

INTER CITY EAST COAST MAIN LINE FRANCHISE REPLACEMENT

RAIL PASSENGERS COUNCIL AND COMMITTEES RESPONSE TO THE STRATEGIC RAIL AUTHORITY'S CONSULTATION DRAFT INVITATION TO TENDER DOCUMENT

June 2004

PREFACE

This document is prepared by Corus Rail Consultancy on behalf of the Rail Passengers Council and Committees (RPC) in response to the Inter City East Coast (ICEC) Main Line Franchise Replacement Consultation Document issued by the Strategic Rail Authority (SRA) in May 2004. The report incorporates the findings of a programme of on-train and on-station passenger opinion survey carried out to ascertain passengers' attitudes to the franchise replacement proposals. The passenger opinion surveys were carried out on Corus Rail Consultancy's behalf by Eden Business Analysis.



RAIL PASSENGERS COUNCIL
AND COMMITTEES



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1.0 INTRODUCTION

The Inter City East Coast (ICEC) franchise, currently held by Great North Eastern Railway (GNER), expires on 1 May 2005. The Strategic Rail Authority (SRA) has issued a draft Invitation to Tender (ITT) for consultation, to assist it in letting the franchise successfully.

The Rail Passengers' Committee Network (RPC), which in this context comprises the Committees for Eastern England, North Eastern England, Scotland and the London Transport Users' Committee (LTUC), welcomes the opportunity to comment on the Strategic Rail Authority's (SRA) consultation document.

The RPCs recognise the constraints that the SRA is working under to complete the competition before 1 May 2005, when the current franchise expires, and the delay in publishing a consultation document on the East Coast Main Line (ECML) Route Utilisation Strategy (RUS). However, a confidential consultation is unsatisfactory. The impression is given of a deal which affects the interests of actual and potential passengers, as well as taxpayers, is being determined by a small group behind closed doors. Passengers are the whole *raison d'être* of the franchise and should be at the heart of the process. The RPCs object to the six-week period for responding to the consultation document which does not meet the Government's guidelines for a twelve-week consultation period.

The RPCs have been advised by the SRA InterCity East Coast (ICEC) Franchise Team that the RUS will be subject to a public consultation later this year. The franchise specification must ensure that it has inbuilt flexibility to allow the outcome of this consultation to be reflected in its final shape.

Prospective bidders who have pre-qualified are:

- Danish Railways (DSB)
- First Group
- GNER
- A consortium of Deutsche Bahn, Stagecoach and Virgin

Three of the four invited shortlisted bids include train operators currently serving the East Coast Main Line (ECML):

- GNER as the franchise holder
- First Group as majority shareholder in the 'open access' operator Hull Trains and as the franchise holder for TransPennine Express
- Virgin Cross Country trains serve the northern part of the ECML
- Stagecoach has current British rail experience as the operator of South West Trains.

Neither Danish Railways nor Deutsche Bahn have current or past experience in Britain.

To ensure that our response to the consultation represents the views of passengers travelling on the East Coast Main Line, we commissioned a survey of customers. Research was carried out during late May 2004 among GNER and Hull Trains passengers. The research was

structured around self-completion questionnaires and was in three parts using three versions of the questionnaire:

- On train distribution on GNER trains (questionnaire version A)
- On train distribution on Hull Trains (questionnaire version B)
- Distribution at one sample GNER station – Dunbar (questionnaire version C)

The survey was structured to give a reasonable cross-section of typical use with a balance of research shifts to cover different:

- times of day;
- days of week;
- sections of ECML route;
- types of rolling stock;
- train service origin/destination

1,668 completed questionnaires were obtained from 9 research days, which covered every day of the week, all times of day, each type of train operated by GNER and Hull Trains and trains serving the full range of origins and destinations on the routes. Passengers were distinguished, among other things, according to origin and destination (including places off the ECML), means of travel to and from stations, journey purpose, frequency of travel, age and disability status.

Table 1.1: Completed questionnaires by research method

	Version	Research days	Returned questionnaires	% Returned questionnaires
GNER on train	A	7	1321	79%
Hull Trains on train	B	1	227	14%
Dunbar station	C	1	120	7%
Total		9	1668	100%

Extracts from the survey report summarising passengers' responses to the issues are included in this report where appropriate.

