



## **2018 periodic review draft determination**

**Freight & National Passenger  
Operator draft settlement  
document**

**June 2018**

# Freight & National Passenger Operator (FNPO) route: draft settlement document

## Summary

This document provides a summary of the key proposals in the FNPO Route Strategic Plan (RSP) and our decisions on the route's settlement for CP6, which forms part of our determination. The role of these settlements within the determination is explained in Appendix A of the [PR18 draft determination overview document](#).

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## The FNPO route strategic plan

### Summary of key proposals

1. The FNPO differs from the geographic routes, as it is not responsible for managing any operational assets, nor does it control the movement of trains. Instead, its role is to represent the interests of a number of customer groups – including freight and national passenger operators (including charter train operators and operators with plans to run open access passenger services) – which operate a significant proportion of their services across a number (and, in some cases, the majority) of Network Rail's geographic routes.
2. It seeks to deliver the train performance and other requirements of its customers by working with the geographic routes, System Operator (SO) and other functions within the company.
3. The stakeholders within the FNPO are wide-ranging and include passenger and freight train operators, passengers and freight end users (FEUs) such as ports and terminal operators. They have varied interests and a core function of the FNPO is to manage stakeholder requirements and engagement with stakeholders as well as other routes and business functions in Network Rail.
4. One aspect of this role is to provide advocacy for its customers across the range of Network Rail's decision-making across the national network.
5. In respect of rail freight, the FNPO describes its vision as being to develop a framework that supports freight growth, and proposed to:
  - support the development and delivery of new freight services to attract new customers to rail and help existing end users to expand their operations;
  - establish relationship and governance arrangements with the SO and eight geographic routes to support the FNPO's framework and its objectives; and

- support governments' freight strategy proposals, that encourage growth in rail freight, relieve road pressures and provide for the FNPO to lead the production of the industry's plan.
6. For its national passenger operators (Caledonian Sleeper and CrossCountry Trains), the FNPO set out proposals to:
- identify and undertake plans to improve performance, through removing bottlenecks;
  - improve the reliability of the national network; and
  - improve journey times.

It will do this by working with train operators and the geographic routes.

7. The FNPO provides a specialised resource for charter train operators, taking account of their specific requirements. The track access contracts held by charter train operators give them the ability to operate bespoke services on the network, subject to the capability and capacity of the network. The FNPO has engaged with the charter industry to develop a charter strategy which would form the basis of the FNPO's commitments to charter customers throughout CP6. One element of this is the proposals to develop strategic capacity for charter customers to minimise the risk of paths not being found.
8. The FNPO also proposes to develop joint performance and safety strategies for each charter operator and update rules that apply to steam locomotive operations with the aim of introducing annual certificates that provide for operation of frequent services cleared over specific routes.
9. The FNPO also represents aspirant open access operators as part of the company's support of open access operators. The route seeks to achieve this by providing expert advice to these operators, and by representing their interests in wider discussions with other stakeholders.
10. The route's RSP set out what the route proposed to deliver in CP6. A summary of this is set out in Table 1. Table 2 sets out its expenditure and income forecasts.

**Table 1: Summary of what the route proposed to deliver in CP6**

Metric	CP6				
	2019-20	2020-21	2021-22	2022-23	2023-24
<b>Freight Delivery Metric (FDM)</b>	94.0	94.0	94.0	94.0	94.0
<b>FDM regulatory minimum floor</b>	92.5	92.5	92.5	92.5	92.5
<b>Charter Train Operator Public Performance Measure (PPM)</b>	88.0	88.0	88.0	88.0	88.0

\*National passenger operators are included in the Consistent Route Measure – Performance (CRM-P) in geographic route summary documents.

