

Department for Transport
Transport for London
Mayor of London

16th March 2016

response to consultation on 'A new approach to rail passenger services in London and the South East'

Introduction

welcomes the opportunity to respond to the prospectus issued by the Department for Transport (DfT) and Transport for London (TfL) outlining a new approach to rail passenger services in London and the South East. We understand the aspiration to transfer inner London services to TfL control and we are keen to work with all parties to identify key issues and risks, while delivering in line with the stated principles of improved capacity and customer experience. supports the clear indication that close engagement with will be required to deliver these improvements.

General Points

Rail use in London and the South East continues to grow and it is essential that the network optimises scarce capacity and continues to adapt to meet demand and passenger needs. The segmentation of passenger services between inner London and longer distance routes can be achieved but there will be challenges which need to be identified and mitigated, and it is critical that the network continues to be planned and used at an integrated level.

We note that the stated objective is that "...we propose to establish a partnership between the DfT and TfL that will provide joined-up strategic direction for the specification and management of rail passenger services across London and the South East.", so it is recognised that this is aimed at facilitating the requirement for integrated decision making.

There are a few key points that are important to make this proposal work:

- It is important to recognise the role of system operator in planning for and allocating capacity across an integrated network, and [REDACTED] supports the statements made about assisting the coordinated planning and delivery by devising an integrated output specification
- The greatest risk to delivering the improvements in service offer for the customers could be deemed to come from the increased number of operating organisations (franchises and concessions) that will almost certainly result from the proposals, and the consequences of the fragmentation of currently coordinated service planning and delivery. [REDACTED] would expect this risk to be mitigated by the principles against which the proposals will be tested, specifically:
 - Neither party to the proposal will want to progress if the implementation can be demonstrably shown to harm any outputs for part of the service (existing or future)
 - There is a clear statement around impact assessing proposals before a specific decision for any franchise is taken
- [REDACTED] supports the prevailing theme in the proposal about wider industry partnership working and coordination, and the specific statement in particular about greater operator focus on partnership working with [REDACTED]
- The splitting of operations across two franchisees must guard against adverse effects on performance, particularly when restricted operations are required during times when infrastructure is constrained
- [REDACTED] is concerned that the splitting of services across two operators, even before an enhanced service offer is developed, may require the provision of additional infrastructure due to the loss of system efficiencies. This could be particularly pertinent for depot and stabling facilities, where additional rolling stock is required due to the service separation. Depot and stabling capacity is at a premium in the London area, and with land availability being so restricted it needs to be noted that it is very difficult to expand the facilities
- Integrated access plans to facilitate infrastructure upgrade and renewal work must not be affected in any way, and all services need to be considered as part of this holistic service planning process

Transfer Timing

The timing of any change in franchise/concession structure is important. It is critical to avoid any change during major periods of disruption, such as those driven by the construction work at London Bridge for the Thameslink Programme, and to target logical opportunities when service change is required, such as that seen for the Crossrail 1 Programme and the phased handover of service accountability to the Crossrail Train Operating Company at significant programme stages.

Network Benefits

There are a number of basic but important requirements that [REDACTED] would seek of any resultant TfL concession to avoid fragmentation of network benefits for rail customers. These include:

- TfL shall ensure that its concession operator shall be licensed under the Railways Act 1993 (or have a licence exemption) to provide the devolved railway services and manage and operate the relevant Stations;
- an acknowledgment by TfL of the role of the ORR in setting licence conditions for any concession operator in relation, inter alia, to the protection of the consumer
- an acknowledgment by TfL that network wide benefits should be protected, these would include TfL's concession operators:
 - committing to bilateral working with the SoS franchisees to develop new ways of displaying public transport information at relevant stations, including information on interchanges with other modes
 - continuing to display the double arrow on station signage
 - having an agreement with the British Transport Police
 - taking part in the National Passenger Survey
 - providing timetabling and other service information for other operators at joint stations
 - sharing timetable information with other operators
 - maintaining connections with other rail operators' services
 - providing appropriate passenger information at all joint stations

Answers to specific questions included in the prospectus

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?

[REDACTED] supports this principle, and welcomes the specific requirement to work closely with [REDACTED]

Question 2

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

[REDACTED] supports the principles, but please note that delivery in line with all principles may require significant expenditure and potentially some compromise, due to the high levels of network utilisation in the London area. Further explanation is provided below in the response to question 5.

Question 3

Do you agree with the proposed governance arrangements?

[REDACTED] supports the proposed governance arrangements, and has experience of similar arrangements resulting in successful and effective, well informed decisions.

Question 4

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

[REDACTED] has no specific view of the form, but notes the importance that views from LAs and LEPs outside the GLA boundary are both invited and taken into account in the partnership's decision making processes.

Question 5

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

[REDACTED] agrees with the principle of the safeguards, but notes that there may be instances where improvements to longer distance services should be made without adversely affecting local London services, so the safeguard must not be exclusively from one perspective. This is particularly relevant where, for example, additional capacity could be utilised by local or longer distance services and the optimal decision could be to enhance the longer distance services.

There may also be instances where it may be necessary to decide to impact frequency, journey times and/or stopping patterns in order to increase capacity, hence considering the overall requirements of all users of the railway and, on balance, delivering the best result for all.

Question 6

Are there other outcomes you might expect to see achieved?

[REDACTED] has no other specific comments to add with respect to additional outcomes.

Yours sincerely

[REDACTED]