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Rail 2014
Transport Scotland
Buchanan House
58 Port Dundas Rd
Glasgow
G4 0HF

Our ref: PRJ_0200_05/6459LGD
Your ref:
Direct Dial 0141-333-3100
Email: gordon.maclean@spt.co.uk

Dear Sirs

Rail 2014 Consultation Response

1. Introduction

- 1.1 Strathclyde Partnership for Transport (SPT) welcomes this opportunity to respond to Transport Scotland's (TS) Rail 2014 consultation on the future of rail services in Scotland. We have considered the consultation document in detail and have made comments on the 40 questions included within, which are attached to this letter.
- 1.2 SPT looks forward to fully supporting TS in delivering the Scottish Government's ambition "to have a railway that offers value for money, ensures that the rail industry acts in a coordinated, integrated manner and most importantly, has passenger interests at its heart."
- 1.3 However, SPT would also highlight that, as documented in recent correspondence with TS, we would be extremely concerned about the potential for any rail station closures in the west of Scotland. We have subsequently received confirmation from TS that it does not have any current plans for station closures and that if they were to consider any reconfiguration of the Strathclyde network they would discuss these matters with SPT. Whilst noting this position, SPT have highlighted in our response to consultation Question 24, that there should be a presumption against closure except in the most extreme cases, particularly in the current uncertain economic environment.
- 1.4 In addition to our detailed response, SPT would highlight the following key points from our response, namely;
 - The need for strong, regional input to the ScotRail Franchise
 - The importance of ensuring there is a mandatory requirement within the franchise to participate in SPT's integrated smartcard ticketing roll-out
 - The benefits of improved co-ordination of regional investment in rail
 - A stronger role for SPT in rail network planning and new station development.

1.5 These points are expanded on below, and include recommendations as to how SPT could assist TS and the Scottish Government in realising our collective ambition for a truly, integrated transport system in the west of Scotland and the country as a whole.

2. The need for strong, regional input to the ScotRail Franchise

2.1 The west of Scotland has a well established rail network. It has the largest commuter rail network in Britain outside London, and four of the six busiest rail stations in Scotland, including Glasgow Central which is Scotland's busiest station. With 186 stations and 555km of track, there are approximately 50 million rail passengers per annum in Strathclyde – 64% of the Scottish total - travelling over 900 million kms.

2.2 The rail network connects to the wider transport network through links with bus, Subway, ferry and Park-and-Ride car parks. An efficient and effective rail network is crucial to the economy of the west of Scotland. Congestion on the road network across the region can be reduced by the transfer of journeys from road to rail. It is vital that the rail network continues to be supported and enhanced in order to meet the needs of the west of Scotland.

2.3 SPT has a statutory responsibility for regional transport planning, including a key role to work with partners to develop the rail network and optimise its integration with other modes. This includes delivery of infrastructure such as bus/rail interchanges and park and ride, operation of the Subway, and management of multi-modal regional ticketing schemes including ZoneCard and the Strathclyde Concessionary Travel Scheme.

2.4 Within this context, SPT would highlight support for the regional planning of transport from Sir Roy McNulty's Rail Value for Money Study¹, published in May 2011. A key recommendation of the study was that regional transport authorities should have responsibility for rail services in their areas so that there would be better decision making and more service innovation whilst enhancing local accountability and reducing costs. SPT agrees with these sentiments and would welcome discussions with TS on following recommendation;

Recommendation; SPT to have a greater role in supervision and development of regional rail services, including the setting of service levels, regulated fares and standards.

2.5 SPT considers there is scope for cost savings, improved partnership working and delivery of a better rail service for passengers in Strathclyde, through a more co-ordinated approach to rail. Improved co-ordination of rail services would be in line with 'A Catalyst for Change', the Regional Transport Strategy (RTS) for the west of Scotland 2008-21, approved by Scottish Ministers in June 2008, which sets out the strategic priorities of SPT and partners over the lifetime of the Strategy to achieve the strategic outcomes of "improved connectivity, access for all, reduced emissions and attractive, seamless, reliable travel". These outcomes are the main issues SPT are seeking to address with our policies including those relating to rail services.

¹ <http://www.dft.gov.uk/pgr/rail/strategyfinance/valueformoney/realising-the-potential-of-gb-rail/>

3. The importance of ensuring a mandatory requirement within the Franchise to participate in SPT's integrated smartcard ticketing roll-out

3.1 ZoneCard² plays an important role in improving the quality and integration of the rail network in Strathclyde with other modes including bus, Subway and ferries. Overall the scheme, operated and administered by SPT, facilitates approximately 14m integrated public transport journeys facilitated per annum.

