**Hogrider 158 (June to Mid-September 2018)**

**South Hampshire Rail Users’ Group Newsletter**

**Contents**: Rail franchising ‘bust’; Southampton-Waterloo open access bid probably killed by Brexit; Problems with SWR performance; Unsatisfactory SWT legacy timetable extended; Industrial action on SWR; New SWR ticketing; Response to DfT’s Cross Country consultation; Cross Country’s temporary timetable improves Southampton-Scotland link; Response to fares consultation; Great Western consultation results; Acknowledgements / Contact details

**P****assenger rail franchising ‘bust’**

Sir John Armitt who now chairs the National Infrastructure Commission considers that rail franchising is bust.

That’s scarcely surprising. In January 2002 a Commons Committee report on rail franchising and infrastructure argued that ‘The Government must restore stability to the industry with the minimum of delay’.

A subsequent report in November 2006 found that ‘The system of passenger rail franchising is a complex, fragmented and costly muddle which is unlikely to provide the innovation and investment needed for the passenger railways of the future. The system has had a decade to prove itself, but it has failed to achieve its core objectives’.

Now a report has strongly criticised DfT for allowing Stagecoach and Virgin to overbid for the East Coast franchise, which soon ended in financial collapse. DfT can hardly not have been aware that this was a typical Stagecoach gamble – they clung to their SWT franchise by overbidding for a third term and then slashing quality and fleecing passengers.

So, after two decades, franchising remains an expensive failure. Small surprise that there is a groundswell of public support for returning the railways to a national organisation dedicated to the pursuit of best practice in all areas of activity. Pity that the BR collective memory is now probably irretrievable.

The government considers that privatisation has transformed the railways for the better. They overlook the huge modernisation programme achieved by British Railways in the second half of the twentieth century against a background of the Beeching (in reality Marples) closures of lines, a few of which are currently approved or proposed for reinstatement at considerable cost.

Performance across the network is now the worst for 12 years and a review is expected but, like so much else, it seems a bit overdue.

**Southampton-Waterloo open access plan killed by Brexit?**

Alliance Rail’s plans to operate higher-quality services between Southampton and Waterloo have been turned down by the Office of Rail and Road.

Most of the rationale is familiar: required cost/benefit ratio not met; revenue extraction from SWR; and reduction of the ‘firewall’ (gaps in service) for recovery from disruption.

The unexpected element is that operator Alliance Rail has stated that the six required Wessex Electric units are no longer available, so they have nothing to run the service with.

Intriguingly, Modern Railways (See September 2018 edition) checked with the rolling stock company (Angel trains) which stated that the six units are ’currently in storage, ready to go on lease and enter passenger service’. But there have been no reports of anyone other than Alliance wanting them.

It rather looks, therefore, as if the trains are only ‘not available’ because Alliance’s parent company, Arriva (now part of DB, the German State train operator) is no longer interested in advancing the project.

Arriva was happily expanding its GB rail operations until the beginning of 2016. It subsequently hasn’t bid even to retain the Wales & the Borders franchise.

Any parallel with National Express, which sold the C2C franchise in 2017 and is now running trains in Germany? If the loss of interest is not connected with Brexit, this all seems remarkably coincidental.

**Problems with SWR performance**

The Office of Rail and Road has published its findings on South Western Railway’s unsatisfactory performance. Sixty-eight per cent of the delays in 2017-18 were caused by Network Rail, and contingency plans have not been updated since 2011. It is taking longer to restore normal services after an incident, and major decisions about who should take the lead and what they should do remains uncertain.

So what went wrong after 2011? April 2012 saw the creation of a ‘Deep Alliance’ between former operator Stagecoach and Network Rail, to put in place a joint management team responsible for infrastructure and train operations. This was promoted as a pioneering move to deliver better services for passengers.

The senior alliance team was headed by Stagecoach, in the person of SWT’s Managing Director, Tim Shoveller, who promised to deliver ‘a great service’ for passengers and presumably then overlooked or neglected the basic need to update contingency plans.

From August 2015, the Alliance became more superficial. The changes were reportedly driven by the organisations’ internal needs, rather than external pressure or regulatory requirements, and enabled them to keep their finances separate. So much for the old Stagecoach myth of putting passengers at the heart of everything it does. In any case, little surprise that nobody now knows who is in control when major incidents occur?

