

Passenger Satisfaction

- Do you support the key priorities that have been identified through the Transport Focus research?

Response: Yes we support the Transport Focus Research, but would like to add that in respect of passengers being kept informed about delays, this needs to be qualified with timely and informative information wherever possible. In addition:

- frequency is also an important element of the service west of Salisbury;
- good value-for-money walk-on fares are as important as pre-booked fare deals;
- direct trains from Exeter to London via Salisbury are a crucial element of the service that needs to be retained and enhanced.

- Are there other priorities you believe should be included to inform the new franchise specification?

Response: The South West Peninsula is at the end of a long route between Exeter and Waterloo that serves a number of markets - including the travel to work areas into Exeter and Salisbury - providing a well-used (and often cheaper) alternative to London, as well as connectivity to destinations on other lines that connect with this line.

The Exeter – Waterloo line has also in effect provided an escape valve for crowding on the Paddington services and during times of disruption; it’s value overall should not be under-estimated.

It needs to be understood that the SW Trains (SWT) line between Exeter and London Waterloo provides a strategic link into and towards London; for many passengers it is preferable, and quicker, than the Paddington route. This includes those from Exeter travelling to South London, and all areas East of Exeter e.g. East Devon, South Somerset and North and West Dorset: the line provides the sole connectivity to London for all these areas.

At times there appears to be very little understanding of the impact that disruption creates when services are disrupted and delayed, e.g. when trains are turned short of Exeter with no alternatives provided. Due to the frequency of services (hourly) this creates significant gaps in service provision and drives poor passenger satisfaction. Very quickly any real delay becomes an additional hour’s delay, due to the limited paths with the single-track sections.

At its western end the franchise overlaps with the Great Western Franchise. Improved integration with the Heart of Wessex line has the potential to improve local and regional connectivity and significantly increase journey opportunities. Improvements at Yeovil Junction and Yeovil Penn Mill are required to fully realise this.

Franchise Objectives

- Do you feel that these are appropriate objectives for the South Western franchise?

Response: Yes we support the objectives. The current franchisee has improved the service including by growing the service, timetable and service pattern during the

current franchise period to meet growing passenger demands. The service now needs to be further enhanced to meet current and future demands.

●Are there any further objectives you believe should be included?

Response: We believe that there should be 2 additional objectives:

1. The franchisee to actively seek opportunities to expand services into the South West Peninsula west of Exeter to enhance connectivity and develop further growth that matches local aspirations and travel patterns.
2. The franchisee to identify, develop and lead delivery of infrastructure schemes that can provide quantifiable improvements to the services, either in conjunction with NR or via third parties.

Capacity

●Considering the planned schemes to deliver additional capacity, what are your views on additional opportunities to deliver more capacity elsewhere within the franchise area?

Response: The line capacity between Exeter and Salisbury is insufficient to accommodate additional services and also provide a resilient diversionary route for the Paddington services, or for Cross Country services, between Exeter to Yeovil, due to single-track sections. This requirement has been highlighted in various previous reports, including the ‘South West Spine Report 2013’¹

It is recognised that additional passing loops are required between Exeter and Yeovil to provide diversionary capacity and resilience to the wider rail network. This work should be progressed as a priority. Reinstatement of the South Chord between Yeovil Penn Mill and Yeovil Junction will enable much greater operational flexibility and result in improved connectivity between the Exeter – Waterloo line and the Heart of Wessex Line. It will also support faster journey times between Weymouth and London and provide a direct link between Weymouth and Exeter – growing the market for rail in this area.

PRTF supports the aspiration of the West of England Line Strategy Group to see

- two trains per hour east of Exeter and west of Salisbury
- reduced journey times between London Waterloo and Exeter

●Are there particular services or routes where you believe there is a need to introduce

¹ 4.2.2. Diversionary Route

The line between Exeter and London Waterloo has always been the diversionary route for hourly Great Western services to Paddington via Yeovil Junction and Castle Cary in the event of disruption on the main line. However the introduction in 2009 of the hourly South West Trains (SWT) service has prevented this, as the line is now working almost to capacity with insufficient paths available for an hourly Paddington train in each direction between Exeter and Yeovil Junction.

This facility needs to be restored to provide this much needed protection from disruption events affecting the peninsula. To this end, additional passing loops on the Exeter/ Salisbury line need to be reinstated to facilitate the current SWT hourly timetable pattern while allowing for an hourly Great Western service in each direction between Exeter and Yeovil Junction when required.

additional capacity to address overcrowding?