3.2 While the ZoneCard paper-based ticket has been successful over many years, this consultation correctly highlights the development of integrated smartcard ticketing as a significant opportunity. Key benefits of an integrated smartcard system include greater transport integration, convenience, flexible fares structures, reduced operating costs and an improved public transport offer. Scotland should aspire to have such a system with a view to incorporating all ScotRail services / journeys.

3.3 As TS is aware, SPT is at an advanced stage in developing proposals for smartcard ticketing and this includes taking forward two key proposals:

- Delivery of a new ITSO smartcard gates, barriers and ticketing system on the Glasgow Subway (operated by SPT)
- Delivery of an integrated ticketing scheme for the SPT area facilitating new smart ticketing media.

3.4 Given these developments, SPT would highlight the opportunity to expand the current pilot of Smartcard ticketing on ScotRail services between Glasgow and Edinburgh to incorporate all rail services in Strathclyde ahead of a national roll out. SPT would welcome further discussions with TS on how this can be taken forward and would specifically recommend the following;

Recommendation; the ScotRail Franchise should specify mandatory participation in SPT's integrated ticketing scheme as a franchise commitment.

Recommendation; the ScotRail Franchise should specify and include roll out of smartcard infrastructure at stations, trains and online (validators / ticket machines etc) by the franchisee in compliance with SPT's integrated ticketing scheme as a franchise commitment.

3.5 Should these recommendations be taken forward in the next franchise, SPT believe there would be key benefits for passengers through better integration of services and a more 'seamless' journey experience similar to that enjoyed by users of the London Oyster scheme. The investment costs required are also likely to be recouped over time through more efficient operations, passenger growth and greater flexibility in ticketing, fares and promotion of services.

4. The benefits of improved co-ordination of regional investment in rail

4.1 SPT has a good track record of success in working in partnership in the development and delivery of improved rail infrastructure in Scotland. Recent examples include the redevelopment of Partick interchange, upgrade of Dalmarnock station (with key partners), strategic rail Park and Ride development and the Subway Modernisation

² If you are travelling in the Strathclyde area, the ZoneCard is a flexible season ticket for unlimited travel on rail, Subway, most buses and some ferries.

project. These examples highlight the important role SPT continues to play in improving the quality and integration of the rail network with other modes through the planning, delivery and renewal of key regional rail infrastructure.

4.2 Due to the current challenging economic circumstances, SPT also recognises that budgets for rail investment are likely to face greater scrutiny and pressure. Given this situation it is more crucial than ever that regional rail investment is prioritised towards projects, programmes, schemes and policies which deliver the best return for the taxpayer. In order for such prioritisation to be undertaken effectively it is recognised that the availability of rail network performance data is vital. SPT would therefore recommend the following;

Recommendation; Greater transparency on performance, costs and revenues generated by rail services in Strathclyde between the Franchisee and SPT.

4.3 In addition to the above, SPT would highlight the importance of early engagement with other delivery partners in order to co-ordinate delivery of complementary rail or wider interventions in an effective and efficient manner. SPT's experience suggests this is not always the case leading to duplication of work and inefficient practices. We would therefore make the following recommendation;

Recommendation; Early engagement and consultation with SPT, on rail policy, infrastructure investment and services/ timetables in Strathclyde.

4.4 In connection with the above we also believe there is scope to improve co-ordination of regional investments in rail across Strathclyde and would therefore recommend the following;

Recommendation; Greater SPT involvement in regional co-ordination of the rail investment programme across Strathclyde, working in partnership with other relevant bodies including Network Rail, local authorities, and ScotRail

4.5 SPT believe the above is likely to be achieved in Strathclyde through a greater role for the organisation in monitoring of regional rail services, including setting service levels, and licensing of regional operators, as recommended in section 2 above.

5. A stronger role for SPT in rail network planning and new station development

5.1 In addition to its statutory transport planning role, SPT is a statutory key agency³ in the development planning process at the Strategic and Local Development plan levels, which includes consideration of new rail station proposals. We note that the consultation document does not rule out the provision of additional stations as long as such proposals take into account, and address, the potential impact on the rail network. SPT is currently aware of a number of local aspirations / proposals for new rail stations across the west of Scotland.

