Purpose

1. To provide Members with a response to the Department for Transport (DfT) consultation on Rail Decentralisation and Rail Fares and Ticketing Review and an update on the Great Western Franchise process.

Background


3. The objectives of the reforms proposed by Government are:
   - Dealing with the fiscal deficit and achieving greater efficiency in the delivery of rail services.
   - Securing better value for the passenger and addressing concerns about rail fares.
   - Supporting economic growth through continued taxpayer investment in both services and infrastructure.
   - Contributing to reduction of carbon emissions through further electrification and smarter design of rolling stock and infrastructure.

4. The Government intends to set out in more detail its plans for how these objectives can be achieved and funded when it publishes the next High Level Output Specification (HLOS) and Statement of Funds Available by the end of July 2012.

5. The publication of the Command Paper was accompanied by two consultations – one dealing with fares and ticketing and the other on the decentralisation of railways. The latter consultation arises from the Government’s pursuit of its localism agenda and its wish to explore potential ways of devolving to local authorities and Passenger Transport Executives (PTE) more decision-making and accountability relating to local rail services.

Rail Decentralisation

6. The consultation sets out five options:
   - Option One – Co-signatory status
   - Option Two – One franchise, one specification
Option Three – One franchise, multiple specifications
Option Four – One principal franchise containing one or more “micro” franchises
Option Five – Entire franchise devolved to a grouping of local authorities and/or PTEs

7. These are discussed in more detail below whilst responses to the questions in the consultation document are in Appendix One.

Option One – Co-signatory status

8. Under this option local authorities work closely with the DfT in developing the specification for a new franchise and priced options for enhancements. This is the current position with the Northern Rail franchise, which has the five north of England PTEs as co-signatory with the Secretary of State. The PTEs receive a Rail Service Grant to pay for local services. For Northern Rail this amounts to £429m subsidising 78% of costs. The Railways Act 2005 removed the PTEs’ right to this status for future franchises. It can, however, be granted at the Secretary of State’s discretion where a PTE is able to demonstrate that the status adds value. For example Centro in the West Midlands lost its co-signatory status with the new London Midland franchise and consequently receives no Rail Service Grant.

9. This does not offer the most practical arrangement for the Great Western franchise due to its large geographic area stretching from Paddington to Penzance and diverse types of passenger services from London commuter services to intercity to regional and local branch lines.

Option Two – One franchise, one specification

10. With this option local authorities (or PTEs) can buy enhancements to the base specification or make proposals to reduce services/ increase fares and retain the resulting funding. For example, if additional train services or a reduction in fares levels was required by the local authority, they would pay for the higher subsidy or reduced premium. Metro (West Yorkshire) used local fares increases to fund extra rolling stock.

11. This option is no different to existing arrangements. The enhanced services on the Severn Beach Line are specified and funded in this way. Annex B in the consultation document lists rail services currently funded by local authorities. The Severn Beach Line is one of only a handful of services funded seven days a week by local authorities. Option Two only offers an element of control over enhancements and the local authority still has to provide the funding. It is also crucial that greater transparency of true operating costs and revenues becomes available to determine whether the budget allocated to the local authorities is appropriate for the services in question. Cost figures have previously been difficult to procure for example on the Severn Beach Line.
12. Enhanced services will have to be funded until at least April 2015. Only then and conditional on demonstrating value for money and being affordable will the DfT consider taking on responsibility for funding.

13. If the local authorities choose not to go for the decentralisation of rail powers the mechanisms for buying enhancements under Option Two remain in force. Whilst not quite a do nothing approach it does allow for the provision of rail services to continue as they are.

Option Three – One franchise, multiple specifications

14. Option Three would see one operator for the whole franchise with local authorities taking responsibility for specific train service groups. The DfT retain responsibility for the strategic elements of the franchise and those services where no local body wishes to undertake them. The DfT would devolve funding to a local authority (or a consortium of local authorities and Local Enterprise Partnerships) for an agreed train service group. Funding would reflect efficiency improvements (in line with the McNulty report on rail value for money) and could mean less funding than is currently provided for local train services. The local authority could supplement this funding from its own resources to secure a higher level of specification. The whole franchise would be tendered as one, but bidders would be required to price devolved train service groups separately within the overall total. Award of the franchise would be considered on the basis of total price for whole franchise. Levels of policing, ticket offices and opening hours could be part of the specification.

