

Gerry Leighton
Stations and Depots Team
Office of Rail Regulation
One Kemble Street
London
WC2B 4AN

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Dear Mr Leighton

Thank you for the opportunity to respond to the ORR consultation on station access conditions.

In general, we are supportive of the concepts behind the consultation to simplify the Station Change processes and encourage third-party investment in the station network. If changes are made, however, it will be important to ensure that they properly integrated with other changes to the rail industry's structure that are either already underway or proposed, such as train companies taking on fully repairing leases for stations.

We note that this consultation is the latest round of a continuing consultation, and that so far, industry consensus has not been achieved. We think that it is important that ORR should continue to work to that end.

We support the proposition that there should be a simpler method of enabling change to be agreed, as well as a full procedure to enable full consideration and consultation, and maintaining the rights of interested parties to object ar make comment. We have no particular observations as to appropriate thresholds to differentiate the two categories. Similarly, we would support the concept of two tiers of interest in a scheme, but have no specific proposals on an approproate threshold.

You will be aware from discussions, between the Minister for Local Government & Communities and Richard Price, that Welsh Ministers are considering taking greater responsibilities for the operation and management of the railway and services in Wales. The Welsh Government is in fact already a major funder of station improvements in Wales with our £40 milion Wales Station Improvement Programme (NSIP+) and other significant investments. In this regard, we note that you will be considering whether the Welsh Government should be included as "funders" alongside the Department for Transport (DfT)

and Transport Scotland. We welcome this commitment and look forward to discussing your thoughts in this regard, taking account of Wesh Ministers' status as "funding authority" under the Railways Act 2005 at a suitable date. During such a discussion we could explore what might be an appropriate "interest period" for Welsh Government funded station improvements.

Yours sincerely

Simon Pickering

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Rail Franchise Manager Welsh Government