response to 'a new approach to rail passenger services in London and the South East; working in partnership to improve services and support growth' - March 2016. welcomes the publication of this joint document by the Mayor, Transport for London (TfL) and the Department for Transport (DfT). We have long been supporters of the principle of devolution of rail franchising to the Mayor and have been pleased with the achievements and improvements that the London Overground and TfL Rail models of operating concessions have delivered for passengers. Devolution is not a 'cure all' for the shortcomings for the shortcomings of National Rail services in London, but does enable a strategic, long term approach to be taken by integrating such services with the TfL network. London's rapid growth in population and economic activity, and associated increases in congestion and crowding makes such an approach essential. An effective and efficient rail network allows this growth to benefit the wider South East area. This partnership approach should if applied correctly and consistently provide the mechanism to achieve this. The partnership approach needs to be applied not only to the planning and procurement of services but also to day-to-day operations particularly at times of disruption, and to address sees the need for this especially in the context poor service reliability. of the current poor performance of the GTR and Southeastern franchises. Therefore, in the interests of passengers we see the need for implementation of this partnership to take place earlier rather than later. thinks that the omission of Thameslink (core route) services (such as those serving the Catford and Wimbledon loop lines) from the document is a serious defect in the proposals that needs to be corrected. Clarity also needs to be given on how Chiltern. Great Western and London Midland services would be treated particularly where the existing service levels at Greater London stations are poor (Chiltern local services) or where investment in a new interchange such as at West Hampstead on the Chiltern line would involve a DfT franchise. 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, as noted above where devolution of responsibility to the Mayor and TfL has delivered significant benefits both to passengers using services within the London area, but also to those outside. For example, improvements in reliability of local train services within the London area on the West Anglia and Great Eastern routes has had either no net disbenefit or contributed to improved reliability of longer distance services on those routes. Question 2. Do you agree with the principles that the partnership will work to? Are there any specific issues that have not been captured? agrees with the general principles of the partnership.

The partnership must also have a commitment to improving the accessibility of the rail and underground networks. This must include step free access to stations, reducing the step / gap between trains and the platform, and providing a 'turn up and go' service for people with

\_\_\_\_\_\_

reduced mobility. There is only one reference to accessibility in the document, but it is an essential part of producing an effective rail network, not only for people with reduced mobility, but more generally because of the benefits of reduced congestion, reduced station dwell times and greater ease of movement.

Question 3. Do you agree with the proposed governance arrangements?
broadly agrees with the proposed governance arrangements. However, the needs of passengers should be expressly taken account of, and acknowledged within the partnership with a requirement on both DfT and TfL to work with and be accountable to passenger representative bodies such as in respect of service specification and operation.
Question 4. What form do you propose the input from local authorities and Local Economic Partnerships could take?
Local authorities, other statutory bodies and local enterprise partnerships should be asked to input to franchises and concessions let by either DfT or TfL, at the specification stage, but also in relation to on going management. This should take the form of regular dialogue on all aspects of operation and policy.
In particular, TfL should be required to take account of the transport policies and plans of local authorities outside of the Greater London area, and be able to demonstrate how its' services meet those policies and plans.
Question 5. Do you agree with the safeguards for transfer of inner suburban services to TfL as set out here?
Yes, but they are quite limited in scope. Instead, advocates the adoption of safeguards that

5.
6. Are there other outcomes you might expect to see achieved?
Users of London's rail services have the highest levels of dissatisfaction with value for money for the price of their ticket than any other metropolitan areas
also be addressed through the partnership. The outcome should be that passengers get better value for money for the price of their ticket.
In addition, there should be more clarity from both the DfT and TfL of they intend to deal with, develop and invest in the various London area stations and services that would remai under DfT franchises. These include :-
Stratford to Broxbourne via the Lea Valley Marylebone to West Ruislip including the local stations at Wembley Stadium, Sudbury & Harrow Road, Sudbury Hill Harrow, Northolt Park and South Ruislip West Faling to Creenford
West Ealing to Greenford Thameslink services operating on the Catford and Wimbledon loops and to local stations between St.Pancras International and St.Albans.