



**Promoting Britain's  
Railway  
for Passengers  
and Freight**

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Dear Sir,

**Response to C&MA Consultation: Competition in passenger rail services in Great Britain**

Railfuture is the UK's leading independent organisation campaigning for better services for passengers and freight. A voluntary organisation to which many rail user groups are affiliated, the organisation is independent both politically and commercially.

This response is made by the Passenger Group, Railfuture, part of the Policy Directorate. The comments made are not confidential, and we would be happy for them to appear on your website and you are welcome to use them in discussion with funders and other stakeholders. We would be happy to enlarge on any of the points made above or to work with you to identify the best options for the future.

**Introduction**

The key issues for us are quality of service, economic cost for the rail industry and therefore the passenger and tax payer. Key quality of service issues are :

Adequate Capacity  
Reliability (minimum disruption and recovery of service when issues occur)  
Economic Fares  
Connectivity with other services  
Quality of Service (Rolling Stock)

Comfortable seating (for journey duration, with limited, forced, standing)  
Onboard information  
Speed of journey  
Wireless and power connections  
Buffet services on longer distance journeys  
Ability to buy a ticket on the train where no provision is available at the starting station.  
Accessibility for all

Quality of Service (Stations and Interchange with road/light rail/bus/bike/pedestrian as appropriate)

An seamless network for the passenger (cross ticketing)  
Ideally staff presence at stations  
Shelters/cover from the elements  
Passenger Information  
Accessibility for all  
Ability to buy a ticket at the station (and additionally other retail outlets and the internet)

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Therefore our responses are based on the perceived ability for rail competition to deliver against these high level criteria.

An issue for us would be the introduction of additional operators on existing lines and operational complexities that can lead to additional railway cost and complexity when dealing with planned and unplanned disruption and the 'steady state railway'. When deciding on the allocation of a finite resource (train paths, platform allocation) we would want to ensure that this does not have a negative effect on other operators and constrain their ability to serve their customers.

Capacity – additional operators can satisfy the need, and even generate new demand. But this could be at a cost to other services.

Reliability – Additional services will not improve reliability and will cause additional wear and tear, leading to further maintenance issues. Steady state operation will be programmed to not interfere with other services, but otherwise it generates additional complexity.

Economic Fares – Additional operators can provide competition and lead to some reduction in fares.

Quality of Service (Rolling Stock) – There are examples of improved quality of rolling stock and on board facilities on open access operators – although this may be constrained by the need to ensure compatibility with the rail infrastructure and the operating capabilities of other operators to make the most effective use of train paths.

Quality of Service (Stations) – Stations are normally owned by Network Rail and leased to franchise holders to operate (except for some larger stations in large cities which are operated by Network Rail themselves). There are examples of some minor stations that are operated by some franchises but who don't actually run a train service to that station – along with operating a station come responsibilities for security, passenger information, ticket selling and handling planned and unplanned disruption at that station.

#### Summary

It is not clear how any of the options identified in the report can satisfy passenger requirements, although they can provide some areas of benefit, this can be at a cost to the wider rail operation.

Of all the options specified only Option 3 brings a new perspective by allowing for an overlap between franchise areas and therefore increased connectivity along with the competition.

There should be a question as to the benefits and practicality of open access services if they paid their full share of track charges and a smaller share of revenue at some stations.

In an ever more crowded network, simplicity of the infrastructure/operator interface must be a priority.

Yours faithfully,



Chris Fribbins  
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Head of Passenger Group