Response: There are currently levels of overcrowding into and out of Exeter during morning and evening peaks, with seemingly no potential for additional capacity due to the extremity of the service from the core SWT operation in the current franchise.

Reducing some gaps in the otherwise standard hourly timetable is likely to both improve the service and ease overcrowding on certain trains.

●It may be possible to increase overall passenger carrying capacity by introducing different rolling stock that has more standing space and/or modifying the internal configuration of trains, including rebalancing first and standard class seating. Do you have views on these potential rolling stock changes?

Response: The current class 159 units have a 1st class section that is totally underutilised on the Exeter to Salisbury section, removing the opportunity to use c. 1/6 of the seating capacity on the services for the majority of customers, this is coupled with the difficulties in accessing the area due to the set of doors behind the driving cab being locked out of use. A more innovative solution looking at different First, and Standard, class needs - and utilisation of the current First Class space - in the peak and off-peak periods needs to be considered.

The length of journey for many people does not justify a greater reliance on standing passenger capacity compared to current configurations. An over-reliance on the ability to carry standing passengers would result in unacceptably long standing journeys compared to those experienced elsewhere on the network. Rather we would look to the needed increased capacity being met in full by increased seating capacity.

Given the long journey lengths for many passengers, provision of electric power points and free (fast) wi-fi is seen as essential to keep pace with these developments on other lines.

Future impacts on demand

●What factors may impact on demand for travel on the new South Western franchise, drawing on local impacts in particular? Please provide any evidence you may have.

Response: Patronage growth in the South West Peninsula since the millennium has been consistently much higher than nationally – around twice the national rate.

The major housing and employment growth in the East of Exeter area (Cranbrook, Pinhoe, Sky Park, Science Park etc.) is having - and will continue to have - a significant impact in terms of increased numbers of passengers wishing to travel by train. Already since opening Cranbrook Station in December 2015, significant numbers are travelling with peak hour standing being the norm. Devon CC and SW Trains are already very concerned that capacity on this corridor, even with two trains an hour in future, may not be sufficient into the near future. The current growth plans for the route require detailed consideration across all parties on how demand will continue to be met satisfactorily.

Similarly current development plans in North and West Dorset and South Somerset would be greatly reliant on the line. For example, the adopted South Somerset Local plan projects a district wide growth by 2028 of 15,950 dwellings and an employment land requirement of c150 hectares. The number of new jobs is estimated at 11,250. A sizeable proportion for this growth, 7,441 dwellings and 50 hectares of employment land is identified for Yeovil. For Crewkerne, as the third largest settlement, the forecast is for 961 dwellings and 10 hectares for employment. Notwithstanding that Crewkerne Station also serves a significant hinterland including the district’s second largest settlement Chard with 1,852 dwellings and 17 hectares for employment. Further demand increases, over and above the current trend, therefore need to be met by capacity planning for the line.

Train Service Specification

- Where, if anywhere, would you like to see any changes to first and last trains on the South Western network and why? Do you have any evidence to support this?

Response: We consider that while the times of the first trains are satisfactory in both directions, the last direct trains between Waterloo and Exeter in both directions need to be later, taking account of the increased numbers travelling and the growth in the 24-hour culture around work and recreation that has grown since the franchise was last let.

We would like to see better late evening services from Salisbury Westwards and from Exeter Eastwards that appear to be possible with some re-forming of the timetable.

- Where, if anywhere, would you like to see any changes to weekend trains on the South Western network and why? Do you have any evidence to support this?

Response: We believe the railway needs to be operated with a 7 day timetable, with the same frequencies at weekends as in the week. This is a key element of the Devon Metro concept, that Devon CC has promoted for some years, and a key strategy in encouraging more sustainable travel and providing greater connectivity and training/employment options generally. Current SW Trains operate a similar Sunday service during the day; earlier/ later services again need to be considered. With GWR services having enhanced timetables from December 2018, working actively towards achieving a 7 day timetable, we feel that the same process needs to apply to the SWT timetables.

- Would you support a specification which is flexible enough to allow the operator to review how station calls are allocated to train paths in order to improve overall line capacity?

What impact might this have on passengers?

Response: We would welcome working with the operator of the new franchise to identify how the station call patterns can best deliver the needs of the local communities and grow usage in line with sustainable travel plans and growth targets. This has been a helpful feature of the current franchise.

