



**Campaigning by the
Railway Development Society Ltd**

Calvin Lloyd
Network Rail
planningahead@networkrail.co.uk

please reply to:
'Clara Vale'
Thibet Road
Sandhurst
Berkshire
GU47 9AR

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chris.page@railfuture.org.uk

Initial Industry Plan

Dear Sir,

We are pleased to submit this consolidated national response on behalf of **railfuture**, which has been prepared by the Policy, Lobbying and Campaigns committee, with contributions from individual branches. The document has been reviewed and approved by the committee, and includes a full response to the IIP Scotland plus other minor updates to the version sent to ORR previously.

Railfuture is a national voluntary organisation structured in England as twelve regional branches, and two national branches in Wales and Scotland.

The attached response is structured in three parts:

- Response to the Initial Industry Plan England and Wales, organised to correspond with the structure of the IIP document
- Response to the Initial Industry Plan Scotland
- Response to the Definition of proposed CP5 enhancements

We endorse the plan and hope that the constructive criticism in our response will contribute to the funding process.

If you require any more detail or clarification please do not hesitate to get in touch.

Yours faithfully

Chris Page
Railfuture
Policy, Lobbying & Campaigns Committee

www.railfuture.org.uk www.railfuturescotland.org.uk www.railfuturewales.org.uk
www.railwatch.org.uk

Response to the Initial Industry Plan - England and Wales

Railfuture endorse the Initial Industry Plan to develop the rail network and offer the following feedback in the spirit of constructive criticism:

Executive Summary. The plan recognises that economic and demographic trends, alongside government policy, will influence rail's future role (Section 2.1 Government Policy). Whilst the plan considers policy issues it does not address the effect that global economic trends will have upon the UK rail industry, or recognise that they will shape government policy. In our opinion fuel prices will continue to increase in real terms as developing countries require more energy and oil supplies decline. Fuel is a smaller proportion of overall costs for rail than other modes, so rail transport is less sensitive to fuel price inflation. Whilst government policy may attempt to soften the impact, increasing fuel prices will drive a modal shift from road to rail transport in the UK – witness the growth that has occurred since 2007 despite the recession (section 2.5.2)

Since rail's market share is relatively low at 7% overall, even a small percentage modal shift will represent a large percentage growth in rail traffic which could overwhelm the railway industry unless sufficient capacity increases are planned and the necessary investment made. The extra capacity provided and the extra journeys generated must be profitable, otherwise growth will drive a requirement for increasing subsidy, which will not be sustainable or politically acceptable.

Therefore the plan should make it clear that the key strategic objective is to put the industry on a sustainable financial footing. Investment is essential, and given the scarcity of investment capital, everything in this plan must contribute to this objective. Whilst unlikely to be achievable in CP5, the long-term objective should be for the industry to become profitable overall, so that future investment can be justified on commercial grounds (one of the key decision areas identified in the Foreword).

The six objectives listed in the Executive Summary all flow from this strategic objective. To achieve it the industry must reduce its unit costs (for example by investment in electrification and introduction of more competition) and increase revenue by increasing volume. Lower unit costs will make the industry more **efficient**, more **affordable to the taxpayer** and drive growth in the industry and **economic growth** overall. To attract more passengers and freight to the railway, higher **reliability**, meeting the **needs of passengers**, and public confidence in rail **safety** are essential. Finally modal shift from road to rail will contribute to a **lower carbon economy**.

This document is the rail industry's only input to the process, which determines funding for CP5. It is therefore addressed to government, not the customer, and is strong on the need for investment and savings but gives little detail on what savings in TOC operating costs and NR revenue requirements will be achieved. Much more detailed work must be done within the industry to create a business case which justifies the investment required by quantifying the savings which will be made. The railway industry must decide what message it wants to send to the public; this message must put the strategic objective in the context of global economic trends and explain the plan to give the public confidence of significant improvements in CP5 to justify the higher fares which will result from the RPI + x% formula.

Efficiency and affordability (page 7). Competition within the passenger rail market is limited to the franchising process. Once a franchise is won, the competitive element has gone, so the franchisee should be incentivised to reduce costs and increase traffic. Possibly access charges should be variable for each path, depending on the day and time. The value of the rail industry in terms of road congestion relief, reduced road accidents and improved air quality to the nation as a whole also deserves consideration.

Sustainability (page 10). Note that electric rail services are lower cost as well as more carbon efficient than diesel.

Investment choices (page 10). Given the high level of committed investment in major projects during CP4 that extend into CP5 (Crossrail, Thameslink, GW electrification and IEP and costing £4.9B in CP5), there is only £5.6B proposed for new projects to deal with increased traffic, congestion etc.

1.2 Scope. The powers of the Welsh Government must be recognised in the plan.

2.1 Government policy. Whilst the rail industry is a major user of electricity and diesel, fuel is a smaller proportion of overall costs than for other modes so rail is less sensitive to fuel price inflation than road or air. Therefore increasing fuel prices will drive modal shift. Whilst national road pricing is ruled out, it should be recognised that a major shift to electric cars would accelerate the need for road pricing to replace the loss of tax revenue on petrol and diesel.

2.1.4 Fares. To make fares simpler and fairer, pricing should be harmonised between routes and areas of the UK to remove the differences inherited from British Rail and perpetuated by the RPI formula. This does not mean a standard price per mile; prices should reflect the speed and quality of the journey, and the demand for and cost of provision of the service. The plan should also consider that the government may wish to reduce the regulation of fares. It is important that pricing of journeys for which the customer does not have an effective choice (e.g. commuting within the London zonal boundaries) remain protected. Note that the RPI+3% formula does not apply next year for Wales; ATW will be RPI+1%.