2.0 APPRECIATION OF THE FRANCHISE PROPOSAL

The draft Invitation to Tender sets out the criteria against which bidders are required to submit their responses. Bidders are required to submit proposals for three mandatory options and two mandatory variants:

- Base Case: focuses on delivering a slightly modified version of the present service more reliably and efficiently
- Mandatory Option 1: Base Case plus four 'Hull Trains' services after expiry of Hull Trains' access agreement
- Mandatory Option 2: Base Case plus fixed lease of current HST fleet
- Mandatory Variant 1: Base Case expanded to two trains per hour between London and Leeds and to offer additional peak services
- Mandatory Variant 2: Base Case expanded to offer five trains per hour plus additional peak services

The Invitation to Tender also invites bidders to submit alternative proposals that improve efficiency, achieve better performance earlier and stimulate further business growth. Options bidders are recommended to examine include lengthening or reconfiguring trains and splitting and joining trains.

3.0 OBSERVATIONS ON THE DRAFT INVITATION TO TENDER

3.1 Specification

Full base specification and variant timetables for the franchise are set out by the SRA. The base specification includes six iterations. This would make for a very complex service pattern, with variations that would be very difficult for passengers to memorise or to rely on.

The RPCs are concerned that the base case timetable is not based on a thoroughly researched assessment of the actual and potential passenger market, including the latent demand for increased travel opportunities. The base case confuses the quite different objectives of high speed intercity services, fast inter-urban services, and relatively fast (because they are on a main line) local services. We examine the issue of journey times, service frequencies and stopping patterns further in section 3.5 of this report.

3.2 'Top down' approach to determining customers' needs.

The role of the SRA should be to determine railway policies at a high level and to ensure compatibility between any competing or inconsistent approaches by different train operating companies. The Invitation to Tender should require bidders to submit proposals that are consistent with a broad timetabling strategy set out by the SRA. The strategy would specify, for example, minimum overall service levels, the need for clock-face intervals and criteria for connections. Bidder-derived options which offer a better passenger service than the "bidding timetable" or the official variants should be encouraged. The over-prescription of the timetable by the SRA appears not to allow bidders sufficient opportunity for innovative and customer-oriented service planning. Under the proposals set out in the Consultation Document, even where variants are requested, these are mandatory. The consultation document asks, more restrictively than we think appropriate, for alternative proposals only if they would improve efficiency and improve performance sooner. The request for bidders to consider options for lengthening, reconfiguring, splitting and joining trains is assessed in Section 3.6 below.

Oddly, given that train operators are required to behave commercially, and that the East Coast operation returns a profit to the SRA, bidders are requested "not to consider anything that would constitute a significant service change" (Consultation Document Chapter 5). We urge that bidders be encouraged to propose improvements and innovations that would benefit passengers. The benefits of a profitable ICEC operation must be re-invested to the advantage of passengers on the route. It is unacceptable if passengers on the ECML experience a lower level of service than would be justified commercially, or pay more for their tickets than necessary, in order to cross-subsidise losses elsewhere on the national rail network.

3.3 Predominance of engineering and operational considerations over customers' needs

In its last years, British Rail successfully began to address the criticism that the railway was too strongly led by engineering and operational considerations and that insufficient attention was paid to the needs of customers. The proposed franchise timetables indicate that this lesson may have been forgotten. Of course the railway must be properly maintained, in order for safe and reliable services to be operated, but the needs of the customer, for whom the service is being provided, cannot be allowed to take second place.

The RPCs consider that the balance has moved too strongly in favour of engineers' demands for unimpeded access to the route for maintenance purposes. The Base Case Specification (Consultation Document Section 3) states that refinements to the existing ICEC timetable will "enable improved engineering access to facilitate more efficient and economic maintenance and renewal of the network by Network Rail". Whilst this is in itself a reasonable objective, it must be achieved in the context of maintaining and enhancing service quality and meeting passengers' requirements. Customers must have and operators must be required to provide a regular and consistent timetable, which does not vary from week to week and connects into and out of other services, notably at the end of the day.

The desire for "efficient" operation goes too far when the effectiveness of the timetable in meeting customer needs is sacrificed. The proposed reductions in the offer clock-face times are not in passengers' interests and any such proposals must be removed from instructions to bidders. Conversely, the SRA should require bidders to develop clock-face timetables. Improvements are required, in particular, to regularise the pattern of services to the smaller intermediate stations and to arrival and departure times at major interchanges. A key objective must be to improve connections where through services are not provided, including to and from locations on and off the main ICEC route.

