

By email only

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Dear Sir/Madam,

DfT and Mayor of London Rail Prospectus – London Councils' Response

London Councils is committed to fighting for resources for London and getting the best possible deal for London's 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

The response to this consultation has been agreed by the London Councils' Transport and Environment Committee. We are grateful for the extension to the deadline that you were able to give that allowed this to happen.

London Councils broadly welcomes the proposed devolution of rail franchising for additional routes in London and the proposed London and South East Rail Partnership. In the following response, we explain that this support is dependent on a satisfactory agreement to limit the impact of devolution on Freedom Pass costs. We suggest that London's local authorities should be involved in the proposed Rail Partnership. We also suggest that value for money and safety and security should be additional objectives for the Partnership.

Yours faithfully,



Cllr Julian Bell

Chair of the London Councils Transport and Environment Committee

DfT and Mayor of London Rail Prospectus – London Councils’ Response

The Nature of the Partnership (Questions 1-2)

The proposed London and South East Rail Partnership is welcomed. London Councils broadly supports greater devolution of rail franchising and investment. Given the proposed partnership will increase the number of TfL-provided services extending outside of the Greater London Authority, a partnership arrangement that reflects the different governance arrangements within and outside of London is appropriate. This must maintain democratic accountability across all rail services, including those already provided or committed (such as Crossrail). We consider the proposals for the Strategic Board outlined at the recent local authority forum, which would see this partnership simply established between DfT and TfL, fall short of what is required.

We are keen to see London’s local authorities given the opportunity to have a greater say in the franchise specifications developed and let in their areas and a role in performance oversight. The establishment of this partnership provides the opportunity to do this. We believe that such an arrangement would have the benefit of better integrating strategies for housing and economic growth along rail lines with plans for service patterns and infrastructure investment. It would also help to provide greater local democratic oversight of the decisions that are made. Furthermore, it would provide London’s local authorities with a stronger voice when decisions are being taken that affect costs that they meet for concessionary travel. We suggest options for how this could be achieved in the following section and we consider that a supplementary consultation is required on this point.

London Councils has raised concerns about the impact of rail devolution on Freedom Pass (London’s statutory concessionary travel scheme for older and disabled people) costs for boroughs. The GLA Act 1999 requires the travel concessions scheme to operate on services provided by, or on behalf of, TfL that are within Greater London or within the “vicinity” of Greater London. The consequence is that the boroughs are already funding travel outside of London, as a result of devolution of suburban rail to places like Watford Junction, Shenfield and Cheshunt. New TfL-run services such as Crossrail to Reading and further devolution to TfL could mean significant cost increases for boroughs. This issue needs to be addressed as soon as possible and certainly before Crossrail becomes fully operational.

London Councils has held productive discussions with TfL to try to limit the impact of further rail devolution and Crossrail services on Freedom Pass costs. It is hoped to agree which stations outside the Greater London boundary can legitimately be considered as being within the scope of the intention of the legislation. It is important that these lead to a satisfactory agreement with London’s local authorities in order to secure their support for greater rail devolution.

It is noted that the Prospectus does not contain proposals for new rail infrastructure or changes to rail infrastructure governance, because the funding and structure of Network Rail is currently being reviewed. Greater regional control over rail infrastructure planning and ownership (such as transferring London Overground stations into TfL's ownership) through the partnership would help to ensure that investment is coordinated with plans to improve service standards and should be considered once the review is completed. Greater involvement of London's local authorities would help to ensure that the views of local residents are taken into account when decisions are made. It could also help to ensure that rail infrastructure plans take better account of plans for how the borough, and its transport network, will develop.

The partnership should have a role in reviewing freight train paths through London to assess whether there are opportunities to reallocate any of these to provide additional passenger capacity during peak periods.

Governance Arrangements (Questions 3-5)

The prospectus states:

The partnership will have a responsibility to take into account the views of local authorities, LEPs and other local organisations as part of its work to recommend the specification and management arrangements to the Secretary of State for Transport or the Mayor of London depending on the rail service in question.

It is important that the proposed Rail Partnership provides a deeper level of engagement with London's local authorities than currently exists in the DfT franchising process. A survey of boroughs carried out by London Councils in 2014 suggested that they experience very little involvement in rail franchising decision making, despite the important knowledge they have about plans for the development of areas along the lines.

