



Consultation Response

**Network Rail Long Term Planning
Process: Urban Regional Market Study**

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1. Introduction

- 1.1. **pteg** represents the six Passenger Transport Executives (PTEs) in England which between them serve more than eleven million people in Tyne and Wear ('Nexus'), West Yorkshire ('Metro'), South Yorkshire, Greater Manchester, Merseyside ('Merseytravel') and the West Midlands ('Centro'). The West of England Partnership, Leicester City Council, Nottingham City Council, Transport for London (TfL) and Strathclyde Partnership for Transport (SPT) are associate members of **pteg**, though this response does not represent their views. The PTEs plan, procure, provide and promote public transport in some of Britain's largest city regions, with the aim of delivering integrated public transport networks accessible to all.
- 1.2. The PTEs and their constituent Local Authority districts are seeking a greater devolved role in the delivery of local rail services in the West Midlands and North of England, and discussions are currently underway with the Department for Transport on this issue. **pteg** is particularly keen for strategic planning processes to acknowledge the potential greater future role of PTEs in setting investment priorities.
- 1.3. This response deals with the Urban Regional market study. **pteg** has already submitted a response to the long distance study, which we refer to in the main body of the current response.
- 1.4. This response pulls together common views across the PTEs and TfGM¹, largely in relation to matters of principle and the overall approach taken rather than specific recommendations. However, some PTEs have also produced individual responses which complement our broader points with specific examples. These responses would therefore best be read in conjunction.

2. Response

- 2.1. The PTEs welcome Network Rail's decision to move towards the more strategic and longer term approach to network development reflected in the Long Term Planning Process (LTPP). We agree that such an overarching framework is essential to justify and prioritise investment in rail infrastructure, given its long pay-back periods and lead-in times, multiple inter-dependencies and potential impact on long term socio-economic objectives.
- 2.2. We would like to acknowledge the good level of engagement between the study team and regional stakeholders, in particular PTEs. We welcome this collaborative approach, which has contributed to a positive working relationship and ensured that the outputs from the study are largely consistent with Local Transport Plans and other relevant policy documents.
- 2.3. Nonetheless, the drafts for consultation have brought to light some potential weaknesses in the approach taken in the study. We have discussed these in some detail in our response to the long distance market study (available here: <http://www.pteg.net/resources/types/consultation-responses/long-term-planning-process-long-distance-market-study>). In doing so, our key objectives have been to ensure, firstly, that different types of service are treated consistently and, secondly, that the proposed conditional outputs can withstand close scrutiny from both within and outside the rail industry. We do not feel the need to repeat those arguments in this response and instead concentrate here on issues specific to the regional urban market study.

¹ Subsequently in our response, we refer to 'the PTEs' to mean 'the PTEs and TfGM'.

- 2.4. The PTEs recognise, of course, that some issues are inevitable in moving towards this more strategic and longer term approach. We are therefore keen to continue to work closely with Network Rail as part of this process to ensure that the rail network of the future contributes effectively towards regional and national socio-economic development.

Process

- 2.5. In the response to the LD market study, we noted that some significant flows appear to be absent from the analysis and argued that this could lead to important missed opportunities for cost effective service and network enhancements.
- 2.6. Although a much lesser issue in the regional urban study we did notice that some important urban centres and rail trip attractors/generators² are absent from table 2.1, which lists the key centres for detailed analysis. The reason seems to be that Network Rail's list is based on the Centre for Cities' factbook, which often tends to aggregate important urban areas (typically with their own main line rail station) into adjacent or neighbouring cities. We expect that this issue can be easily addressed, for example, by using ORR's station passenger data to identify any key stations/urban areas currently missing from table 2.1.
- 2.7. More generally, there seems to be very limited reference to cross-city flows, where the removal of the need to interchange, alongside other small timetable improvements, can often generate significant additional demand at little cost. This is potentially a complex area which would eventually require detailed timetable analysis beyond the scope of the market study. However, we feel it deserves an explicit reference, perhaps including a list of station pairs for further analysis and an illustration of the methodology that could be used.
- 2.8. On a separate note, the delay in the publication of the conditional outputs for areas other than West Yorkshire has limited the ability of the PTEs to fully gauge the views of local stakeholders ahead of the consultation response deadline. Although this has been mitigated, to some extent, through regular engagement between Network Rail and PTEs, we expect that in the future important proposals such as conditional outputs are made publicly available at the start of the consultation period.

Conditional outputs

- 2.9. The PTEs are satisfied that the conditional outputs seen to date are broadly in line with our medium term aspirations, set out in Local Transport Plans and other key policy documents.
- 2.10. However, the proposed outputs seem to lack almost entirely in ambition when seen in the context of a 30-year strategic document. Few of the proposals seen to date appear to go much beyond qualitative statements about incremental timetable improvements and there seems to be an implicit assumption that significant infrastructure investment beyond existing commitments is out of the question altogether. The persistent use of the term "as is" to define conditional outputs is also worrying as it seems to suggest that some routes will get exactly the same service level for the next 30 years.
- 2.11. We appreciate, of course, that the level of uncertainty involved in long term scenarios means that any proposals will inevitably need to be revised over time. For that reason, we feel

² For example, Stockport, Rotherham, Selby, Harrogate, Manchester Airport, St Helens or Birmingham University.

Network Rail should clearly set out what it sees as being the lifespan of the current market studies, as well as how and when it proposes to review them in the future.

- 2.12. But at the same time, we feel strongly that the market study should acknowledge that PTEs are seeking to deliver a step change in the quality of local rail networks over the next two decades, including in terms of capacity, connectivity and rolling stock quality. This could lead, for example, to large scale electrification, which may be an important factor to take into account in future network development plans.
- 2.13. At a more detailed level, some of the least ambitious conditional outputs seem to be justified by circular arguments which could lead to spiralling decline for local services. This is based on the premise that flows with low levels of demand do not justify service improvements, without considering the hypothesis that it may be low service quality at present which is keeping patronage down. As we argued in the response to the long distance study there are features of the forecasting methodology employed which could be reinforcing the more pessimistic view. We are therefore keen for Network Rail to audit its methodology and, if necessary, consider more appropriate methods to deal with this type of flow.
- 2.14. Turning to the contextual chapter, we feel it could do more to acknowledge the unprecedented growth in the urban regional market observed over the past decade. This is important background information in understanding our aspirations for the coming decades. The market study could also do more to acknowledge the failure of conventional industry forecasting models in anticipating regional patronage trends and to explain how the approach adopted has mitigated against these past failings.
- 2.15. For the reasons identified above, we have some concern that this first regional urban market study could be a missed opportunity in some respects and would urge Network Rail to consider our suggestions in the final draft of the document.