15. This model offers a potential way forward for the West of England authorities and the DfT has suggested it is the most appropriate model. Local services on lines linking Bristol to Bath, Weston-super-Mare, Yate and Severn Beach, plus future services to Portishead and Henbury could form an appropriate discrete Greater Bristol Metro network (see the map in Appendix Four) with scope for increased services above the base specification (that meet a business case) to be funded from a devolved budget and/or priced option. Again, it is crucial that greater transparency of true operating costs and revenue becomes available to determine whether a particular priced option offers best value.

16. In terms of the governance required for Option Three the West of England already has the Joint Transport Executive Committee. With its clear remit and openness it will meet the Government’s prerequisite that decentralization should be accompanied by enhanced democratic control and accountability. Under emerging negotiations for the City Deal one of the ‘asks’ is for the Government to work with the West of England to put in place an appropriate form of devolution which will give greater responsibilities for rail. Key to the City Deal in unlocking growth and generating 95,000 jobs by 2030 is delivering the Greater Bristol Metro. Equally Option 3 is key to delivering the Greater Bristol Metro. Without the Metro the benefits of decentralisation are limited to existing local services.

Option Four – One principal franchise containing one or more “micro” franchises
17. Option Four would see the DfT procure and manage a principal franchise. Local lines, however, that are self-contained in operational terms could be separately tendered and managed by local authorities or other bodies, as "micro-franchises." This differs fundamentally from Option 3 in that a different train operator from the principal franchisee could operate the micro-franchise.

18. This kind of arrangement could be appropriate for self-contained operations that don’t interact significantly with the wider network for example certain branch lines in Cornwall. Responsibility for the services and line would transfer to the local authority (or a consortium) who would then procure the operator. This model is less appropriate for Greater Bristol as local services share sections of line and station with longer distance services meaning the local network would not be operationally self-contained. It would be challenging and complex to devise an arrangement for applying this model to the West of England.

Option Five – Entire franchise devolved to a grouping of local authorities and/or PTEs

19. Under Option Five A group of local authorities (and/or PTEs) would form a consortium to take responsibility for specifying, funding and managing a wider network of services. The DfT would allocate a grant to fund the devolved services.

20. As with Option Four, this model lends itself to situations where the franchise concerned was comparatively separate from the rest of the rail network and there was only one local authority or PTE involved as the franchise manager. An example is the current Merseyrail network in the Liverpool area and potentially the model could also be suitable for rail services on the Isle of Wight. It should be noted that Merseyrail is not covered by the HLOS and any enhancements have to be funded from its own resources.

Responsibilities

21. Table 4.1 in the consultation document (see Appendix Two) sets out how responsibilities might be assigned under the five options. It becomes clear that the DfT are keen to retain considerable influence over the planning, procurement and contract management of rail services with local authorities often left in a consultation role. For Option 3 decisions such as prequalification of bidders, design of bid evaluation criteria, bid evaluation and contract award should be made jointly by the DfT and the local authorities and not left either to the DfT alone or the vague ‘DfT in consultation with the local authorities.’ Table 4.1 does not appear to be in the spirit of localism and devolution. If it is to be the local authorities must be involved in decision making from the earliest stages. There is the risk the DfT will make decisions without the support of the local authorities but with the latter taking on the funding, risks and responsibilities.

Neighbouring Authorities

22. How neighbouring authorities are involved under any of the decentralisation options will need to be carefully considered. A key question is whether they will be able to contribute funding towards local services which may extend into their
areas. At officer level discussions are already taking place with Wiltshire Council, Somerset County Council, Swindon Borough Council, Gloucestershire County Council and Monmouthshire County Council/South East Wales Transport Alliance.

23. As reported in paragraph 48 of this report Halcrow have been commissioned to undertake additional work on the case for the Greater Bristol Metro. This includes examining wider regional linkages to improve services to the Wiltshire towns, Taunton, Gloucester and Cheltenham.

Funding and risks

24. A block Rail Service Grant or ‘dowry’ from the Government would be expected under Options 1, 3, 4 and 5 to fund a network of services similar to that currently operated. There is also an expectation the ‘dowry’ will include funding to meet growth but the DfT will clearly be expecting efficiency savings in line with the McNulty report. These will happen before any ‘dowry’ is provided. Efficiency savings, however, should mean lower costs for both running rail services and building infrastructure and this will help improve the business case for the Greater Bristol Metro.

25. Getting the right level of funding is critical to the ability of the local authorities to sign up to any decentralisation of rail powers. The DfT will want to transfer certain risks as part of the deal and the local authorities will need to fully understand the implications. It could impact on the local authorities ability to invest in other transport measures by diverting funding away from them to pay for rail. An additional risk is the successful bidder for the whole franchise may not be the one with the cheapest option for the Greater Bristol Metro. This would need to be reflected in the level of ‘dowry’ and decision making process. There are though potential rewards with fares revenues ploughed back into services and infrastructure.

