

By e-mail to [railprospectus@tfl.gov.uk](mailto:railprospectus@tfl.gov.uk)

## **A NEW APPROACH TO RAIL PASSENGER SERVICES IN LONDON AND THE SOUTH EAST: CONSULTATION RESPONSE BY [REDACTED]**

### Introduction

- 1.1 [REDACTED] welcomes the opportunity to respond to the consultation on “A new approach to rail passenger services in London and the South East”.
- 1.2 We note the proposal includes the transfer of responsibility from the DfT to TfL for inner suburban rail services that operate mostly or wholly within Greater London, as current franchises fall due for renewal. We also note that the DfT will continue to be responsible for outer suburban services.
- 1.3 [REDACTED] has a significant interest in this proposal due to its clear association with the Thameslink network.

### Detailed Comments

- 1.4 We note that the key recommendation is to set up a partnership between TfL and DfT that will allow a forum to give LEPs and local authorities a say in determination of service patterns and infrastructure requirements. Whilst the document is clear that this applies to local authorities within the immediate environs of London it is not clear how this mechanism would reach out to local authorities beyond the core area, such as Bedford who may be affected by decisions made in the partnership area.
- 1.5 We commend the approach that changes would only occur as franchise become susceptible to renewal. We note that this is on the proviso that the current franchising timetable is closely adhered to. Changing of the strategic specification of franchises through further direct awards or unplanned short term extensions will create a degree of uncertainty that will hinder land use planning and make economic development problematic in areas such as Bedford due to the unknown and unplanned effect on the south east rail network.
- 1.6 We address the specific consultation questions below.

*Question 1 Do you agree with the principle of a partnership to better integrate the specification of rail passenger services across London and the South East?*

A partnership approach is eminently suitable for this task. The key issue for Bedford is that safeguards are offered to local authorities on the fringes of the partnership area that are affected by proposed service or infrastructure changes within the partnership area.

Similarly, [REDACTED] is part of the emerging England's Economic Heartland Strategic Alliance, which has established a Strategic Transport Forum with the specific intention of providing the

focus for a single strategic conversation with Government. The strategic interests of partners outside London must be reflected in any proposed partnership arrangement and we would suggest that the proposed partnerships should not be limited to DfT and TfL.

*Question 2 Do you agree with the principles that the partnership will work to? Are there any specific issues that have not been captured?*

The key issue for Bedford is that proposals to increase frequencies in the partnership area are not detrimental to the provision of services to Bedford. We see no mechanism in the current proposal by which this would be protected. This lack of certainty could lead to adverse economic consequences if labour market access for Bedford and businesses which rely on Bedford as a source of labour is not maintained. We provide further comment on this point in respect of questions 5.

We are supportive of the proposal to improve interchanges, provide greater reliability and increase levels of customer care.

*Question 3 Do you agree with the proposed governance arrangements?*

We have no specific comment on the governance arrangements and timing beyond those made in our previous observations and would reiterate that accountability for coming to a recommendation to the Secretary of State and Mayor of London should not rest solely with DfT and TfL.

*Question 4 What form do you propose the input from local authorities and LEPs could take?*

We are disappointed that the Prospectus makes no initial view known by the DfT and TfL as to possible governance arrangements. We have already referred to the need for the governance arrangements to take cognisance of the input from relevant public bodies outside the immediate area involved in the proposed partnership. [REDACTED]

[REDACTED] is party to both the East West Rail Consortium and the new sub regional transport body (England's Economic Heartland Strategic Alliance) which provide a voice on major transport issues in the northern home-counties. These bodies should be party to the partnership's working arrangements.

*Question 5 Do you agree with the safeguards for transfer of inner suburban services to TfL, as set out here?*

The safeguards proposed whilst stating that there will be no reductions in service frequency, journey times or station stopping patterns, are limited in the sense that they do not provide protection for future necessary changes or enhancements. The safeguards should protect the relevant factors at the time of transfer and not at the current time. The approach of the Secretary of State to addressing competing proposals within and outside the partnership area needs to be made explicit within the partnership's terms of reference to ensure decision making remains transparent. We would also expect that the

appropriate level of funding for rail investment is retained irrespective of the governance arrangements in place.

*Question 6 Are there other outcomes you might expect to see achieved?*

We note that the Prospectus sets out possible short, medium and long-term objectives including likely schemes and interventions. Whilst this is welcomed we note that some of the proposals such as the possible changes relating to Thameslink and Crossrail-2 could have implications (both positive and negative) for rail services across a far wider area north of the Thames than Hertfordshire.

We would expect this wider effect to be discussed as a specific outcome in terms of economic opportunity.

Whilst we are supportive of the intentions behind the principles underpinning the proposals, the consultation document should take into account existing partnerships as well as the emergence of strategic sub-national partnerships.

#### Contact

1.7 For further information please contact

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