**Table 2: Summary of route’s proposed expenditure and income for CP6**

£m (2017-18 prices)	CP5 total <sup>1</sup>	CP6					
		Total	2019-20	2020-21	2021-22	2022-23	2023-24
Support	0	0	0	0	0	0	0
Operations	22	28	6	6	6	6	6
Maintenance	0	0	0	0	0	0	0
Renewals	0	0	0	0	0	0	0
Schedule 4&8	71	92	21	18	19	19	14
Traction electricity, industry costs and rates	0	47	9	9	9	10	10
System Operator	0	40	7	8	9	8	7
Route controlled risk funding	0	5	1	1	1	1	1
Route contribution to group portfolio fund	0	4	0	1	1	1	1
<b>Gross revenue requirement</b>	<b>94</b>	<b>216</b>	<b>44</b>	<b>43</b>	<b>45</b>	<b>44</b>	<b>40</b>
Other single till income	(20)	(20)	(4)	(4)	(4)	(4)	(4)
FNPO recharge	0	5,832	1,134	1,219	1,232	1,158	1,089
<b>Net revenue requirement</b>	<b>74</b>	<b>6,029</b>	<b>1,174</b>	<b>1,258</b>	<b>1,273</b>	<b>1,198</b>	<b>1,125</b>
<u>Recovered through</u>							
Variable charges	0	(399)	(74)	(76)	(79)	(82)	(88)
Fixed charges / Network Grant	0	(5,630)	(1,100)	(1,182)	(1,195)	(1,116)	(1,037)
<b>Total SOFA related income</b>	<b>0</b>	<b>(6,029)</b>	<b>(1,174)</b>	<b>(1,258)</b>	<b>(1,273)</b>	<b>(1,198)</b>	<b>(1,125)</b>

## Our approach to assessing the plan

11. Our assessment of the FNPO RSP considered, in particular: the costs included in the plan; the route requirements and scorecards; and the financial and stakeholder engagement aspects. This work was supported by additional scrutiny from our internal team which shadows the FNPO route. In particular, we carried out:

<sup>1</sup> The FNPO is a new route. The CP5 numbers do not cover a five-year period and so are not comparable to CP6 totals.

- 'deep dive' meetings looking at performance trajectories for freight and passenger train operators, including meeting with specialists in each relevant area. The deep dive meetings we held with other routes also helped to inform our assessment of this route;
- three main meetings with the route overall, including the route managing director. This included a presentation by the route on its plan in December 2017. This followed on from our engagement with the route prior to the SBP submission; and
- attendance at a series of stakeholder engagement workshops, which were targeted at each of freight and national operators, to understand and assess their views of Network Rail's proposals as set out in the RSP.

## Our assessment of the FNPO plan

12. There are a number of different aspects of our assessment of the FNPO's RSP, in particular the:
  - assessment of the quality of route stakeholder engagement on the RSP;
  - assessment of the scorecards and performance trajectories for freight and national passenger operators. This considered both the levels of performance proposed by each geographic route and how these individual trajectories were combined into the national FNPO targets where relevant (this is discussed in more detail in PR18 draft determination overview);
  - consideration of other commitments included in the plan, notably in respect of health and safety improvements; and
  - FNPO's plans for representing the interests of its customers and wider stakeholders, including the role that engagement and governance arrangements can play in delivering improved outcomes and holding the route to account.

13. We discuss each of these below.

### Route stakeholder engagement

14. Network Rail engaged with its customers at specific events which were tailored separately for freight and national passenger operators to provide more details on the specific steps to be taken to meet the FNPOs customers' needs in its engagements with other routes and business functions.
15. As part of our SBP review, we have assessed how well Network Rail's routes and the System Operator (SO) engaged with their stakeholders to inform their strategic plans. We wanted the routes/SO to engage with their stakeholders to help understand and meet their stakeholders' requirements, and to allow them to use operators' railway

expertise and understanding of operations, access and costs to make their plans more efficient, realistic and credible.

16. We have assessed the FNPO route's approach with respect to three areas (scope and methods of engagement; recording and analysis of priorities; and trade-offs and line of sight)<sup>2</sup>. Our findings with respect to each of these three areas are discussed below.

***Scope and methods of engagement: Which stakeholders did the route engage with and how well did it do so?***

17. The FNPO route engaged with a good range of stakeholders, including freight operators and their end user customers, passenger operators (including charters) and prospective open-access operators.
18. The FNPO route used a reasonably good range of approaches to engage its stakeholders, hosting six CP6 stakeholder workshops as well as engaging through a range of other forums. Each workshop was aimed at either freight or passenger operators (including prospective open access operators). The workshops appear to have been well run and to have given stakeholders adequate opportunity to provide input. However, the FNPO RSP did not explain in detail what engagement processes the route followed.
19. Stakeholders have reported receiving the relevant drafts of the FNPO's RSP during 2017 but raised concerns that the governance arrangements for making changes to drafts needed improvement together with the process for agreeing and proposing changes to customer scorecard requirements.
20. RDG and a group of freight operators together wrote to the FNPO route expressing general support (albeit with some qualifications) for its strategic plan. They also