We recognise that conflicts may occur between long-distance travel requirements and local travel needs. We welcome the opportunity to work with the industry to deliver

local connectivity improvements and to tailor rail services to drive growth and productivity within the region.

Where the services are used for local travel it is key that regular patterns are maintained so that commuters can reasonably maintain and plan their travel patterns. There would need to be extremely good reasons to reduce connectivity for any community. The increase in both local and longer distance traffic is such that consideration of increased frequencies is long overdue.

● Respondents are invited to propose any changes to the current service pattern which they feel should be considered and to explain their rationale, for example by identifying specific local factors which might influence the future level of passenger demand which should be reflected in a revised specification.

Response: Devon CC is working with SW Trains and Network Rail on establishing a new station at Cranbrook East to accommodate the planned-for growth as Cranbrook expands to the east.

The Peninsula Rail Task Force is working with Wiltshire Council, Dorset County Council, Dorset LEP and Swindon & Wiltshire LEP on a joint plan to improve services on the line as part of the new SWT franchise. This includes:

(a) Sufficient train paths for the diversion route for Paddington and Cross Country trains between Exeter and Castle Cary via Yeovil Junction;

(b) SW Trains have suggested (and PRTF supports this) faster train times by splitting trains at Salisbury and non-stop running of one section between Salisbury and Yeovil Junction before going onwards to Exeter (and vice versa), with the other train section stopping at all intermediate stops between Salisbury and Yeovil Junction;

(c) Better connectivity along the South Coast, at Yeovil Junction station, including with the Heart of Wessex line (Bristol – Weymouth) and the possibility of Weymouth – London trains operating via Yeovil Junction as part of a new enhanced timetable.

(d) increased frequencies (see above). The rail industry has embraced the Devon Metro concept with a 30 minute frequency on lines into Exeter; to ensure that Devon Metro continues to be seen as a network-wide approach to the network centred around Exeter, the same principles need to be applied to the Exeter – Salisbury line.

All these enhancements will require infrastructure improvements to enable pathing etc. These are seen as essential to realising the full potential of the line in contributing to economic growth and performance, in the context of the growth plans for East of Exeter, South Somerset, North and West Dorset and Salisbury.

● Respondents who wish to promote service changes should clearly identify these in their response to this consultation, as well as any supporting business case or value for money(Vfm) analysis.

Response: The current demand for travel and loadings already justifies two trains an hour between Exeter and Honiton/ Axminster as part of the Exeter travel-to-work area.

Line speed improvements are seen as key to improving connectivity, and to enhance the SW Trains proposals (see above) for faster journey times by a change to stopping patterns West of Salisbury.

A more local SWT operation at the Devon end would enable SWT services to extend beyond Exeter:

(a) to Barnstaple: current work under way with SW Trains and GWR indicates that several through-trains between Barnstaple and Waterloo can operate without additional cost either to TOCs or to the public purse by, in effect, stitching together the two services for e.g. the 0700 train from Barnstaple (or, instead, an earlier first departure from Barnstaple than currently operates – needed to address overcrowding on the 0700) and the 1520 and 1720 from Waterloo. As we understand this will therefore improve connectivity with virtually no cost, there should be no reason not to vigorously support this proposal being implemented from the December 2018 timetable. For this reason we would expect DfT to require the franchise to fully co-operate on this.

(b) Beyond (west of) Exeter – to Paignton and Plymouth. Until 2009 Paignton enjoyed three trains a day direct to Waterloo, with the onwards connectivity along the South Coast this would provide. These services were only withdrawn due to the introduction of the hourly service between Waterloo and Exeter. Loadings were good at the time; more recent surveys show significant numbers of passengers currently travelling across Exeter towards Newton Abbot and beyond. We believe these services should be reinstated, without removing or reducing the speed of other direct services to Plymouth.

Performance and reliability

● Are there any specific stations or services where you believe reliability or punctuality should be improved?

Response: Currently services are regularly cancelled on route and fail to reach Exeter; no alternatives are provided - meaning long delays and very few alternatives for passengers. The operator needs to have robust arrangements in place to deal with disruption at the extremities of their network.

It would appear that extension of the passing loops at Tisbury and Templecombe into the stations would improve reliability and reduce the common incidence of trains being held up by delays to the train in the opposing direction.

