

**From:** [REDACTED]  
**To:** [RailProspectus](#)  
**Subject:** MAYOR OF LONDON / TFL / DfT CONSULTATION ON A NEW APPROACH TO RAIL PASSENGER SERVICES  
IN LONDON AND THE SOUTH EAST  
**Date:** 10 March 2016 15:43:49  
**Attachments:** [REDACTED]

---

Dear Sirs,

[REDACTED] would like to register an interest in this consultation and offer a couple of freight related observations.

[REDACTED] members operate over 220,000 goods vehicles - half the UK fleet – and consign over 90 per cent of the freight moved by rail and 70 per cent of sea and air freight.

The proposal in this consultation 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. While the DfT will continue to be responsible for the franchising of outer suburban services, the partnership is intended to ensure that all the region's passengers benefit from a joined-up approach.

Obviously [REDACTED] concern in this consultation is that specification of rail services (whether franchised or by management contract) by funders needs to build in and recognise the needs of freight at that stage before, and before any Track Access Contract or path bidding presumed upon those specifications takes place (with Track Access administered by Network Rail and overseen in a regulatory context by ORR).

Devolution of funding (already to Scotland and increasingly potentially regionally within England) and service specification for passenger services is clearly the direction of travel in rail policy and with reviews of the shape, functions and financing of Network Rail and also a review of the Regulator and consultation on a Network System Operator role, freight clearly has a concern given that it operates across Britain and across Network Rail or devolved funder boundaries. This is perhaps especially a concern with London where freight to and from the rest of Britain transits London by rail, sometimes to come back to London by road from e.g. Daventry.

[REDACTED] would therefore be glad to be involved further in any freight aspects about the impacts of these proposals.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]