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<sup>2</sup> We have summarised our assessment of the route's engagement using the following terminology:

- *effective*: The engagement is effective in supporting delivery of our overall PR18 aims and, specifically, that it enables stakeholders to influence priorities and challenge performance (where necessary). The engagement should also be proportionate to what it is seeking to achieve (so that money on engagement is well spent);
- *inclusive*: The overall engagement should seek to involve all relevant stakeholders (without undue discrimination) and should adopt different approaches to reflect differing stakeholder capabilities and interests;
- *well governed*: There should be processes that encourage meaningful engagement and accountability, as well as providing mechanisms for challenge and escalation; and
- *transparent*:
  - On performance: There should be provision of appropriate and relevant information and data to enable stakeholders to influence and challenge in an effective and timely way; and
  - On engagement: It should be clear how engagement arrangements have been implemented and what impacts they have had on Network Rail's actions and delivery. For example, there should be a record of key points made by different stakeholders and how they have been acted on (or, if not, why not).

stated that they understood the reasons for the route's difficulty in engaging with freight operators in autumn 2017 (citing the delay in the announcement of the SOFA and the need to ensure internal alignment and consistency across a suite of devolved SBPs).

21. The FNPO route's engagement was *inclusive*. However, it should have been more *transparent* in setting out its engagement activities in its plan, which could have given greater confidence that the process was *well governed*.

***Recording and analysis of priorities: How well has the route recorded, analysed and reflected on its stakeholders' priorities?***

22. The FNPO RSP included detailed discussions of the needs of each of its customers or customer groups. However, it did not clearly summarise what the route saw as the key needs of its stakeholders, or demonstrate a link between the outputs of its engagement activities and its understanding of customer needs as set out in the plan.
23. The FNPO route made good use of research evidence to inform its understanding of its stakeholders' needs, including presentations at workshops, consultancy input on the freight market and Transport Focus research on passengers' priorities.
24. While the FNPO route's use of evidence was strong, it could have been more *transparent* in setting out how its engagement activities have influenced its understanding of stakeholders' needs.

***Trade-offs and line-of-sight: Has the route demonstrated a robust process for deciding between competing stakeholder priorities? Has it demonstrated a line-of-sight between stakeholder priorities and the actions it has committed to in its RSP?***

25. The FNPO RSP included little discussion on how the route traded-off competing priorities. The plan could also have offered more explanation of what the route intended to do to ensure that the geographic routes act to meet the route's stakeholders' needs.
26. The FNPO could have done more to demonstrate a line-of-sight between its understanding of its stakeholders' priorities and the actions it has committed to for CP6.
27. In general, the FNPO RSP could have made it clearer how the FNPO route's engagement has been *effective* in influencing its plans for CP6.

**Scorecards and performance trajectories**

28. Network Rail has established route scorecards which include a range of measures relating to safety, train performance, finance, investment and asset management measures, people measures and locally agreed customer measures.

29. The FNPO scorecard includes six measures that are currently 'TBC' in Network Rail's FNPO RSP. The status of these measures varies as some have been included to address a Transport Scotland HLOS requirement, whereas others are locally agreed customer measures. The FNPO is reviewing these scorecard measures and is developing 'Milestone Plans' which seek to establish the targets and trajectories for these measures in advance of April 2019.
30. The FNPO has worked with CrossCountry Trains to understand the specific interventions required at network wide and geographic route level in order to deliver improvements in its performance delivery. The interventions included improvements in autumn preparedness and vegetation management, reductions in line obstructions and fencing improvements, reductions in fatalities and trespass, improvements in track quality and reductions of temporary speed restrictions and focus on right time arrivals and departures at key locations.
31. We set out below a summary of the issues relating to operator performance. More information on our review can be found in the relevant chapter of the [requirements and scorecards supplementary document](#).

