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Our reference: 2536do

Dear Chris

COMMUNITY RAIL DEVELOPMENT: RESPONSE TO CONSULTATION EXERCISE

I refer to your consultation document issued in February 2004 and the request for comments.

PTEG welcomes the proposals to encourage more people to become involved with less well used lines, it can only bring about a positive result for the network, as long as it is supported by funding and expertise from the regulating authorities. You will appreciate that in the PTE areas there are already various forms of community involvement. These range from such initiatives as the Penistone Line Partnership to individual station adoption groups. These have generally proven successful and are an indicator of the potential benefits which might be derived from a more comprehensive application of the 'Community Railway' approach. Whilst overall the community railway approach is seen as being beneficial, there are some reservations about the possible impact on through services which operate over the routes you have proposed in your consultation document.

Also, some mainline routes have occasional stopping services which it is not considered justify the whole line to be designated as a "Community Railway". Some community focus on the stations would probably help especially in regard to reducing vandalism and stimulating patronage growth. Responses to specific questions are set out below in the order presented in Appendix 'A' of your document:-

General Approach to Community Railways

1. *Do you agree with the general approach proposed for Community Railways?*

The general approach is supported but it is considered that there should be recognition of the benefits which can come from community involvement in specific stations. Effectively, any station on the network could be subject of some form of community involvement. This would be irrespective of whether it was located on a designated "Community Railway". The designation should not be seen wholly as means a means of cost saving, it should primarily be a means of allowing local lines to flourish as can be seen in such countries as Germany.

2. *Are there ways to increase the socio-economic value of local and rural lines, other than through the three broad objectives outlined?*

Local authorities through the planning process should be encouraged to favour developments adjacent to stations which would increase usage of the rail line whilst meeting overall planning objectives. The improvement of station and environment quality through community railways also has a high potential value.

3. *Microfranchising might involve vertical integration (bringing train and network operations together under a unified management). What role do you think microfranchising has to play in the development of Community Railways?*

Microfranchising is a possible but by no means the only option for achieving the development of Community Railways. It may not be appropriate for a mixed use route. The economics of microfranchising need testing against the other options and it also needs to be clarified how a micro franchise operator would impact on the complexity and robustness of operations at main centres. It should be appreciated that many of the railways proposed for “Community Rail” designation include major civil engineering structures which would present a significant potential maintenance liability. If a small company with limited resources were to take on the line such liabilities would have to be underwritten centrally.

Definitions

4. *Do you agree with the broad definition outlined above for Community Rail designation?*

It seems illogical to exclude routes which have a through passenger service to London when you have included routes with through services to major provincial centres which have an hourly frequency or better. Some of the routes with services feeding into London are very rural at their outer ends and it would seem unreasonable to deny the inhabitants of the south-east the potential benefits of community railways. Many of the routes nominated in Appendix ‘C’ do have through services to London. Thought should also be given to the status of a Community Railway if service frequencies increase.

5. *Are there any other characteristics that could usefully be included in such a definition?*

A flexible approach would perhaps be more appropriate in regard to the definitions. Whilst they are useful guidelines there will inevitably be routes which would make ideal “community railways” but do not comply with the definitions. A consideration of such proposals on their merits might be appropriate rather than them being excluded automatically. I am sure that whilst some routes might not fully meet the criteria they could nonetheless benefit from some elements of the “community railway approach”. I would suggest that the last entry in the second

set of bullet points would be more appropriate in the list of what traffic would not be carried on a “community railway”.

6. *Do you agree that the lines listed in Appendix ‘C’ are those that should initially be designated as Community Railways?*

As stated earlier, there are reservations about the listing of routes which carry through services to main provincial centres. PTEs would like to discuss routes which impact on their service specification in more detail with the SRA before they are finally designated. The benefits of reducing the operating costs of some sections of railway and increasing community involvement are potentially valuable and it would be helpful to better understand what implications there might be for existing levels and quality of service. Perhaps it would be worth considering some form of guarantee or assurance to this effect. This may lead to a case being made for other routes being designated in the PTE areas following a proper assessment of the costs and benefits on a line by line basis.

7. *Do you agree with the process proposed to include or exclude Community Rail lines in the future?*

The broad outline of the process is supported but clearly there could be major cost implications should there be a need to take a designated section of railway back into the mainstream. For this reason there should be a mechanism which ensures that the future potential of the railway is properly assessed and regularly reviewed in conjunction with the local planning authority. Also there should be no major downgrade of the infrastructure capability on a ‘community railway’ without first conducting a paper consultation exercise. This would be to safeguard against prohibitively high costs of restoring the railway to mainstream capability.

Increasing passenger use and revenue

8. *Do you agree that fares structures on Community Railways should be changed to provide for integration with local bus fares?*

Fares regimes should be more flexible and reflect local circumstances. Any changes to PTE fares would need to be considered in the context of a PTE’s fares specification. There is potential to facilitate integration with local buses and there are some situations where bus and rail could provide a complementary total public transport offer and benefit from being marketed as such. This would work best with interavailability ticketing but it is not the only option. Integration of all rail and bus fares should be a general aspiration. To achieve proper integration with bus services, there needs to be changes to the regulatory framework for local bus services outside London to allow specification of integrated services/ticketing.