Rail Fares and Ticketing Review

26. The DfT’s Rail Fares and Ticketing Review aims to identify ways to allow more passengers to travel whilst bringing down industry costs in line with the McNulty report on rail value for money, minimising public subsidy and keeping up with technological changes.

27. The following fares are regulated:
   - London commuter fares
   - Commuter fares in Cardiff, Glasgow and English PTE areas
   - Weekly season tickets
   - Off-peak walk-up fares for longer-distance journeys
   - Severn Beach Line zonal fares (Severnside Community Rail Partnership with local authorities as members have a role in fare structures and levels)

28. The DfT is considering ways to reward passengers who do not travel on the most crowded trains to make the best use of capacity. It is not about squeezing more
revenue out of regulated fares but the prospect of some passengers paying more is not ruled out. The Government has committed, once savings are found, to reduce and then abolish above inflation rises in regulated fares. This will depend on finding efficiency savings.

**Smart ticketing**

29. The DfT want to maximise the opportunities presented by smart ticketing. Ultimately the DfT’s vision is for a ticketing system that is flexible and adaptable to modern travel requirements and where paper tickets are no longer required. The DfT want smart ticketing to be rolled out as widely and as soon as technology permits. New franchises will have binding commitments to introduce ITSO compliant smart ticketing. A lot is being expected of smart ticketing and it is to be hoped the train operators will prove willing partners. One element missing from the consultation document is to ensure smart ticketing is truly multimodal and usable on all local bus services.

**Season Tickets**

30. The DfT want to see more flexibility around season tickets to take account of changes in passengers’ work patterns and products introduced to appeal to those commuting less than five days a week (such as carnets) and also off-peak season tickets. Operators will be encouraged to allow for payment in monthly instalments.

31. For both smart ticketing and more flexible season tickets fares derogations, where the DfT permits changes to regulated fares, will be required

**Price Signals and capacity**

32. This is the most controversial part of the DfT’s proposals with the aim to use ‘price signals’ (higher/lower fares) to encourage passengers to use less crowded trains and smooth demand across the commuter peak. Figures from London, Leeds and Birmingham show there is some standing capacity on trains either side of the main peak.

33. Potentially a passenger could face three fares in the peak – normal peak fare, a lower later/earlier peak fare and a high peak fare for the busiest and most convenient trains. The DfT recognise that any changes resulting in passengers paying more require careful consideration. They also highlight that a wider range of tickets/prices would be cumbersome to implement with paper based tickets and would rely on the roll out of smart ticketing.

34. The DfT want to reward passengers who travel on less busy trains but what is a reward for some is a penalty for others. Passenger Focus has raised concerns that many commuters have little or limited ability to change travel patterns in response to higher/lower fares. There is also the risk that this will disproportionately affect those on lower incomes who traditionally have least flexibility over start and finish times.
35. The DfT acknowledge that price signals are unlikely to provide a long term solution to capacity issues. There has to be a concern that price signals whilst squeezing a bit more out of existing capacity is merely putting off making difficult decision about major investment to address passenger growth and capacity issues.

36. In terms of timescale the DfT accept that changes would be incremental with a gradual rebalancing of the relationship between different types of fare.

37. The DfT will review the nature of evening peak restrictions on longer distance London trains and consider whether similar restrictions on off peak tickets could be applied to evening departures from major centres outside London.

Fares

38. The DfT has no plans to change the overall approach which permits train operators to set fares commercially within a regulated framework. Operators, however, must do more to help passengers understand why they might be asked to pay more on some services and less on others. Whilst it is the DfT objective not to squeeze more revenue out of fares this is somewhat undermined by their belief that there is a case for reducing any significant regional imbalance in fares. The implication here is regional fares are too low compared to London. Devolution of rail powers, described elsewhere in this report, could lead to local authorities setting fares.

39. There is no explicit aim to reduce the complexities of ticketing for passengers other than the more general one to better serve the needs of passengers. It is hard not to form the view that the proposals for price signals will serve to increase the complexities of ticketing with even more options for the unwary passenger.

Buying tickets

40. The McNulty rail value for money study identified ticket offices as a major cost inefficiency. They are the most expensive way of selling tickets and the DfT view this as a barrier to future growth on the railways. Against this Passenger Focus research found that passengers are more confident with ticket offices than any other sales channel and associate a staff presence at stations with higher levels of security. The DfT propose to revisit the procedures operators are required to follow when making changes to ticket office opening hours.