2.3 Sustainable development. The plan states correctly that delivering the plan is about “how to do business” – the industry must operate like a commercial business. The sustainable development principles should include the provision of more journey opportunities through interchange stations to improve connectivity between existing routes and providing new services linking locations where there is a latent demand and existing infrastructure (see comment on section 5.5.3 below).

2.4 Long term planning. The plan is based on the previous Network RUS documents and Railfuture responses to these still stand. The RUS are focussed on existing routes and so do not address latent demand where no rail route currently exists, e.g. East-West Rail or orbital routes parallel to the M25 or North Circular Road. Whilst the latter are not achievable in the CP5 timeframe the long-term plan should address the possibility of new rail development to address these demands in the context of a long term modal shift to rail.

2.5.2 The cost of today’s railway. Growth has been driven by increasing fuel prices. This trend will continue, causing a modal shift to rail. Statistics and expenditure in the future should have separate figures for Wales - it should be clear that the Welsh Government receives funding to support all ATW services except those wholly in England.

2.5.4 The outputs of today’s railway – Punctuality and reliability. Disruption is not improving - sometimes alternative routes are also blocked, and some blockages are for a longer length than are actually required. Some operators substitute buses for longer distances than actually required because of transfer problems at turn back stations or the absence of a crossover for reversals.

2.5.4 The outputs of today’s railway – Capacity. If the new high-density trains (procured for Thameslink and Crossrail) are used on long journeys, then the measure of capacity must be the number of seats, excluding standing, for calculation of train utilisation.

2.5.5 Choices and trade offs – Policy choices. The choice of whether improvements in efficiency are reflected in lower subsidy or lower fares should depend on whether sufficient capacity is available, ie the savings from improved efficiency should be used to provide sufficient capacity. Lowering fares when there is not sufficient capacity would only aggravate overcrowding. We support the introduction of smart ticketing to allow pricing to more accurately reflect demand at different times.

3.3.1 Changing Network Rail – Revising standards and operating rules. Simplifying processes is key to reducing unit costs. This applies to the planning processes for network development as well as operating procedures. We support the concept of individuals taking responsibility for their own safety rather than relying on excessive health and safety regulation. Care must be taken that new standards are not merely overlaid on the old, creating more bureaucracy.

3.3.1 Changing Network Rail – Multi-skilling and delivery. The workforce must be included in decision-making. More delegation of responsibility to individuals will encourage efficient working and reduce the risk of centralisation to labour relations.

3.4 Passenger train operator’s plans to improve value for money. Sales of tickets through station shops, following the innovation by Merseyrail, could make savings compared to a ticket office, without losing a staff presence.

4.3 Market analysis. Note that the spatial pattern of growth is also determined by the relative cost and time of rail commuting to Central London, which is a factor in each individual traveller's decision of where to live – ie people who want to work in London but can't afford to live there, choose to live where they can get to London by train.

4.4.2 Sector outputs – Affordability of the sector. The plan relies on modal shift to generate both growth in volume and customer tolerance of above inflation increases in fares, so that revenue increases can replace subsidy.

4.5.2 Growth. Despite the London and South East RUS indicating that the SW main line into Waterloo is forecast to be the most overcrowded route into the capital by 2031, there are no proposals for increasing capacity and yet, by the end of CP5 in 2019 there will only be 12 years remaining to plan and implement a solution.

The rail share of orbital journeys in London is much lower than for radial journeys. Therefore the potential growth in orbital rail journeys is much greater. Since the L&SE RUS looks at existing routes only, it misses opportunities for development to capture latent demand for orbital journeys which are not currently rail-served.

Whilst not being promoted by Network Rail, there is no mention of the proposal for reopening the line between Bicester and Bletchley, known as the East-West Rail scheme which would provide through services between Oxford and Milton Keynes and beyond. We would have expected some recognition of this scheme and its benefits in the plan. To summarise, these are:

- excellent cost/benefit ratio
- through services between Reading/Swindon – Milton Keynes/Bedford which provide a more direct route avoiding the need to go via London, thus helping to relieve congestion
- much enhanced connectivity between Oxford/Milton Keynes themselves compared to the slow journey by road at present
- by extending Marylebone – Aylesbury trains through to Milton Keynes via a new station at Winslow opening up direct rail routes between Buckinghamshire's principal centres, again poorly served at present
- an alternative freight route between the south coast and Midlands/North without having to go through the West Midlands conurbation, providing much needed extra capacity
- a very useful diversionary route between Oxford and the Midlands

This scheme has significant benefits to the economy of the area and social mobility by providing access to work and education opportunities in, for example, Oxford and Milton Keynes for those at present unable to benefit from them.

Capacity on the West London line could be improved by moving the electrification switchover point between 25KV overhead and 750V 3rd rail south to Olympia station. This would prevent an additional stop.

Other smaller projects are required to address capacity constraints, e.g. Alton – Farnham and Fareham – Botley.

4.5.3 Journey times. Note that faster journey times also improve stock and staff utilisation, and so may reduce costs. Opportunities for new services to address latent demand without network development should be exploited, for example WCML to Heathrow via Acton Wells, or Chiltern Line to Heathrow via Greenford (provided that capacity can be found on the GWML).

5.4.1 Sector outputs – Capacity. Weekend peaks are not acknowledged or recorded. In some parts of the country; peak use is late afternoons on Sundays and this is not always provided for. Event and shopping peaks are also not provided for. For example, there is considerable overcrowding (150%) on some trains when events are held at Cardiff, and some trains that leave passengers behind. There is also the question of need for later and earlier services than those at present provided. Some parts of the country require 24/7 services.

5.5.2 Growth. Railfuture strongly advocate investment in electrification and capacity enhancement of the Midland Main Line to bring it up to a standard comparable to other lines connecting London with the UK's major cities. More detail is given in our response to the 'Definition of proposed CP5 enhancements'. Planning for Newark and Werrington ECML flyovers should also be started in CP5. Where possible enhancements should be combined with planned renewals to avoid further

changes being required in future: for example segregation of traffic flows to Birmingham and Trent Junction, including the extra platforms to the east of the existing platforms, should be included in the planned Derby station track renewal.