5.2 We would suggest that such proposals for new stations proposals should be subject to comprehensive transport appraisal in compliance with TS's STAG guidance. However, given SPT's role in the Strategic and Local Development plan processes SPT would further recommend the following;

³ Town & Country Planning (Development Planning) (Scotland) Regulations 2008, Regulation 28

Recommendation; Formal support from SPT, as the regional transport planning authority, for new station proposals should be a pre-requisite to them being passed to TS for further consideration

5.3 In addition to the above, SPT are aware of a number of rail stations in the west of Scotland with a low annual footfall - some of which are highlighted in section 7.11 of the consultation document and the supporting fact sheet. Given that such stations are likely to have received considerable legacy investment by SPT and other bodies, it is important that all opportunities to grow demand, increase utilisation and improve connectivity are explored. SPT would therefore recommend the following in this regard;

Recommendation; SPT should be provided with access to all pertinent station performance information relating to all stations in Strathclyde in order to focus investment, promote and market stations and ensure rail station infrastructure and services support effective and integrated land use planning

5.4 Similarly, SPT consider the performance and potential of existing stations on the Strathclyde network should be fully evaluated by TS, in partnership with SPT, on a periodic basis based upon the principles set out in HM treasury Green Book Appraisal and Evaluation in Central Government. The results of such evaluation should be shared openly with partners including SPT and our constituent councils in order to support station development, target scarce resources and help general decision making on rail issues. Further details on this recommendation are set out under Q24 in the attached response.

6. Conclusion

6.1 In this letter and the attached consultation response SPT have endeavoured to provide comment and recommendations which support the Scottish Government's ambitions for rail services in Scotland. We are very conscious of the challenging economic environment the nation faces and believe that SPT can play a vital role in delivering future rail services in Strathclyde which are fit for purpose, offer value for money and satisfy growing passenger needs. Within this context, we welcome recent assurances from TS that station closures are not being considered as part of this consultation, and look forward to further engagement on our detailed response to the consultation and the issues and recommendations highlighted above as we move towards the next ScotRail franchise in 2014.

Yours faithfully



Gordon MacLennan
Chief Executive

Enc Rail 2014 Consultation - SPT Response

Rail 2014 Consultation
SPT Response

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?

In principle, there would appear to be merit in this approach. SPT, working with local communities, would welcome the opportunity to have a greater involvement in the specification of services and to work with our constituent councils and other community and rail stakeholders to find innovative approaches to reduce the gap between revenue income and subsidy as set out in the consultation document

However, there would need to be effective safeguards to ensure that the level and quality of services for the social railway would not deteriorate by comparison with that of the economic railway and that there did not emerge a two tier railway with the social railway becoming, in effect, a poor relation to the economic railway. Without detailed information about the economics of routes and services by time period it is not possible for SPT to make a judgement about which services might be covered by the social and economic categories, though clearly social would involve many rural routes and particular services related to the time of day and seasonal factors.

For the economic railway in particular, specification would also require further consideration of the financial performance of particular lines both in isolation and the efficiencies presented through wider network access. This point is particularly relevant in Strathclyde, with the largest commuter network outside of London, with an expansive travel to work area, supplying vital labour to the west of Scotland economy. .

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

Longer franchise lengths provide the franchisee with both the incentive and the opportunity to invest and realise a return on investment during the life of the franchise. SPT would suggest that longer franchise lengths with suitable safeguards or pause clauses could be introduced.

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

Risk support should perhaps be split between franchiser and franchisee given the impact of unpredictable external influences on income streams within franchises – particularly if franchises are going to be longer than in the past. However, claw back might be appropriate where external circumstances help to increase patronage and/or income.

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

As per above a risk share mechanism could be applied to unexpected profit/loss scenarios if appropriate – although properly costed options at the outset should go some way to reducing profits/losses. The performance of the railway should not be limited to consideration of revenue but should also take into account, for example, punctuality, reliability, patronage and quality.

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

Third party services are not widely operated in Scotland and perhaps there are limited opportunities within the network (Steam specials and tourist services are perhaps not "services" in the understood sense of the word). If a third party's service did not adversely impact on the operation or the patronage of the franchised service then there is little need to oppose operation, however, a profit share on such services might have to be imposed should any adverse impact result.

