

## **A railway fit for Britain's future - Railfuture's response to government consultation on Great British Railways - GBR**

### **incorporating suggestions from Railfuture Officers and Branches**

Please note that Railfuture responded to all questions posed in the on line version, which removes some questions depending on the status and nature of the respondent. A paper submission has all 46 questions but may be filtered as per the on line version.

We have received some great suggestions on the draft from Railfuture group and branch colleagues. Many of these have been incorporated. A degree of editor's license has been employed for brevity, to amalgamate responses from more than one colleague whilst trying to avoid the trap of not answering the question. Importantly I have tried to ensure that our response is seen as a strategic one for a national consultation so more localised suggestions are omitted. These ideas remain for use in illustrating our response during potential follow on discussions.

#### **Personal details**

Q1. What is your name?

Ian Brown CBE FCILT, (Policy Director, Railfuture)

Q2. What is your e mail?

[ianbrown@railfuture.org.uk](mailto:ianbrown@railfuture.org.uk)

Q3. Are you responding on behalf of an organisation

Yes on behalf of Raifuture Group and Branches, following internal consultation.

#### **Organisation details**

Q4. The name of your organisation is?

Railfuture.

Q5. Your organisation is best described as:

Railfuture is th UK's leading independent organisation campaigning for better rail services for passengers and freight. It is a voluntary group representing rail users, with 20,000 affiliated and individual members.

Q6. The number of employees of your organisation is?

It is a voluntary organisation consisting of a corporate group and 12 branches in England plus Scotland and Wales.

## Leadership of Britain's Railways

Q9. Do you agree or disagree that GBR should be empowered to deliver through:			
	Agree	Disagree	Don't know
<b>reformed objectives</b>	<b>X</b>		
<b>a simplified and streamlined regulatory framework</b>	<b>X</b>		
Why?			
The present structure lacks all industry incentives Regulation at all levels does not foster change, it is viewed as an inhibitor.			

Q10. Do you agree or disagree that the:			
	Agree	Disagree	Don't know
<b>Secretary of State should be responsible for issuing and modifying a simplified GNR licence by the ORR</b>		<b>X</b>	
<b>ORR's duties with respect to GBR should be streamlined to reflect the new sector model</b>		<b>X</b>	
Why?			
The ORR is a respected body but should be far more responsive to the evolving needs of the rail industry set against its objectives. The rail industry must be far more agile and not hide behind turgid industry practices.			

Q11. Do you agree or disagree that the Secretary of State should be responsible for setting a long term strategy for GBR to align with government priorities?	
Agree. Government should set national strategic objectives for GBR. Objectives should be quantified and include supporting economic growth including facilitating housing targets, environmental sustainability and social inclusion. Transport objectives should include meeting a required subsidy level, achieving target modal shift for passengers and freight, and meeting a decarbonisation target.	

## A new voice for passengers

Q13. Do you agree or disagree with the proposed functions of the new passenger watchdog?	
Agree, but it should be stressed that the consultation makes no mention of user groups nor Community Rail Partnerships. The new watchdog should have a representative of a national rail users group ie Railfuture on its Board, and be obliged to have a formal relationship with CRPs at regional level.	

## A new passenger watchdog

Q17. In your view which of the approaches do you think would best enable the establishment of the new passenger watchdog?	
Statutory advisor. The Passenger Watchdog should scrutinise all services controlled by devolved Mayors including rail, light rail and buses.	

## Approach reasoning

Q18. Why?

Presuming this refers to the passenger watchdog

We have just noted the fact that objectives should come from the SoS. These should take into account the wider economic, social and environmental benefits of rail with regulation from a more responsive ORR.

The passenger watchdog should work within this mechanism, not compete with it.

Clarity of direction will be essential

## Alternative Dispute Resolution (ADR)

Q21. In your view which of the options to establish the ADR function as part of the passenger watchdog would deliver the best outcome for passengers?

Transfer the powers and functions of the Rail Ombudsman to the new passenger watchdog through legislation

Q22. Why?

As before in response to Q12

## Making the best use of the rail network

Q25. In your view does the proposed new access framework enable GBR to be an effective directing mind that can ensure best use of network capacity?

Yes

## Proposal

Q27. What if any:

access rules for GBR should be updated and included in legislation

They should be made clear and possibly simplified in the legislation as opposed to changing them.

access requirements for GBR should be updated and included in the legislation

Again a clear statement should be made in the legislation

Q28. In your view does the proposed role of the ORR acting as an appeals body, to ensure fairness and non-discrimination, provide sufficient reassurances to all rail operators wishing to access the GBR-managed network?