5.5.3 Journey times and connectivity. Faster journey times also improve stock and staff utilisation, and so may reduce costs. For example there should be continuing improvements to the Plymouth to Paddington line, so that Plymouth is brought well within 3 hours of London, and the upgrade at Market Harborough to remove the curve and increase line speed should be in CP5.

6.3 Market analysis. It may be considered that long-distance commuting should not be subsidised as the commuter has a choice of where to live. Deregulation of these fares would impact growth.

6.4 The current railway – Affordability of the sector. The choice of whether improvements in efficiency are reflected in lower subsidy or lower fares should depend on whether sufficient capacity is available, ie the savings from improved efficiency should be used to provide sufficient capacity. Lowering fares when there is not sufficient capacity would only aggravate overcrowding. Whilst the long-term objective may be for the industry to be profitable overall, cross-subsidy within the industry will be necessary so that journeys originating on less used lines are not lost to rail, and to promote social inclusion.

In the regional sector, some services may always require subsidy, and in these cases we wish to highlight to government the wider economic and social benefits that rail transport provides. For example, in around 2003 the county of Gwynedd carried out a survey into the viability of the Cambrian rail network that required an annual subsidy of £900,000 at the time. The study found that the wider external benefits the service provided were worth around £3m per year in addition to social and other benefits that cannot be measured in monetary terms. Similarly, reopening the Welsh Highland railway has only been possible because grants totalling nearly £30m from local authorities, the Heritage Lottery and the EU Regeneration funds were provided together with about £10m worth of volunteer labour but it has been estimated that the railway will generate about £14m of external benefits to the region as a whole, effectively paying for itself in about 3 years even if it never makes a profit in commercial terms.

6.5.4 Journey times and connectivity. Faster journey times also improve stock and staff utilisation, and so may reduce costs. Minor network enhancements, e.g. the Todmorden curve, or a new south to west chord at Yeovil Junction, would provide new service and journey opportunities.

7.2.1 Strategic requirements. Note that the strategic objective of financial sustainability is met by the nine core principles. Electrification (objective VII) will drive lower costs. Objective VIII should make it clear that strategic freight terminals are required in more locations.

7.4.1 Outputs. The East-West Rail proposal, whilst not promoted by Network Rail, would reduce the need to run intermodal trains from Felixstowe via London. In conjunction with the East-West route, a flyover at Redhill would provide a through route for freight from the Channel Tunnel to the South West, South Wales and the West Midlands, avoiding London and the congested West London Line and promoting rail freight growth through the Channel Tunnel. The land required must be safeguarded to avoid planning permission being given for an alternative use.

Measures for gauge clearance and longer trains (eg 775m loops on the Southampton – Basingstoke – Reading route) are supported.

8.1.1 Customer information strategy. Information must also be made available to staff, as they are a key route for communication to customers.

8.1.2 Ticketing and retailing. Ticket sales need to be accessible; not all can be purchased from machines. There must be provision for manual sales at every station, either from a booking office or by the conductor on the trains. Sales of tickets through station shops, following the innovation by Merseyrail, could make savings compared to a ticket office without losing a staff presence. Such shops could be run by private operators (rather than the TOC) selling tickets on commission.

8.1.3 Stations. Plans to improve stations should avoid multiple phases - for example the Basingstoke booking hall is currently being rebuilt whilst works to manage overcrowding are planned for CP5. This extends the period of disruption.

8.2.3 Electrification. Railfuture strongly supports electrification of the Midland Main Line and North Trans-Pennine routes to unlock the potential for growth in these areas by increasing capacity. The benefits include 20% savings on fuel and rolling stock maintenance. If progressed, DC to AC conversion should be coupled with increases in capacity; conversion alone is not worth the inconvenience and delay to passengers during conversion. Conversion may not produce any reliability benefit either – overhead lines suffer regular failures, whilst third rail can be kept clear in severe weather by all-night running. The GWML electrification should be to Swansea and include the relief lines between Severn Tunnel and Cardiff West and the diversionary Vale of Glamorgan line. Cardiff Valley electrification must include the lines to Maesteg and Ebbw Vale and the Vale of Glamorgan line to give the best stock utilisation as well as all the other benefits of electrification.

8.2.5 European Rail Traffic Management System. The testing of ERMTS on the Cambrian lines has caused considerable disruption - it is essential the issues are resolved before deployment nationally.

8.3 Rolling stock. Capacity issues are becoming urgent, as is the need to start replacing aging and unsatisfactory designs like the Pacers. The aim should be for a consistent rate of new orders to create a stable market for new trains in the UK, which will help to contain rising costs of production, and to plan for future growth. The need to provide more capacity on long distance routes quickly has sometimes been met by using high-density stock, for example class 450 stock on the London-Portsmouth route. This has an adverse effect on passenger satisfaction and in the long term additional capacity should be provided by investment in infrastructure, not by increased crowding over longer distances. Whilst existing stock released by new build programmes must be cascaded to increase capacity elsewhere, care must be taken that the stock is appropriate for the services to which it is being redeployed, and is energy-efficient.

8.5.1 Investing in people. The workforce must be included in decision-making. More delegation of responsibility to individuals will encourage efficient working and reduce the risk to labour relations posed by centralisation.