● Where possible, please explain your reasoning when responding to this question.

Response: The service of one train per hour provides a key commuter and off peak service into Exeter throughout the day; the loss of this service results in a 2 hour wait. Reliability is the cornerstone of a good service, and providing the infrastructure which minimises unreliability should be seen as an essential element of the new franchise.

Managing disruption

- Respondents are asked to suggest what mitigating actions and steps the South Western operator should be expected to take to meet the needs of its passengers both during the planned disruption to the franchise as a result of enhancement works and when ‘force majeure’ events, such as extreme weather or unplanned events that impact the smooth operation of the network.

Response: Firstly good communications is key. It is recognised that the work needed to provide this promptly, as incidents occur, is a challenge when railway staff are trying to work around an immediate or sudden problem; nevertheless good information needs to be seen as an essential way to maintain passenger confidence when things go wrong.

Routine driver announcements of the cause of delays on-route, as provided on other services, should be considered.

We are open to considering longer line closures to enable enhancement works to be carried out, as an alternative to a larger amount of shorter Network Rail possessions, with potential benefits in relation to costs and resources – through discussion of options with the relevant local authorities, Network Rail and the train operator(s).

- Respondents are asked to consider whether they would support replacing first/last train services with alternative transport where it can be demonstrated that a longer period of engineering access for Network Rail would improve the infrastructure reliability and reduce disruption overall.

Response: Local Authorities will always balance the needs of the customer with the longer term benefits of infrastructure enhancement. Where regular maintenance work is being undertaken impacts should be minimised on customers through route closures and disruption. However where enhancements are being made that will lead to long-term customer benefits, we support working with the industry to minimise the period of works and maximise the efficiency of the work undertaken, to reduce costs.

Good and comprehensive prior and ongoing customer information across a wide range of media is seen as essential in these cases. This must include better information on, and arrangements for ensuring, onwards connections.

Partnership working and collaboration

- We are interested in your view on the best way to achieve efficient operation of this railway through partnership and collaboration. Please describe how such working arrangements might support this objective.

Response: We have benefited in recent years from increased engagement with the operator in identification and delivery of infrastructure changes and enhancements that provide growth and productivity opportunities in line with the Local Authority and LEP growth agenda. We also believe that the franchise should incentivise the operator to lead on, and provide funding for, enhancements; examples of this type of approach are the Chiltern ‘Evergreen’ project.

Further:

(a) the scope for improving line speed should form an essential part of the franchise, with the TOC and Network Rail required to actively work together with DfT to make this happen. It has been recognised, from PRTF work, that journey times into the SW Peninsula are longer than for any other main lines; the economic benefits of improving line speeds and journey times should be recognised within the franchise and these improvements seen as essential targets that need to be achieved. However we would also expect to see a combination of investment (infrastructure and trains) being proposed that drives a wider benefit, similar to the recent franchise awards in the North.

(b) Opportunities seem to exist for private financing of infrastructure improvements. These opportunities need to be fully examined and exploited.

The concept of creating a dedicated business unit “for services that extend into Devon” (para 5.8.) has several dimensions. It does not help focus on services more generally west of Salisbury unless it also includes Somerset in particular. An effective local operational and maintenance presence, as well as a management presence, may help the PRTF aspiration of developing services further west of Exeter. However PRTF is expecting shortly to engage with DfT on government proposals for what government has termed a “Devon & Cornwall franchise”, as there are a number of implications which, depending on detail, may or may not be seen to be advantageous to PRTF. Whilst we understand the origins of this suggestion, in order to have a true relevance this business unit would have to have the power and ownership to specify and change the service delivery options within the area in response to the stakeholders and industry needs, including over paths and pathing constraints into and out of Waterloo, as well as being able to define and deliver regional and local requirements. Given that the Devon section of the line East of Salisbury is smaller than that of Somerset or Dorset, we are unsure how a Devon & Cornwall franchise will be helpful in providing a more joined-up approach to developing the line between Exeter and Salisbury.

Community rail and other local partnerships

●What opportunities are there for Community Rail Partnerships and other local partnerships to expand their role and range of activities to support local communities, businesses and other organisations?

Response: Community Rail Partnerships are a key component of growth for local and community rail lines, providing a strong link with the local community. The Devon & Cornwall Community Rail Partnership has provided significant input into promoting lines and usage; they should continue to have a pivotal role in the future including on the Exeter – Waterloo line West of Salisbury.