Despite the much friendlier and responsive attitude of First Group, SWR’s performance over the past year has been a major disappointment for passengers. There are still examples of a serious lack of information, including at Waterloo, when things go wrong; too many trains dropping booked stops for operational convenience; and even Lymington trains leaving Brockenhurst just as the mainline ‘connection’ arrives – First had stated at a stakeholder meeting that Brockenhurst was an example of a station where connections could be held for a few minutes.

We recently responded to a substantial on-line questionnaire about what stakeholders consider good and bad about SWR. Our reply co-ordinated examples of issues which have been brought to our attention.

It’s good that SWR are much more engaged with rail users than their predecessors, but it’s time to exorcise the Stagecoach ghost. There is a general feeling that SWR’s first year has been an anti-climax. When things are normal passengers get a fairly good service, except at stations with poor inherited timetables. When they go wrong, they are often neglected.

SWR’s annual stakeholder report refers to problems from severe weather, including speed restrictions and equipment failures during the summer heat; train failures at critical locations; a serious fire on the approach to Waterloo; and industrial action.

They intend to roster crews more effectively; design support software for the Control Centre to help recovery from disruption; provide better support for the Desiro fleets and speed up modifications to improve reliability. Hopefully this will be achieved sooner rather than later.

**Unsatisfactory SWT timetable extended**

Stagecoach’s South West Trains recorded such diabolical performance that a 20 year franchise award from 2001 was replaced by a 3-year award from 2004.

Performance failures were then masked by cutting services and inflating journey times. Managing Director Andrew Haines brushed aside public anger, for example writing to New Forest East MP Dr Julian Lewis that: “It would be impossible for us to carry out detailed consultation on something as radical as a completely new timetable.”

The timetable was further slowed from 2007 but, following last year’s franchise transfer to First/MTR, extensive consultation resulted in the prospect of improvements from this coming December.

Now DfT has approved the recommendations of the new Network Rail Chief Executive (Andrew Haines!), that virtually all December’s timetable changes should be deferred. This has resulted in the SWR franchise having to be renegotiated, because profit forecasts will be affected by failure to deliver the promised capacity improvements on time.

SWR is left hoping to phase in improvements as soon as possible, and deploy the refurbished Wessex Electric trains where feasible. Their less-cramped, and therefore reduced, seating compared with the unpopular ex-Stagecoach class 450 stock, means they will not be able to substitute the latter on some busy Waterloo-Portsmouth services until the promised additional hourly train on that route can start.

According to Roger Ford (Modern Railways, September 2018) the underlying issue is power supply. Network Rail needs the power requirements to be remodelled before the additional Portsmouth-Waterloo and Portsmouth-Southampton services start. One effect is that, while the Wessex Electrics have been refurbished this year, they will not receive their new motors until next year, because these higher-performance motors need more power.

One might have expected DfT to liaise with Network Rail in advance of letting the franchise, or Network Rail to have raised issues about the franchise’s commitments (it was awarded 18 months ago). Another failure of the country’s disjointed railway.

**SWR industrial action: Mind passengers (including Fido)**

Long-term industrial action over working practices in several franchises would have become a farce but for the misery inflicted on long-suffering and high-paying passengers. In the case of Southern, March this year brought the 40th strike day over a two-year period, before an agreement was reached some months later. There followed a timetable crisis on Thameslink (of which Southern is part), with full implementation of the new, much-expanded service delayed until December. Meanwhile, it’s great to see the new Peterborough services at Horsham every half hour, apart from their ‘ironing board’ seats.

On SWR, contention has been whittled down to whether trains should operate with only a driver when a guard is not available. So what’s at stake? In extreme scenarios, such as a crash (the railways have achieved a great safety record in recent years, but there have been some horrifying near-misses), there is no guarantee that the guard would be in a position to do much.

The issue probably raised most often is help for disabled wheelchair users when trains and stations are both unstaffed. It’s obviously right that disabled people should be able to access trains like everyone else. But cancelling the train because there is no guard doesn’t help them at all. It may actually be detrimental if the next train is severely overcrowded. That still leaves the question of how long people could reasonably be expected to wait for another service, and the complications if it departs from a different platform.

RAIL, issue 861, reports an increase of incidents where safety was an issue when contingency guards have been substituted. These involve things like drivers being given the signal to depart when facing a red light.