Other than for limited tourist services, SPT does not see there being a case for third party operation of the rail service. Introducing an additional tier of rail operation may result in greater complexity in what is an already complex rail landscape. That said, as per our response to question 1., SPT would welcome a greater degree of engagement in helping to determine regional services and timetables, within the framework of a national rail franchise set by TS.

SPT considers that the development of measurable outcomes for the franchise is vital in ensuring effective monitoring of its success. These outcomes would need to be accepted by both franchiser and franchisee as being at the heart of franchise performance, and would be both additional and complementary to any 'value for money' targets / indicators set.

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

The current model of penalties covering reliability, punctuality and service and station quality has gone some way to ensuring an attractive and consistent rail offer. There should be investigation of how incentives might drive standards and how innovation and creativity can be encouraged. However, this should be from a firm base of minimum service requirements.

The concern would be that aspects such as station maintenance and cleanliness would suffer in any drive to achieve more global outcomes. This would need to be carefully considered and safeguarded against although there may be scope for a more flexible and graduated performance regime which takes into account scale of stations, or local conditions.

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

The danger of performance bonds is that if they are set too high then only large companies are able to enter the market place – similarly if too low then they lose any potentially controlling effect.

SPT would argue that the current system should be retained to ensure the taxpayer is protected and to ensure high quality bids from respected industry partners. There may be an opportunity to reward those companies which meet their obligations as well as a form of no claims bonus which would kick in at different points during the franchise lifespan.

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

Sanctions are essential to ensure robust control over quality and service. However, sanctions should be proportionate and the adoption of a 'traffic light' system could be introduced to highlight issues prior to financial or other sanctions being taken. Indeed, financial sanctions might not be the most appropriate for some failings – indeed additional passenger benefits might be one approach to incentivise patronage rather than punish the operator e.g offering discounts to passenger whose journeys have been persistently disrupted.

Achieving reliability, performance and service quality

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

Both – Careful note would have to be taken when setting performance levels to make them realistic especially if operating a reward/penalty system. A lack of reward may dampen an operators will to excel in the service they provide and this may, in turn, have a negative impact on passenger satisfaction levels.

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

The performance regime should be route based and the information publicly reported to ensure service achievements and failings are transparent. Persistent underperformance of specific routes should incur graduated penalties. Additionally, infrequent services cancelled should command a higher penalty as should peak services on more frequent routes. Which ever method is chosen, a balancing act will be required when setting targets/incentives.

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

By taking greater and formalised account of democratically accountable bodies such as SPT. Also by seeking the views of passengers, passenger forums and industry stakeholders through a range of engagement approaches including interviews, focus groups and social media.

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

It could be argued that a late or slow running train should not incur the same penalty as a cancelled service – the operation of "skip stop" services in order to make up time on delayed or late running services should only be a last resort – a balance would have to be struck between on train passenger delay and station passenger delays caused by trains no longer stopping at previously booked stops.

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?

SQUIRE is essential but should have flexibility built-in to ensure that operators are not disincentivised from operating services despite there being a minor infraction of the SQUIRE regime along the route. Normal, safe operational practises will always take priority but SQUIRE has a role to play to ensure quality but not perhaps to cover all aspects of station and service delivery for which there are already mechanisms in place within the rail industry. Some form of inspection is needed to maintain good service levels. A consistent/seamless approach to inspections would be preferable particularly in rural areas where identification of faults and their repair could be spread over a longer time frame.

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

Encouraging greater passenger participation through targeted market research and harnessing the power of social media in fault reporting and complaints.

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?

On short metro journeys (say 20 minutes maximum) there may be a cause for more standing passengers within carefully considered and monitored safety limits. For longer journeys, capacity must be built-in. This could make more efficient use of existing rolling stock and negate the need for additional rolling stock which is then underutilised during off-peak periods.

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?

The number of services making use of interchange stations should be increased, where appropriate. It is crucial that a multi modal and integrated approach is taken when planning the rail network. Interchange opportunities are common across the SPT area but could be extended and enhanced in turn optimising the benefits of smartcard ticketing and enhancing links to longer distance rail.

Differentiation of longer rural and longer suburban services compared to short more regular suburban service may have benefits for users but might be more difficult to supply, and delays, missed connections and signalling might arise.

The omission of stops along any lines should be based more on passenger demand (or lack of) at specific stations and not driven exclusively by quicker point to point services. However, interchange benefits may be hard to realise against a backdrop of a deregulated bus market and severe pressure on supported service budgets.

