

[REDACTED]

Date: 16 March 2016

Dear Sir/Madam

Consultation on prospectus for "A new approach to rail passenger services in London and the South East"

Thank you for the opportunity to provide comments on your joint prospectus with the Department for Transport. [REDACTED]

[REDACTED] on 14
March 2016.

We are very appreciative of the substantial improvements which Transport for London has secured on their orbital services into Clapham Junction since the demise of Silverlink Metro, and we also aware of the major improvements secured to stations and services in north and west London by TfL arising from this take over from Silverlink. We, therefore, are supportive of the principle of TfL attempting to extend this success across other parts of London as rail franchises come up for renewal, but a number of factors cause us to question whether similar improvements can be achieved elsewhere:-

1. The Silverlink Metro network was in a very poor state when it was taken over by TfL, and therefore the improvements introduced were dramatic and very noticeable to travellers. The current rail franchises operating in [REDACTED] (South West Trains and GTR) have much higher standards of operation and quality of service, and we wonder just how much impact TfL can have on these services without both significant additional expenditure and major changes to the infrastructure by Network Rail and through Crossrail 2. We are also aware that TfL are finding it more difficult to secure improvements in north-east London where it has recently taken over some services.
 2. We are concerned at the cost implications for our residents and businesses of TfL operating local train services and securing service improvements. We
- [REDACTED]

suspect that the current train operators, who have already provided extra train services, new trains and some station improvements, would have also provided these improvements if they could have been easily secured. We suspect the cost of improving services in South London will be very high and will offer wider benefits than just to south London, and therefore should be secured as part of improvements to the national rail network, financed by the DfT. We are also concerned about the potential costs to councils should the validity of Freedom Pass be extended by permitting use before 09.30hrs on these proposed national rail routes, and also potentially extended beyond the London boundary.

3. We are aware that TfL's proposals to increase train frequencies, whilst very welcome, can only be achieved by simplifying service patterns, which will entail the withdrawal of direct trains to certain destinations, and the need to change trains to access these places. We, therefore, need to see the details of this before making further comments.
4. Some of the aspirations in your document need to be treated with caution. For example, you suggest that the new London Suburban Metro would use new metro style high performing trains, but of course we already have these trains on the London Overground network, where they generally amble around at a very leisurely rate, seemingly because of generous timetables to minimise the risk of trains arriving late. South West Trains have adopted similar timetabling, and it is difficult to see how high performance trains will make any noticeable difference unless timetables are re-written, which would be difficult in view of your undertaking not to affect outer suburban train paths, where trains with lower performance specifications will continue to operate.

In answer to your specific questions:-

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, subject to the caveats described above.

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

Yes, we agree with the principles, subject to the caveats above. We would suggest that a fourth principle should specify clearly that you will fully consult local authorities, LEPs etc. on all proposals, as this is currently only referred to in general terms in the text.

Question 3 Do you agree with the proposed governance arrangements?

No comments

Question 4 What form do you propose the input from local authorities and LEPs could take?

There should be full consultation at each stage of the process, both in writing and by way of meetings, so that local authorities can be involved from an early stage in specifying the terms of a franchise or concession. We are not familiar with the principles of devolution for Rail North referred to in the document, but we would suggest that there should be representatives of local authorities and LEPs at the meetings which TfL have with bidders, to ensure that our interests are fully covered, and also in the management team responsible for decision making.

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

The safeguards are very vague and potentially meaningless: for example, when “adverse impacts” are being considered, whose interests are being considered? An increase in the number of stops on longer distance trains may adversely impact on the journey times for some travellers, but for others it would be a positive change, potentially opening up new journey opportunities and interchanges, possibly avoiding the need to travel into the congestion and expense of Zone 1. Further details need to be provided.

Question 6 Are there other outcomes that you might expect to see achieved?

Yes, local railway stations should continue to offer the full range of national rail tickets and advice, and not be downgraded by TfL as seen in some other parts of London. Travellers should be able to freely buy national rail tickets and add-on tickets to take them beyond the range of their current Travelcards, season tickets or Freedom Passes.

We look forward to hearing your response to our concerns. Please contact us if you have any queries on this response.

Yours faithfully