41. The DfT identifies that more needs to be done on ticket machines as many are around ten years old and require upgrading. Train operators will be encouraged, not required, to do so. For passengers with disabilities and those less confident with new technology ticket machines are a barrier.

42. Ticket offices at 8 of 67 stations on the Merseyrail network now have MtoGo retail outlets which sell sandwiches, snacks, drinks and newspapers as well as tickets. Merseyrail provides the staff. The DfT’s view is where operators believe
a similar concept could be implemented, at no additional cost, they would be encouraged to do so. Where provided the facility should be more than just a ticket machine recognising the importance of face to face advice on tickets.

43. Overall the implication is there will be fewer ticket offices or reduced hours of opening but with the prospect of new types of outlet and improved ticket machines.

Next Steps

44. The DfT’s next steps are:

- Push ahead with rolling out smart ticketing
- Explore the scope for using price signals to smooth demand
- Consider options for fares and regional imbalances
- Encourage operators to improve ticket machines and online sales and reduce costs
- Consider the process to change ticket office opening hours

45. A detailed response to the questions raised in the consultation document can be found in Appendix Three.

Timetable

46. The deadline for both consultations is 28 June 2012. It is intended to submit the West of England’s response straight after this Committee. This will confirm our position to the DfT and enable them, time permitting, to fully reflect our response in the Invitation to Tender for the Great Western Franchise.

Franchise Update

Bidders

47. Since this Committee endorsed the West of England’s response to the Great Western Franchise consultation on 7 March 2012 the short listed bidders have been announced as:

- First Great Western
- Arriva
- National Express
- Stagecoach

Additional work

48. To assist the four franchise bidders in drawing up their proposals and to strengthen the case for the Greater Bristol Metro (see the map in Appendix Four) as endorsed at the Joint Transport Executive Committee on 7 March 2012, Halcrow, the West of England’s framework consultants, have been commissioned to undertake additional work. This includes a more detailed capacity assessment on the network’s ability to support the Metro, develop the
business case for the proposals, quantify the economic development impact of the Metro and its role in widening the labour market and examine wider regional linkages to improve services to the Wiltshire towns, Taunton, Gloucester and Cheltenham. In terms of the business case the DfT expect to see a Benefit Cost Ratio (BCR) of at least 1.5 and ideally 2.0 for the whole of the Greater Bristol Metro Phase One.

49. In a separate study Halcrow will look at the implications and risks of delivering local rail including the decentralisation of rail powers and identifying potential models for the West of England. The possibility of setting up a company, answerable to the local authorities, to take on devolved rail powers and deliver the Greater Bristol Metro will be explored. Timelines will be identified with key dates for decision making. A final piece of work will look at the benefits and disbenefits of extending electrification.

50. It is proposed to report progress on all these pieces of work to future meetings of this Committee.

Franchise timescale

51. The timescale for the new franchise appears to be slipping. The DfT planned to publish the Invitation to Tender, setting out what they expect to see in bids, in May 2012. It is expected this will be put back to coincide with the publication of the High Level Output Specification (HLOS) in July 2012. It is to be hoped that the HLOS and the Statement of Funds Available will enable Network Rail to propose the four tracking of Filton Bank as necessary to deliver the capacity to meet growth in demand or include it as a named scheme. Delivery of this scheme is key to the Greater Bristol Metro proposals and this will give clarity to bidders on what infrastructure will be provided. As a piece of infrastructure of local, regional and national importance we will continue to urge the DfT to include the four tracking of Filton Bank in the HLOS.

52. The delay to issuing the Invitation to Tender may mean the new franchise starting in June/July 2013 (instead of April 2013). As indicated in the Great Western Franchise consultation document no timetable changes will take place until December 2014.

Priced option

53. The Halcrow study, which accompanied the West of England’s response to the Great Western Franchise consultation, found that the Greater Bristol Metro Phase One would require an annual subsidy of around £900,000. This figure is based on conservative estimates of future demand and when tested against the impact of the Temple Quarter Enterprise Zone and other development areas the subsidy falls to £240,000 a year. Because a subsidy is required the DfT has indicated that the proposals for the Greater Bristol Metro Phase One could be included as a ‘priced option’ in the Invitation to Tender. This means the local authorities would fund the additional subsidy requirement of the new services and potentially take the revenue risk for the new services. It is crucial that there
is greater transparency of true operating costs and revenue to determine whether existing services and enhancements offer best value.