It may be, however, that it is the rarer situations where safety is most critical. In 2012 a Merseyrail guard received a 5-year sentence for manslaughter after the death of a drunken young woman who was leaning against his train when he gave the signal to start.

In early September, an elderly disabled woman’s dog was killed when its lead got trapped in a train door at Elstree. The following week, there was a similar incident when a blind woman started to be dragged along a platform by her trapped dog’s lead at King’s Cross Northern Line station. Fortunately, a bystander pulled the lead from her hand and the dog was collected off the train at the next station. [Source: Metro 17.9.2018]

From the viewpoint of staff and unions, suspicion will always be a factor. If no driver is available, the train will be cancelled. Presumably operators will want to maintain adequate driver levels to avoid a financial penalty. Planning for operation when guards are not available can be seen as suggesting that they are ultimately dispensable, with the operator more likely to pare numbers to the bone.

That said, the issue needs to be resolved urgently. If trains do run without guards, the operator should be required to demonstrate that it is not due to a shortfall in the workforce. Also, it needs to be recognised that, with no guard, the driver has a very wide safety responsibility in combining two roles. If we still lived in an age of ‘common sense’, the Transport Secretary would convene the parties over tea and biscuits, get to the roots of all the issues, and attempt to guide them to a consensus which ensured that the highest safety standards would not be compromised. Remember Barbara Castle’s era?

**New ‘part-time’ tickets**

SWR has introduced a new type of ticket for passengers who regularly make the same journey, but not often enough to benefit from a season ticket. Passengers with the SWR Touch Smart card can buy a ten-ticket carnet which provides a five per cent discount. Each ticket is valid for one day (up to two months from the date of purchase) and can be used all day for travel between the stations. Passengers can buy the carnet on line at: southwesternrailway.com/train-tickets/smart-ticketing/carnet.

They have also introduced an Auto Renewal Monthly Season Ticket which allows passengers to buy eleven monthly season tickets in succession and get the twelfth free. They need to pay by direct debit and set up auto renewal on their touch smart card. This appears to be designed to help passengers who cannot get salary advances to purchase annual seasons.

**Points made in Group’s response to DfT’s Cross Country Rail Franchise Consultation**

DfT has consulted on aspirations for the next Cross Country rail franchise term, which is due to run from the end of 2019. Thanks to everyone who contributed to our response.

Our principal points are below.

### **Travel patterns?**

Passengers using Cross Country services to or from stations south-west of Basingstoke have widely varying travel needs.

### The big attraction of Cross Country for long distance journeys from this area (especially for older people and those with heavy luggage) is not having to travel via London. We are in a different position from people in the West of England towns and cities, where Cross Country is the much quicker route to the North (generally the journey times from, for example Plymouth, to Birmingham New Street and London Paddington are very similar).

**Particular services, routes and times of day where crowding on Cross Country services needs to be addressed most urgently?**

Services anywhere south of Birmingham around peak commuting times. Saturday services in holiday seasons (Bournemouth in particular is a major holiday resort and obvious daytrip destination for families from places such as Oxford and Reading). Saturday services when there are major sporting fixtures. Friday and Sunday evening services – there are universities at Birmingham, Coventry (plus Warwick), Oxford, Reading, Winchester, Southampton and Bournemouth, which all generate weekend travel.

**Priorities for service improvements?**

More frequent weekday and weekend services are more important than earlier or later trains, or summer-only services.

**Routes and stations where improvements needed?**

General need for more capacity on services to/from Southampton and Bournemouth. Doubling the Southampton-Newcastle service to hourly and extending the service to Sundays seems the most obvious measure. Particularly odd for weekend travel to have direct services for outward travel on Friday afternoons/evenings but not for return travel on Sunday afternoons/evenings.

Winchester is not shown as an interchange station. It offers easy same-platform connections between trains to/from Newcastle and SWR services to/from Portsmouth (from the proposed SWR timetable changes, the northbound connection would be with trains to Manchester). The Southampton-Portsmouth corridor is a huge built-up area. ONS lists it as the 7th most populous such area in Britain. This suggests Cross Country services to/from Portsmouth are desirable, but they are probably precluded by pathing difficulty, so easy connections are the obvious alternative. (Michael Fallon, as Minister for Portsmouth, identified improved rail connectivity as a prime aspiration).