3.4 Responsibilities of franchisee vis a vis infrastructure provider (Network Rail) for infrastructure performance

We do not agree with the requirement (Consultation Document, Section 3.2.1) for bidders to have a proactive relationship with Network Rail (NR) with regard to performance, to make challenging demands to ensure that NR prioritises train service performance improvements, and to ensure that NR meets its obligations. In general, it is the SRA, not train operators, to which NR is accountable. Accountability in specific instances will depend on which party pays for the work to be done. The emphasis in the ITT must be to call upon bidders to establish good relationships with NR to ensure delivery of the franchise's commitments.

3.5 Timetable

If the base case proposals were to be adopted, the times of late evening trains would be subject to unacceptable variation from week to week, including differences to arrival and departure times and to stopping patterns. In particular, the times of the last trains would be too variable and often too late to connect with the last trains of the day at key interchange points.

For example, the design of the timetable to fit in with proposed increased night engineering time for Network Rail is that the last southbound ECML train (present arrival at Kings Cross 2359) would arrive much later, varying from 0016 to 0031 according to the week of the NR maintenance cycle. This is a vital difference. A 2359 arrival provides access to all LUL last trains from Kings Cross and thus to many parts of London. An arrival at Kings Cross at 0016 or later destroys this connectional network and, apart from taxis and night buses. We can accept such a major loss of service only if Network Rail can demonstrate that:

- it has already reached the maximum output possible from its existing possession times
- the work to be done in the extra time is essential
- it cannot be done in a manner which is less disruptive to passengers

A similar issue arises with regard to changed patterns of northbound service, including termination of the 1730 ex London at Newcastle. The proposed timetable must be closely monitored to ensure that connections are maintained in Edinburgh and Glasgow by the later arrival time off the 1800 from London. As currently proposed, this is not the case and would cause huge disadvantages to passengers travelling on within Scotland.

Insufficient attention has been paid to improving frequencies (particularly at the smaller stations), to maintaining clock face departure times and to offering good connections. There remains an unsatisfactory balance of provision of services on the ECML, with some 'fast' long distance services making intermediate stops that should be made by shorter distance or inter-urban trains. The result is un-competitive end-to-end journey times. Nevertheless, adequate consideration must also be given to the needs of stations that currently experience less regular ICEC trains for a satisfactory level and mix of through and connecting trains. For example, stations such as Stevenage and the stations between Peterborough and Doncaster require improved connections and/or through services to and from Scotland – concentrating virtually all Stevenage calls in Leeds trains is not an acceptable balance. An ECML timetable that adequately addresses the needs of all passengers will be identified only when these conflicts have been identified and resolved, during a wide-ranging consultation on the RUS strategy.

The passenger survey showed 58% of respondents to be opposed to the proposal to reduce late evening or early morning trains in order to give engineers more time for track maintenance. 48% opposed the removal of lightly used trains from the timetable. The most favoured approach to carrying out track maintenance was for work to be done on Saturday nights and Sundays, with overnight maintenance every night as a second preference. Only 17% of respondents preferred blockades involving closure of the route for several days.

Dunbar commuters to Edinburgh are particularly opposed to any reduction in peak hour services and also support improved evening provision. They recognise the anomaly of a commuter service being provided by long distance trains and support the concept of an alternative type of service.

The proposed withdrawal of the 1835 Edinburgh – Newcastle raises two issues. The first affects all ECML passengers leaving Edinburgh from tea-time onwards. Dunbar commuters are reliant for their service on ICEC trains from Edinburgh during the afternoon peak, when they are very busy

with long distance passengers. Consequentially Dunbar commuters and long distance passengers compete for seats. The second effect is the long gap that will result (1730 to 1900) between trains from Edinburgh to Dunbar. Dunbar should cease to be reliant on irregular calls by ECML trains and instead should have a regular alternative. A similar situation arises regarding commuters from Motherwell to Edinburgh.