54. The DfT has asked the West of England for some indication that the local authorities had every intention to take up the ‘priced option’ should the price be close to the estimated one. They also expect an acknowledgement that it would be the West of England’s intention to fund the capital costs associated with the Metro through a local source such as the devolved Major Local Transport Schemes Budget. The assumption here is that post 2014/15, when devolved funding is likely to start rail will be amongst the major scheme priorities for the West of England. As covered under Item 12 to this Committee a process is in place for prioritising major schemes. Previously the Greater Bristol Metro and Portishead line have been identified in the Joint Local Transport Plan as future priority schemes after the five that recently received programme entry. We are awaiting future funding allocations from DfT and once these have been received we hope to complete the prioritisation process. Other sources of funding will need to be explored including the Temple Quarter Enterprise Zone, developer contributions, New Homes Bonus and any new Government funding competition.

55. The West of England will continue to argue that the Greater Bristol Metro Phase One should be included in the baseline specification supported by the additional Halcrow work. The DfT’s view is this will not be the case. They point out that few suburban rail services operate without subsidy so a ‘priced option’ may remain the only way forward. The DfT will ask bidders to include a price for the Greater Bristol Metro Phase One. Following discussions with the bidders and backed up by the Halcrow work we would hope to see as much of Phase One as possible included, at low or no cost to the local authorities, in their bids. We will continue to ask the local MPs to press the DfT for Phase One to be included in the baseline specification along with support for the four tracking of Filton Bank.

**Greater Bristol Metro Phase Two**

56. As the Greater Bristol Metro Phase Two is longer term and less well advanced than Phase One the DfT has indicated that it would be difficult for bidders to price sensibly for a scheme that may not be introduced for at least five years. Instead there will be a facility within the franchise contract to enable a change to be negotiated at the appropriate time. This will place an expectation on the successful bidder to work with the West of England to bring Phase Two to fruition during the life of the franchise. Whilst recognising the uncertainties around funding and timescales for Phase Two we believe the is inclusion in a second ‘priced option’ will ensure greater commitment from the bidders and give more confidence to the local authorities that proposals will happen. Phase Two will be driven by the development timescale of Filton Airfield. Should this proceed quicker than anticipated we would expect the ‘priced option’ for Phase Two to enable the franchise holder to bring it forward.

**Severn Beach Line**

57. The DfT is prepared to include the enhanced services on the Severn Beach Line in the baseline specification for the new franchise but with the expectation Bristol
City Council and South Gloucestershire Council continue to provide funding until April 2015. Given the success of the enhanced services, passengers up 123% over five years, it is disappointing not to see them funded directly through the new franchise. Bidders will be pressed to include it in their bids at no cost to the local authorities.

Response to the DfT

58. It is proposed the Chair of JTEC write to the DfT indicating the local authorities are willing to take up ‘priced options’ for the Greater Bristol Metro Phase One and Phase 2 subject to the prices being reasonable and acceptable. At the same time we will negotiate with bidders to include Phase One, based on its state of readiness, as part of their franchise bids at no cost to the local authorities. For Phase 2 we will seek to develop the business case with bidders.

59. To reassure the DfT over capital funding reference will be made to the Greater Bristol Metro and Portishead line having been identified in the Joint Local Transport Plan as future priority schemes after the five that recently received programme entry. Once future funding allocations from the DfT have been received we will complete the prioritisation process. Other sources of funding will need to be explored including the Temple Quarter Enterprise Zone, developer contributions, New Homes Bonus and any new Government funding competition.

Environmental Impact Assessment

60. Whilst rail’s share of journeys to work is modest, modern rolling stock contributes less carbon emissions than other forms of transport.

Risk

61. Implementation of electrification, a new longer franchise and rolling stock is at present largely beyond the control of the West of England authorities. Under decentralisation the DfT will want to transfer certain risks and the local authorities will need to fully understand the implications.

Resources (financial and personnel)

62. Under decentralisation a block Rail Service Grant or ‘dowry’ from the Government would be expected. The DfT will be expecting efficiency savings in line with the McNulty report so the ‘dowry’ may be less than current levels of funding. Getting the right level of funding is critical to the ability of the local authorities to sign up to any decentralisation of rail powers.

Equalities Implications

63. The DfT’s Rail Consultation document invites comments on broad proposals. In view of this the DfT believe there is no requirement to publish an impact assessment but they will keep this under review.
Clearly as decentralisation would involve local authorities taking on more responsibility for rail services this would come with an increased role in considering and taking action on equalities implications. This would in no way absolve Network Rail and the train operating companies from their obligations for equalities impact assessments. Indeed as the owner of stations and operator of trains and stations the chief responsibility remains with them. The local authorities would need to work closely with them on services provided under any of the decentralisation options. Similarly if DfT suggestions to devolve Access for All funding to local authorities occurs there would be a leading role for them to play in assessments.

