

20th August 2007

Tim Griffiths
Senior Economist
Office of Rail Regulation
1 Kemble Street
London
WC2B 4AN

Our ref: F2/CON/ORR/014002/0014a/hm
Your ref:
Direct Dial 0141-333-3742
Direct fax: 0141-333-3284
Email: ron.culley@spt.co.uk

Dear Mr Griffiths

Periodic Review 2008: Charge to recover the costs of freight-only lines

SPT welcomes the opportunity to comment further on this proposal.

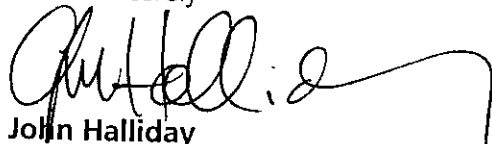
As stated in our earlier response SPT's main concern is that the outcome of the review would not lead to any transfer of freight to road. SPT notes that the recommended approach is to add an amount to the variable charge across the network. SPT notes that while this approach is supported by key industry bodies such as Network Rail and Transport Scotland it is not supported by the Scottish Resources Group. SPT notes that this could potentially lead to the switching of traffic from Hunterston to ports on the east coast.

As highlighted previously and as recognised in this consultation, there is significant freight movement by rail within route area and to external destinations. SPT would expect that for any decision on charging that the economic impact of the proposal is borne in mind in addition to its simplicity to implement. SPT would be concerned if the proposals as implemented had an overall negative economic impact on the economy in the west of Scotland.

SPT is content to leave it to the Rail industry partners to comment in detail on the proposed regime.

SPT has no objection to this consultation being made public in the normal manner.

Yours sincerely



John Halliday
Assistant Chief Executive (Transport & Strategy)