



Community Rail Development Response to SRA

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Prepared by:
Richard Wallace
Head of Rail Industry Liaison
Transport for London
London Rail
1 Butler Place
London SW1H 0PT

COMMUNITY RAIL DEVELOPMENT – A CONSULTATION PAPER ON A STRATEGY FOR COMMUNITY RAILWAYS

RESPONSE TO SRA

1. Summary of Response

Thank you for giving Transport for London the opportunity to comment on this consultation paper. Whilst the ability to apply “community railway” concepts is limited in an urban area we would agree that such developments can have an important part to play in the retention, improvement and development of the railway, particularly in a rural context. We do believe however that any changes to community rail operation should be carried out in conjunction with the local transport authority or county council as a minimum. It is essential that those charged with developing local transport plans should have greater responsibility in the process of such decisions, supporting a move to more regionally-based accountability.

However, TfL would not support the full ‘micro-franchise’ option in an area such as London. The need to offer an integrated transport product is essential in an urban area and the community railway concept in an operational context may have severe limitations in what it is able to achieve. TfL is in the process of developing options for improved control and specification of London’s suburban railways through a proposal for a London Rail Authority and full “community” operation is unlikely to fit in a growing developing rail environment which must be geared to meeting the needs of London.

There is however some community involvement which could be appropriate in an urban area and we detail this later in our response.

2. General Findings

Whilst the broad concept is one which could improve the viability of some lines we note that the overall focus of the paper is on their complete operation. Experience suggests that, up to now, the majority of community involvement schemes are related to stations, their adoption and upkeep (with alternative uses). Support for operations is mostly confined to promotion of special services etc.

To move towards a truly community-operated railway will be a significant task and poses major issues relating to securing maintenance/engineering resources, retention of competent staff (e.g. as safety case holders etc.) amongst other matters.

We suggest it may be better to examine options for at least two tiers to the community railway concept as a way of securing benefits in a wider context; part of which could be delivered relatively easily. The suggested tiers are as follows:

- a) Level 1 - community adoption – to improve the quality of areas such as the station environment (both within and external/adjacent to the station ‘footprint’ – but excluding interface with train operation) and to provide added value – supporting the national franchised operation (e.g. by local business opportunities, ticket retailing etc).
- b) Level 2 - community operation – a standalone operation from the national franchise (e.g. microfranchise) with infrastructure control either within Network Rail ownership (particularly where other operations such as freight require access) or integrated as part of the community operation.

It is only Level 1 which is likely to be feasible in an urban context. In the case of Level 2 it is hard to identify a line in London or its hinterland which could be operated in such a way without detriment to freight or the line’s place in delivering an integrated transport solution. The position of Level 2 ‘community operated’ lines in the regulatory framework also needs to be addressed. The national structure of charges poses cost overheads which may be unnecessary given the economic situation of many of the lines in question. It also exposes the lines to the checks and balances of economic regulation which is primarily aimed at national operations. The level of access charges for such lines would also need consideration and review if they were to remain within the national regulatory framework.

This issue is not dealt with in the paper but, we suggest, needs further thought if the community operation concept was to be taken further.

We note the reference to examples of local management in mainland Europe in the Background section of the paper (p3). Not stated here are the important points that local authorities have greater accountability in service specification and this is accompanied by local funding in the provision of services¹. We would advocate that the community rail concept should also be accompanied by changes to the decision-making structure to ensure greater local responsibility and control.

On funding, unfortunately the consultation paper only skims the surface of the issue – consigning this to possible reintroduction of RPP schemes or similar. The existence of longer-term funding streams, probably locally derived, is an important factor to decide upon if community rail partnerships are to succeed.

Whilst the paper does seek to identify alternative funding methods (e.g. RPP) we would advocate, as a general policy, that there needs to be more

¹ In France, the Regions have seen greater accountability in the specification and funding of services, whilst in Switzerland, there is not only local funding from the Cantons (for both service support and infrastructure) but greater integration of track and train provision - a key element if costs are to be driven down.

local accountability; not only for community lines but all national rail local services.

Detailed Responses to Consultation Questions

Our detailed responses to your consultation questions are as follows:

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

Yes – although the process of designation must involve an element of local decision-making to ensure that local considerations are fully taken into account. Despite our reservations on the application of community railways in London there may be a role for some of the Community Railways concepts on routes within or close to the Capital. Best practice, in terms of station adoption by the community at those stations with low footfall can often support a healthier environment in terms of safety, security and general perception than would otherwise be the case. This is just as important in urban areas as rural areas.

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

As already mentioned, improvements to the quality of the station environment (both within and adjacent to the station footprint) also need to be taken into account as they will support achievement of the first objective and are normally a by-product of the third.