The concept of “Community Rail” on a main line is always a challenge, but we believe there are opportunities for the operator to improve the benefits from this approach including the following:

I. A level of defined payment support within the franchise so that community rail teams can plan for the future without spending lots of their time in ensuring their survival rather than promoting the lines.

2. Define, and commit to, the objectives and the support that will be provided throughout the franchise, including marketing plans.
3. Commitment by the operator to close engagement with Community Rail groups along the line.

There is an overlap between the West of England line and the Heart of Wessex line. The PRTF support the aim of better integration between these lines to deliver service enhancements and improved connectivity across the region. Any new CRP should work closely with the Heart of Wessex CRP to maximise the benefits of investment and draw on its success.

Island Line

- What factors do you consider should be taken into account in assessment of options for the Island Line?

Response: N/A

- Do you have any innovative proposals for how the Island Line might operate on a more self-sustaining basis?

Response: N/A

Third party funded changes

- Are you aware of any proposals for third party funded changes?

Response: Devon CC has provided funding for the new Cranbrook Station, and will be open to considering a similar approach for any other planned new stations.

- Please provide details in line with the requirements set out above, or provide sufficient detail for further dialogue to take place to understand the proposals.

Response: Further discussion is required on funding the suggested new Cranbrook East station.

Stations

- What improvements would you like to see at the station(s) you use to enhance your journey experience?

Response: We would like to see the level of cleanliness and modernisation rise to ensure a good customer experience at stations, currently it feels like cleaning is something that is seen as a cost rather than a customer enhancement.

Access improvements are needed at some stations: lifts at Honiton are essential to provide access for all between the two platforms. Disabled access to the stations in South Somerset is poor. We feel that there is a strong case for enabling full disabled access at Yeovil Junction station. The industry should review the funding mechanisms for delivering these improvements which are based in large part on footfall making it very difficult for stations outwith the larger towns and cities to secure investment.

Gatelines at Exeter Central and Exeter St David's are causing queues at the barriers, which in turn result in queues off the platform. There needs to be work with GWR,

Network Rail and DfT to fund the measures necessary to solve these problems, that affect both ticket holders and those queueing to pay for their journey on exit.

- Please indicate the name of the station(s) and the rationale for your specific comments.

Response: Honiton Station (see above)
Exeter Central Station (see above)
Exeter St David’s Station (see above).

Door-to-door journeys

- What are your proposals for providing passengers better and safer access to different modes of transport at stations (including bus, car, cycling and walking)?

Response: Recent improvements have resulted in better interchange facilities at stations.

- What opportunities exist for improved integration between modes, citing relevant examples to support your comments?

Response: While the deregulated bus environment results in difficulties in achieving a truly integrated network for passengers, the current SW Trains company and the dominant bus company in Exeter and East Devon are both owned by the same holding group (Stagecoach). It is a wasted opportunity that within this group there has not been a concerted effort to introduce co-ordinated timetables, through-fares and ticketing, and day/ rover tickets available across both modes. Aware that government is currently looking at changing the powers at the disposal of local authorities over bus services, these missed opportunities need to be overcome in new franchises regardless of who owns what rail and bus company.

Fares and Ticketing

- What are your views on the availability of retail staff and the ability for passengers to have widespread access to ticket buying opportunities (e.g. through new and improved approaches such as smart ticketing, increased advance purchase ticketing or via mobile phones), adequate measures to ensure vulnerable passengers are not disadvantaged, and more effective customer service by both station and on-train staff?

Response: The schedule 17 regime is outdated and availability of retail staff and systems should be approached in the same way as the proposed timetable specification over station stops, allowing the operator to staff stations and sell tickets in a way that supports the market and the customer needs. We would support proposals for innovative and cost-effective mechanisms that reduce cost and improve customer service and revenue collection, through realignment of activities and delivery outcomes, but not as a cost cutting exercise. We would also welcome initiatives in ticketing that use mobile phone platforms.

Common sense needs to be applied to train-specific tickets during delays. With a train-specific ticket, it would appear to be an essential part of “putting the passenger first” to enable travel on another train when the designated train is delayed and when travel on another train will get the passenger to their destination with less delay than if they had to wait for the delayed train. This does not currently happen routinely, and is a source

of (unnecessary) added frustration that adds to that caused by the delay. This should not add to industry costs and we therefore urge this to become a standard feature of all delay management in future.