The RPCs have considered the question of how to provide a proper service for commuters and leisure travellers at smaller intermediate stations on the ECML, and in particular between Newcastle and Edinburgh. We believe that SRA should commission, or require the successful bidder to commission, market research amongst passengers about a new service, operated by high quality, high acceleration trains running from Newcastle to Edinburgh calling at Morpeth, Alnmouth, Berwick and Dunbar. This could be part of the ICEC franchise, the Virgin CrossCountry or the ScotRail franchise. Either way, the objective would be to improve service frequency at these stations and, while maintaining appropriate through journey opportunities to London, remove calls at these stations in most ICEC services to speed up end to end times.

3.6 Rolling stock standards

The inclusion of minimum rolling stock standards in the SRA's criteria is welcomed. Results of the passenger survey show the overall level of satisfaction (as measured by a 'good' or 'very good' response) with the trains on the ICEC route to be 66%, with 18% expressing no strong views and 16% dissatisfied. Satisfaction with individual features of the trains was generally lower, with 35% finding legroom insufficient and 31% recommending more luggage space. The lowest score was for the condition of the toilets, reported as poor or very poor by 40% of respondents. When separated by train type, the highest overall level of satisfaction was with the class 170 trains, followed by the White Rose Eurostars, with un-refurbished IC225 carriages scoring the lowest. For all train types except class 170s, condition of toilets was accorded the top priority for improvement. For class 170, passengers viewed sufficiency of seats and luggage space as most in need of attention.

Half the passengers surveyed consider new trains to be necessary for the East Coast route, though a further 40% has no strong view on this matter. Opinions are equally divided as to whether the Authority or operators should make decisions about new trains. 45% oppose, but only 34% support the principle that the train operator should decide whether or not to provide smoking areas on trains.

The RPC is strongly critical that there appears to be no rolling stock strategy for the ECML. Clearer direction must be given in the ITT to the future provision of rolling stock on the route. Specific aspects to be covered include:

- the consideration of alternative strategies should the popular Eurostar trains cease to be available from 2006. The loss of these trains would be very unwelcome to passengers, who have come to appreciate their comfort, lower noise levels and better ambience they offer.
- The proposal to replace Eurostar trains by 25-30 year old HSTs would represent a substantial downgrading in the quality, performance and image of services and would be wholly inappropriate, as a long-term strategy for one of Britain's most important and prestigious main lines. There would also be environmental implications, most noticeably at stations, due to the inferior exhaust emission standards of older diesel trains, compared to electric or modern diesel traction.
- It will be necessary for the new ICEC franchise holder to start planning for a successor to the IC225 trains, which will pass their 20th anniversary during the course of the franchise.

- The final version of the Invitation to Tender must require a strategy for replacement of the HST fleet.
- If bidders are to be required to consider the case for joining and splitting trains, strategic options for their procurement and deployment must be included in the rolling stock strategy. Piecemeal proposals for joining and splitting trains should be avoided. Bidders should also be asked to provide a robust assessment of the operational implications of the procedure, including where it could take place and the risks to service reliability,
- The ITT, in combination with rolling stock and Route Utilisation Strategies must address the question of total seating capacity on the route, which is not covered in detail in the Consultation Document.

Passengers support the SRA's determination to improve and maintain standards regarding delays to trains and short formations. However, the ways by which this can be made to happen must be spelled out. Assurances must be written into bids that guarantee against declining rolling stock reliability, as fleets become older. The Invitation to Tender must require bidders and the SRA to set out how they will exploit to maximum effect for the benefit of passengers the technical characteristics and capability of the route. (e.g. power supplies, mix of double and multiple track, mix of train types and speeds, different degrees of capacity utilisation at different locations).

Bidders must also be required to specify quality elements they propose to include, relating for example to the provision of refreshments, assistance with luggage, provision for buggies, prams and cycles and other aspects of customer care on trains and on stations.

3.7 Brand image, service quality and fares

The image and brand values of ICEC services are important. Responses to our research cast doubt on the extent to which the perception of quality has been successful with passengers. 55% have no strong view on the statement that the East Coast route is "the best in Britain", compared to 32% who agree. 50% consider the route to be in need of investment and 41% have no strong view on this subject. Clearly the route's image as the "best in the country" is only partial. There is plenty of room for improvement, the potential for which must be a key criterion in judging bids for the new franchise.

CLARIFICATION: Because of potential confusion in the mind of research respondents about whether a research question referred to the East Coast route or to trains run by the Intercity East Coast franchise operator GNER, we urge caution about drawing significant conclusions from the statistics quoted.

