

Railfuture Submissions to the House of Lords Built Environment Committee's Williams Shapps review

"In May, the Government published a White Paper on rail reform, the Williams-Shapps Plan for Rail. The White Paper represents the greatest change to the railways since the end of nationalisation almost 30 years ago. This inquiry will focus on the Government's proposals for fare reforms and how the new system will benefit consumers."

The Inquiry home page is at https://committees.parliament.uk/work/1372/williamsshapps-plan-for-rail-fare-reform.

Neil Middleton, one of our Directors, was asked to give evidence to the inquiry and gave oral evidence to the Committee on 13 July 2021. The transcript of his (and other interviewee's) responses can be read here: https://committees.parliament.uk/event/5071/formal-meeting-oral-evidence-session/

We are also submitting 3 further written submissions:

	Title	Submitted	Commentary	Size		
1	The cost of ticketing	15 Aug 2021	This principally looks at the costs of ticketing from the perspective of the traveller; it also contains commentary on the principal types of costs and some cost information for third party resellers	6 pages		
2	Possible tactical improvements to the Rail Flexi-Season fare	18 Aug 2021	This identifies tactical improvements to the Flexi-Season. It takes as a given the nature and purpose of the ticket and the overall fares system in which the exist and suggests incremental improvements. It does not attempt to address more strategic solutions for part time commuters, nor wider changes required to fares & tickets	3 pages (& 2 page appendix)		
3	Tentatively: The case for a new approach to rail fares (and some key objectives)	Not yet submitted	The paper will address the case for change, including the view that retaining the current fare arrangements is as just as much a risk as the uncertainties arising from big change. It will also consider key objectives and potential unintended objectives	Around 4 to 5 pages		





Railfuture Submission to the House of Lords Built Environment Committee's Williams Shapps review A supplementary response setting out possible tactical improvements to the Rail Flexi-Season fare

During his oral evidence on 13 July 2021, Neil Middleton promised a follow up on sensible improvements that could be made to the National Rail Flexi-Season ticket. This response is authored by Neil Middleton; the document has been extensively shared for comment within Railfuture's Branches and Groups and incorporates their ideas.

The Flexi-Season is an add-on to an already very complex fares system that has its roots in a different era – one that revolved around traditional 5 day a week peak time commuting. We believe it essential that the current Flexi-Season is seen by Government as just a temporary "fix" to the fares system, to deliver some tactical improvement pending the promised – and hopefully much more radical – changes to the approach to rail fare setting planned by Williams Shapps.

In this paper we take as our start point the current Flexi-Season Ticket – and make suggestions for improvements that do not require significant changes to the business case supporting its introduction. It is not, therefore, a Railfuture suggestion as to how a Flexi-Season might have been added to the current fare structure. Railfuture will write separately on the best goals for a more radical restructure of fares, including of fares for part time commuters; in the interim we have made a few short observations on missed opportunities in the current product at the end of this paper.

CHAL	LLENGE	SUGGESTED SOLUTION	EXISTING MITIGATIONS	KE	EY ADVANTAGES	KE	Y DISADVANTAGES
da	2 day a week user can easily lose ays through unplanned non travel ee appendix for sample impact)	Ticket to become 8 uses in 31 days ¹ , not 8 in 28	None		Improves credibility of offer Increased sense of fairness; Encourages travel	•	Some reduction in revenue per person (offset by increased travel via better product)
us an me	or both the 2 and the 3 day a week ser longer planned (eg holidays) and unplanned non travel days sean lost tickets or full price travel ee appendix for sample impact)	Multiples other than 8 in 28/31 should be sold: See below for more detailed suggestions	None	•	No fundamental changes to business case		
	uidance on obtaining best value is mited in scope and confusing	National Rail and TOC Season ticket calculators to be changed ² ; be clear about other options	Third party advice	•	Improves credibility of offer Encourages travel through clearer advice	•	None
an	ne ticket is limited to National Rail nd does not include Transport for ondon & metropolitan area travel ³	Travelcard add-ons and equivalent	Can use PAYG on a separate card / device	•	Increased sense of fairness: Encourages travel Through ticketing	•	Possibly some loss of income for metropolitan transport operators

¹ An alternative is 8 in 35 days, which will provide more benefit to those who do not travel on the same days of the week or travel 3 days apart. For instance, a consistent Monday & Wednesday traveller will be able use tickets during their fifth week of travel; a Monday & Thursday user could only use 1 ticket in the fifth week and someone who normally travels Mondays & Thursdays travelling on Thursday & Friday in their fifth week could not use any remaining tickets.

