



Transport for Wales - Design of Wales and borders rail service including metro –  
May 2017

1. The Associated Society of Locomotive Engineers and Firemen (ASLEF) is the UK's largest train driver's union representing approximately 20,000 members in train operating companies and freight companies as well as London Underground and light rail systems. The union has just over 600 members in Wales.
2. ASLEF responded to Transport for Wales' initial consultation in March which examined the wider context in determining the new franchise specifications. Much of the detail sought in this consultation such as seat specification is more relevant to passengers and ASLEF will not take a view on these matters. Nonetheless operational issues are considered in the consultation and the union is glad to have the opportunity to respond to these.
3. ASLEF totally rejects any extension of driver only operation (DOO) and therefore opposes any proposals which would remove a second member of staff from train services in Wales. We take the view that Welsh rail infrastructure makes it particularly unsuitable for DOO not least because much of the rolling stock simply makes any driver control of doors and dispatch impossible.
4. We restate our policy that transferring responsibilities for guard duties to drivers is a safety concern. Driving trains is an enormously safety critical role and we want train drivers to be entirely focused on the track and signals ahead. Closing doors and dispatch is a safety critical role in itself

and safety is at risk should this not be done correctly. ASLEF believes that it is therefore a risk to the safety of the travelling public to try and combine these two separate roles. Our view is that drivers should focus on driving and guards should focus on safe dispatch.

5. Additionally, having a trained guard on trains who is practised in dispatch and door operation is important for potential emergency situations. Passengers want a second member of staff on board who is as skilled and qualified as possible to deal with whatever situation could arise.
6. ASLEF once again restates its opposition to any deskilling of train crew. Guards must continue to hold and prioritise their responsibilities for door operation and dispatch and not simply be there to primarily protect the revenue of the franchise holder.
7. It is clear that passengers feel strongly about this issue and is demonstrated by Transport Focus' report "Passenger attitudes towards rail staff." When asked whether they had cause to worry about their personal security during a rail journey in the previous six months, one in ten passengers said that they had. This is clearly too many. The report notes, "When asked what could allay some of those concerns, passengers consistently identified staff presence as the key."
8. The report also points out that "the industry needs to consider how it can best deploy staff across the rail network to meet this need. Cutting the number of staff, either at stations or on the train, runs counter to what passengers actually want and could jeopardise their confidence in their ability to get to their destination safely."
9. A recent poll commissioned by our sister union the RMT of passengers on Southern found that three quarters (73%) are concerned about the safety of travelling on trains that no longer had an on-board train guard and a

similar percentage believe Southern Rail should not allow trains to operate without at least one member of staff assisting passengers and protecting their safety (70%).

10. It is therefore fair to surmise that passengers believe that a second member of staff must be present on services.

11. ASLEF also believes that questions over who runs stations in England that are predominantly serviced by the Welsh franchise are an instructive illustration of the problems which beset rail devolution in the context of our fragmented and franchised network. ASLEF believes that devolution can bring many benefits to our network and can allow local communities more say in how the railway functions. It can also make control of the network far more democratic. The optimum scenario in which to achieve these outcomes is within the context of a national, integrated and publically owned network. Devolution within an already fragmented structure could lead to further disintegration. The lack of clarity over the future of these stations demonstrates this.

12. Furthermore it would clearly be illogical to have stations in England run by an operator who is chosen by the Welsh assembly. It would, in fact seem very undemocratic. However, as the consultation notes, "experience suggests that the operator which is the majority user is more likely to deliver improvements as it is their customers and revenue that benefit the most."

13. The consultation acknowledges that the Department of Transport is considering the possible transfer of responsibility for running the three largest English stations, Shrewsbury, Chester and Hereford from the Wales and Borders Rail Service to other operators. This is despite the fact that the Welsh franchise is by far the largest operator at these stations. A likely implication of this is that passengers at these stations will either have

a government who does not represent them and they cannot vote for choosing who runs their stations, or a company who they are unlikely to be a customer of, and has little financial incentive to improve facilities for. ASLEF does not believe either of these options are acceptable.

14. ASLEF would also point out that the Welsh franchise has some of the oldest rolling stock in the country. In fact, the average age is 25 years old, making it the operator with the 8<sup>th</sup> oldest stock. It is essential that Welsh passengers are not short changed and procuring new trains is considered a priority.

15. In addition the union objects to any proposals which would put rail freight at a disadvantage or undermine rail freight's access to the network in favour of passenger traffic. Rail freight is currently going through a very difficult time following the decision to increase tax on coal and problems in the steel industry. Between 1 January and 30 September 2016, the amount of coal trains it ran fell by 78% on the previous year. Steel traffic fell by 33%. The ORR's figures show that the volume of freight moved in Q1 2016-17 was down 8.4% across the board with coal falling 61.4%. This is a record low for any quarter. The amount of freight lifted by tonne in 2015-16 fell 22.1%. This has led to a dramatic reduction in rail freight traffic. In fact, in 2015-16 there were 236,290 freight train movements. This is the lowest since records began in 2003-04 and a decrease of 16.3% on the previous year.

16. However, the industry's less traditional consumer market is forecast to significantly increase over the coming years. Network Rail's Freight Market Study has projected annual growth in total rail freight volumes of about 3% per annum to 2043. Intermodal volumes were forecast to increase by over 5% per annum and construction volumes were forecast to grow by 1% per annum. To close lines to freight would be extremely short sighted and would lead to far more freight being pushed onto the road.

17. It is well known that road congestion is estimated to cost businesses £17 billion a year and the Department for Transport calculate that the cost of congestion being 99 pence per lorry miles on the most congested roads. The UK has signed up to legally binding Climate Change targets making the growth of rail freight even more important. Rail freight produces 76% less CO2 emissions than the equivalent HGV journey. In 2014 carbon dioxide emissions from transport went up from 25 per cent to 28 per cent of which surface transport emissions account for the 94% of that with HGVs contributing 17 per cent, despite making up only 5 per cent of road vehicles. Both passenger and freight rail together are less than 2 per cent. Added to the fact that the ORR states that rail is 20 times safer than road it's clear that we must support industry growth, not stunt it.

18. As ASLEF outlined in the union's previous response to the consultation on this matter, the creation of a not-for-profit Transport for Wales is welcomed and a management contract is a more progressive option than a franchise which keeps revenue. However, the union remains disappointed that genuine public ownership of the franchise has been rejected. Money will still leak from the industry. Nonetheless we look forward to working closely with the Welsh government and the newly formed "Transport for Wales" to ensure that the railway in Wales provides a quality service where people are put before profit.

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