Any changes to regulated rail fares and ticket purchase arrangements should take into account the impact on equality groups, particularly any potentially adverse consequences for passengers with low incomes. Design of ticket vending machines at stations should take into account the needs of those with physical and sensory impairments and those less confident with new technology.

Views of Joint Scrutiny Committee

The Joint Scrutiny Committee has not met since its 27 February 2012 meeting.

Recommendations

Members endorse the response to the Rail Decentralisation and Rail Fares consultations set out in this report and in Appendix One and Three.

Members endorse Option 3 as the most appropriate decentralisation model for the West of England subject to agreement on levels of funding.

Officers continue discussions with the DfT over the decentralisation of rail powers.

The Chair of JTEC writes to the DfT indicating the local authorities are willing to take up ‘priced options’ for the Greater Bristol Metro Phase One and Phase Two subject to the prices being reasonable and acceptable. At the same time we will negotiate with bidders to include Phase One, based on its state of readiness, as part of their franchise bids at no cost to the local authorities. For Phase 2 we will seek to develop the business case with bidders. The importance of the Greater Bristol Metro to the City Deal in unlocking growth will be highlighted. To reassure the DfT over capital funding reference will be made to the Greater Bristol Metro and Portishead line having been identified in the Joint Local Transport Plan as future priority schemes after the five that recently received programme entry. Other sources of funding will need to be explored including the Temple Quarter Enterprise Zone, developer contributions, New Homes Bonus and any new Government funding competition.

The Chair of JTEC writes to the local MPs asking them to continue to press the DfT to include the Greater Bristol Metro in the Great Western Franchise base specification and for their support for the four tracking of Filton Bank.
Appendices

Appendix One: Rail Decentralisation response
Appendix Two: Responsibilities under decentralisation
Appendix Three: Rail Fares and Ticketing Review response
Appendix Four: Greater Bristol Metro map

Author
James White, West of England, tel: 0117 9224924, email: james.white@westofengland.org

Local Government (Access to Information) Act 1985
Background Papers:
Appendix One: Rail Decentralisation response

Experience of existing rail devolution arrangements

1. Consultees are invited to identify lessons which may be learned from existing rail devolution arrangements in Scotland, Wales, London and on Merseyside, and which are relevant to any proposals for future rail decentralisation covered in this document.

There is no “one size fits all” solution and the level of decentralisation should be variable to meet local circumstances. For the West of England area, it would be most appropriate to achieve improvements in local rail services through “topping up” the base franchise specification.

The level of an appropriate level of Rail Service Grant as provided to the PTEs or equivalent dowry is critical to devolution. Without it local authorities are unlikely to consider taking on rail powers.

We remain concerned and disappointed that the DfT will only consider taking over local authority funded services after April 2015 and subject to value for money and affordability. Experience from the West of England on the Severn Beach Line has demonstrated the value of funding enhancements with passengers growing by 123% over the last five years (West of England Annual Rail Survey). This should be rewarded by the inclusion of the enhancements in the baseline specification of the new Great Western Franchise at no cost to the local authorities. A lesson is not being learnt here.

How decentralisation could contribute towards achieving objectives and outcomes

2. Consultees are invited to submit views on how they consider that devolving responsibility could help achieve the objectives for the railway set out in (consultation) paragraph 3.1.

The government’s objectives set out in Paragraph 3.1 of the consultation are:

a) cost reduction and enhanced value for money
b) local democratic control
c) benefits for passengers
d) supporting and stimulating economic growth
e) contribution to carbon reduction

Local rail services offer limited opportunities to be completely viable but there is scope for the rail industry to address costs and alter working practices to enable objective (a) to be delivered over time. It is considered that decisions on local rail services within a defined area (such as the West of England) would be better placed at sub-regional or local level, subject to a devolved level of Rail Service Grant or ‘dowry.’ This would meet objective (b) and it gives greater scope for the local authorities to align services to link up the local authorities’ Core Strategies, transport planning and the opening up of development land. It will ensure future major developments can be served sustainably with new/reopened lines and stations.
The contribution that the Severnside Community Rail Partnership has made in improving the environment of local rail stations has proved invaluable and devolved governance arrangements should embody the strong liaison between the West of England authorities and the Partnership. Improvements to local rail services, irrespective of the funding source, contribute to modal shift through improving the public transport offer overall. Consequently, improved services meet objectives (c), (d) and (e).

