

██████████ is pleased to provide our views on the ideas set out in the document “A new approach to rail passenger services in London and the South East” (the “Document”).

We believe strongly that a partnership model between public and private sectors delivers the best outputs for passengers who use public transport, for taxpayers whose money is invested in a key part of the country's infrastructure, and for investors whose funding helps underpin the long-term sustainability of the system. ██████████

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Where transport bodies and authorities fund and specify their requirements, we believe a unified public sector approach can deliver improved results. ██████████ when the public sector presents a unified approach. We therefore welcome the new partnership between DfT and TfL, and look forward to a more co-ordinated approach from them.

We would highlight that what is important is the content of a specification, rather its owner. As pointed out in the Document, both DfT specified franchises and TfL concessions have delivered improved services for passengers. We would therefore like to see the business case and rationale for the transfer of any services out of DfT franchises. ██████████

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██████████ On a national basis, the publicly specified, privately delivered railway is the best in Europe, delivering growth in excess of that in Germany, France and the Netherlands, at higher levels of satisfaction and with better on-time performance. Any move away from this system should be undertaken with care.

As far as the principles to be followed by the proposed partnership set out in the Document, the key issue for London's railways is the delivery of additional capacity. The London Infrastructure Plan 2050 set out some objectives for rail which can only be met by the construction of new routes. We would encourage DfT and TfL to work together to plan and determine that additional capacity.

Whilst over 65% of all rail journeys nationally involve London, that does not mean that the capital should take precedence in defining rail services that will have a far wider impact. The London and South East Route Utilisation Strategy (“the RUS”) produced by Network Rail noted (Figure 7.1) that of the eight routes into London that required additional capacity in 2031, seven were outer suburban and long distance commuting routes with only one Inner London route (to Moorgate). For the South West London route, Network Rail noted that “even before growth is considered approximately 20% additional capacity is required to deal with existing over crowding on these services. Standing is commonplace from Woking and Basingstoke”. Therefore DfT and TfL should work together to maximise capacity into London from all destinations, as set out in section 2.7 of the RUS.

It is therefore important that DfT and TfL have consistent criteria for the use and allocation of capacity. In many London terminals, inner, outer and long distance services are interwoven, using the same tracks, platforms and resources. Any attempt to separate such services is likely to result in either increased resources or reduced services, or both.

██████████ recognises that there is much more detail to be determined which is not set out in the Document. We would refer to the RDG response that sets out some of the issues to be considered, particularly relating to the separation of services between DfT franchises and TfL responsibility. These include, but are not limited to:

- Operational issues such as value for money, the need for co-ordinated management, allowances for freight, platform capacity, capacity allocation and ticketing solutions.
- Resource issues such as rolling stock requirements, staff requirements, fares structures and management.
- Transition issues such as TUPE arrangements, pension costs and defined mobilisation plans.

*Q1 Do you agree with the principle of a partnership to better integrate the specification of rail passenger services across London and the South East?*

We would welcome any co-ordinated approach to the specification of rail services, and would like to see more outcome based requirements.

*Q2 Do you agree with the principles that the partnership will work to? Are there any specific issues that have not been captured?*

As mentioned above, we believe that the partners should also agree a long term strategic plan for the London transport network.

*Q3 Do you agree with the proposed governance arrangements?*

We would like to see more detailed proposals before we comment. We have set out above some of the issues involved transferring just those services operating mostly or wholly within Greater London.

Specifically for those services operating into London Waterloo, there are currently few daily train diagrams that operate solely on services operating mostly or wholly within Greater London. This highlights the resource issue mentioned above. We also note (Appendix II of the Document) that the end result in South West London is to operate 90tph (presumably into London) but that this includes trains operating on Crossrail 2. Whilst plans for this new route are at an early stage, TfL envisage operating 30 tph on Crossrail 2, leaving 60 tph to operate into Waterloo, basically no increase on the number operated today. We would like to see further detailed proposals as to how that capacity will be used and believe that further increases in capacity into London Waterloo should be considered.

We also believe that the partners should take a holistic view of Crossrail 2. The determination of which services will be diverted onto the new route is important. There is also an opportunity for Crossrail 2 to act as an enabler in the provision of significantly more capacity into Waterloo, noting that we currently operate 24 tph over two tracks in the peak hour using conventional signalling and control systems (See Table 3.1 in the RUS).

*Q4 What form do you propose the input from local authorities and LEPs could take?*

Whilst this is a matter for the partners, we would caution that expectations can be raised over the delivery of improved rail services that are simply not possible in practice within current constraints.

*Q5 Do you agree with the safeguards for transfer of inner suburban services to TfL as set out here?*

We look forward to receiving further details in order for us to comment further.

*Q6 Are there other outcomes you might expect to see achieved?*

We would like to see outputs that are linked to the London Infrastructure Plan 2050.