9.4.2 Investing to reduce operating costs – Further network electrification. Railfuture endorse the Electrification RUS. The more of the network that is electrified, the more the business case for further electrification improves. For example, if the Cross Country route from Birmingham to Bristol is electrified, it improves the case for taking the wires on to Exeter and Plymouth. This would in turn dramatically strengthen the economic case for filling in the gap between Newbury and Taunton and so on. Similarly, infill electrification schemes reduce costs and improve interoperability – for example the Uckfield line should be considered, to avoid requiring extra diesel stock for train lengthening and allow cascade of diesel stock to Marshlink (section 9.4.3 page 137).

9.4.3 Investing to support & stimulate sustainable economic growth. Continued growth in national passenger demand during the recession shows that increasing fuel prices are driving modal shift. This trend will continue and investment will be required to provide the necessary capacity.

9.4.3 Investing to support & stimulate sustainable economic growth – Northern Hub. Services from Chester and North Wales and from Mid Wales require access to Manchester Airport and interchange with services to the east and North East, so should not be diverted to Manchester Victoria.

9.4.3 Investing to support & stimulate sustainable economic growth - Cross country train service connectivity. There should be adequate interchange between cross country services e.g. from North and Mid Wales to the High Speed Line at Birmingham.

9.4.3 Investing to support & stimulate sustainable economic growth – Western access to Heathrow Airport. This is strongly supported.

9.4.4 Investing to meet the needs of freight users – Gauge clearance on the Great Western Main Line. This must extend to Cardiff, even if not via the Severn Tunnel.

9.5.3 Passenger capacity. Assessment of the capacity of ‘high density’ rolling stock on Thameslink and Crossrail for longer distance trips should exclude the standing capacity, which is provided for central London journeys.

Response to the Initial Industry Plan - Scotland

Network Rail Scotland produced an Initial Industry Plan for Scotland (IIPS) and invited comments. The plan constituted a large and interesting document requiring some consideration before response.

This response was prepared by Railfuture Scotland (RFS) in respect of the separate IIP for Scotland. RFS generally supports the IIPS on the basis that it is re-investment of Network Rail revenues into the network to achieve cost reductions, better reliability and safety etc. and is not meant to be a wish list for expansion which would require external funding.

Nevertheless, RFS does campaign for expanded services to comply with the third of the National Transport Strategy (NTS) headings: "Improve quality, accessibility, affordability and alternatives to the car". This expansion may require external funding but it is to be expected that the IIPS would not prejudice any of these future projects.

RFS supports the Foreword and Executive Summary with only minor queries. These would seem to be Network Rail showing compliance with various external recommendations but, at the same time, making it clear what Network Rail has already achieved under difficult circumstances and that Network Rail is the only organisation qualified and experienced to maintain and develop the rail network.

PART 1 INTRODUCTION

RFS supports that Network Rail Scotland is putting significant management resources into addressing the many government reports and recommendations but is also articulating its own side of the story.

PART 2 CONTEXT

The context is that the railway is a success with increasing freight and passenger custom even in a recession.

Context includes the NTS (National Transport Policy) – the first three headings are:

- Improve journey times and reduce congestion
- Reduce emissions
- Improve quality, accessibility, affordability and alternatives to the car

RFS understands that improved journey times do not take priority over providing alternatives to the car.

Climate Change Scotland Act 2009 (page 15) requires reduction in emissions of 80% by 2050 and that the rail network will be essential if this to be achieved.

2.1.3 High Speed Rail (page 16). Little is said of High Speed Rail as it is clearly not within the scope of the IIPS and key external decisions have yet to be made.

While the Scottish Government maintains annual fare increase limits lower than in England, RFS believes fare rises should not be higher than inflation and ultimately lower than the incremental cost of car use. Increased patronage should be the route to lower support payments.

2.2 User Satisfaction (page 17). This discusses high rates of passenger satisfaction with statistics, and also sources of dissatisfaction. RFS notes that ticket barriers are not mentioned but these are a source of dissatisfaction, restricting passenger flows, restricting access to station retailing, effectively extending journey times and a source of inconvenience to fare paying customers. Part of the problem is the way it is enforced on the basis that everyone is a fare evader. Tickets have been for many years a form of receipt. Receipts now issued do not show equivalent journey details. Staff are not always available in case of difficulty. Those barriers which are deliberately unstaffed must be a safety risk (e.g. Queen Street Low Level). It is a far cry from Chris Green's welcoming railway. While ticket vending machines are useful the enforced use of these machines would extend journey times. RFS feels this issue is not mentioned in case it offends other industry partners.

The concept of freight user satisfaction is good. It is appreciated that a IIPS believes rail freight must concentrate on efficiency but RFS believes the main issue must be relative subsidies. Without these effective subsidies to road haulage the demand on the railway system would be much, much higher.

2.3 Sustainable Development (page 20). RFS considers this an unavoidably loose review, as it must be, there are 10 headings, of which an important one for RFS is

“Putting rail in reach of people”

2.4 Long Term Planning (page 21). A Planning Oversight Group (POG) is being set up with discussion on trying to extrapolate growth rates (passenger and freight). The conclusions are uncertain but RFS believes there is massive suppressed demand, perhaps in the sectors not yet considered a priority, such as more local rail travel. The IIPS should aim to cater for higher of the growth estimates and not take any actions which would unnecessarily restrict future increases in capacity.

RFS also believes that the POG should consider the ability of the rail network to manage in national emergencies.

2.5 Railway Today (page 23). 25% of train kms are cross border services. There is no conclusion on passenger kms, tonne kms revenue or costs percentage which are cross-border. RFS believes this puts some doubt on the claim that Scotland has a self-contained railway. RFS is also concerned that the revenues of cross border services may not be not fully accounted for in the Scottish Network accounts.

ScotRail shows a 65% increase in passenger travel since 1996 and other statistics are provided. RFS congratulates all the industry partners involved in this increase in patronage and contrasts it with the “managed decline” of a few decades ago.

2.5.2 Present Costs (page 26). These costs are listed. Of interest is the high amount necessarily spent on renewals. A large proportion of all these costs appear unavoidable.