9. *What simplified local ticket retailing options do you think should be considered to encourage sales through local outlets such as newsagents and post offices?*

Encouraging off station and off train sales would raise the profile of the local railway and there are particular benefits from the expansion of carnet ticket sales especially with more flexible work regimes. The expansion of the range of services offered at existing ticket offices is supported where these do not detract from the core activities of the staff. Consideration should also be given to internet sales of tickets. This is becoming an increasingly popular means of buying long distance tickets and its appeal for rural communities must be greater when they may have no easy access to a manned station or travel agent. Use of area multi-modal tickets and, in the future, utilising “smart card” technology, both provide opportunities.

10. *Do you think that more flexible timetables, geared around seasonal variation in demand, would provide a better service within the resources available, and how they best be communicated?*

The concept is supported but PTEs are concerned that the interests of passengers who use the route to access the main regional centres must be borne in mind. The variable timetable should just be planned around a stable core. It would be undesirable to introduce a perception with passengers that service levels were unstable and that the ability to make their journey would vary from month to month. Changes should be co-ordinated with bus service changes where possible. Similar uncertainty has tended to discourage use of the bus network outside of London since deregulation.

11. *What are your views on use of railway station for retailing or community activities where the buildings are no longer required for railway use?*

The concept is fully supported especially where it can help improve the perception of passenger security, improve the appearance of a station, reduce vandalism and costs. Generally, anything which will bring life to a station and increase footfall is to be supported and should be positively encouraged. It is a concern at present that the achievement of such initiatives is sometimes frustrated by the sometimes less than helpful approach displayed by Spacia. If the initiative is to work, a more realistic approach to the market value of such properties is needed especially when the object of the exercise is primarily to bring life to the station. Costs of undertaking work close to the railway (usually involving Network Rail) need to be reduced. Rationalised regulatory procedures for community railways would assist options to transfer ownership.

12. *Do you think there would be value in the integration of bus and rail services in the way described? To what extent do you think buses and trains can substitute for each other?*

The response to question 8 is applicable. In addition, I would fully agree that where both bus and rail services on the same corridor are subsidised there is potential for improving value for money. There is also potential for linking buses routes firmly to key rail stations to create what might be termed “virtual rail routes” to service those destinations which no longer or never had a rail connection. Branding and an impression of permanency would add considerably to the appeal of such services. Unless real savings can be proven there is generally little value in replacing trains with buses because of the rail costs which cannot be escaped. Application of this approach is currently constrained by the Competition Act.

13. *What role do you see for community transport operators in providing rail-link services, including demand-responsive services?*

PTEs are trialling a number of innovative road based transport initiatives. These are sometimes funded with Rural Bus Grant funding and development of rail-link services in this context would have considerable potential and would benefit from the experience of and expertise being accumulated within the PTEs. However, operation to a published timetable does give users a level of confidence which ad hoc arrangements do not provide. Such facilities would be of particular value where the location of the station was remote from the residential settlement. It would be important to promote both railway and feeder road services together even going as far as having a single branding identity.

14. *How can local management best be introduced? What would be the advantages and disadvantages?*

The major benefits of local management are a heightened awareness of local opportunities and greater accountability within the community. The management must be suitably empowered but at the same time work within parameters which will ensure that nationally accepted standards apply in regard to such areas as disabled access and information. Initially, the expansion of local management should focus on passenger related issues and station maintenance. Dedicated train crews and rolling stock have advantages, but can increase operating costs through the loss of economies of scale. Devolvement could initially focus on specific issues such as ticket retailing. The economics of further devolving responsibility for track and train maintenance should be properly examined before expanding further.

Managing costs

15. *Do you agree with the approach of defining separate standards suitable for the characteristics of Community Railways?*

The approach could bring major benefits but the application of these different standards should not lead to an irreversible situation should it be decided in the future that the railway be returned to the mainstream network. Neither should reduced infrastructure standards lead to a situation where rail journey times become less competitive.

16. *Do you think passengers' interests would be better served by altering or ending the performance regime, to incentivise operators to maintain connections, rather than to put the priority on punctuality? Where do you think the balance of interests lies?*

There is no benefit to the passengers if the primary purpose of their journey is frustrated because of a rigid adherence to the performance regime. This will reduce revenue by discouraging future travel. However, consideration must be given to the ability of the branch line timetable to recover from a delayed departure and whether the service is there predominantly to provide a connection with the main line service or be a self contained means of travel for local journeys. In any regard if late running is occurring on a planned or unplanned basis, the essential factor is to keep passengers fully informed. The operators of branch lines should be incentivised in a way that reflects the benefit to passengers of their action. In other words, if delaying the branch service by 10 minutes avoids a 60 minute wait at the junction station for passengers they should be rewarded not penalised. To allow advertised connections to be maintained it will be necessary to change the current performance regime. PTEs do not believe performance regimes should be abandoned altogether for community railways.