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 may have an important role to play in rural railways which can be largely separated operationally, but this is unlikely to be appropriate for urban routes with mixed use. For those routes with interworking/through trains to the main network (e.g. Marlow/Bourne End branch) microfranchising could pose different problems and the benefits of this approach need to be balanced against (possible) loss of through facilities.

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

No. We do not believe that some of the reasons for designating routes as Community Rail routes are appropriate in all cases

In terms of passenger services, the issue of local identity (with the community) seems a more important factor and we have already stressed the possibility of a tiered approach to defining concepts of community rail. In this case the level 1 (community adoption) could still be appropriate on a line with significant freight use.

The exclusion of services with 'frequent' services to London is also questioned. The Uckfield line meets this category but the stations and rural area served make it a prime candidate for an element of community support. Conversely some lines without through services to London may be wholly inappropriate for community operation. There is also a mismatch between this statement and the lines selected in Appendix C. The Southminster line has enjoyed hourly services to Liverpool Street yet is a candidate for designation. Again we refer to the tiered options which could have differing criteria for designation. In the event it is possibly a matter for individual appraisal as to what type of community partnership is proposed and what the objective is rather than to attempt to define a set of standards which do not readily fit with achieving the objectives.

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

This is likely to be fairly subjective. It may be worthwhile including a review of the characteristics of the community served by a line and the stations themselves (rather than the route) to assess its applicability for some type of community involvement (see also the response to Question 4).

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

There are some mismatches between the list and the criteria defined in section 3 (see response to Question 4). We also have reservations about the inclusion of lines close to London which are seen as part the commuter network (see also our response to question 26)

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

There is no mention of how local authorities are to be involved in the process. The nature of community rail operation means that it essential that a local decision-making process is implemented in order to safeguard the local interest. The process must focus on the local benefits to accrue from community involvement. However, as the change process is not clearly defined it is difficult to comment authoritatively on the merits or demerits of the process. The process must not be used as a 'one way'

street. There must be the ability to bring the railway back to the national network if demand warrants.

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

Yes, but this should not just be confined to community railways. Benefits from integrated fares systems apply to all public transport networks. What is not detailed is whether there are any Competition Act issues which need to be addressed in terms of interavailability of fares in what would normally be a competitive environment.

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?*

There are opportunities for a number of options such as local retailing and use of technology solutions such as 'Smartcard' which could be accessed via the Internet. Local retailing opportunities must take account of the opening hours of shops etc. which are likely to be more restricted in rural areas – they must be geared to transport needs as well as retail needs if ticket retailing is to be successful. Opportunities are likely to be more widespread in urban areas.

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 would they best be communicated?*

Yes. We strongly support the concept that there needs to be a "basic" level of service that is guaranteed with seasonal enhancements. There are various ways in which information can be communicated but the need for effective and accurate communication is essential. Distribution of 'traditional' information leaflets should be widespread within the local area, but also available at key originating stations, many of which will be in urban areas. Electronic information should also be available but as an adjunct to traditional information which is likely to be the only appropriate medium 'in the field'. Care must be taken to ensure that electronic information sources are regularly updated.

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

We support this approach. In our introduction we noted that stations and their immediate environment can often be improved with great benefit to the railway without necessarily intruding into the operating environment. It is an important area for community involvement and one which can be

achieved at low cost. Discussions have already taken place between TfL and ACORP about what could be done in this field and whether any London lines have station sites suitable for such treatment.

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 that buses and trains can substitute for each other?

Better integration of bus and rail services is essential in any public transport environment. The two modes should aim to be complementary rather than competitive, the latter option acting as an abstractor rather than an attractor. As noted in the document and in our response to question 8, fares, ticketing and also timetable issues may need to be reviewed in the light of Competition Act requirements and derogations sought where applicable.

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

They could play an important role for co-operation in this area. However, the voluntary nature of some community operations may restrict the ability to provide demand-responsive services.

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

It is vital to identify those activities that can best be carried out locally. Some activities (e.g. safety functions/maintenance) may still need to be resourced and controlled centrally to ensure sufficient coverage. It is in this area that the distinction between tiers of support are necessary. Level 1 (community adoption) can easily be managed at a local level. This is also where the passenger interface occurs and where local commitment can see a better quality of service and thus improved passenger satisfaction. With Level 2 (community operation) the introduction will depend on local availability of the correct skill sets and the existence of adequate cover to insure the service is reliable. The benefits of local involvement are not as easily quantifiable here and the disadvantages of limited resources may outweigh the benefits. However the role of planning and local involvement also needs to be reviewed. This is another area where local support and knowledge is often advantageous in gearing the service offer to the demand. Local management must however be accountable and have a responsibility to work with the national network operators where required. A system of performance monitoring geared to the needs of the community and within the domain of responsibility of local management needs to be established.