IIPS mentions that the cost inefficiency of Network Rail has been generally overstated. RFS supports the Network Rail view.

2.5.3 Train utilisation (page 29). This discusses how train utilisation is measured/presented and also how it is partly caused by funders specified requirements. Mentions more use of old trains for “peak busting”. It discusses factors in train utilisation (how full or empty are the trains) and also gives calculations/graph of net revenue against train frequency.

RFS is concerned that the fixed (or inflexible) formation of modern trains is at odds with the train utilisation. The parameter is Passenger kms against Train kms but it would be more accurate as Passenger kms against Train **vehicle** kms. More flexible train formations would allow a much better match between capacity and demand and thus reduce costs. All the industry partners studiously ignore the fact that trains cannot be altered to match demand.

RFS also has a concern about the cost of high frequency services. Everybody likes to have a very frequent train service but it is costly in terms of train operating costs and line capacity. Frequency should match demand as much as is practicable down to a minimum useable service level of, say, five well-timed trains per day. Trains are more cost effective carrying more passengers on fewer trains.

2.5.4 Stations (page 32). Here comes the infamous list of least used stations, some only served by one train a day. Network Rail does not make much of it, they are effectively specified by the funder, mainly Scottish Government/taxpayer. RFS believes each station should be considered on its merits. There is normally a reason for low usage and the issue should not be generalised. Also, RFS is not convinced that passenger numbers are known accurately for these low usage stations.

2.5.5 Safety. Quick summary of train accidents, no passengers killed in train accidents. 8 passenger fatalities at stations, 31 public fatalities, mainly trespassers, includes 4 at level crossings, does not seem to mention suicides. 1 worker died in a non-train accident. Overall RFS congratulates the reduction in accidents, especially fatalities and wonders if the cost of safety on the railway is fully appreciated.

Performance (page 35) (reliability, track availability). This discusses improvements being made including for bad weather. However, RFS is concerned that it states clearly that in the worst winter conditions the lines carrying most traffic will be prioritized, i.e. “lesser” lines will be “locked out” completely. They will not share the pain to keep up a minimum service so that, for example, Hamilton/Larkhall could be shut down completely while the WCML keeps running. Also there is no mention of keeping up driver route knowledge for diversions.

Capacity. The IIPS seems to believe (over) crowding limits (10 minute crowding limit) is too severe and gives a worse performance overall than if more people were having to stand for longer periods at peak times. RFS considers there are few 10 minute journeys on the network and that extending the standing time to 15 minutes would just lead to calls for further extensions of standing time. More important is that passengers often (or regularly) have to stand for long journeys. Standing all the way from Glasgow to Edinburgh is not uncommon on Saturdays. Short formations and inadequate formations (e.g. at weekends when there is clearly surplus rolling stock) is unacceptable and appears to be a deliberate decision by the TOC Scotland. Other operators, e.g. Trans-Pennine, are limited by UK Government refusing to provide rolling stock. Note that the serious effects of short formation are made worse by the inflexible design of train sets.

Carbon (page 40). Rail is doing well, train is better than cars or buses. Info given (from Defra/DECC guidelines)

From these (independent?) statistics Network Rail trains are more carbon efficient than light rail or buses and incredibly more carbon efficient than internal airlines. Even more important is the carbon efficiency advantage of railfreight over road haulage. So much so that Government subsidies for road haulage should be reduced and that Network Rail should plan ahead for greater increases in rail freight capacity. To meet carbon reduction targets of various governments it is essential to increase the proportion of freight travelling by rail and water.

PART 3 RAIL VALUE FOR MONEY

This appears to be a politely critical 20 page review of the McNulty Report with Network Rail defending its record, pointing out the simplistic logic as subtly as possible but also addressing the recommendations of the report

RFS tends to support Network Rail. The McNulty Report, which may have been worth doing, is full of contrary conclusions and recommendations and is unconvincing on the comparison with other European railway networks.

RFS particularly notes that these other networks were not privatized into multiple companies, and did not suffer bankruptcy or widespread speed limits. Network Rail was created to manage the outcome of the Hatfield disaster and it was well understood it would cost. As it is Network Rail costs have been reducing year by year and will reach parity with these other networks. At the same time rail demand has been increasing in the UK rather more than most other European countries.

One conclusion to which RFS particularly objects is the recommendation for selling off more railway land. The report does not seem aware that one of the main costs of re-openings or increasing capacity is that former railway land has been sold off but is now vitally needed.

The three more startling reactions by Network Rail are:

- More outsourcing of maintenance (that's private companies getting track maintenance back – McNulty ordered it)
- Revise standards, change from prescriptive standards, individuals taking greater responsibility for their own safety
- Give Train Operating Companies more say in services and timetables

Network Rail suggests taking up some of the weary, scraping-the-barrel conclusions of McNulty including discussion on what train does best, with the rather simplistic:

- Large volumes of people into main cities particularly from outer areas
- Large volumes of people over medium and long distances

- Sufficient volume of freight over medium and long distances

Even though more local regional services are now showing the highest growth and even Network Rail suggest that some freight flows can be competitive over much shorter distances.

On train utilisation little is said by either McNulty or Network Rail. The quite obvious issue of fixed formation trains not being capable of matching differing demands is totally ignored.

There are the unproductive discussions about giving up certain track paths and that some traffic could be transferred to other modes.

Quite rightly, Network Rail want Government to be clear about what it wants to pay for and then the railway industry can get on with it. However, RFS believes Network Rail is the most “experienced contractor” and should not hand over too much authority. Transport Scotland had bright ideas about how to realise Borders Rail without the help of Network Rail!

On wages and conditions Network Rail make it clear – that this is a subject for employers, employees and their trade unions. Full stop.