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?

Both – the Govt. should be sufficiently knowledgeable about its franchise and the wider transport network as to be able to direct certain aspects of service demand and the operator should also be aware of the passenger flow on the contracts it is operating. The responsiveness of demand between 1 per hour or 2 per hour services should dictate whether or not service levels can be increased or decreased – in specific cases a reduction in service level could be a false economy.

As mentioned in our response to question one, SPT would seek a greater role, with others, in setting timetables on a Strathclyde basis, in advance of formal agreement

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

Again, SPT would welcome a greater role, with others, in helping to specify the franchise at a Strathclyde level. In the absence of this a structured Full Specification with safeguards such as fully costed options within a wider and agreed framework to encourage innovation could be a way ahead.

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

Greater use of pricing options to encourage travel on less busy services with the franchisee taking the revenue risk and the Government and other parties such as SPT, enabling service expansion through modest and appropriate investment.

Scottish rail fares

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

Variously to:

- Promote rail travel as an alternative to private car.
- Promote economic growth and revitalise and sustain communities.
- Optimise net revenue at peak times and on peak trains, and to maximise utilisation of services at off-peak times.
- Achieve a fairer balance between passenger and public contribution to the £1bn annual running costs.

Also to promote:

- Greater financial transparency
- Consideration of the respective balance of subsidy and investment across the transport network
- Promote use of the railway through a policy for fares that builds a stable passenger base by rewarding loyalty and strongly markets and encourages use of all free capacity
- Recognise the opportunities for better modal integration i.e. with bus, Subway

Critical to the future success of rail fares policy will be full franchisee participation in Integrated and smart ticketing solutions that facilitate:

- Seamless ticketing at interchanges for passengers across operators and modes;
- Compulsory participation in ZoneCard multi-modal ticketing to :
- Smart ticketing technology, when applied to fares automatically regulates travel times, permitting:
 - Comprehensive gathering of passenger journey information to better inform transport planning and fares modelling;
 - Full realisation of *revenue gains from fraud prevention* through investment in:
 - station platform smartcard validators for tag-in/out;
 - smartcard readers *on all gates* at major stations;
 - smartcard validators for ticket inspectors;
 - greater publicity about penalties for fare evasion.

Additionally:

- Continuing to conclusion the expansion of the successful Edinburgh/Glasgow smart season ticket scheme to other ticket products and the entire SPT area.
- Sufficient flexibility in fares policy to permit higher fares where passengers have a choice to benefit from incremental investment in higher quality trains, faster journey times or guaranteed seating.
- Exploit Scotland's *Greatest Railway Journeys in the World* status by encouraging the promotion abroad of special package offers for tourists and students (e.g. The West Highland and Stranraer Lines).

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)?

Peak fares in Strathclyde should be regulated reflecting the severe socio-economic conditions which exist across the area and the expansive travel to work area.

There is scope for multi or bulk purchased ticket orders being introduced to incentivise potential passengers. Deregulating fares in the off-peak has the potential to better fill trains on some lines which are otherwise relatively empty and to encourage the introduction of innovative ticketing solutions.

In the longer term, the introduction of smartcard ticketing will harness the full potential of

- Enhanced season-ticket offerings, such as off-peak products hitherto considered too complex;
- Shoulder-peak pricing products;
- Product offerings to employers that reflect flexible working hours (i.e. late start & off-peak travel)
- Credits to peak-season ticket holders for Off-peak travel;
- Many other innovative products delivering value-for-money benefits to both passenger and operator.

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?

This should be considered in the context of the wider decisions about investment across the transport network and not simply the rail network in isolation. Whilst efforts should and can undoubtedly be found to reduce subsidy, it should be underlined that taxpayer subsidy encourages greater use of the rail network and in so doing reduces road accidents, congestion, road damage and the significant costs involved) if it is difficult to accurately quantify actual "real" subsidy. However, it is acknowledged that a subsidy/passenger payment ratio forms ticket costs. An appropriate level of subsidy should reflect the local impact of the service – if it is quantifiable – and decisions about investment should be made as part of a wider consideration of land use needs, wider transport network needs and the economic and social viability of local communities.

A direct relationship between area needs and benefits brought about by rail services could be applied in certain areas and this would include new or improved lines – indeed it could be argued that the rolling stock profile might suggest that certain lines have a very modern fleet whereas other lines are served by older and less fit for purpose units – however, it is doubtful if a fair fares mechanism could be introduced to reflect this.