Southampton-Bournemouth is scarcely a ‘fringe’ route. It is the end of an axis notable for its concentration of universities. ONS lists the Christchurch-Bournemouth-Poole corridor as the 16th most populous built-up area in Britain, and Bournemouth is one of the country’s few seaside resorts of international standing, besides being close to the eastern end of the Jurassic Coast.

Cross Country might increase its loadings west of Southampton by stopping Bournemouth trains at Eastleigh. Despite Eastleigh having a population very similar to Winchester, it has hardly any fast services to Bournemouth (a legacy of South West Trains’ timetable cuts), while Winchester generally has three per hour. In addition, Eastleigh station is very close to a bus station serving an increasingly populous surrounding area, and is the railhead for the celebrated conservation zoo at Marwell.

Ideally, given the concentration of elderly residents at the eastern end of the Dorset Coast, there would seem to be a case for introducing Cross Country stops at picturesque Christchurch and perhaps New Milton. Running trains beyond Bournemouth to Poole, as in BR days, also seems desirable, though would probably require an additional train unit.

For additional carriages, dual-voltage bi-mode stock (whether new or through the introduction of extra carriages with electric motor) would seem ideal for Cross Country, which operates a huge diesel mileage over electrified routes.

It would also be good to have a wider range of destinations from Bournemouth and Southampton. There used to be direct trains to Bradford, Liverpool, Nottingham, Glasgow and Aberdeen (even Blackpool on summer Saturdays). Direct services are particularly helpful for elderly people, many of whom live in the Bournemouth area as above. To maximise the appeal of direct journeys, Cross Country services need to return to the West Coast line north of Crewe. The Poole-Glasgow (Dorset Scot) service was probably killed off by being re-routed via Newcastle instead of Preston, resulting in passengers for Glasgow saving 2 hours and 7 minutes by changing at Birmingham New Street.

**Changes to the way Cross Country currently sells and provides tickets?**

The principal problem is that Cross Country tickets can be relatively high-cost. In many cases it can be significantly cheaper to travel via the London terminals, which undermines the value of having direct services. With huge ongoing investment to expand rail capacity in the London area to cope with demand, it is counter-productive to route passengers between Hampshire, Dorset and the Midlands and North via London.

**Changes to the Advanced Purchase on the Day (APOD) system?**

### It seems wrong that people already using unreserved seats may be required to make way for those paying much less for APOD tickets, which suggests that the latter should not provide reservations.

**What additional information would be useful when planning journeys or making connections onto other services?**

Passenger flows could be improved through more information on what changing at a station en route involves.

In some cases station signage could be much clearer. Wolverhampton seems an easy station to use, but Birmingham International confusing. Platform monitors which flick from page to page are an irritation when someone has little time to make a connection.

At Southampton Central people do not always grasp, for example, that platforms 1A and 1B are simply opposite ends of platform 1.

In BR days station announcements invariably told passengers which platforms connecting trains would leave from. Nowadays, time is wasted with information on things like who runs a train.

**How should the information (in question above) be communicated?**

Perhaps leaflets, ticket vouchers and websites could give information about the stations where passengers need to change.

**How might Cross Country staff be more effective in providing service and assistance that passengers need on a modern railway network?**

Some conductors very helpfully announce things like platform numbers for connecting services, whether connections have been held, and best alternative options when they haven’t. This could become the norm. Missed connections are a principal disincentive to travel by train, and underpin the need for direct services.

**Improving the overall passenger experience before, during and after the journey?**

On trains, greater capacity is desperately needed. The consultation suggests omitting stops to reduce ‘churning’ of boarding and alighting passengers but this would simply make trains less convenient for people who would use the omitted stops, and also increase churning at the remaining stops. Making stops ‘pick up’ or ‘set down’ only means trains will travel with fewer passengers to or from such stops, which is wasteful of resources. Alighting passengers increase capacity for boarding passengers. Greater capacity reduces the incentive to book seats, so the considerable congestion caused by passengers searching for reserved but unoccupied seats (a major phenomenon) would be mitigated.

**Priority ranking for improvement to the carriage layout for long distance inter-city Cross Country trains?**

Suggest: (1) More seats; (2) Greater leg room; (3) Extra room for luggage; (4) Seats that align with windows; (5) More table seats as opposed to ‘airline’ seats; (6) More comfortable room for short distance standing; (7) Cycle storage.