PART 4 SCOTRAIL

RFS supports the majority of the proposals/achievements including electrifications.

4.4 Capacity

IIPS is concerned at limited capacity at existing main “terminal” stations. RFS believes the surviving main “terminal” stations are quite large and it is difficult to imagine that they cannot service additional train movements by further investment. Glasgow QS and Waverley had further railway land available which has now been redeveloped for what is effectively non-railway use. What might be termed throat capacity has been reduced at Glasgow Central and at the east end of Waverley. The low levels have some spare capacity given investment to redirect trains. Only Glasgow QS remains restricted by platform length and throat capacity that would be very expensive to expand. The paragraph does not define if it is passenger circulation or train operation which is constrained. Clearly, retail, which is not a bad thing in itself, has restricted some passenger circulation area. The other issue is frequency of relatively short trains using these terminals.

Everybody, including apparently TOC’s, likes very frequent trains. Railways work better and more cost efficiently with longer trains at lower frequencies. Even amongst rail campaigners there is a concern that frequencies are above optimum particularly between Glasgow and Edinburgh. There is a lack of trust on this as to who is better to specify frequencies between Transport Scotland and TOC’s. RFS believes that minimum frequencies should be specified but on the basis that individual communities are not deprived of reasonable frequencies. TOC’s could well prefer to keep up high frequencies to the disadvantage of the overall network.

4.5.1 “Making best use”. This raises the issue of extending the standing time beyond 10 minutes. It is difficult to imagine this would not just set a new lower standard. Some overcrowded journeys are just that bit longer from major terminals. Should passengers have to stand routinely from, say, Paisley, along with the discomfort of those who have seats from further out? The example given in the IIPS, from Aberdeen, is a very poor one. RFS believes the problem is mainly one of a TOC running short formation trains almost as a calculated commercial decision, including on Saturdays. Extending standing times would encourage more of this. There are few services where specially designed trains for more standing passengers could be really justified. They would soon be pressed into service for longer distances. The above view is taking into account that Scotland, unlike England, has few routes absolutely constrained by train length and that the Scottish Administration has been relatively generous in provide more rolling stock.

4.5.5 Journey Times. Given increasing passenger demand it appears that reducing journey times is not the absolute priority except possibly on a very few routes which are limited for historical reasons. The other passenger preferences are more important such as reliability, fares, integration and station/train access are more important. The Strathclyde system is successful not because of its journey times but because it is so comprehensive. There is an impression that on some routes the stopping trains are better patronised than the limited stop trains. Anecdotally Motherwell to Coatbridge is far, far

quicker than road travel but other issues seem to depress use. The problem of ticket barriers and ticket vending machines must be taken into account as they lengthen effective journey times.

4.5.5 Carstairs. There are proposals to renew junctions at Carstairs, mainly for reducing maintenance costs but also to reduce crossing times for both Scottish and Anglo-Scottish services. RFS is pleased to note the assurance in the "Definition of CP5" document that Carstairs Station will remain in place and that connection to Ravenstruther Coal Terminal will be improved. Both are important for the local economy. Network Rail will be aware of the operational flexibility required at Carstairs, especially in emergencies. It is difficult to see the need for the proposed additional Glasgow to Edinburgh via Carstairs trains if they are not going to provide a service to South Lanarkshire.

RFS particularly welcomes substantial improvements to Inverness to Perth and Inverness to Aberdeen routes.

RFS is disappointed at the cancellation of the Airport rail projects and, perhaps, Network Rail should remind Transport Scotland of the continued success and expansion of Manchester Airport Station.

EGIP may not be directly a IIPS matter but although the project is welcomed there is disappointment at the omission of the Garngad Chord which would have improved journey times and capacity.

PART 5 ANGLO-SCOTTISH

Generally WCML trains serve Scotland badly with people voting for other means of transport and trains being relatively empty. They may be full at Euston but they are relatively empty north of Carlisle. The trains themselves have poor passenger comfort.

The "Manchester" trains operate relatively frequently with short formations over long distances. When extra stock is available, and in this case the TOC is not held accountable for lack of stock, trains are run at 6 cars. After electrification the trains will be 4 car units and there is a question as to whether these 4 car trains will be doubled up at busy times.

RFS advocates a recast of timetables with local trains re-introduced to give better access for communities south of Motherwell and Drem with connections into main line trains at Carlisle and Berwick.

Availability: Maintenance time is at a premium on these lines (WCML, ECML) and weekend possessions appear unavoidable, in particular preventing a Saturday Night Sleeper service. While the commitment not "to bus" is welcomed it is difficult to see how diversions can be time competitive and this will be even more difficult when less diesel trains are available.

PART 6 RAILFREIGHT

IIPS is extremely positive about railfreight and has RFS support. Taking much more heavy freight off the road is essential to meet environmental objectives. There is extensive evidence that road haulage is heavily subsidised in terms of road infrastructure and transfer to rail would reduce costs to the Treasury and local authorities. It is unfortunate that both governments have recently decided to make major concessions to road haulage in terms of road fuel duty, larger lorries, major road building and withdrawal of freight facilities grants.

There is little to add to the many positive achievements/proposals in the IIPS and following CP's.

All proposals should be strongly progressed. The 24/7 railway is essential but very difficult to provide in its entirety. The point is taken that electric locomotives are only a partial answer to line capacity and OHL is not particularly welcome in freight and especially mineral terminals. Mention is not made of the train length capabilities of the receiving coal fired power stations.

While railfreight demand is growing but unpredictable, as discussed in the IIPS, there is a potential which could far exceed existing capacity.

RFS would answer the query about a freight train versus a (lightly loaded) passenger train as priority for track capacity. RFS believes Railfreight should be given priority over most passenger trains as freight is much more commercial with most passenger trains in Scotland requiring subsidy. The proviso is that no

community loses an essential passenger train service. In general, it will be the over-frequent short train syndrome that is the capacity issue. It should be clear that it is the stopping trains which most closely approach the average line speed of railfreight and therefore less in conflict with freight capacity.