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?

The emphasis should be on encouraging greater use of public transport, including rail as a proportion of overall trips. This requires attractive pricing as an essential component of a wider offer including high frequency and reduced journey times. If this is not achieved passengers will be driven off the railway.

Within the confines of a sensible and proportionate pricing structure, if the differential between peak and off peak fares were of the order of 50% then greater incentive might be given for people to purchase season or longer type tickets – this might be a benefit but it might not raise the overall income of the rail operator substantially. If a single peak journey became the same cost as an off peak return then there might be added impetus to shift the shoulder of the peak – although trains operating very close to the peak hour might become less used. However, if there was an alteration to the validity of peak and off peak tickets such that the arrival time at the destination is used rather than departure time from station of origin then there might be an increase in both patronage and income.

Scottish stations

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

The economic and social viability of communities should be uppermost in making decisions about rail station development, closure or relocation. Proposals for new stations should be subject to comprehensive appraisal in compliance with Scottish Transport Appraisal Guidance, before they are considered for inclusion in Strategic and Local Development plans. Given SPT's strategic role in the development planning processes we would recommend that formal SPT support for new station proposals in Strathclyde should be a pre-requisite to them being passed to TS for further consideration.

Similarly, the performance and potential of existing stations on the ScotRail network should be fully evaluated by TS on a periodic basis based upon the principles set out in HM treasury Green Book Appraisal and Evaluation in Central Government. The results of such evaluation should be shared openly with partners including Regional Transport Partnerships and Local Authorities in order to support station development, best target scarce resources and help general decision making.

Where station patronage is under threat, more should be done to promote marketing and attractiveness of rail services and enhance the proposals. Consideration also needs to be given about the knock-on effects on the wider transport network, in particular the impact of modal shift to car and the financial pressures placed on supported bus budgets. In any event, there should be a presumption against closure except in the most extreme cases, particularly in the current uncertain economic environment.

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?

Working with our constituent councils and other stakeholders, SPT would welcome greater engagement and participation in decisions about rail investment in the local Strathclyde network. However, there should be effective coordination to reduce wasteful and duplicated feasibility work. A clear programme of local rail investment should be agreed ideally on a three – five year framework.

There are significant obstacles for local authorities and businesses proposing and promoting a station or service. SPT's experience in the past has shown that there are significant operational, safety and delivery aspects to be considered as well as very significant and complex regulatory regime under which such proposals have to adhere.

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?

There is scope for local management and maintenance provided it is within a clearly defined framework of quality and service requirements. Such an arrangement might yield cost savings and encourage local community involvement and business support, thus reducing costs to the taxpayer. Simplification of the regulatory regime, where appropriate, would be welcomed.

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

To a degree this already happens with Community Groups "Adopting a Station" and supplying improvements to the physical environment at and around the station (planters etc.) – it is perhaps easier to facilitate such an approach in remoter areas and this, in itself, would be of massive benefit if it reduced costs and increased patronage at more marginal locations. As above, there is scope to build on this approach provided that minimum quality thresholds are maintained.

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

Station categorisation should be based on patronage and service provision and/or destination choice. All stations should have a minimum of facilities available to the

public to ensure passengers are safe, well informed about services and can access information points, telephones, and where appropriate toilet facilities. All stations should move to full DDA compliance although it is recognised this will be a challenge for many stations which were engineered before DDA issues were considered and where it is not practical in the short term to introduce ramps or lifts to ensure access.

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?

Yes – although changes in days of operation might be appropriate in some instances; If there is duplication then the wider use of the rail network for a multitude of trip purposes should be encouraged – if subsidy can be reduced by the use of practical and convenient interchange with domestic Scottish services and economies can be realised then the case could be made to examine the possibilities for earlier connecting ScotRail services on routes to/from the Highlands and particularly the West Highlands; Scottish Ministers should specify these services. These services should be specified by Scottish Ministers as part of the ScotRail Franchise.

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?

See answer 29 above. If improvements to internal Highland/West Highland services can accrue then there could be a case – however connections to/from the west Highlands early in the morning would have to be facilitated by the operation of connecting rail services more locally – this could be expensive to provide. It should be noted that West Coast passengers require to break their journeys on arrival at Glasgow if travelling to points further north.

