flows;
- e) the present connectional allowance (10 minutes) is not realistic now, due to distances, and would have to be significantly increased;
- f) Cross-border passengers almost by definition have more luggage than most passengers, and with luggage and luggage trolleys, the disadvantages of d) and e) above are accentuated;
- g) the perception of passengers of the increase in journey time due to changing trains used to be reckoned as an additional 20 minutes, so at Waverley that would mean 20 + 10 (more correctly 10+, see above) minutes. This will work against use of rail, or . . .
- h) through fares should be reduced to reflect the reduced convenience, in proper market conditions;
- i) a Hub concept implies that the expense of additional on-station facilities for passengers can be afforded and will be installed, as in airports. But people do not want to be spending unnecessary time and money in such amenities in the first place. It therefore runs counter to the object of a transport system.

Rolling stock

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

Q31 comments:

I do not feel I have sufficient expertise to comment deeply in this area, but the ROSCOs appear to me to have demonstrated sense and innovation as well as technical competence, which I doubt can be obtained under another arrangement.

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

Q32 comments:

Route characteristics	Inter city	Tourist	Outer Suburban	Suburban/ branch line
Toilets;	✓	✓	✓	✓

Catering;	✓	✓		
Power points	✓	✓	✓	
large provision for luggage;	✓	✓		
Tables (mixture of tables for four and face-to-back with robust large fold-out tables);	✓	✓	✓	
First Class;	✓	✓	✓	
more comfortable headrests than at present	✓	✓	✓	✓
Seats in line with windows	✓	✓		
Public address	✓	✓	✓	✓
Automated train running information	✓		✓	

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:

Yes, and for many of the reasons I mention below about First Class travel in connection with attracting passengers for business travel. Fortunately, Investment in WiFi benefits passengers in both levels of accommodation. It is a facility offered in competing modes of transport, but rail has the advantage that passengers can use it for work or entertainment, and the train operators can use it for selling. Accordingly, rail cannot afford not to provide it.

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:

I would go so far as to say this matter should not be left to the operator, but specified by Transport Scotland. I say this because two levels of accommodation are a *sine qua non* for inter-city travel in Scotland as elsewhere in the UK. This reflects the differing needs of the market segments in order to attract the maximum traffic to rail in accordance with government aims. First Class travel attracts a premium beyond the limited costs of providing the facilities.

There is also the not inconsiderable matter of Image: if Scotland is to measure up against European comparators, or indeed those south of the border or Ireland, it must be seen to be attractive to businessmen, tourists, and those seeking peace and quiet.

Confusion exists at present with the use of trains with First Class accommodation being used on routes where First Class is not offered officially. The passengers become accustomed to using this without payment of any excess, and this encourages them to encroach into First Class accommodation on routes where it is offered. Policing of encroachment is not all it might be, and it often seems that on Saturdays ScotRail has given up First Class facilities, while still charging for them.

Your question seems to imply that the need for additional seating capacity might be met by abolition of First Class. This is false – in the peak, when the additional capacity is needed, it is also needed by First Class travellers who are prepared to pay a premium. So you risk seating no more passengers and the loss of the premium. In any event, the First Class accommodation is not extensive compared with

England (and is sometimes inadequate. I would also point you to my comments about the cross-border trains and the quantity of First Class travel).

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

Q35 comments:

Firstly, though you do not seek comments, I note and fully support the policy of two crew members - at the least - on all trains, and would oppose the McNulty notion of extending the one-man operation which pertains south of the border.

This is relevant to the question which you do ask about alcohol.

You ask What Issues or Evidence?

I submit that there is no shortage of anecdotal and formal evidence that passengers are frequently embarrassed by noisy and offensive language and behaviour. When accompanying children, I have often been concerned for them and the impressions they are receiving of public transport. Indeed I feel inhibited from travelling on days of sporting events, despite the alcohol ban. A problem also exists on afternoon trains from Aberdeen with oilrig workers, and I am sure ScotRail has no shortage of material on the issues and evidence on this.

The intrusive behaviour of passengers affected by drink can be a result of a) drinking before joining the train; and b) drinking on board the train.

You only refer to the latter, but tackling the former would trap a lot of problems at source, and I am not convinced that the automatic barriers provide the solution which is sometimes claimed for them. Nor does the banning of consumption on trains help with the initial state of passengers joining.