## **Freight performance**

32. The FNPO included train performance measures and trajectories on its route scorecard which it has sought to agree with its freight operator customers.
33. The delivery of performance to freight operators is represented by a range of different measures. This includes the Freight Delivery Metric (FDM), which provides a way of measuring national freight performance, and a consistent way of measuring freight performance in each route, through the 'Freight Delivery Metric - Route' (FDM-R) measure.
34. During our review, there was a lack of clarity about whether the CP6 FDM trajectory had been agreed between Network Rail and its customers. In particular, Freightliner commented that it had seen a higher proposed FDM target of 94.5% but had not agreed to the final 94.0% that was included in the FNPO RSP in February 2018. While the FNPO could not provide clear evidence that the change to 94.0% had been agreed, it did provide sufficient evidence that it had informed Freightliner of this change, and so arguably provided an opportunity for comment on the change.
35. However, there should not be any doubt about whether performance trajectories have been agreed or not. It is important that all routes maintain clear documentary evidence of both seeking views and obtaining a clear statement of agreement or disagreement to changes. The experience described above highlights the need for changes to be made to how the FNPO records whether customers have agreed with its proposals, and to the standards of recording areas of agreement and



disagreement. We are mindful that insufficient clarity at this stage of a consultation process can undermine confidence in earlier phases of engagement.

36. Against this background, we reviewed the FDM trajectories put forward by the FNPO and, in particular, whether they were sufficiently stretching. Overall, we consider that 94.0% is an appropriate baseline against which to hold the FNPO to account.

### **National operator performance**

37. The FNPO scorecards capture key aspects of delivery to national passenger operators through the inclusion of: route performance measures; customer-specific measures on the FNPO route scorecard; and locally-agreed measures on geographic route scorecards.
38. The current CrossCountry Trains franchise expires in October 2019. The FNPO argued that it was difficult to develop targets for performance across CP6 without sufficient detail of the likely franchise commitments which it had discussed with DfT (the franchising authority for CrossCountry Trains). It has agreed to update the performance metrics for the majority of CP6, once the franchise has been awarded.
39. Network Rail has introduced customer scorecards in 2017/18 that it stated had been agreed with CrossCountry Trains. Reflecting this, the FNPO proposes to continue to use the Public Performance Measure and Cancelled and Significantly Late measures as its key performance metrics. These are likely to be of particular relevance until October 2019, after which the new franchise is expected to commence operation.
40. CrossCountry Trains also said that changes had been made to a measure for right-time arrivals at Reading on the Wessex route scorecard without its knowledge or agreement and it had been omitted from the Anglia and LNE route scorecards which was unexpected and unexplained. It considered there was a lack of clarity in the relationship and roles between routes and the SO in respect of the management of enhancements and event steering groups for example.
41. CrossCountry Trains considered that the FNPO could not be held solely accountable for delivery of its performance given this was essentially deliverable through a culmination of seven route delivery plans and other objectives. It felt it was essential that any route in which it operated includes a measure of delivery on its scorecard which it can be held accountable for. More generally, CrossCountry Trains considered that Network Rail's proposals were too focused on freight initiatives, as there was a lack of provision for passenger operator performance improvement schemes.
42. The national passenger operators face particular issues in terms of ensuring that each of the geographic routes focus sufficiently on their needs, and that there is sufficient weight given to these operators by the FNPO. Reflecting this, we agree that

CrossCountry Train's performance should be reported on all relevant geographic routes' scorecards, and for these to be proportionately reflected in how the routes' aggregate performance is recorded.

43. Caledonian Sleeper operates two groups of services between London and major cities within Scotland. The Highlander service operates between London Euston and Edinburgh, where coaches either detach into separate services for Fort William, Inverness and Aberdeen or join at Edinburgh for southbound services for London Euston. The Lowlander service operates between London Euston and Glasgow Central and Edinburgh Waverley with services either combining or detaching at Carstairs to form a single service to or from London Euston.
44. The measurement of performance has been agreed with Caledonian Sleeper, and is to be measured consistently with the key franchise commitments. This takes the form of measurement of 'Right Time' arrival of the two morning arrivals at London Euston and five arrivals at destinations within Scotland.

### **Charter performance**

45. Charter operators hold track access contracts that provide them with the ability to operate anywhere on the network, subject to the current capability and capacity of the network. Reflecting this, their operations are not conducive to being measured in the same way as scheduled passenger services. Instead, greater reliance is placed on the set of agreed local customer measures.

