



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication.

Please send your response to Licensing.Enquiries@orr.gov.uk by 5pm on Tuesday 23 May 2023.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

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*This information will not be published on our website.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

No: putting the specified time period into the Network Code makes it easier to respond to customer needs.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Evidence 1: Holidays: The timescales for booking package holidays, which create demand for connecting trains to airports and seaports, has increased to pre-Covid levels, and prospective passengers can now book up to a year ahead. A very expensive holiday like a cruise can be booked up to two years in advance. Advance rail tickets to access such an expensive purchase should be available up to 52 weeks in advance with flexibility to change times if necessary, and Advance tickets should be bookable 12 weeks in advance based on the draft timetable. This means a requirement in the Network Code for the draft timetable to be booked at T-12.

Currently for a two-week holiday timetables for return trains are not available until 10 weeks before the date from which accommodation needs to be booked. It is not just a question of confirmation of train times, it is a question of knowing whether trains will run at all (ie will there be engineering works, bus substitution, which could be unpleasant, add hours to the journey, and cause onward connections such as ferries, causeways, accommodation check-in times etc to be missed.) If seasoned rail campaigners such as our members find the rail industry's too short window times and fares will drive them to air, think how much this happens with the public at large. A local example could be: "Would I plan a weekend break in Yorkshire to travel over the Settle – Carlisle line?" Better not. It could well be closed for the weekend. Might also be worth thinking about how anything less than T-12 will affect the rail charter market. This may make it unviable.

Evidence 2: Lack of printed timetables. Because printed timetables are no longer available, it's impossible for those who don't have access to the internet to find out even what the default timetable is. Recent research in the London area has shown that 20% of people do not have internet access, and this will surely be replicated throughout the country.

Evidence 3: Mobility Impaired Travel. By not releasing timetables in advance, rail companies are discouraging disabled passengers from travelling: passengers who may only use rail because there is access to toilets and no requirement to use inaccessible coaches. Information on changes during a journey also need to be planned in advance for disabled passengers to allow time to travel from one platform to another at stations.

Evidence 4: There appears to be a contradiction between:

1. The statement in para. 3 of the consultation that the BTBF proposal based on processes used since 2020, will be more flexible, efficient, high quality and safer, and (Annex A) is driven by the needs of the passenger and freight market that it is serving: and
2. that operators have frequently been unable to fulfil the timetable produced by those processes, resulting in many cancellations, often without notification to passengers, and that passengers will only be informed of confirmed train times at the 8-week milestone – clearly not a benefit to passengers.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.
Railfuture does not object to this.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily the Freedom of Information Act 2000 (FOIA), the UK General Data Protection Regulation (UK GDPR) the Data Protection Act 2018 (DPA) and the Environmental Information Regulations 2004.

Under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, if you are seeking confidentiality for information you are providing, please explain why. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on ORR.

If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response.

Any personal data you provide to us will be used for the purposes of this consultation and will be handled in accordance with our privacy notice, which sets out how we comply with the UK General Data Protection Regulation and Data Protection Act 2018.

Consent

In responding to this consultation you consent to us:

handling your personal data for the purposes of this consultation; and

publishing your response on our website (unless you have indicated to us that you wish for your response to be treated as confidential as set out above.)

Your consent to either of the above can be withdrawn at any time. Further information about how we handle your personal data and your rights is set out in our privacy notice.

Format of responses

So that we are able to apply web standards to content on our website, we would prefer that you email us your response either in Microsoft Word format or OpenDocument Text (.odt) format. ODT files have a fully open format and do not rely on any specific piece of software.

If you send us a PDF document, please:

create it directly from an electronic word-processed file using PDF creation software (rather than as a scanned image of a printout); and

ensure that the PDF's security method is set to no security in the document properties.