18 August 2021 1 of 5

² Eg Harpenden to London Thameslink: 3 days per week for 1 month: Suggests Anytime returns (£27.00 per journey, £351.00 in total) or Traditional Monthly (£399.00/£30.72 per journey). It does not offer 1 * Flexi-Season + 5 Anytime tickets (£326.10/Average £25.08 per journey); options for travellers returning outside the peak are not covered (from £23.00 return). See also Barry Doe's article in Rail Magazine 935 - https://www.railmagazine.com/ & https://www.railmagazine.com/ & https://www.railmagazine.com/ & https://www.railmagazine.com/ & https://www.railmagazine.com/ & https://www.railmagazine.com/ & https://www.pressreader.com/uk/rail-uk/20210714/282316798036766 [subscriptions required].

³ Principally London and West Midlands, although in the case of West Midlands, National Rail fares are often already uncompetitive and Network West Midlands Zonal fares more appealing.



C	HALLENGE	SUGGESTED SOLUTION	EXISTING MITIGATIONS	KEY ADVANTAGES	KEY DISADVANTAGES
				 Noticeable saving when u a lot of metropolitan trav 	,
5.	. No savings for rail users only travelling within metropolitan zonal areas ⁴	Where National Rail season tickets are available, a Flexi-Season ticket should always be available	Daily capping available (limited benefit) ⁵	Increased sense of fairnesSupports goal of encoura	
6.	The Flexi-Season had adverse consequences for some commuters who mix peak and off-peak travel (see below for context)	Retain existing off-peak Carnets indefinitely; consider tactical extensions. See below for more detailed suggestions	For some flows, Off-Peak Contactless	 Increased sense of fairnes Off-Peak tickets often use waged, so financial impact greater 	ed by lower
7.	. Flexi-Seasons aren't always available outside metropolitan areas ⁶	Flexi-Seasons to be automatically provided whenever there is a traditional weekly ticket	None	 Engenders a sense of fair Allows a simpler explanat product Expands the travel to wor London and other metrop 	rk area for

Multiples other than 8 in 28/31 should be sold

Selling tickets only for 4 weeks of usage (for the 2 day a week commuter) is problematic if the traveller will not be using them in every one of the next 4 weeks (whether planned [eg holidays] or unplanned [eg illness]). We recognise that a single sale of a 2 in 7 product is not in the spirit of the product's target market – the commuter, rather than someone with a short term need to go to London on a few occasions in (eg) a week. A solution to the problem that 2 day a week commuters will find it very difficult to use Flexi-Seasons effectively needs to be provided. We are less concerned about the specific solution chosen, but a simple solution would be to add a 20 in 91 days version; like the traditional monthly and annual season, reward a commitment for travelling for a longer period and offer a discount for doing so. Even for a 2 day a week traveller, this would allow the journey not to be made on 6 occasions (eg a two week holiday and two unexpected absences). Thus commuters could choose between 8 in 31 or 20 in 91. Other solutions such as offering top up purchases to extend the life of a Flexi-Season would be an alternative – eg can add 2 tickets and a further 8 days to an existing ticket within 21 days of expiry.

The ticket is limited to National Rail and does not include metropolitan area travel including the London Travelcard

Flexi-Seasons with the London Travelcard add-on are not available (nor are equivalents elsewhere – eg Network WM Zonal Cards). This is disappointing. In the case of London, for commuters who make a single return journey to Underground Zones 1 or 2 each day, the add-on is primarily a convenience as PAYG costs are similar. However

. .

⁴ Eg a Traveller from Elstree & Borehamwood to London Bridge.

⁵ However this often does not get triggered until a third daily trip, so of limited use to the simple out and back commuter.

⁶ Eg for stations west of Poole and Yeovil Junction to London.



other commuters will pay noticeably more (eg travel further to Zone 3, use a bus as well or make three journeys). There are also other unintended consequences such as some National Rail Seasons that are inter-available with TfL services are not available as Flexi-Seasons⁷.

We urge that, if need be, feasibility be investigated properly as we believe the minimum to be a credible, properly researched, explanation as to why expected costs exceed expected benefits, leading to a "Not available" decision, rather than the current bland solo "No"; and if benefits do exceed costs, then steps need to be taken to add this feature.