The RPC is strongly opposed to bidders' proposals to meet profitability targets by stripping out costs that would impact on the quality of service. The pursuit of cheapness must not allow good levels of on-train and on-station staffing to be sacrificed. Excessive reliance on cost reductions may result in trains that, for example, have too little turn-round time between trips or at depots and receive insufficient cleaning and maintenance. Maximising rolling stock utilisation has resulted in short turn-round times and service unreliability. The desire for through services by different operators has resulted in some sections of route becoming congested. These difficulties have been recognised by the SRA and some rail passenger services altered or franchises reorganised to improve reliability. The ICEC franchise must not be let on the basis of unsustainable cost reductions.

It will be important to establish whether "management of train loadings to mitigate the risk of overcrowding" means "management of loadings by price", as may be inferred from the Consultation Document. This would be unacceptable to passengers if it meant, for example,

selective price increases or the more widespread adoption of advance bookings restricted to specific trains. The SRA should seek proposals for flexibility and innovation in pricing, e.g. fly one way, train back; sleeper one way, ICEC back, etc.

Responses to the market survey show the extent of passengers' concern over fares. 51% consider that advertised cheaper tickets never seem to be available. The same proportion considers the difference between advance purchase and other tickets already to be too great. 49% do not think fares are good value for money, compared to 26% who think they do. Comments about fares were the largest category of responses to the request for additional observations. Many complained about the general high level of fares. There were significant numbers of comments about the relativity between fares, e.g. differences between first and standard, advance purchase and walk-up, single and return. Lack of flexibility with certain ticket types and quota restrictions were mentioned by some. A few respondents made price comparisons with other modes.

3.8 Stations

In the passenger survey 83% of respondents favoured station standards being set by the Government, rather than the rail industry. This suggests that station standards and station operation is an area in which customers are dissatisfied. The SRA should be much more prescriptive in this area. Passengers appear to believe that the market is not currently providing what they need.

Whilst major schemes such as that under way at Kings Cross and proposals for Edinburgh Waverley are a vital part of the image of the ICEC route, they lie outside the control of the franchisee. The new franchisee must be given the opportunity and encouraged to become involved in the design and implementation of station schemes, including at Network Rail Major Stations. Major schemes under way or likely to commence during the period of the proposed franchise include Kings Cross Western Concourse and Edinburgh Waverley upgrading. Of equal importance to involvement to ensure designs are fit for purpose is the issue of customer care, including signage and the provision of temporary facilities, during scheme implementation.

We are concerned at the limited emphasis paid under the heading of Minor Station Works to works to improve the standard of stations within the control of the franchisee. Bids should be judged on the attention they give to wider aspects of station improvements than are cited in the Consultation document. This must include improvements to the ambience and provision of facilities for all users and to encourage integration of stations into the wider community (e.g. improved and extended catering and shops and updated ticket sales and travel centre facilities). The SRA must devise a means of ensuring that more significant improvements whose implementation may take longer than the duration of the next franchise (schemes that may fall somewhere between "major" and "minor" works) are not neglected. Facilities at Newcastle, York and Peterborough for example, fall noticeably below current best practice, as now seen at Leeds and Manchester Piccadilly.

The need for improved facilities for passengers with heavy luggage was given the highest priority in responses to the market survey, particularly by older customers and those needing to make connections. The next highest priority was for facilities for people with disabilities, the importance of which has been highlighted by passengers who are not themselves disabled. Good accessibility is also family friendly, as it facilitates use of the railway by people with children, shopping, etc. We question whether £250,000 per annum is sufficient to deliver accessibility at stations in a reasonable timeframe.

The next priority cited by passengers was for better information when changing trains. The need for better information about all train operators' services needs to be stressed. This applies both to

information about non-ECML services at ECML stations and vice versa. Even if information about all operators' services is available at an individual train operator's information office, it is easy to gain the impression that it is only intended to provide assistance in respect of that company's trains.

Finally, bidders must be required to guarantee that station staffing and opening hours, for example of booking offices, will be maintained or improved compared to present levels.