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

In some cases - Yes. Strict imposition of Railway Group Standards for a national operation may not be the best solution for lightly used routes and could add costs unnecessarily. However the standards must be of an adequate level to allow for safe working and also interworking if required. Applicability of different standards should not be used to render a route inaccessible for future use such as freight opportunities.

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?

TfL believe the present system of performance apportionment and monitoring does not act in the best interests of branch line passengers. The existing regime is not yet structured to maintain connections and, as a result, it may dissuade prospective passengers. There must be a greater focus on the needs of passengers connecting in to less frequent services in order to improve the perception of the railway as a whole and branch line services in particular.

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

This will depend on the local situation (e.g. promotion opportunities; relationship with the local Train Operating Company). Closer involvement with the community and an ability to influence decisions to benefit passengers must inevitably improve motivation of staff and thus the quality of service offered.

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?

This is an issue which needs to be reviewed on a case by case basis. Older units with, for example, improved carrying space for cycles, prams may be of benefit to certain demand profiles. However, heritage units pose environmental, access and social inclusion issues that need to be assessed. The impact of noise and emissions from use of such vehicles must be taken account of. Requirements of the Rail Vehicle Accessibility Regulations and potential modifications to the Regulations may render this question redundant unless units are modified to comply. In any event the focus must be on a railway which is inclusive if it is to succeed. If heritage

units can meet that need and be acceptable in an environmental context then they may well have a role.

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

Light rail is usually most appropriate where there is a requirement for an intensive service and high volume of passengers. This is not likely to be the case for the lines under consideration. Ultra-light rail solutions are likely to be highly restrictive and inflexible in catering for variable loadings although there may be some lines which would be appropriate for such a solution. The question must be asked as to whether the continued existence of infrastructure costs, even for ultra light solutions, will weigh against such options given potential inflexibilities in operation.

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

If separate standards are adopted, they need to be flexible to cover safe working of freight where required (see response to question 15). Connections to the national network need to be maintained or to be capable of easy reinstatement (at low cost) and the ability to enable track access safeguarded through revisions to the Regulatory mechanism if any community railways become separate from the main body of national regulation. Any infrastructure changes must not be irreversible. Community partnership developments need to be carefully monitored to ensure they do not take over land that may be required for viable freight developments in the future. This, of course, is also a matter for local planning frameworks.

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

No. We do not regard this as being appropriate in every case especially in terms of introducing micro-franchised operations. Some local lines on the periphery of large conurbations would better be considered as part of the total public transport network rather than a separate operation. As stated earlier there are different levels of community involvement available and each line should be evaluated on its own requirements.

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

We have already stated that grants or other methods of funding should be valid for sensible periods of time in order to allow the operation to have longer-term certainty, to encourage commitment and confidence and also

to ensure assets are maintained appropriately. We would suggest that a minimum period of three years should be adopted in terms of funding streams. The document refers to the reintroduction of RPP grants. We are not sure that a nationally funded mechanism is the most appropriate in terms of an operation which needs to be responsive to local circumstances. We have already made the case for greater involvement of, and decision-making by, local authorities. A system of funding through local authorities may be a better system in terms of meeting the broad objectives of community partnerships. This also removes the potential of different regions, with similar justifications, competing for the same national based funding. This is not a desirable mechanism and may be seen to be unfair by the 'losing' party.

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

Yes – as stated earlier this is an area where community involvement can be successful, gaining benefits without the major logistical problems of taking over operations. The concept could also apply to urban stations although the challenges and options in such areas are different from those applying in rural situations and may need more careful consideration before proceeding with..

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

We have already set out our view that local funding streams (e.g. from Counties or transport authorities) would be more appropriate to support community partnerships. Local boroughs could also provide support funding for small station-based projects. Organisations such as the Association of Community Rail Partnerships (ACoRP) and Groundwork can play a useful role in co-ordinating small sources of funds to deliver wider benefits. Revenue generation from activities associated with, for example, use of redundant station building should be ploughed back to the railway for local benefit – not to the national 'pot'.

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

Schools and other local educational opportunities should be canvassed as part of any community programme. This is particularly relevant in increasing awareness not only of environmental benefits of sustainable transport but also to highlight safety issues.

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

As an urban transport authority we have no firm views on the selection of the routes involved with the exception of the St Albans Line. This line, adjacent to the West Coast Main Line and resourced via the Silverlink franchise may pose a number of significant challenges and should not be included. We would be happy to see consideration of a line in an urban environment to test application of what we have termed the Level 1 tier option but not a full micro-franchise-type community operation.

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

We would not advocate any early trials on any London suburban lines but would accept that the Level 1 tier of operation may be worthy of test once the concept was established and understood. However most lines in London which may be suitable for consideration under the community rail option have varying degrees of joint-use with freight and it is unlikely that any full-blown micro-franchise operation would be deliverable in such circumstances.

END