As I doubt if public opinion generally (as opposed to that of passengers with first-hand experience) is ready to support the formal banning of the consumption of alcohol on trains, I consider that the solution is more likely to come from the number, training, and effectiveness of staff. The main considerations appear to be:

- a) rail serves a variety of markets, and in the event of a ban "babies and bathwater" spring to mind;
- b) rail has a role as an attractive alternative to drinking and driving on the roads;
- c) enjoying a meal on a train, with an accompanying drink, is an important differentiator from other modes, and particularly so on cross-border trains, the Sleeper Lounges, and charter trains;
- d) a ban would be hard to get across to foreign visitors and those from south of the border, and risks repeatedly underlining the poor image of Scotland in terms of drink; and the scope for confusion and situations of conflict will ensure ongoing undesirable media coverage;
- e) there is a limit as to how far the rail industry can reasonably be expected to solve what are underlying problems of society;
- f) decisive enforcement by staff of good behaviour must be seen to be swift and inevitable;
- g) such positive action is beneficial because other passengers can deduce that the train is being properly managed, not only in regard to drink, but for their general comfort and security;
- h) the visible presence of staff, actually patrolling trains, is a greater reassurance to passengers than a statutory instrument;
- i) there may be a case for raising the penalties for misbehaviour generally and enabling easier prosecutions, but I have not researched this.

This clear emphasis on staff on their role is why I began this response by stressing the importance of the numbers of staff aboard trains and the undesirability of following McNulty and the rest of the UK. Note that I do not suggest that one of the members of staff need be a Guard in the traditional sense: the key aspect is that this person should be continually visible to passengers as unmistakably in charge of the train and events.

The corollary of this emphasis on visible staff is that where trains have more than one portion, and there is no through connection, then a member of staff has to be provided in the otherwise unstaffed portion. It may be of interest that the German railways have a formula for the number of staff to be provided, in relation to the number of carriages, irrespective of whether there is through connection or not.

Experience shows that additional staff generally pay for themselves in trapping fraudulent travel, but not to be underestimated are the intangible benefits and long-term financial ones of increasing the confidence of the public in their personal wellbeing, safety and security aboard trains.

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

Q36 comments:

By reduction! While accepting the need for security and respect for the sight-impaired, the amount of repetitive announcements should be reduced and the content should be reviewed to eliminate trivial information and enjoinders to do impossible things.

In general terms, however, great strides have been made with information and methods of dissemination. I doubt if further methods are required. The need is consolidation and developing the accuracy and timeliness of information. This difficult at times of complicated disruption, hence my emphasis on getting better rather than on new methods.

It must also be borne firmly in mind that too much information confuses the public.

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:

You should continue to specify sleeper services, as these are of strategic importance to large areas of Scotland and should not be left to the market.

Given that sleeper services are inherently difficult to provide profitably, it seems essential that they are specified by a public body like Transport Scotland, with a wider remit on behalf of the public and government strategy.

You may infer from this and my later arguments that I feel very strongly that the sleeper service must remain, even in the changed circumstances since the present pattern was devised. The effect of HS2 is not at the moment relevant to this consultation.

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:

There is a case for detaching the sleepers from the ScotRail franchise altogether, and handing the operation to one of the Anglo-Scottish franchises or freight operators, insofar as they operate loco-hauled trains and could bring economies of scale and resources.

On this argument, transfer of maintenance out of Scotland, where it is fragmented but gives employment, to the central point of London would allow faster rectification of defects and deployment of spare vehicles.

There is less of a case for creating a Sleeper-only franchise, i.e. one separate from ScotRail or other FOC/TOC, as this would aggravate further the multi-contract nature of the business, and put up costs as additional contractors extracted profits.

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:

- **Level and type of service that the Caledonian Sleeper Services should provide**

The Sleepers at present serve all Scottish cities/centres with the exception of the south-west. This seems the right level of service to pursue.

A Saturday night service would be useful, but inappropriate if costs are to be saved.

The Highland train can be justified in that it brings social benefits to areas where air or accelerated rail services are not likely to offer an attractive alternative. The operation is however complex, and it is not easy to propose more economical alternatives, though a routing via the Scottish Central and combination/division at Mossend might enable existing freight staff to do the work. On this basis the Aberdeen train would be routed via Falkirk Grahamston and not the Inverness train. See below re the Fort William portion which may well be dispensed with.

Retimings of the Highland train in order to take over some of the functions of the Lowland one would seem to result in an unattractive compromise.

It would be desirable for a train to call at Birmingham, but again the timings would be unattractive.