17. *Do you think that local management of operations is likely to bring improved staff motivation and involvement, and better service for customers?*

It is considered that provided local management adhered to professional standards and was properly focussed on the needs of the community then it should improve motivation of staff because they were benefiting the community and hence likely to be regarded more highly in that community. Customers would obviously also benefit. This is one of the potentially more beneficial aspects of the "Community Railway" approach. However, there is a need to consider how the individuals' career progression aspirations can be satisfied without detriment to the quality of a community railway.

18. *Would you support the use of older heritage diesel units in the short term (up to five years) where they were retained to meet a specific local requirement?*

It is considered that this would be a retrograde step as the quality of such trains is generally not of a standard which would attract existing car users. Such units would presumably have to meet current industry standards if used on the main line, modification costs would be significant. The significant reduction in leasing costs of more modern units would be more preferable. It is difficult to see how the existing leasing costs of such units for use on community railways can be

sustained. There should be consideration of appropriate leasing charge applied in line with the less arduous usage levels which might apply on a community railway. This may facilitate more stock dedicated to community railways which could have advantages.

19. *What scope is there for light or ultra-light rail solutions on some Community Rail routes?*

Light rail is attractive for passengers but would obviously involve an initial capital outlay and there are interoperability issues to consider. Using the existing routes in isolation with new vehicles would have very limited benefit. The full benefit would come from penetration of areas not currently served by conventional rail such as pedestrianised or heritage areas. Full conversion to light rail with operation on a 'line of sight' basis could bring considerable savings. Light rail schemes should be supported where they can be proven to be appropriate for specific routes, will reduce costs and increase usage/revenue levels.

20. *How can the future potential for rail freight best be protected and developed on these routes?*

The potential future use of the community rail routes should be kept under review in conjunction with PTEs, the local planning authority and the rail industry. No irreversible infrastructure modifications should be implemented without full consultation and a consideration of possible future use for freight or other mainstream rail activities. Connections to the national rail network should not be removed.

Community involvement

21. *Do you agree with the extension of Community Rail Partnerships to all rural and local lines?*

Community involvement in local railways should be encouraged. It is not necessary to establish Community Rail Partnerships to achieve this. In PTE areas there is already a formal local involvement which can be used as a base for further devolvement. Application of Community Rail Partnerships should be on a line by line basis, extension to some rural and local lines may not be appropriate and decisions should only be made following specific assessments following the trials.

22. *How could Community Rail Partnerships be funded to ensure they have a stable, long-term future?*

Funding for such partnership schemes should be predominantly from the SRA (through PTEs where appropriate) using some of the savings achieved by community railway designation. The funding approach adopted for the Merseyrail Electrics Franchise may be appropriate. Funding should be on the basis of long-term commitment.

23. *Do you think that station adoption can be effective in improving conditions at stations and highlighting issues for station facility owners to address?*

Station adoption has considerable benefits and a number of PTEs already have active and prospective schemes. This approach can be applied to any station provided appropriate consents are obtained and the community group work within clear parameters and with the full co-operation and support of the relevant TOC.

24. *Are there any other forms of funding that could be secured to provide improvements to stations, facilities or services on Community Railways?*

Ancillary revenue generated by use of the station facilities should be ploughed back into the stations. This could include the rental for use of spare accommodation on the station to car parking fees. PTE/Local authority and European funding would be available provided the scheme supports relevant objectives. Use of Groundwork or AcoRP resources would also be appropriate. PTEs have invested considerable sums in station improvements through LTP funding. This works best when it can be done in partnership (eg with TOCs). A way of addressing ongoing revenue costs (eg maintenance of new facilities) is essential if PTEs are to continue with this type of investment.

25. *Are there any other forms of community involvement on local and rural railways that ought to be considered?*

The positive support and enthusiasm of the various rail user groups (RUGs) should not be ignored. In most PTE areas there are RUGs who enthusiastically distribute information literature and arrange promotional events for little or no financial support. There appears to be no specific reference to these in the consultation document. AcoRP should not be forgotten in this regard and the active involvement of local schools would bring benefits in regard to vandalism reduction and other safety issues.

Pilot schemes

26. *Do you agree that the lines selected could be used to trial some of the initiatives outlined in this paper as pilot schemes?*

A trial would be very helpful before further progress is made in line designation. Whilst predominantly self contained, the lines should help to give an indication of potential cost savings and revenue generation.

27. *Are there any other routes that you think should be used to trial aspects of this strategy and why?*

A trial involving a route which has through services to a major centre would be very helpful. Whilst the list of pilot schemes is supported, it is suggested that

using a route which is located in one or more PTE areas could be instructive. PTEG would be happy to discuss suitable potential routes and the letting of the Northern franchise could provide suitable opportunity to facilitate this.

Thank you for the opportunity to comment, I trust you will find my comments both constructive and helpful.

Yours sincerely