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

Friday 18<sup>th</sup> March 2016

To whom it may concern,

**██████████ RESPONSE TO THE DEPARTMENT FOR TRANSPORT – TRANSPORT FOR LONDON PROSPECTUS ON PARTNERSHIP ARRANGEMENTS FOR SPECIFYING AND MANAGING RAIL SERVICES IN LONDON AND THE SOUTH EAST**

Please accept this letter as [REDACTED] response to the rail prospectus issued jointly by the Department for Transport (DfT) and Transport for London (TfL) on new approaches to delivering suburban rail services across London and the South East.

Suburban rail is a key component in London's transport network, and [REDACTED] has benefitted greatly from improved London Overground services since their devolution to TfL in 2007. Notwithstanding this success, there are substantial further improvements to be made in the borough. [REDACTED] is also served by:

- Chiltern Railways metro services at Wembley Stadium, Sudbury & Harrow Road and Sudbury Hill Harrow Stations,
- Southern Railway's West London Line services from Milton Keynes Central to East Croydon calling at Wembley Central station
- Thameslink services calling at West Hampstead Thameslink, Cricklewood or Hendon stations, as well as the future Brent Cross Cricklewood station.

██████ appreciates the opportunity to contribute towards DfT and TfL's work; and the Borough supports the process currently being undertaken to identify the appropriate governance arrangements to manage the change to a new service delivery model for suburban rail services in London. The following response has been prepared based on the questions put forward by DfT and TfL.

**Q1: Do you agree with the principle of a partnership to better integrate the specification of rail passenger services across London and the South East?**

In principle, [REDACTED] supports the establishment of a partnership arrangement to integrate the specification of rail passenger services across London and the South East. Across these services, [REDACTED] supports a uniform accountability structure to provide all stakeholders, including residents and businesses with clear vision of who is responsible for service provision. While devolution for rail services to TfL was successful for the existing London Overground service and forthcoming Crossrail services, it's clear that with a greater number of services extending beyond the boundaries of the Greater London Authority, it would be inappropriate for TfL to manage these services exclusively. Therefore, a partnership between TfL, DfT and local authorities (including Borough Councils, County Councils and London Boroughs) should be utilised. Network Rail, as the infrastructure operator, must also be included in any partnership arrangement.



**Q2: Do you agree with the principles that the partnership will work to? Are there any specific issues that have not been captured?**

█████ naturally agrees with the concepts raised by the principles outlined in the rail prospectus, however it's quite unclear how these would be achieved. Specifically, █████ is also concerned that there is no clarification over which of the principles will take precedence over the others. For example, recent timetable changes on c2c services in East London have provided for more frequent services and better interchanges, however these changes have also reduced the reliability of services, particularly for long-distance passengers. Other issues, such as simplifying fare structures are impossible where individual stations are provided with multiple different service provisions and stopping patterns.

█████ would also like to note that the prospectus has excluded an important stakeholder in Network Rail, who must be included in any discussion regarding infrastructure improvements across the network in order to deliver more frequent services or greater reliability.

In addition to this, the partnership should have the scope and ability to review all aspects of rail operations in London, including but not exclusive to:

- Stopping patterns of local and express services;
- Infrastructure or timetable gaps which cause conflicts between stopping and express services;
- Track infrastructure, including points, signals, track amplification and station improvements; and
- Reviews of freight train paths through London (including both slot times and routes) to determine if there are opportunities to reallocate or relocate trains to provide additional passenger capacity during peak periods.

**Q3: Do you agree with the proposed governance arrangements?**

As the governance arrangements have not been communicated in any detail, it's difficult for █████ to provide an assessment of the proposed structure. To enable services to be provided that meet local needs it is essential that governance arrangements allow for London Boroughs, shire authorities and LEPs to be involved. █████ has a concern that decisions will be made exclusively by DfT and TfL then 'informed' to local authorities and public bodies along the route. █████ concern is that this would lead to the provision of services that are believed to meet local needs, rather than providing services which meet actual local needs. The two are not necessarily the same. Also we note our concern with the dual level structure of responsibility for some services being transferred to TfL and some services retained by DfT. █████ would prefer responsibility for all services were given solely to the partnership in order to provide passengers with clear lines of accountability to the service provider and improve service planning across the network as a whole, rather than a split focus on inner-suburban and outer-suburban services. A split management operation also provides circumstances for conflict between operators, particularly in the case of civil assets, such as stations etc, are served by multiple operators

**Q4: What form do you propose the input from local authorities and LEPs could take?**

It is fully accepted that not all partners can be on the partnership Board due to the large numbers of stakeholders, but all authorities along the route must be able to have a voice, therefore █████ believes a regular standing committee of local authority officers which provides review and oversight of activity of the partnership is essential towards developing trust of the partnership by all local authorities in London. Similar arrangements already exist for borough cycling and freight officers to liaise with TfL on projects across London.

At the point of change over from existing DfT franchises to partnership management, a subcommittee of local authorities along the route could be called upon to devise Service Improvement Plans, which will review the specific improvements to be made to stations and services along that route. London Councils could co-ordinate this and be the London partner on the partnership Board.

**Q5: Do you agree with the safeguards for transfer of inner suburban services to TfL, as set out here?**

██████ is highly concerned regarding the proposed safeguards for transfer of inner suburban services to TfL. While the safeguards are admirable, we believe either will be impossible to achieve whilst still aiming to achieve the proposed goals of delivering more frequent services, increased capacity and greater reliability. Given limited track capacity, we don't believe the partnership will be able to deliver additional services or increased capacity without affecting the frequency, journey times or stopping patterns of longer distance services. In addition to this, this overarching constraint on potential improvements limits the potential benefits of new infrastructure schemes, such as Crossrail, Crossrail 2, Thameslink and London Underground upgrades which could allow for a reconfiguration of existing service provision.

Furthermore, ██████ is greatly concerned with the text of "no detrimental effect on fares" and the risk that this means higher fares for passengers who are already struggling to afford the existing fares. This is of particular concern in locations currently with multiple Train Operating Companies who may charge different fares for their services. As part of any amendment to the existing fares settlement, consideration must be given to the potential for perverse outcomes of changes, which may include passengers changing their travel habits to cheaper or faster services, which can exacerbate existing overcrowding issues.

**Q6: Are there other outcomes you might expect to see achieved?**

We believe the three main outcomes proposed in the prospectus are broad enough so as to encompass most issues across the network, but it might be worthwhile to extract certain issues, such as fares policies in order to give it greater emphasis and elaborate on potential improvements in that area.

We believe we've made our thoughts clear through the comments provided above, but if you'd like further clarification on any item raised, please feel free to contact my transport planner, ██████████

Yours sincerely,