The proposition that the Glasgow portion of the Lowland sleeper should be withdrawn seems likely to lead to political outcry over discrimination without actually yielding savings. Since maintenance is in Glasgow, with associated empty workings to/from Edinburgh, it is perhaps the Edinburgh service which should be withdrawn for maximum cost reduction. Largely because of the issue of servicing the trains during the day, it is not easy to see how the two portions could be combined as one train starting in either Glasgow or Edinburgh and travelling south via the other city, and do so at acceptable times for passengers.

- **What is the appeal of the Caledonian Sleeper Service,**

- Avoidance of early rises for planes or trains; London hotel prices.
- Sheer good sense of travelling while asleep.
- Ability to do a day's work the evening of travel and the following morning.
- Ability to connect with Eurostar (important now and increasingly so with open access for the DB and others).
- Sheer civilisation of the experience.

All the above are valid for travellers in both directions, but the sleeper seems to be primarily perceived as for Scots going south and coming back. It is much less known as a highly practical, attractive and special way of travel for visitors to Scotland. It is important that Transport Scotland and any operator realises the value and potential from England and abroad. To that extent, this consultation on the sleeper is flawed by its direction to the Scottish public.

- **and if there were more early and late trains would the appeal of the sleeper services change?**

I assume you refer to early and later daytime trains, rather than adjusting the times of the sleepers themselves. The daytime trains have little relevance.

Although progressively earlier and later trains have been added to the East and West Coast timetables, however

- they do not start/finish further north than Edinburgh and Glasgow, and in an earlier part of this consultation you suggest that cross-border trains shouldn't be so extended. So their already limited value is further restricted and certainly does not offer an alternative to the sleeper for large parts of Scotland;
- Transport Scotland has not so far specified appropriate connecting services, thus reducing their practicability; people therefore have to drive to these cities and will have no incentive to pass the airports and their ample car parks.
- These daytime trains do not offer several of the benefits which I have ascribed above to the sleepers.

- **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?

Inverness and Aberdeen are natural focal points from a railway point of view as well as population, and little would be gained by projecting them further, or curtailing the routes.

Fort William is a different matter. The train is awkward and expensive to operate and arrives there too late for the steam train, for example. Historically, the Oban sleeper ran on fewer days of the week than the Fort William one, but the port is now an important interchange, and more research is needed. The scope for increasing the productivity of the resources employed is likely to be less than at Fort William.

However, the West Highland operation is an expensive one and difficult to operate at attractive times, and there is a case for withdrawing it in favour of an attractively-designed package of sleeper to Glasgow, breakfast in Glasgow, and onward travel by morning service train.

• What facilities should the sleeper services provide?

- a) High levels of personal attention, and as far as practical hotel facilities, (but I comment on this below);
- b) A quiet journey (and therefore silence in the corridors should be strictly enforced);
- c) The present range of facilities in the cabins and the Lounge (i.e. no reduction thereof, but the possibility of enhancements);
- d) WiFi and charging facilities in each cabin;
- e) More attractive platform environment (for example, not like Platform 1 at Euston);
- f) Showers are often asked for, but are not really important. They would be extremely costly to provide, and unable to cater for demand approaching main termini.
- g) While Lounge car space is often at a premium, the journeys of the Caledonian Sleeper are not such as to require cabins adaptable for day and night use.

I notice you do not refer to the seating facilities on the sleepers. In order to make more space available on the sleeper trains, seating accommodation should be considered for spinning off into a separate train using vehicles which are idle overnight, or should be withdrawn altogether.

• and would you pay more for better facilities?

There is certainly a case for a simple budget facility, largely equivalent to the present two-berth arrangement, and I think there would be little leeway for price increases here. However I think I might well pay for a single berth facility with enhanced environment and facilities, particularly on the Highland Sleeper. In fact, I could see three categories –

- a) cheap and cheerful two berth – fares largely as now;
- b) cheap and cheerful single berth for the businessman or leisure passenger who essentially from central Scotland and wanting simply a good sleep during the night hours – basically the present First Class fares range;
- c) premium single berth with more room and amenities for the long-distance businessman or tourist who will essentially be on the Highland sleeper for the evening as well as the night – Premium fare as a package.

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:

I am not sure that mathematically specific targets are appropriate (for example, closing windows en route and closing doors at turn-rounds, car park lighting, putting individual vehicles out of use on lightly loaded trains to save light and heat).

It should be sufficient to:

- a) Indicate the areas in which the government expects the franchisee/Network Rail to demonstrate forward progress objectively year on year;**
- b) incentivise the franchisee/Network Rail to seek new areas and initiatives.**