Yes, provided that the ORR has speedy access to information including GRR databases.

## Making best use of the rail network

Q30. What, if any, unintended consequences do you think could occur by the ORR retaining its existing powers with regard to other infrastructure managers and which may affect the smooth passage of trains between the GBR and non GBR network?

The ORR has a good track record on regulation provided the criteria for acceptance including open access are clear. GBR does not appear to introduce any new issues regarding trains passing to/from networks such as the Channel Tunnel, London Underground, private sidings if the ORR's existing powers are retained.

## Financial framework

Q33. Do you agree or disagree with the proposed legislative approach regarding a 5-year funding settlement for GBR?

Agree. However, particularly for capital investment planning for capital works this should include a rolling indication of longer term funding envisaged in order to facilitate the efficiency of long term programmes such as electrification of the rail network.

## Fares, ticketing and retailing

Q35. Do you agree or disagree with the legislative approach outlined to retain the Secretary of State's role in relation to fares and continuing to safeguard certain rail discount schemes?

Agree. The range of ticket types needs to ensure nobody is excluded from Travel by safeguarding Railcards (including for families and children.) Existing smart cards issued by existing TOCs such as Travel Key need to be blended in and made compatible across the network. The system must also provide for continuance of devolved authority smartcards providing integrated travel, including Oyster in London and Pop in the North East

## Online retail

Q37. What if any safeguards are needed to ensure a thriving and competitive retail market while also ensuring GBR can deliver a high quality offer to its customers?

This is an important area from a passenger viewpoint. Quality is important but so is encouraging smaller local business. Also smaller stations retail can increase 'staff' presence so improving security. The rules should reflect this with lower rents for improving staff presence at smaller stations including Sundays. The rules should be clearly set out against such a wider objective ie not just maximising income from retail.

GBR should maximise revenue from ancillary activities associated with the railway estate but refrain from archway leases that involve practices that may disrupt the operation of the railway (eg repair facilities that use acetylene or other inflammable materials that require long cool off periods following fires before rail operation can be restored).

## Devolution

Q38. Do you agree or disagree with our approach to GBR's statutory duty in relation to devolved leaders

Agree

## Devolution

Q40. Do you agree or disagree with the proposed approach in:

	Agree	Disagree	Don't know
<b>Scotland on enabling further collaboration between track and train while preserving the devolved settlements</b>	<b>X</b>		
<b>Wales on enabling further collaboration between track and train while preserving the devolved settlements</b>	<b>X</b>		
<b>If disagree explain why?</b>			

The same must apply to larger conurbations such as TfGM and the West Midlands, both the subject of current devolution exercises.

## Devolution

Q41 Do you agree or disagree with the proposed approach on making targeted amendments to existing legislation to clarify the role of devolved leaders in relation to GBR?

Agree, The "big six" authorities, Merseyside, Greater Manchester, West and South Yorkshire, Nexus and West Midlands should have responsibility for urban rail services within their regions, and also cross boundary urban services in cooperation with local councils. This should also apply to urban services between devolved authorities eg Merseyside - Greater Manchester, West and South Yorkshire.

## Train driver licensing and certification regime

Q43 Do you agree or disagree with our intention to create a new delegated power that would enable the Secretary of State to update, amend or revoke provisions in TDLCR and related assimilated law in Great Britain, subject to public consultation?

Agree. As driver retirement ages tend to be lower in the EU care should be taken to facilitate EU certified drivers to work in Britain.

## Additional evidence

Q45 Provide evidence

Given the high fixed costs of the rail network, particularly infrastructure costs, it is essential that the GBR structure actively encourages growth in passengers and freight moved.

The structure must be set against the economic, social and environmental objectives of a fully integrated transport system for the country, so providing a value for money solution achieved by increased output incentives and pricing should foster this wider remit for the industry

## Final comments

Q46. Is there anything else you would like to share with us?

GBR should be the engine of growth for the UK economy.

Efficiency and productivity of the railway is also essential. As we have seen there is very little incentive through the franchise system to address this with short term franchises. GBR must grasp this opportunity

Although a 5 year funding timescale is indicated, the industry also needs an indication of future fund flows so it can plan for system improvements such as a rolling programme of electrification