The West of England is a high growth area, one of the fastest growing economies in the UK and the economic hub for the South West. An active Local Enterprise Partnership (LEP) is leading the way with the aim to generate 95,000 more jobs over the next 20 years. The City Deal, currently being negotiated with the Government, will set out a strategy for this growth with an Economic Development Investment Fund to accelerate development and attract inward investment.

Devolving responsibility for rail will facilitate this economic growth, thereby meeting objective d), through delivering a Greater Bristol Metro serving:

- Temple Quarter Enterprise Zone - centred around Bristol Temple Meads station with 17,000 new jobs (4,000 by 2017).
- Five Enterprise Areas including Bath City Riverside (9,300 jobs), Weston-super- Mare Gateway (11,000) and Filton/A38 (4,000).
- North Yate – 3,000 homes (for Yate station).
- Charlton Hayes – 2,400 homes and 14 ha employment (close to Patchway and Bristol Parkway stations).
- Rolls Royce East Works – major employment site (close to Patchway station).
- Harry Stoke – 3,200 dwellings (close to Bristol Parkway).
- Filton Abbey Wood - continued growth of Ministry of Defence (MoD) jobs from 8,950 at present to 10,100 by December 2012 with closure of MoD sites in Bath and Wiltshire and more commuting to Filton.
- Cheswick/Walls court Farm – 800 dwellings and 6 ha employment (close to Filton Abbey Wood).
- University of the West of England (UWE) – ongoing master planning for 11ha expansion to campus including a new sports stadium (home to Bristol Rovers F.C.).
- Avonmouth/Severnside – 650 ha site with extant permission for B2/8 land uses (adjacent to the Severn Beach Line and Henbury Loop).
- Keynsham Town Centre and Somerdale (former Cadbury’s site) – 700 new dwellings and 20,000m² employment land (close to Keynsham station).
- Weston-super-Mare – 8,000 new homes including two new villages.
- Bristol Airport – served by Bristol Flyer coach service to Bristol Temple Meads.
- Filton Airfield redevelopment - 5,700 homes, 50 ha of employment land and 35,000m2 of retail.

The objective to reduce carbon is an important one and we welcome its inclusion here and particularly the role rail services could play in the Air Quality Management Plans in Bath and Bristol. However we remain surprised by its absence from the objectives set out in the ‘Great Western Franchise Replacement Consultation’ document.
3. Views on activities that should be devolved

Comments are invited on the list of responsibilities that should be retained by central government and those that might be devolved to sub-national bodies.

In terms of local services in the West of England, the following responsibilities are considered appropriate for coverage by a devolved body:

- Service specification – routes, number/frequency of trains, length of operating day, weekend services, calling patterns, journey times and ticket office hours
- Enhancements to local services
- New/reopened stations and lines
- Local ticketing arrangements (including progressing multi-modal ticketing)
- Local fares policy – setting fares to fund enhancements
- Access for All and NSIP funding

Under current practices the absence of cost data makes it difficult for authorities to analyse operating costs and determine whether a particular potential improvement or reduction offers best value. Greater transparency of true costs and revenues needs to be forthcoming from the rail industry in order that a local authority can make a better assessment when considering enhancements to existing services or new services.

It is considered that DfT, Network Rail and the train operators as appropriate should retain all other responsibilities.

Whilst we acknowledge it may be more appropriate for the DfT to retain its role of funding additional infrastructure for capacity and performance through the HLOS process we would want a greater say and input into the process that fully recognises the new roles and responsibilities of the local authorities.

Views on types of service that should be devolved

4. Which types of service are suitable for local control? Should longer-distance services be regarded as “strategic”, because they serve a variety of markets and economic purposes, and therefore be specified nationally?

We believe the following services are suitable for more local control:

- Severn Beach line.
- Greater Bristol Metro Phase One and Two (services to local stations) including the Portishead and Henbury lines.

There is scope to expand coverage to include local services to places beyond the West of England area (for example services to Gloucester, Somerset, Swindon, Wiltshire and South Wales) subject to partnership arrangements and funding being established with the local authorities concerned. It would not be appropriate to include the inter-region or inter-city services, not only because of their wider “strategic” role but also the route length would entail involvement of a great number of authorities. The variety of priorities, by virtue of having several constituent authorities, presents risks of conflict of interest as the outcome. The Cardiff – Bristol – Portsmouth service is an example of a
route that is considered inappropriate for devolution to local control. The status of the Cardiff – Bristol – Taunton service is unclear. Nonetheless given the inter-locking and complementary nature of regional and local services and to avoid conflicts over capacity and timetabling we would require a mechanism for local input into the specification of strategic services.