We are aware that Ticket Vending Machines (TVMs) are not customer-friendly (in the eyes of many passengers) and are not always reliable. If we are to continue to encourage maximum use of the railway by all sections of society, there therefore needs to be a balance between encouraging on-line and TVM sales, and also enabling people to buy tickets by other more traditional means.

A mix of smartcard and mobile ticketing can help reduce current delays for passengers leaving Central, and St David's, stations due to ticket barriers/ gatelines, if there were sufficient readers at the barriers.

We believe that the passengers best interests are served by simplicity in fares to enable people to have the confidence that they can get the best fare.

●Do you have any evidence to support your views?

Response: Transport Focus surveys, and anecdotal evidence from travel supports lack of compliance with opening hours and where staff undertake dual roles, retailing comes second to operational duties.

Personal experience from use of TVMs and from observing how others use TVMs is that they are not easy to use, or sufficiently reliable.

Smart ticketing

●What are your experiences of using smartcard technology within the franchise area to date?

Response: None, as none has been available in our area. Stagecoach buses provide a very limited smartcard ticket offer that does not include rail travel on their trains.

●To what extent do you believe that smartcard technology could be used to manage passenger demand and to create an integrated journey experience for passengers?

Response: There needs to be a raft of new ticketing offers that include both (a) smartcards (that can be used nationally on the rail network and on buses), and (b) the use of smart technology using smart phones that is developed and implemented nationwide.

We believe that the passengers best interests are served by simplicity in fares to enable people to have the confidence that they can get the best fare, and by ensuring that a range of ticketing options are available:

- good walk-on fares,
- good pre-booked fares,
- paper ticketing,
- mobile ticketing, and

- smartcard ticketing.

Passenger Information

●Are there areas of improvement in customer information and engagement you would like to see before, during and after your journey?

Response: One of the key areas that customers go for, in relation to push and pull information for their travel needs, is through apps and the internet. We would like to see stations and trains equipped with free wi-fi as standard. However it is critical that sufficient bandwidth and availability is provided to ensure a benefit is provided that truly meets customers’ needs rather than creating a poor facility that prompts complaints.

Service quality

●What areas of customer service within your end-to-end journey would you expect to see monitored and reported on to improve the service quality for passengers?

Response: We believe that the following areas should be monitored;

(a) Punctuality should be measured relative to the journey that the customer is making and not by the full line of route for the purposes of discounts.

(b) Catering should be monitored by the designed timetable journey, so early closure, late opening, or no provision, would all be a failure.

(c) Train loadings by sections of route should be monitored remotely and where overloaded action plans should be required within 90 days.

(d) Surveys should be conducted on passenger satisfaction for their specific journeys by route with the results published and action plans created and implemented.

Passenger compensation

●Please provide details of your experience with the current delay repay passenger compensation arrangements, and suggestions for how this might be modified in the new franchise to make compensation more transparent and convenient for passengers.

Response: Passenger compensations arrangements would seem to be outdated and archaic, it takes too long, any compensation should be paid back in the form that payment was made. Why can’t customers enter their details on the website and it be automatically refunded?

Security and Safety

●Do you have any proposals to improve security and safety at stations and on trains that you would like us to consider?

Response: Unstaffed stations in the dark, which of course includes early evening in winter, can be intimidating places for many rail users, particularly the elderly, the frail and women. We believe this has not been sufficiently recognised in recent years, and has been exacerbated by ticket office closures. As a result, for many people in practice the train service cannot be regarded as inclusive, or open to all.

We therefore would look for more innovative thinking in e.g. using redundant or little used rooms at stations for e.g. taxi offices or other activities which are staffed in the evening (with taxis of course there would appear to be synergies in locating their base

at a station also). The benefit of any such arrangement should be translated into rents that enable this to happen rather than not letting premises unless the maximum rent is achieved.

● Please provide details of the stations(s) and/or train(s) where appropriate that have informed your comments, and provide supporting information where available.

Response: This general principle needs to be looked at for all stations which are unstaffed after dark.

Additional Comments:

In section 6.36 the document references the National Skills Academy for Railway Engineering.

Response: It should be noted that the Institute of Railway Operators (IRO) also undertakes skills and distance learning that is designed to enhance the operational skills of staff working on the railway and which is likely to be of a higher value to the delivery of a daily service and customer satisfaction.

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