### **Other commitments in the FNPO plan**

#### **Supporting freight and passenger growth**

46. There was a significant emphasis in the FNPO plan on the case for setting charges on freight operators at a level that supported growth. We have set out our proposals to apply a cap to the Variable Usage Charge (VUC), and to do so in a way that phases in increases to the charge over time. The VUC proposals are discussed in [variable usage charge consultation](#).
47. The FNPO also set out its proposals to continue with its approach to support service plan reviews to enable longer and heavier freight services to operate.
48. In respect of passenger operations, the RSP also proposes to focus its efforts in respect of the potential growth of CrossCountry Trains on: major city to city flows (particularly North East England to Birmingham and the Manchester to Birmingham corridor); and airport demand (particularly at Birmingham International, Manchester Airport and Stansted Airport stations).
49. The FNPO plan also includes additional staff such as a capability and planning manager working to the Head of Strategic Capability whose role is to work with route planning managers, the SO and customers to provide effective delivery to national

operators. The FNPO is also recruiting people for developing and using strategic capacity and strategic freight capacity.

### **Capacity and capability of the network.**

50. The FNPO RSP sets out its proposals for maintaining the published and physical operational capability of the network for its customers, working with the geographic routes and SO to develop and provide clear statements of network capability and capacity. This is particularly important to the FNPO route's customers' operation across multiple geographic routes.
51. Understanding the capability of the network is important for Network Rail, its customers and for its funders. It is important that the published and physical state of the network match and essential that should any discrepancies arise, they are addressed as soon as possible so customers and stakeholders can plan their businesses with a reasonable degree of assurance. Network Rail's geographic routes are responsible for ensuring details relating to network capability are maintained and kept to the published and physically operational levels. More details on our proposals for holding Network Rail to account for its obligations in respect of network capability can be found in the [scorecards and requirements supplementary document](#).
52. The FNPO is also working with its charter customers to develop and secure a number of strategic charter paths which would provide guaranteed gauge and vegetation-cleared paths on core charter routes. Network Rail has engaged with charter customers to develop a charter strategy which will form the basis of its delivery for charter operators in CP6. This will require Network Rail to develop solutions to secure paths for charter train operators, which can only be requested once other operators' firm rights have been planned.

### **Freight and national passenger operators in Scotland**

53. Transport Scotland set out requirements in its HLOS relating to a number of areas of the FNPO's responsibilities, notably:
  - targets for the growth of rail freight in Scotland;
  - ensuring that the network in Scotland is appropriately gauged-cleared with diversionary options at times of disruption on the network<sup>3</sup>; and
  - proposals to improve journey times, capacity and timetables.
54. The FNPO needs to provide more details on the specific steps it will undertake to meet the specified requirements of the Transport Scotland HLOS and provide

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<sup>3</sup> The Scotland HLOS included a requirement for freight gauging to "be maintained to at least the capability in the most recently published issue of the Freight Gauge Database Map, or the Sectional Appendix, or the full suite of RT3973 forms for Scottish routes, whichever is most capable at the time of publication of the HLOS". More information is included in the [Scotland summary document](#).

assurance of its delivery. These specific requirements are set out in more detail within the [Scotland summary](#).

## **Safety**

55. Network Rail identified a £22m funding requirement to address and mitigate safety risks for the FNPO's customers that operate on Network Rail's infrastructure. The FNPO plan described this work as being contingent on funding being secured.
56. Our view is that this work is not discretionary and is needed in order to meet the requirements of health & safety legislation. Consequently, the funding of this work needs to be included in the FNPO's baseline plan (and should not be contingent on risks not crystallising within the FNPO or elsewhere in the business).

## **Route efficiencies**

57. Network Rail has identified proposals for staff savings in its plan. It has also identified further efficiencies by combining activities within teams within the FNPO rather than placing them in distinct geographic routes and other parts of the business. The company has also identified other efficiencies such as the creation of dedicated strategic charter paths which will be gauged-cleared and timetabled, providing an 'off the shelf' path. This will minimise detailed engagement between the FNPO, the geographic routes and SO and charter operators and customers who can plan their businesses with a reasonable degree of assurance.