**Other comments or suggestions about the on-board experience?**

Catering could be improved. Long-distance passengers appreciate things like good-quality sandwiches, including vegetarian, vegan and gluten-free. Perhaps too much snack food, which is perceived as unhealthy. Most people will eat plain crisps and don’t really need a selection of flavours, and similar considerations apply to biscuits.

**Cross Country changes 22 July – 7 October 2018**

Trains between Southampton and the North East have been affected by re-signalling work at Derby. They operate normally south of Birmingham but are re-routed in the Derby area, beyond which they switch paths with services from the West of England. The following services have been operating, which give direct links with many more towns and cities than the normal service!

Mondays-Fridays

08.12 Winchester-Edinburgh

09.46 Southampton-Aberdeen

11.46 Southampton-Dundee

13.46 Southampton-Edinburgh

15.46 Southampton-Leeds

17.46 Southampton-Birmingham

Saturdays

06.53 Southampton-Glasgow (06.25 from Bournemouth)

07.47 Southampton-Edinburgh

09.47 Southampton-Aberdeen

11.47 Southampton-Dundee

13.47 Southampton-Edinburgh

15.47 Southampton-York

17.47 Southampton-Birmingham

Notes

There are no direct Sunday services between Hampshire and the North East.

The Manchester services, including the summer Saturday diversion of the 18.20 from Southampton (17.47 from Bournemouth) to Leeds, are not affected.

**Fares consultation**

The rail industry and Transport Focus have conducted an ‘Easier Fares’ consultation.

Respondents were asked to rate the many elements which determine fares, such as time of travel; age group of passenger, whether tickets purchased in advance, and whether split or through ticketing used. With industry involvement, it is unsurprising that differences between franchise operators was not included.

Unfortunately, there was an overall caveat that the average fare should remain the same.

Points made in our response:

**General**

The loss of a comprehensible fares structure has been one of the great failures of rail privatisation. There is plenty of anecdotal evidence that high fares are a disincentive for rail travel. The overriding objective should be to increase custom through attractive fares.

The problem with this consultation is that the current fares structure is so complex, and creates so many cost ranges and anomalies, that it is impossible to see whether a particular group of options might produce both a similar overall average rail fare as now, and an attractive fares basket. The markings we have given are therefore very tentative in the absence of illustrative in-depth computer modelling.

Franchising appears to create an additional problem since individual franchises are let on the basis of revenue forecasts. By way of example, an off-peak day return from Southampton to Brighton (62 miles) by Southern is about one third less than the corresponding Stagecoach SWT legacy fare between Southampton and Weymouth (63 miles). This offers a very simple example of fares which might be levelled (preferably at less than the median rate, in order to increase custom) but would franchise revenue forecasts militate against the potentially substantial effects of applying the process on a wide scale?

**Markings**

Rail fares definitely need restructuring, and most options are worth some degree of consideration. Greater reflection of distance travelled, fares set so that they are not dearer than split tickets, lower fares for groups such as young and elderly, outward and return tickets both reflecting time of day used (for example, peak outward rate and off-peak return), e-tickets with a cap on the total amount for all journeys undertaken in a given period, and on-line accounts embracing all forms of public transport are options which should rank high for consideration.

Lower fares for travelling on a particular train, lower fares based on loyalty for regular passengers, lower fares when not using booking offices, are less attractive options.

**Additional points**

For occasional journeys, a simple structure might be adopted such as Xp per mile for the first Y miles, and then a reducing mileage rate for every additional Y miles. This could help ensure that the longest journeys would remain competitive with more-polluting air travel.

The capped Oyster card system has proved very popular in Greater London, and could be extended to built-up areas with rail networks generally. ONS produces a schedule of built- up areas by population. This is quite revealing, for example because Southampton-Portsmouth is reckoned to be the seventh most populous built-up area but is rarely, if ever, presented as being in the same league as, say, the West Midlands or West Yorkshire. With Southampton also one of the UK’s most badly polluted cities, a convenient passport to Travel, such as Oyster, seems highly desirable.