The impression is that more and longer freight overtaking loops are required than that proposed.

While “North of Preston WCML” freight capacity is recognised with some enhancement proposals RFS has a particular concern about future freight capacity from the north end of Carlisle Station to Kingmoor Yard now that the old reserve of re-instating the Carlisle Freight Committee/Freight Avoiding Line is no longer available. Sufficient other land should now be protected to allow additional capacity.

PART 7 NETWORK ANALYSIS

RFS supports IIPS proposals but with a few comments on individual points.

7.1.2 Ticket Sales. IIPS should beware of statistics showing a move away from buying tickets at station staffed outlets. Many on-line sales are on the basis that a cheaper advance fare is possible. Fewer ticket staff can result in major hold-ups dealing with inquiries while immediate travellers for whom a ticket is compulsory cannot purchase one. Ticket staff do make other contributions to the service besides selling tickets. Ticket vending machines (TVM) are a benefit but if made compulsory they would extend effective journey times, the opposite of transport policy. It does have to be settled that if a TVM is present then a ticket has to be bought before boarding. This is a major issue. Some station notices warn that this is the case, thus alienating passengers who do not know that such notices should be ignored. Network Rail must take a lead in this as the TOC’s tend to have short term views and Transport Scotland a poor knowledge of train users. In the Scottish situation the vast majority of stations will never be staffed and the standard method of purchase must be on-train.

7.2.3 “Interoperability” and ERTMS. In practice “Interoperability” is EU bureaucratic empire building and Network Rail is correct in slowing adoption down to the minimum possible except where there may be real cost savings or for long-life new infrastructure.

7.2.5 Carbon. While supporting the proposals the priority issue is reducing road haulage.

7.3 Rolling Stock. RFS supports “whole life” costings but recommends pursuing more flexible train designs which allow a closer match for train utilisation. It cannot be cost efficient that practically each new rolling stock purchase seems to be of a new design. It is unfortunate that a recent major acquisition of new rolling stock in Scotland is of a different length and probably incompatible with existing trains and even some routes. Similarly, the UK Government sponsored I.E.P. design seems to be an even more over-complex inflexible design than anything that has preceded it. Train specifiers seem to have little interest in passenger preferences.

There is a fashion for proposing a limited number of train types according to market or route segment. While sensible in principle there really is not much variety in uses for internal Scottish services. There are very few very short distance suburban services in Scotland and most diagrams involve journeys for some of the passengers of approaching or over one hour. There are very few, if any, “sleepy” branch lines. Most “rural” journeys in Scotland are necessarily long distances. Therefore practically all passengers deserve a comfortable seat, luggage space and a view out of the window. It is not just that passengers deserve it, the trains are often an important part of the Scottish economy, for example, the Highland Lines. The number of train requirements which could justify poor accommodation and no toilet provision are so small that a few special trains would restrict flexibility and would probably end up being rostered for completely unsuitable journeys. The “Light Rail” syndrome is often proposed as a solution to train service issues. The IIPS would seem to confirm that there is no sensible role for light rail vehicles on the Scottish railway network.

7.4 Asset Management. While RFS supports the IIPS on asset management it is clear there has been a disgraceful level of asset management in the past and that while Network Rail seems to have improved matters it must be an important cost consideration for the future. Issues include:

- Completely inappropriate types of line side fencing in the wrong locations and very poor communication with local communities.
- Loss of maintenance accesses even where these have been written in to legal titles.

- Lack of interest in planning applications immediately adjacent to the railway, often on railway land, and which then cause major problems for the operation or costs of the railway.
- Various neglect of vegetation or land use on railway land or land immediately adjacent to the railway.

The impression is that Network Rail is taking a more pro-active view than its predecessors but there must be no complacency.

PART 8 ASSESSMENT OF INVESTMENT CHOICES

While RFS campaigns for expansion of the railway it supports the investment choices within the scope of the IIPS. The financial difficulties in which the UK is presently placed should not interfere with investment choices as there appears to be funding available for very much more expensive major road building projects. RFS also had thought that much of the Eddington Transport Report had been, if not entirely discredited, at least consigned to history.

Although not being entirely clear if certain proposals are entirely within the scope of IIPS, RFS strongly supports the further electrification proposals and the journey time improvements and possible new stations on the Inverness to Aberdeen Line and on the Highland Mainline.

The further (third) mention of line speed improvements at Carstairs is accepted on the basis that it will reduce operating costs and that the station itself is not prejudiced.

PART 9 NEXT STEPS

RFS supports the proposals

RFS SUMMARY

Further expansion of the rail network is necessary to meet the Government Transport Policies and particularly includes some new station and line reopenings along with increased capacity for railfreight. IIPS should not preclude this expansion.

RFS supports the IIPS proposals to reduce operating costs while improving safety, passenger (and freight customer) satisfaction and environmental performance.

RFS is generally critical of the "McNulty" Report

RFS is concerned at the lack of interest in designing trains which can be more closely matched to demand.

RFS is concerned at the effective increase in journey times if ticket barriers and buying tickets before boarding are rigidly imposed.

Response to Definition of proposed CP5 enhancements

Railfuture welcome all the proposals planned for CP5. In particular we strongly advocate investment to bring the Midland Main Line up to a standard comparable with others running from London to major UK conurbations. This is vital for the East Midlands's economic future and should not be sidelined by the promise of a high speed route which may or may not open in 25 years time, and is unlikely to serve all East Midlands conurbations (eg Leicester).

1) Midland Main Line electrification (page 83):

To electrify the core scheme on the route including Bedford to Sheffield via Derby, Trent Junction to Nottingham, and Kettering to Corby.

