

From: [REDACTED]
To: [RailProspectus](#)
Subject: A New Approach To Rail Passenger Services In London And The South East
Date: 16 March 2016 18:10:21

We welcome the opportunity to respond to the consultation to improve rail services in the south east, including the proposed transfer 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.

Although [REDACTED] is clearly some distance from Greater London, our services could be impacted by the proposals, particularly those peak trains which currently do not stop within Greater London, but which potentially could be as a result of these proposals.

Our answers to the specific questions raised in the consultation document are as follows :-

- 1) Yes. Greater integration of rail services is welcomed. This will give those services a clear definition and recognisable operational framework.
- 2) Yes. A move towards a common fares policy in conjunction with improved infrastructure is sensible, and the prospect of improved access for all is to be particularly welcomed.
- 3) Yes, in principle. If an expanded inner suburban ('LOROL') network is to be successful then it needs to have governance arrangements that are specific to the area it serves.
- 4) Services from outer suburban (and beyond) destinations, such as the south coast, could be impacted by the arrangements. Although local authorities in these areas are not in the area directly covered by the proposed new arrangements, it is certainly possible that their residents could be. We would therefore hope that there would be an appropriate mechanism put in place to allow local authorities such as ours – and we acknowledge that are a number in a similar position – to have input into service planning, where this involves services originating from/terminating at stations within 'our' (i.e. outer suburban/coastal) areas.
- 5) This is our area of concern. It is possible to increase the capacity of longer distance services, and benefit inner suburban stations, by stopping these trains which currently run fast at additional stations nearer to London. For example, most peak trains to/from Hastings run fast from High Brooms, between Tonbridge and Tunbridge Wells, and the London termini, a journey time of 30+ minutes. Stopping these additionally at, say, Orpington, would increase their capacity (under the 20 minute rule, which says that no-one should stand for more than 20 minutes, but 35% can stand under 20 minutes). Such additional stops would add to journey times, and make already long journeys longer and more congested. **We would want the 'No adverse impacts on the frequency, journey times or stopping patterns of longer distance services to and from London' to be absolutely adhered to, not just 'work to ensure' as currently stated.**

6) Our key 'ask' is that there is no worsenment of our services as a result of these changes. Our fastest off-peak journey times to/from London are over 90 minutes, our fastest peak journey times over 100 minutes, for a journey of just over 60 miles.

Regards,

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