

Working in partnership to improve services and support growth.

is pleased to respond to the above consultation.

Our research suggests that passengers are more focused on the outputs that matter to them – how punctual their service is, how many seats are available and whether they are kept informed when there are delays - rather than the structures adopted to deliver them.

Question1: 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. Train services do not follow political boundaries and passengers want to be able to travel to, from and within London and the South East. So it makes absolute sense for DfT and TfL to plan in tandem to ensure that the needs of all passengers are considered to the widest possible extent.

Question 2: Do you agree with the principles that the partnership will work to? Are there any specific issues that have not been captured?

The consultation lists three broad priorities:

- More frequent services, better interchanges and increased capacity
- Greater reliability for all passengers
- High standards of customer service (to include better integration of real-time information and, in time, simplifying fares)



Hence there is a good degree of overlap between these aspirations and the principles set out in the consultation document.

Our research consistently emphasises the importance of punctuality to passengers. We do not, however, feel that the existing mechanisms within DfT franchises for measuring performance adequately reflect the experiences of passengers

Therefore we think it important that any new franchise/ concession also looks at the metrics used to measure performance. Our clear preference is for greater use of right-time performance.

We think there is also merit in including transparency as one of the core DfT/TfL principles. Giving rail passengers access to performance figures on their own service(s) will help them to hold the train company to account and to ask what is being done to improve services in return for the fares they pay. Indeed the availability of accurate data may actually help dispel negative perceptions – a particularly bad journey can linger in the memory and distort passengers' perceptions. Hence, we believe there is a case for providing performance data at a disaggregated route level or, ideally, on a train-by-train basis (i.e. the performance of 'my train'). We believe transparency is important enough to warrant a specific mention in the principles

Question 3: Do you agree with the proposed governance arrangements? Question 4: What form do you propose the input from local authorities and LEPs could take?

Question 5: Do you agree with the safeguards for transfer of inner suburban services to TfL, as set out here?

London Travelwatch produced a set of safeguards in 2013 designed to address the needs of passengers within and outside the London area. These covered:

Seamless access for passengers
 As part of our submission to the Northern and TransPennine Express franchises
 we asked passengers for their views on devolution¹. They recognised that
 devolution could help in capturing the views of local people and businesses.
 However, they were also keen that it did not make it harder to access the rest of
 the network. Passengers recognised the concept of a 'network' and wanted a

seamless delivery of service between the devolved element and the rest. This included the timetabling and frequency of services, fares, and the provision of information especially during disruption.

This is equally applicable in a London context. Passengers will want to see interavailability of tickets, seamless provision of information, especially during disruption and an agreement between operators to work together in the best interest of passengers.

Even handedness in track access

Proposals will also need to establish a mechanism for dealing with 'longer-distance vs local' issues when it comes to allocating capacity both during normal times and when planning for major engineering projects. In an ideal world there would be sufficient capacity for all aspirations to be met but with demand already being high - and forecast to continue growing – there will inevitably be clashes. It will be important that decisions on devolution clearly specify a mechanism for dealing with disputes.

Consultation

We note, and welcome, the commitment within the 'principles' to ensure the voice of local authorities and LEPs is heard. We would, however, also like to see explicit commitments to consulting passengers and ensuring that they also get a chance to comment. During the initial 'split' it will be very important that passengers who will be on the inner services have every chance to comment on specification of the outer services and vice versa. This will help to ensure that existing journey opportunities or benefits are not lost.

We also think it important that passengers' representatives are also consulted. We believe that there should be a commitment to regular and meaningful consultation

issues affecting passengers. This should be inclusive from the tender design stage by TfL through to day to day operation by the concessionaire, and should at a minimum be comparable to that currently required of train operating companies under the existing franchise arrangements and licensing regime.

We also believe it is important that this engagement with passengers continues throughout the life of any new franchise/concession. We would like the specifier of the franchise/concession to set out how they intend to gather the views of passengers on the services being provided on an ongoing basis. Traditional 'hard' measures on delays, cancellations and crowding are important but so is the quality of service being provided. On the latter our strong preference is for targets based on what passengers think – the best judge of quality being those who have used the services in question.

At present new franchises let by DfT include targets for passenger satisfaction – as measured by the National Passenger Survey (conducted by Transport Focus). Our experience with NRPS confirms the value of benchmarking service quality. Being able to compare performance across operators and sectors as well as over a period of time has real benefit to passengers. There is a genuine reputational effect in doing so – everyone wishes to be the best at something, no one likes to be the worst. You lose this ability if there is no consistency between franchises or service groups. It will be important that there is still a degree of comparability between the inner and outer services. We would, of course, be happy to discuss this further with TfL

To this end we are pleased to see the document committing the partnership to ensuring that "all the region's passengers benefit from a joined up approach" and to seeking greater input from local authorities.

When looking at rail specifications the devil is invariably in the detail and it will be difficult to assess the impact on all passengers until individual specifications are produced and examined. However, the document does go a long way to allay any concerns when it makes two very important commitments:

- No detrimental effect on fares, either at stations served by TfL services or at other stations outside London
- No adverse impacts on the frequency, journey times or stopping patterns of longer distance services to and from London. Extra capacity on peak local London services would only be added if there is no negative impact on longer distance services no detrimental effect on fares.

We welcome these specific commitments

Question 6: Are there other outcomes you might expect to see achieved? We have covered this in the sections above.

We would be happy to discuss this response in more detail with DfT and TfL should you find it useful.



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