Rolling stock

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

The use of second hand, proven rolling stock which can be seamlessly introduced – recent unit introduction has been dogged by issues – predominantly technological – and tried and tested unit introduction might have benefits. Upgrading of existing units where appropriate might also be an option although this could, in some instances be a false economy.

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

Facilities on board should reflect journey time and distance as well as, potentially, patronage level. However, standard unit configurations will predominate across the network making bespoke unit allocation difficult and potentially expensive to provide. To a degree the nature of the Scottish network is fairly uniform which permits the use of similar units with similar facilities across particularly the rural network as well as the Scottish City services. Local differences regarding the Glasgow network are primarily distance based – appropriate comfort levels should reflect this. All services should be

fully DDA complaint have toilet facilities and adequate seating. Trains should be well lit and provide electronic and audio announcements and Wifi connections.

Passengers – information, security and services

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

On busier commuter routes initially and then rolled out across the network.

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?

In Scotland the additional seating released by the conversion of First Class accommodation would be minimal (Cl 170 some Cl 158s?) as such the additional seating and the cost of providing it might not be economically viable – If the franchisee wishes to provide such accommodation they should be free to do so and to charge accordingly – however there should also be a threshold of crowding where use of all available seating is triggered on a more regular basis.

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

Problems associated with excess alcohol consumption are primarily societal not the direct responsibility of the transport sector. That said public transport passengers must be entitled to travel on a public transport service free from harm, intimidation and nuisance. The banning of alcohol on football specials is sensible and should be continued but a policy of zero tolerance would be preferable rather than an outright ban, where those who indulge in anti social behaviour, particularly of a violent or aggressive nature and aggressive nature are prosecuted and, depending on the severity of the offence, barred from future travel on transport services.

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

Great strides have been taken with the provision of CIS screens and long line announcements across the network and information provision is probably better now than it has ever been. The use of such technology now provides quick and accurate information provision and where this is not available then “help-points” are often provided. Additional information provision should be targeted at areas where there is relatively high footfall and also where provision is currently yet to be upgraded or where there is a safety (perceptual?) issue. In addition there is scope for improved communication through mobile telephone information, social media and on train information, particularly in terms of providing passengers with information on alternative travel choices during service disruptions due to weather or events

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

These should be specified by TS. However, we note recent announcements by the UK and Scottish Governments committing £50m each (£100m in total) for the upgrading of rolling stock for sleeper services.

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?

While there are advantages of including Caledonian Sleeper services within a single Scotrail franchise, other options (i.e. a separate niche franchise) should be investigated to determine potential impacts in terms of costs, benefits and service provision.

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?**

As stated above early/late domestic services on Sleeper routes might be more attractive for internal users and Sleeper passengers could change at Edinburgh/Glasgow. An analysis of the days of operation/route options etc. might have to be undertaken prior to the inauguration of any such service pattern.

Currently it is possible to get to London from the East of Scotland at a relatively early time in the morning by using a 0500ish service from Edinburgh – this might diminish the appeal of the over night service. Cost is, of course, another issue and it may be argued that the Sleeper does not satisfy the needs or requirements of either an “economic” or indeed a “social” railway as outlined elsewhere in this document. The overall cost effectiveness of the Sleeper service might have to be re-assessed in light of improvements elsewhere on the long distance rail network as well as the high, and increasing, cost of supplying the service.

- 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?**

Oban would be an ideal destination given wider ferry links perhaps in addition rather than in place of a service (to Fort William presumably). The issue of connections to/from more remote communities to the rail network is one of considerable importance and the ScotRail Franchise – and all its conditions - should perhaps be more closely linked to the CHFS tender process – including penalties and connectional issues.

- What facilities should the sleeper services provide and would you pay more for better facilities?**

Facilities should be commensurate with similar hotel type accommodation – with perhaps a premium for travel and time saving. Perhaps there should be a “basic” service level but the notion of all en-suite single facilities is probably more realistic nowadays – as such the Sleeper would become a “top-end” facility which is perhaps its niche within the market – additional seat sleeping carriages at lower cost could be utilised. People are probably inclined to pay for additional services such as en suite etc. as this is common within the wider tourist market.

Environmental issues

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

Environmental KPIs might include:

- fuel consumption – particularly if conversion to electric traction was encouraged;
- passenger kms/metric tonne of CO2 etc.
- incentivisation to operators or indeed potential payment penalties for environmental improvements to be added to the SQUIRE regime;
- potential impact on modal shift from private car.