The regional partnership's governance structure can usefully include representatives of London's local government. This could be achieved by appointing representatives on a sub-regional basis within London. London Councils nominates representatives to similar partnerships, such as the Thames Regional Flood and Coastal Committee, and would be well placed to fulfil this role for the London and South East Rail Partnership. We would suggest that this governance structure is appropriate for oversight of performance once a franchise has been let.

In addition, we consider that, from the start of the process of preparing a new franchise specification to the point at which it is let, all local authorities whose areas are served by the prospective operator should be offered the opportunity to engage through the partnership through, for example, a sub-committee. Further consultation should be carried out to determine the best way to achieve this.

The Prospectus anticipates that the first opportunity to transfer control of services to TfL will be in 2018 when the South Eastern franchise is up for renewal. It is suggested that this could be followed by services from the new South West franchise in 2020 and the

Thameslink, Southern and Great Northern franchise in 2021. Further consideration should be given to whether the inner suburban services within the South West and Thameslink, Southern and Great Northern franchises can be devolved to TfL earlier.

London Councils recognises the need to provide safeguards to communities to ensure that their fast services are maintained following devolution of inner suburban services. However, any safeguard should work both ways, with Londoners relying on local stopping services offered a guarantee that these will not experience adverse impacts as a result of any improvements to fast/direct services agreed by the DfT. The protection of fast services does not only concern commuters from outside of London. Some communities in London are reliant on more direct services that connect London's economic centres with the Central Activities Zone. However, it is not clear how long the safeguard that there will be "no adverse impacts on the frequency, journey times or stopping patterns" is intended to apply. As new infrastructure, such as Thameslink, Crossrail, Crossrail 2 and Tube extensions, are delivered there may be changes to service patterns that are warranted. Changes in local population or employment, for example those associated with major new developments, will also warrant a reconsideration of services over time.

Outcomes (Question 6)

The Prospectus proposes three main outcomes that will drive the work of the partnership:

- More frequent services, better interchanges and increased capacity.
- Greater reliability for all passengers.
- Higher standards of customer service, which includes better information, more weekend and night services, accessibility, simpler fares and ticketing, a better travel environment.

The objectives need to be delivered over the lifetime of a franchise and there should be mechanisms that allow changes to be made to the contracted service if they are not being met. This could occur because of a reduction in the performance standards of the operator but may also occur where local population or economic growth result in the operator no longer being able to cope with the demand that the service is under. The review mechanism should certainly be factored into the new Southern franchise, given that the current proposal is that inner suburban routes from it would not transfer to TfL when the franchise begins. Any opportunities to make changes that deliver these outcomes through timetable changes or infrastructure investment within the existing franchises should also be taken.

The partnership should aim to secure common minimum standards that operate across the whole area or defined parts of it. This may include, for example, all-day station staffing within London or minimum periods between train refurbishment or deep-cleaning.

London Councils suggest the inclusion of the following outcomes (more detail below):

- Value for money for passengers, including affordability of fares.
- Safety and security.

London Councils suggests that **value for money** for passengers should be included within these outcomes. Delivering those identified in the Prospectus will help to achieve value for money but it will also be important to ensure that fares are competitive to avoid significant numbers of passengers shifting to other modes, which is likely to result in congestion. It is essential that users in London should not have to pay more than the appropriate zonal fare if services become part of the London Overground network. By aiming to achieve value for money for passengers generally the partnership can also help to achieve value for money for London's local authorities that meet the costs of the Freedom Pass.

London Councils, London TravelWatch and Trust for London recently commissioned research into transport affordability in London. This found that there are significant numbers of Londoners that are not using the fastest modes of transport available to them because of costs. Participants in the research identified a number of ways that concerns over the costs of travel could be addressed. These included:

- Part-time season tickets.
- Loans for season tickets.
- Off-peak travelcards.
- Better awareness of existing discounts, such as the daily cap for Oyster and contactless payment, and the Jobcentre Plus Travel Discount.
- Concessionary fares for those on low incomes.

The London and South East Rail Partnership should consider options that it believes can help to ensure that rail travel in London is affordable to those that live and work in the capital.

Safety and security are not identified as ambitions within the proposed outcomes. Whilst this could be said to fall within the ambition for a better travel environment, London Councils believes that it warrants greater consideration. Station operators should work with London's local authorities to ensure that the safety and security of stations are considered alongside the surrounding environment.