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Rail Partnership Engagement  
Transport for London  
5R3 Palestra  
197 Blackfriars Road  
London  
SE1 8NJ

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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17<sup>th</sup> March 2016

Dear Sir/Madam

### **Rail Passenger Services in London & South East Consultation Response**

[REDACTED] represents Rail Users from Bedford (EMT and Thameslink services) and Flitwick (Thameslink services). This document is the [REDACTED] response to consultation document outlining the new approach for Rail Passenger Services in London & South East.

We note that for services north of London the only identified services that would be transferred to TfL are those operated by GTR from Moorgate which constitute the Great Northern Inner services. No services operated by GTR on the Midland Mainline have at present been identified for transfer to TfL.

We also note that the present service provided by GTR on the inner services is every 15 minutes which meets your minimum aim i.e. a train every 15 minutes.

We of course expect to be notified by you if you were considering transferring GTR inner services on the Midland Mainline to TfL at some future date.

Our response to the questions is:

#### **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?**

Yes.

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

Yes. As regards specific issues, it is not clear how this will meet the requirements of Long Distance operators (the old "Intercity" services). South of the Thames, broadly, 100% of services will be subject to the partnership arrangements; however, north of the Thames, most lines includes services that will not be covered by the partnership. In our case, broadly, capacity will need to be shared between 3 train service specifications:

1. TfL for inner services – presumably to St Albans and Luton

2. DfT under a London & South East Partnership contract for services to Bedford
3. DfT under a national contract for services to Leicester, Derby, Nottingham, Sheffield etc.

The DfT need to consider how it will separately represent South East passengers and those from the remainder of the country – some of whom are daily travellers to London, and, in many cases, use trains that also serve South East destinations on their journey to/from London. These will all need to be managed to make best use of total capacity – principles need to be established for this. More generally, the paper seems to operate on the basis of protecting current long distance services (whether national or South East regional) from deterioration, rather than recognising that demand is likely to increase and these services will want a share of capacity increases – and may be a funding source for the improvement.

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

We note that train operators will be appointed by either the DfT or TfL. This is sensible, so accountability is clear.

In recent years there has been a move towards one (main) operator per London Mainline termini, and this is now widely in use. With the new regime, there will be a growth in two operator terminals, and, in addition to the longer term governance arrangements referred to in the paper, it will be essential to put in place arrangements for equitable sharing of resources during incidents and subsequent recovery. These will need some form of “single mind” to make decisions. Recent concepts such as shared control rooms need to continue to allow coherent overall operation to take place – now with more TOCs present.

There is reference to “for inner suburban rail services that operate mostly or wholly within Greater London”; we believe this needs considerable further thought where “mostly” is relevant – by distance, by station count, by passenger numbers (or a mix thereof) are all possible. In our case:

- Bedford, stations to St Albans, then fast to London: presumably DfT – (GTR operated)
- Bedford to London express: presumably DfT – (EMT operated)
- All stations to Luton & St Albans: Whilst this seems a natural candidate for TfL: - (GTR operated)
  - In the case of Luton services, 5 of 11 stops north of St Pancras are outside Greater London
  - Whilst St Albans is a key interchange station, there are important flows from south of St Albans to/from destinations north of St Albans
- Semi Fast Services to/from Luton & Bedford (peak hours only) that typically serve 2 / 3 stations in Greater London and 5 outside: not clear; could be either. – (GTR operated)

Our view is that the bias should be towards passenger needs and effective railway operation, rather than formulaic definitions of inner & outer London services. It would, for instance, in our case be a distinct retrograde step for travellers if service patterns were strictly segmented at St Albans – it is critical that for TfL contracted services that start / terminate outside London, passengers from all stations are fairly treated.

It may also make sense to require some common services to be provided by joint ventures of both DfT and TfL appointed operators – eg for drivers, particularly where the same type of rolling stock is in use.

Whilst separate contracts seem sensible, we think consideration should be given by the partnership to a principle that all contracts for a single route are signed based on the sum of the two bids (ie one operator, two contracts), rather than appointing best of each bid, as economies of scale will be lost etc. This will also make it easier to address some of the issues we have highlighted above.

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

We believe that Local Authorities and LEPs should form consortiums in order to be able to form a common view. Without such an approach, there will be elements of “divide and conquer”, with the

relatively small entities outside London either not able to make their voice heard or not providing a common message, allowing the London preference to dominate. Organisations such as ourselves need to have a role as we have the practical experience (and advice) due to our day to day involvement with travellers.

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

Probably not. As regards your statement:

*“No adverse impacts on the frequency, journey times or stopping patterns of longer distance services to and from London. Extra capacity on peak local London services would only be added if there is no negative impact on longer distance services”*

This could be interpreted to mean that all additional capacity will be allocated to inner London services. Such additional capacity should be shared between inner and outer-London services – and indeed Long Distance Services as well (see our answer to question 2). The safeguards need to reflect both no deterioration and the sharing of improvements.

Furthermore, there should be an explicit reference to capacity being retained for longer distance services (in addition to frequency, journey times and stopping patterns).

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

The Fares and Ticketing structure should have national scope, not just London & the South East. There remains a focus on “Smart Cards”, “Oyster” etc. Instead, the emphasis should be on a “National Ticketing Account” – to which you can evidence your entitlement to travel by many means – Smartcard (including Oyster), bank contactless card, phone (NFC and/or App) etc.

**Conclusion**

Despite the questions we have raised above, we support the types of improvement described in the paper.

I hope that our response is useful and if required would be prepared to meet you to discuss them further.

Yours Sincerely

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