

[REDACTED]

**[REDACTED] TO OPEN  
CONSULTATION ON RAIL PASSENGER SERVICES IN LONDON AND THE  
SOUTH EAST : A NEW APPROACH**

[REDACTED]

**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?**

**Response to Q1**

Overall we agree strongly with this principle as it is clearly necessary to take into account the views and needs of key stakeholders in addition to the DfT and TfL particularly at time of unprecedented growth in the region. However important issues will need to be considered and clarified to ensure that these changes have the intended effect. These would include the planned means of engagement with the LAs and LEPs inside and outside London, the selection of services to be handed over from DfT to TfL that are “wholly or mostly within Greater London” and the distinction between inner and outer suburban services .

We note that the aim is to “bring together different funding sources”. At this juncture, when the UK’s rail network is subject to a series of fundamental reviews including its funding and management structure, it is difficult to comment conclusively on this particular consultation.

**Question 2**

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

**Response to Q 2**

The three principles set out are the achievement of;

1. More frequent services, better interchanges and increased capacity.
2. Greater reliability for all passengers
3. High standards of customer services

We agree that all three of these principles should be pursued by the partnership and suggest that they become the core aims for delivery. We note that a more integrated fares structure is to be achieved within the customer service principle, that south London is highlighted for service improvement and that possible London Suburban Metro services are focused there. Clearly, the delivery of these improvements will need to be carefully and fairly prioritized across the region taking into account both current conditions and demands and emerging demands triggered by concentrations of growth.

### **Question 3**

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

#### **Response to Q 3**

It is not made clear if TfL would have a changed degree of influence in determining the service specifications it already handles. The division between inner London and outer London services needs to be clarified – we have assumed it follows the same pattern as that described in the SW Franchise stakeholder consultation in 2015. We note that the DfT will continue to be responsible for outer suburban services. We also note that there is always a priority assumed for the longer distance services over peak local services and would question whether this should continue to be the case where exceptional local demand is expected to arise. We are also interested in knowing how “greater accountability” is actually to be achieved.

### **Question 4**

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

#### **Response to Q 4**

This should reflect the devolution approach being adopted for Rail North but should probably retain the catchment sectors of the current franchises at least in the shorter term. A willingness and ability to bring funds to service improvement via the broader development process should also be taken into account in determining the engagement of stakeholders.

### **Question 5**

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

#### **Response to Q 5**

The principal safeguards are fares overall (no adverse impacts) and the preservation of longer distance service performance. As mentioned in our response to Q 3, this latter safeguard may need to be reviewed on a case by case basis using consistent criteria .

## **Question 6**

**Are there other outcomes you might expect to be achieved?**

### **Response to Q 6**

A more pro-active engagement in realizing the development potential around suburban station areas. Further outcomes may well arise once the futures of rail governance, funding and ownership are determined. [REDACTED] believes that much more should be done to attract sustainable, mixed development around transport hubs and nodes and that the transport providers with property holdings and development rights should be the prime movers in this regard.