2) Train lengthening on Midland Main Line's long distance services (page 85):

To improve infrastructure capability to enable the introduction of 11 x 23 metre vehicles on the MML on selected services in order to accommodate forecast levels of passenger growth by 2019, and to reduce crowding on services between London St Pancras and Corby, Nottingham, Derby and Sheffield.

3) Derby station area remodelling (page 87):

To provide a remodeled and segregated layout at Derby to improve the currently poor interaction at the junction between services to London and to the South West of England, in order reduce journey times and to improve performance.

4) Midland Main Line journey time improvement (page 38):

To provide a fund to deliver well targeted improvements in rail journey times and connectivity in England and Wales which should include the Market Harborough station realignment scheme and the Corby-Bedford slow line as top priorities.

5) Leicester area enhancements including Syston to Wigston remodelling (page 44/5):

To carry out works to meet the long term growth requirements and take advantage of the '*once-in-a-lifetime*' opportunity presented by the recontrol & relocking of the signaling in the Leicester area. This project will provide the network capability to accommodate anticipated growth in intermodal traffic from the port facilities at Felixstowe to terminals in the Midlands, North West, North East and Scotland. There would also be spin-off benefits for MML passenger services, including better punctuality and reliability and opportunities to increase service frequencies.

6) Sheffield station area (page 117):

In conjunction with planned signalling renewals, to remodel Sheffield station layout and its approaches to meet anticipated passenger and freight growth, ease crowding on local, regional and long distance services by allowing longer trains to operate, and to improve Nottingham to Leeds journey times. Additionally to carry out signalling renewals along the Hope Valley route and at Dore and Totley, including junction doubling at Dore Station Junction and Dore South Curve extension, on this busy but partly single track route between England's 3rd and 5th largest cities.

Our rationale for the above investment is supported by evidence from two fairly recent rail based reports:

The Government's White Paper "*Delivering a Sustainable Railway*", published in 2007, considered the potential challenges for the railway over a 30-year horizon. It identified several long-term agendas for Government and the rail industry working in partnership as follows:

- **increasing the capacity of the railway whilst further improving safety and performance**
- **delivering a quality service for passengers**
- **improving cost effectiveness**
- **fulfilling rail's environmental potential**

The "*Rail transport submission to the Committee on Climate Change*" published in 2008 by a working group including Network Rail, DfT, ATOC and the ROSCO's, stated:

- **electrification is an important consideration given the benefits of electric trains over diesels in terms of performance, reliability, capacity and carbon**.
- *The funding and capacity of the industry to manage too many large projects means that the schemes which might be completed and will be considered as part of our further analysis are: Edinburgh - Glasgow, the Midland Main Line, the Great Western to Bristol and Swansea (following on from Crossrail), and the North East/South West fill-in.*

Of the electrification schemes in England & Wales noted above, the Great Western as far as Cardiff has now been selected well before the completion of Crossrail, while the **Midland Main Line** has fallen behind new projects in the north west of England that were not even listed. However, the same report shows in 2006/07 that "*Passenger density on NON-electrified lines*" between Bedford and Trent Junction near Nottingham, and from Sheffield to Dore, **exceeded** that on the Great Western lines west of Swindon, and also anywhere else in the England (Annex B).

Finally we would again quote the White Paper "*Delivering a Sustainable Railway*" which states:

- *"Environmental performance will be a determinant of future public perception for all businesses and for the transport sector in particular. It will help determine commercial success or failure. The Government will play its part, but it is vital that the rail industry is seen to take a lead. There are strong commercial reasons for it to do so, reinforced by its corporate social responsibility as suppliers to the public. The rail industry needs to have a collective environmental vision and support this with effective action".*

We therefore urge the railway industry and Government to take action now to ensure the economic viability of the East Midlands region.

Railfuture are also concerned that there are no planned enhancements in CP5 in the West of England – the following should be considered:

- Devon County Council plans for an additional hourly Exeter to Axminster service
- Extension of the proposed Axminster service through to Yeovil Pen Mill to provide connections with the Bristol to Weymouth line
- Hourly Exeter to Taunton services with reopened stations at Cullompton, Willand (old Tiverton Junction) and Wellington
- All day half hourly local service between Exeter and Paignton and a new station at Marsh Barton (Exeter).
- On the Paignton line a new station at Kingskerswell should have equal priority to the proposal for a new station at Edginswell (Torbay Hospital).
- Plympton remains one of the largest urban areas with no direct rail access, and needs a new station.
- The long established proposal to restore Tavistock to the rail network from the Plymouth direction. Work towards this scheme should be compatible with the objective of providing alternative route from Plymouth to Exeter.

We would also like to point out that there are many CP4 works not yet built which should not be forgotten, for example the following in the West Midlands area alone:

- Bromsgrove station replacement and electrification for extension of cross-city services.
- Redditch line enhancements for additional services.
- Stourbridge-Walsall restoration for freight, followed by passenger services.
- Coventry-Nuneaton line (the Godiva Line) enhancements.
- Coventry-Leamington redoubling and Kenilworth station.
- Coventry-Birmingham passing loops.
- Walsall-Rugeley electrification and linespeed increase.
- Aldridge station and turnback siding.
- Birmingham-Tamworth new stations.
- New St-Moor St dedicated pedestrian route.
- Midland Metro extension to New St and restoration of Snow Hill plat 4.
- Stratford-Long Marston reopening.
- New stations on Camp Hill line and Water Orton line, Bordesley chords and new platform 6 at Moor St.
- Electrification of Nuneaton-Proof House Junction, Wolverhampton-Shrewsbury, Coventry-Nuneaton.
- Other route and capacity upgrades, especially linespeed, headways, junction improvements and platform extensions.
- Park n ride and station access improvements.