The Flexi-Season had adverse consequences for some commuters who mix peak and off-peak travel

Off Peak commuters – those that do not routinely travel in the morning peak have typically not received any form of discount for their regular travel. Historically, there have been one noticeable exception and one partial mitigation:

- 1. The exception: For selected stations between London and Bedford, Huntingdon & Royston, Carnets were sold as singles with a peak and an off-peak version. Given the price increase that would be involved for someone travelling off-peak both ways, the off-peak version has been retained for now. It is essential that it be retained until such time as the more far reaching fares reform is put in place.
- 2. *The partial mitigation:* For other selected stations & routes where Contactless Bank cards are accepted⁸, commuters who travel out in the morning peak and back offpeak are charged a combination of one peak single and one off-peak single, these uniquely priced at half the cost of the relevant return.

It is difficult to see how Flexi-seasons can be evolved – within the constraints of the current fares design to meet this need, and this is useful evidence to support the need for change.

Part time commuter communities not served by the Flexi-Season

The following types of part time commuter are either not served, or not served well by the Flexi-Season:

CHALLENGE	SHORTCOMING	POSSIBLE SOLUTION
The Longer distance 3 day a week commuter	For many of these commuters, the traditional season ticket remains better value. For instance on the Midland Mainline, a 3 day a week user at Harlington (Beds) and south thereof will typically find the Flexi-Season of value; at Flitwick, a traditional Annual and a Flexi-Season give a very similar cost per journey. For Bedford and stations north of it, the traditional season is better value.	 Introduce a 3 day a week offering at a lower price per journey.
2. Those who do not travel in the morning peak	The Flexi-Season perpetuates typical historic practice of not offering a discount for those who travel outside the morning peak (see above for the one known exception).	 A product for the off-peak commuter should be prioritised during fares reform.
3. Those who prefer to use First Class	There is no First Class Flexi-Season; the increased gap in price (vs Standard Class) is likely to result in switches to Standard Class due to the increased price differential. Net, the Railway is likely to receive reduced revenue.	 Provide a First Class Flexi-Season where a First Class Traditional Season is available.

⁷ Eg Stevenage, Welwyn Garden City & Hatfield to East Croydon. Stevenage typically has 4 direct trains per hour to East Croydon; otherwise, a same platform change in central London.

⁸ https://tfl.gov.uk/fares/find-fares/national-rail-fares-beyond-zone-9.



Appendix – sample impact of Railfuture idea of a switch from 8 in 28 days to 8 in 31 days:

The example on this page shows how a part time commuter might end up using their Flexi-Season tickets in two scenarios: (1) the current 8 tickets in no more than 28 days; and (2 also Railfuture's suggested validity of 8 tickets in 31 days.