3.9 Infrastructure requirements

We support the phased proposals for infrastructure improvements to support the different service options put forward by the SRA. However, we also note that no mention is made of what infrastructure developments will be needed to enable bidders to deliver variants to the base timetable reliably and efficiently. Further developments that may be required depend, for example, on:

- Whether the proposed Hitchin grade separation resolves the Welwyn bottleneck
- What proposals may be developed to mitigate capacity constraints in north east England, e.g. longer-term capacity enhancement such as grade separation at Ferryhill or Leamside re-opening?
- The possible need for enhanced route capacity north of Newcastle
- Progress towards increasing station capacity at key bottlenecks
- The implications for route capacity requirements of open access train services

3.10 Value of occasional through trains versus frequent guaranteed connections

We endorse the encouragement for bidders to consider the potential for splitting and joining trains. This should not just be treated as an opportunity to increase route capacity, but could also offer opportunities to serve alternative destinations (e.g. Lincoln and Yorkshire destinations beyond Leeds) in a cost-effective manner. The issue of through trains to destinations of the main ECML was addressed in the programme on on-train and on-station surveys. Respondents accorded a more favourable response to direct services (73% reported 'good' or 'very good') than to connections with other trains (38%).

It should be noted that joining and splitting trains would introduce a performance risk, as delay to one portion of a train could delay the whole service. Bidders must be asked to indicate their strategies for mitigation of this risk to reliable performance of services. The bidders must also be asked to identify their approach to the selection and timely procurement of suitable rolling stock.

The ECML currently supports train services operated by several franchised and one open access passenger train operator. We oppose the option of subsuming the present open access services to Hull into the mainstream ECML franchise. The different types of train service are of great benefit to customers in different niches of the rail market and we fear reversion to the gradual erosion of through trains to Hull, should operation revert to the mainstream operator. The concept of developing the different types of train service to meet different markets must be developed, both by bidders and in the forthcoming RUS, for example to differentiate between the markets for:

- Long distance end-to-end trips or those between key hubs, for which short journey times with few intermediate stops are essential
- Medium distance trips, including those involving smaller ECML stations at one or other end of the journey. Overall journey time may be less critical, as many trips will be made for leisure.
- Travel to and from key destinations of the route, that are or could be served by a mix of through and connecting services.
- Commuters using ECML trains and the extent to which this might be transferred to increased dedicated commuter train provision, e.g. Dunbar
- Balance between regular services with repeating (clock-face) intervals and occasional through services to particular destinations off the main ICEC route

- The needs of wider markets around the main conurbations, such as Central Scotland, the North Eastern and Eastern counties and northern Home Counties of England, including a clear policy for connections and the demand for rail-heading from rural areas.

Responses to the passenger survey indicated a high level of customer satisfaction with “through” services to destinations beyond the main ECML route and for the wider principle of introducing more direct trains to and from such locations (54% support or strongly support). This favourable response is made despite Hull Trains services currently being operated by trains with a lower maximum speed than the HST/IC225 services. On other parts of the ECML, we recommend that further consideration be given to market segmentation, for example in the provision of services to intermediate stations between Peterborough and Doncaster, York and Newcastle, Newcastle and Edinburgh and north of Edinburgh.

A balance of advantage between improved connections, more regular trains and higher frequencies compared to occasional through trains needs to be explored further, both by drawing the attention of bidders to this matter, and in the RUS.

We suggest that more creative use be permitted of the principle of allowing other passenger operators on the ECML, to provide more consistent and regular services to intermediate stations on the route, as well as to improve the provision of through services to a wider range of locations.

3.11 Personal security and car parking

The consultation document is silent on the issue of personal security. Research (*Fears and Experiences of Passengers*, Risk Solutions, for RSSB, 2004) has shown that personal security is an important issue for passengers, especially women (*Women and Travel*, Scottish Parliament). We therefore believe that the ITT should require bidders to develop proposals to assess and then reduce passengers’ fears about personal security at their stations and in their car parks. Aspects to address these fears include staff presence, CCTV, lighting of stations and accesses (including to and from car parks).

The majority of respondents to the RPC Market Survey hold no strong views regarding car park value for money or the availability of train information. A significant minority (46%) also has no strong opinion regarding the number of spaces available. However, responses to other surveys show this to be important and numbers dissatisfied with car parking provision outweigh those who are satisfied with respect to numbers of spaces, availability of train information and overall value for money. Security of car parks is the aspect passengers – and particularly those who use the car parks – consider in the greatest need of improvement.