

Our Ref: PS/SP383380
Your Ref:

24 March 2010

Neil Leedham
Secretary to the Access Planning Industry Working Group
Office of Rail Regulation
One Kemble Street
London
WC2B 4AN

Dear Neil

Consultation on Review of Access Planning

The PTEG response to the consultation is as follows.

Timetable Planning Process

PTEG supports the review of timetable planning process and agrees that the current process can be cumbersome and inefficient. Where there is no significant change to timetables planned, if the process can be streamlined and simplified, this would bring benefits.

PTEG believes that the current twice yearly changes ought to remain as the basis for publishing timetables, as this offers predictability to passengers. Timetable changes outside of these dates ought to very much be the exception rather than the rule, and driven by significant external factors, such as the completion of infrastructure projects. Operators should not be encouraged to change timetables outside of these dates, especially on shared routes where all operator timetables are produced either by a TOC, PTE or other body. We need to avoid a situation where the industry ends up moving towards publishing single-operator only timetables because of uncertainty over what other operators are doing.

The process for planning significant timetable changes does need a clear structure and project plan, and involve all relevant parties, including funders such as PTEs.

Franchising and Access Planning

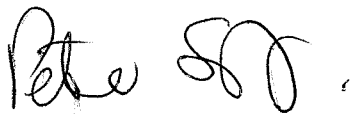
Rail services in PTE areas are heavily subsidised and are therefore subject to detailed specification within Franchise Agreements. Without a detailed franchise specification there would be no commercial incentive to operate many services, and TOCs would choose not to run them. PTEs have plenty of evidence that this is what

happens without detailed specification. It is therefore the case that the public sector needs a strong degree of certainty that whatever it specifies as the service required to meet its social, economic, environmental and other objectives, it is capable of being delivered through the industry planning processes. PTEs have the power fund services over and above that specified by the DfT and have a direct interest in ensuring that we are able to deliver services in a timely and cost effective manner.

However PTEs recognise that there could be wider economic benefits to be achieved through allocating capacity differently, and would not rule out being flexible with local service specifications where there were demonstrable wider benefits to local rail users. However, this does not change the requirement for there to be a detailed service specification in the first place.

Any process that considers the impact of changing local service provision, needs to see wider role urban rail plays in the overall transport network of a city. Having frequent, clockface services is important to encourage modal shift and there should be a general avoidance of any destruction of a clockface pattern to achieve the occasional extra path for other operators. However, the industry needs to be creative in how it deals with differences between working and public times in order to advertise services that could, in fact, be slightly off-pattern to deliver improved capacity utilisation.

While I have not followed the structure of the questions in the consultation, I hope these comments are helpful.

A handwritten signature in black ink, appearing to read 'Peter Sargant', with a stylized flourish at the end.

Peter Sargant
Chair PTEG Rail Group