vo day	s a week	use						On	basis of	8 in 28 d	days use	e			Or	basis of	8 in 31	days us	e
Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat		Mon	Tue	Wed	Thu	Fri	Sat
28 Jun	29 Jun	30 Jun	1 Jul	2 Jul	3 Jul	4 Jul							Flexi-season does not make sense for weekend use, unless tickets will otherwise expire						
5 Jul	6 Jul	7 Jul	8 Jul	9 Jul	10 Jul	11 Jul		Flexi S	Season	used			Se e		Flexi	Seaso	n used		
12 Jul	13 Jul	14 Jul	15 Jul	16 Jul	17 Jul	18 Jul		7 iı	n 28 da	avs			. <u>≅</u>		8	in 29 c	lavs		
19 Jul	20 Jul	21 Jul	22 Jul	23 Jul	24 Jul	25 Jul				,-			the				.,-		
26 Jul	27 Jul	28 Jul	29 Jul	30 Jul	31 Jul	1 Aug	ATR		ATR				0						
2 Aug	3 Aug	4 Aug	5 Aug	6 Aug	7 Aug	8 Aug	ATR		ATR				S W						
9 Aug	10 Aug	11 Aug	12 Aug	13 Aug	14 Aug	15 Aug	ATR		ATR				ket		Flexi	Seaso	n used		
16 Aug	17 Aug	18 Aug	19 Aug	20 Aug	21 Aug	22 Aug							s tic		7	in 31 c	lays		
23 Aug	24 Aug	25 Aug	26 Aug	27 Aug	28 Aug	29 Aug	ATR		ATR				les						
30 Aug	31 Aug	1 Sep	2 Sep	3 Sep	4 Sep	5 Sep							'n.						
6 Sep	7 Sep	8 Sep	9 Sep	10 Sep	11 Sep	12 Sep		Flexi 9	Season	used			nse		Flexi	Seaso	n used		
13 Sep	14 Sep	15 Sep	16 Sep	17 Sep	18 Sep	19 Sep			n 28 da				pu		8	in 29 d	lays		
20 Sep	21 Sep	22 Sep	23 Sep	24 Sep	25 Sep	26 Sep		0 11	11 20 U	ауз			ek K				-		
27 Sep	28 Sep	29 Sep	30 Sep	1 Oct	2 Oct	3 Oct							×						
4 Oct	5 Oct	6 Oct	7 Oct	8 Oct	9 Oct	10 Oct		Flexi S	Season	used			for		Flexi	Seaso	n used		
11 Oct	12 Oct	13 Oct	14 Oct	15 Oct	16 Oct	17 Oct		8 iı	n <mark>22</mark> da	ays			nse			in 28 c			
18 Oct	19 Oct	20 Oct	21 Oct	22 Oct	23 Oct	24 Oct							Se		3	20 (,5		
25 Oct	26 Oct	27 Oct	28 Oct	29 Oct	30 Oct	31 Oct							ake						
1 Nov	2 Nov	3 Nov	4 Nov	5 Nov	6 Nov	7 Nov		Flexi S	Season	used			t m						
8 Nov	9 Nov	10 Nov	11 Nov	12 Nov	13 Nov	14 Nov		7 iı	n 28 da	avs			s nc			Seaso			
15 Nov	16 Nov	17 Nov	18 Nov	19 Nov	20 Nov	21 Nov							doe		8	in 29 c	lays		
22 Nov	23 Nov	24 Nov	25 Nov	26 Nov	27 Nov	28 Nov			ATR				ouc						
29 Nov	30 Nov	1 Dec	2 Dec	3 Dec	4 Dec	5 Dec	ATR		ATR				eas			ATR			
6 Dec	7 Dec	8 Dec	9 Dec	10 Dec	11 Dec	12 Dec	ATR		ATR				z <u>-</u> s	ATR		ATR			
13 Dec	14 Dec	15 Dec	16 Dec	17 Dec	18 Dec	19 Dec			ATR				E E	ATR					
20 Dec	21 Dec	22 Dec	23 Dec	24 Dec	25 Dec	26 Dec													
27 Dec	28 Dec	29 Dec	30 Dec	31 Dec	1 Jan	2 Jan		N1	٠						N1	٠			
	D							Num	Cost	•					Num	Cost			
	2	ay in the wo	•			Ticket type		tickets	tick		Total				tickets		ket	Total	
		d / changed				Flexi Season		4	£191		£764				5		£191.10	£955	
	î ·	d absence from		•		Anytime return		14	£27	.90 _	£390		_		2	•	£27.90_	£11:	
	Planned at	osence from	tne workpl	ace		Davis kurus II I		42	-	\l	£1,155							£1,06	
						Days travelled		43		er day	£26.	გხ			43	5		£24	.82

The above is for Harpenden to London Thameslink, where a Flexi-Season offers a 12.5% discount as compared to an Anytime Return. For journeys with larger discounts, decisions may vary - eg 6 days use may be enough to justify purchase



The example on this page shows how a part time commuter might end up using their Flexi-Season tickets in two scenarios: (1) the current 8 tickets in no more than 28 days; and (2 also Railfuture's suggested validity of 8 tickets in 31 days.