## **Holding the FNPO to account for delivery**

58. The FNPO has a wide and varied customer and stakeholder base, comprising operators, passengers, freight end users of which it is the principal point of contact.
59. Network Rail has had a number of discussions with its stakeholders, as it developed the RSP, including a number of CP6 stakeholder workshops. At these, stakeholders emphasised the need for clarity about how the FNPO will balance the needs of its different stakeholders and how the interfaces with the SO and geographic routes will work in practice.
60. We have considered the issue of how best to hold the FNPO to account, and discussed this issue in some detail with the FNPO route team. This is a particular issue for the FNPO, as a significant proportion of its activity is reactive to either changes in market demand or other unexpected events – this makes it hard to describe in advance what we expect the FNPO to do and can make it hard to measure success using quantitative metrics.
61. We have considered whether the FNPO's proposals in respect of scorecards are appropriate and, in particular, capture those aspects of performance that are conducive to quantitative measurement. On this, we were content that the

combination of the proposed scorecards would achieve this, particularly in light of the confirmation by the FNPO that the final set of scorecards would include those for:

- End customers, including larger freight customers (e.g. Tarmac, British Steel, etc.) and the larger ports; and
- Charter operators.

62. In addition, we took some comfort from the FNPO's commitment to continue with its stakeholder survey, as this provides a direct way of measuring whether the FNPO has been successful in its management of stakeholder relationships. This is a relatively more important aspect of the route's delivery than it is for a geographic route (which typically would have a smaller set of less diverse stakeholders).
63. We also consider that certain aspects of Network Rail's governance act in ways that support delivery by the FNPO of its objectives. In particular, it has the same reporting structure as the geographical routes and the route is included within the reporting packs provided to its Executive Committee and Board. The FNPO is also involved in key operational decision-making, allowing it to discharge its role more effectively.
64. We note that FNPO has placed some of its staff physically within the geographic routes to strengthen links and engagement, and to provide focus for its customers by working closely with route controls on real time train performance and regulation, in particular to network recovery following disruption.
65. Network Rail is also planning to introduce a supervisory board for the FNPO, and is in the process of agreeing the terms of reference. We see this as an important opportunity to create a board that will provide a degree of external challenge to the route management team, including by monitoring delivery against the scorecards and, where performance is falling short, agree appropriate action plans to recover performance levels.
66. However, we remain concerned about the general lack of public transparency and clarity about these arrangements. Indeed, stakeholders have expressed concern about how they will work in practice. The FNPO should publish (and maintain) a document that explains how Network Rail's wider governance interfaces with the FNPO. This needs to explain to all parties who is responsible for each activity, who is responsible for reviewing performance and how customers and end users can escalate issues within the company.
67. In addition, in a number of places the route plan was not clear on the specific actions it would take on behalf of its stakeholders. In some cases this reflected the fact that projects were at an early stage. Once these projects have started, it will be important to reflect updated milestones for delivery in subsequent annual updates to the FNPO plans.

68. Finally, there remains a risk that there is insufficient focus on the range of reactive work that the FNPO is expected to undertake. To some extent, successful completion of this work will be reflected in the stakeholder perception survey. However, this will not provide all stakeholders with an understanding of how the FNPO has been allocating its time and its achievements. Reflecting this, we want the FNPO to set out annually a summary of its activities, with a particular focus on the work that it has undertaken – and the associated outcomes it has supported – and which is not directly reflected in the quantitative metrics in its scorecards.
69. In light of the concerns set out above about the relative focus that is given to freight in the FNPO RSP, this annual report should separately identify activity against each of: freight; national passenger operators; charter; and (subject to commercial confidentiality) aspirant open-access operators. This report should be published and stakeholders provided with an opportunity to discuss and comment on its contents.

## Our decisions

70. Our review of the FNPO plan has resulted in one discrete adjustment to the FNPO's plan, namely to include within core spend the funding intended to improve health & safety risks.
71. There is also a need for the FNPO to take a number of steps to improve the extent to which it faces appropriate incentives to deliver against its plan. We have discussed these with the FNPO team – some of which reflect proposals that the FNPO made during our scrutiny process – and are seeking their firm commitments to deliver against them. They are to:
- publish and maintain its governance and reporting framework, so that its stakeholders understand the interfaces between the FNPO, geographic routes, the SO and other parts of Network Rail;
  - provide greater clarity on the role of the FNPO Supervisory Board and how this provides assurance to its customers around delivery;
  - publish annually a report on its activities and achievements, clearly setting out how these relate to each customer group (freight, national passenger operators, charter and aspirant open access);
  - continue with its annual stakeholder survey (and supporting 'pulse checks') to directly capture evidence on the quality of its stakeholder engagement;
  - roll-out its proposals for end-customer scorecards; and
  - identify and publish milestones on those aspects of the RSP that were not sufficiently well-progressed to have clear milestones attached at the time of publication (and reflect these in the route's annual business plans).



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