Railcards are popular, but have multiplied to an extent that they have created their own complexities and some people can qualify for more than one. A universal railcard for discounted weekend and off-peak travel would appear fairer. This already exists in South East England in the form of the Network Card, but the introduction of additional restrictions has reduced its appeal. Group Save has to some extent compensated for the gaps in railcard availability, but discriminates against people travelling alone, and operators are not obliged to provide it. Gift vouchers towards the cost of railcards, or even fares, might be popular.

To mesh with a universal card, Monday-Friday peak periods could be standardised across the national system and disapplied at weekends. Whereas peak fares are supposed to mitigate overcrowding, the widening of peak bands by some operators has tended to increase both overcrowding and the numbers of empty seats, depending on which side of the time threshold a particular service falls.

Having both off-peak and super-off-peak fares is confusing and unnecessary. Super-off-peak tickets are generally a renaming of off-peak fare rates, while new ‘off-peak’ rates embrace big surreptitious rises.

**Booking issues**

Some reform of booking arrangements is desirable.

It's anomalous that trains are increasingly being provided at turn-up-and-go frequencies, yet passengers can in many cases benefit from booking in advance. Various forms of on-line purchase usually work well, but getting tickets promptly at stations can be a nightmare, with stations unstaffed, long queues because the booking office is also the information point, and tickets machines awkward or slow.

**DfT’s Great Western Franchise stakeholder briefing document**

We are grateful to DfT for copying the above to us. It summarises the findings from stakeholder events which some of our Group attended last year or early this year.

Passenger aspirations generally cover the range which might be expected, for example on maintenance, reliability, convenient timings, accessibility and ticketing. DfT may use differing levels of leverage on particular issues.

No fundamental changes are proposed, such as dividing the franchise geographically, or splitting the occasional Brighton services with GTR (Southern) taking them over east of Southampton.

Given the new Intercity Express Trains, electrification (albeit truncated), and very good quality electric commuter trains in the Thames Valley, it is perhaps unsurprising that responses were significantly weighted towards the cross-Bristol regional and local trains.

There were concerns about the quality and age of rolling stock and perceived service deficiencies. The Cardiff-Portsmouth service featured prominently, with calls for additional capacity, newer trains, first class accommodation, and extra services.

Westbury tops the list of stations which could benefit from better connections. Passengers who use West of England main line services from stations in Wiltshire and Somerset are concerned about possible loss of stops, whereas those in Devon and Cornwall would be content for stops to be omitted to provide quicker journey times.

The Paddington-Westbury-West of England service could be revised, but there is no specific commitment to restore the much faster early morning connectional service between South Hampshire and Cornwall, which was lost at the beginning of this year.

There are also aspirations for the proposed new Bristol area local ‘Metro’ services, restoration of direct Bristol-Oxford (and possibly on to Milton Keynes) trains, return of regular passenger trains to the Exeter-Okehampton route and its reinstatement to Bere Alston (still linked to Plymouth), and direct trains on to private lines to restore a Taunton-Minehead service, and services beyond Paignton towards Kingswear.

[Transfer of Thames Turbo trains to the Portsmouth-Cardiff route is not discussed. These trains now operate the two weekday morning services from Southampton Central to Great Malvern. Reports in the railway press indicates that the Turbos are out of gauge on the Portsmouth-Brighton line, so the Brighton-Great Malvern/Bristol trains look unlikely to change.

We are not aware of Turbos reaching Portsmouth so there may be problems on the Netley line as well. However, reports suggest that the intention is for 3-car Turbos to operate between Portsmouth Harbour and Westbury, with a further two carriages attached between Westbury and Cardiff. Although the Turbos are excellently maintained, their 2+3 seating would represent a distinct downgrade of the present service.

SWR’s earlier update suggested that extension of Romsey-Southampton Airport-Salisbury trains to Swindon is still under consideration. This would make better use of existing rolling stock and, depending on timings, might possibly provide new journey opportunities to Cheltenham via Stroud and Gloucester, and to South Wales. This would be particularly useful when there is engineering work between Westbury and Filton via Bath and Bristol Temple Meads.]

**Acknowledgements / Contact details / GDPR**

As always, thanks to everyone who has been kind enough to contact us. Without your support and input, this newsletter would be much less comprehensive. It is produced in good faith, based on reports and information from individuals and sources including the press and news websites.

Contributions are always welcome. We aim for accuracy at all times, because our good reputation depends on it. We do not use material which could be offensive or which appears unlikely to be correct.

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