iree da	ays a wee	k use						On b	asis of 8 in	28 days	suse			On	basis o	f 8 in 31 (days use	e
Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed Th	ı Fr	ri Sat		Mon	Tue	Wed	Thu	Fri	Sat
8 Jun	29 Jun	30 Jun	1 Jul	2 Jul	3 Jul	4 Jul	I	Flexi S	eason us	ed		Flexi-season does not make sense for weekend use, unless tickets will otherwise expire		Flexi	Seaso	n used		
5 Jul	6 Jul	7 Jul	8 Jul	9 Jul	10 Jul	11 Jul		8 in	17 days			e e		8	in 17 (lavs		
2 Jul	13 Jul	14 Jul	15 Jul	16 Jul	17 Jul	18 Jul						K				•		
9 Jul	20 Jul	21 Jul	22 Jul	23 Jul	24 Jul	25 Jul	1	Flexi S	eason us	ed		the		Flexi	Seaso	n used		
6 Jul	27 Jul	28 Jul	29 Jul	30 Jul	31 Jul	1 Aug		7 in	28 days			0 ≣		7	in 31 (lavs		
Aug	3 Aug	4 Aug	5 Aug	6 Aug	7 Aug	8 Aug		•	Loudys			× s.		•	51 (.uys		
Aug	10 Aug	11 Aug	12 Aug	13 Aug	14 Aug	15 Aug						Жet						
Aug	17 Aug	18 Aug	19 Aug	20 Aug	21 Aug	22 Aug						s tic						
8 Aug	24 Aug	25 Aug	26 Aug	27 Aug	28 Aug	29 Aug	F		eason use	ed		ıles		_		n used		
) Aug	31 Aug	1 Sep	2 Sep	3 Sep	4 Sep	5 Sep		8 in	20 days			'n,		8	in <mark>20</mark> (lays		
Sep	7 Sep	8 Sep	9 Sep	10 Sep	11 Sep	12 Sep						nse						
3 Sep	14 Sep	15 Sep	16 Sep	17 Sep	18 Sep	19 Sep	F		eason use	d		pu		Flexi	Seaso	n used		
Sep	21 Sep	22 Sep	23 Sep	24 Sep	25 Sep	26 Sep		8 in	20 days			eke		8	in <mark>20</mark> (lays		
7 Sep	28 Sep	29 Sep	30 Sep	1 Oct	2 Oct	3 Oct				_		ě						
Oct	5 Oct	6 Oct	7 Oct	8 Oct	9 Oct	10 Oct			eason us	ed		for				n used		
1 Oct	12 Oct	13 Oct	14 Oct	15 Oct	16 Oct	17 Oct		8 in	16 days			nse		8	in 16 (lays		
3 Oct	19 Oct	20 Oct	21 Oct	22 Oct	23 Oct	24 Oct						e se						
5 Oct	26 Oct	27 Oct	28 Oct	29 Oct	30 Oct	31 Oct	F	Flexi Se	eason us	ed		ake		Flexi	Seaso	n used		
Nov	2 Nov	3 Nov	4 Nov	5 Nov	6 Nov	7 Nov		5 in	28 days			E H			in 31 d	lavs		
Nov	9 Nov	10 Nov	11 Nov	12 Nov	13 Nov	14 Nov			•			s nc			0 _ \	,5		
Nov	16 Nov	17 Nov	18 Nov	19 Nov	20 Nov	21 Nov		Flexi S	eason us	ed		Joe			_			
Nov	23 Nov	24 Nov	25 Nov	26 Nov	27 Nov	28 Nov		8 in	17 days			ou c		_		n used		
Nov	30 Nov	1 Dec	2 Dec	3 Dec	4 Dec	5 Dec						eas		8	in 17 (
Dec	7 Dec	8 Dec	9 Dec	10 Dec	11 Dec	12 Dec	ATR		ATR AT			<u>×</u> -				ATR		
3 Dec	14 Dec	15 Dec	16 Dec	17 Dec	18 Dec	19 Dec	ATR		ATR AT	R		Fley	ATR		ATR	ATR		
) Dec	21 Dec	22 Dec	23 Dec	24 Dec	25 Dec	26 Dec						- -						
7 Dec	28 Dec	29 Dec	30 Dec	31 Dec	1 Jan	2 Jan												
	š							Num	Cost per	_				Num		per	_	
	Planned da	•	•			Ticket type	t	ickets	ticket		tal cost			tickets		ket	Total	
80000000000	8		day in the w			Flexi Season		7	£191.10		L,337.70			7		£191.10	£1,33	
	•		om the wor	•		Anytime return		6	£27.90		167.40	_		4		£27.90	£111	
	Planned ab	sence from	the workp	ace							L,505.10						£1,449	
						Days travelled		58	Perd	ay i	£25.95			58			£24.	99

The above is for Harpenden to London Thameslink, where a Flexi-Season offers a 12.5% discount as compared to an Anytime Return. For journeys with larger discounts, decisions may vary - eg 6 days use may be enough to justify purchase