5. In areas where responsibility for local passenger services is devolved, what are the implications for other users of the rail network, including freight customers and operators, and how might these implications be addressed?

By selecting the potential Greater Bristol Metro network as a model for devolution in the West of England, it is considered that this would minimise conflict with governance and operation of other more strategic passenger services in the sub-region. As noted in the response to Question 5 we would require a mechanism to input into the specification of strategic services.

We recognise the role of the freight sector, particularly in the context of rail traffic to/from the Avonmouth and Portbury port facilities. Expansion of rail freight movements is supported (as that would mean less lorry traffic on the congested motorways and local road network) and the local authorities would aim to avoid stifling that expansion as an unintended consequence of improving local passenger services.

Under the City Deal we propose setting up a High Level Steering Group to oversee the development of rail in the West of England. Membership of the Group could be extended to a representative of the freight industry to ensure their requirements are taken on board.

Views on the five options

6. Consultees are invited to comment on the models for decentralisation and how they might apply or be appropriate to particular parts of the country or service groups in a particular area.

Option Three offers the most appropriate model for application in the West of England. Local services on lines linking Bristol to Bath, Weston-super-Mare, Yate and Severn Beach, plus future services to Portishead and Henbury could form an appropriate discrete Greater Bristol Metro network with scope for increased services above the base specification (that meet a business case) to be funded from a devolved budget and/or priced option. Again, it is crucial that greater transparency of true operating costs and revenue becomes available to determine whether a particular priced option offers best value.

We are concerned over how responsibilities might be assigned under Table 4.1 in the consultation document. For Option 3 decisions such as prequalification of bidders, design of bid evaluation criteria, bid evaluation and contract award should be made jointly by the DfT and the local authorities and not left either to the DfT alone or the vague ‘DfT in consultation with the local authorities.’ Table 4.1 one does not appear to be in the spirit of localism and devolution. If it is to be the local authorities must be involved in decision making from the earliest stages. There is the risk the DfT will make
decisions without the support of the local authorities but with the latter taking on the
funding, risks and responsibilities.

Views on governance

7. Comments are invited on issues related to the size of the area that needs to be
covered by a devolved body and the governance issues that this may give rise to.

Part of the City Deal negotiations include an ‘ask’ for the creation of a Local Transport
Body based on the geography of the West of England area to manage post 2015 major
scheme funding. The West of England is a natural economic area, with a high level of
transport self-containment (89% of journeys to work starting and finishing in the area,
Census 2001).

The four West of England authorities and the Local Enterprise Partnership (LEP)
provide a well-established and robust governance framework for making major
decisions about transport funding. The successful and widely supported Joint Transport
Executive Committee, comprising all four Executive Members for Transport, has the
ability to jointly and transparently progress cross boundary work on transport initiatives
and projects.

We have clear transport priorities with wide ranging support from the business
community. We have proven ability to deliver major transport schemes to time and to
budget. The West of England area is thus ideally placed to take on new rail powers
building on our track record of joint working and delivery. The Joint Transport Executive
Committee with its clear remit and open accountability, ultimately reporting to the
Cabinets of the individual councils, offers an appropriate bedrock for a governing body.
We believe this will meet the Government’s prerequisite that decentralization should be
accompanied by enhanced democratic control and accountability.

Emerging negotiations on the City deal include an ‘ask’ for the Government to work with
the West of England to put in place, as soon as possible, an appropriate form of
devolution which will give greater responsibilities for rail and to ensure local priorities
are taken account of when developing rail industry plans and strategies.

Part of the City Deal ‘ask’ is to establish a local rail High Level Steering Group to take
forward devolved arrangements for rail and ensure appropriate governance
arrangements are in place. It is proposed that the High Level Steering Group includes
three appropriate senior representatives from the rail industry (Network Rail, Train
Operating Company, DfT) and three from the West of England (LEP, Unitary
Authorities). We will consider how neighbouring authorities and the Welsh Assembly
Government are represented in this process. Discussions have already taken place
with them.

The High Level Steering Group will set up an Executive body to manage newly
devolved responsibilities for rail including input to the future development of any rail
industry plans and strategies. It is proposed the Executive body will report to the Joint
Transport Executive Committee.
Views on funding

8. Consultees are invited to comment on the basis on which the level of funding to be devolved might be established.

Any devolution of rail powers in respect of local rail services is expected to be accompanied by a Rail Service Grant or ‘dowry.’ This would enable risks to be managed within the overall budget.

It is also crucial that greater transparency of true operating costs and revenue becomes available to determine whether existing services and enhancements offer best value.

We are disappointed to see the DfT will not provide new funding for service enhancements or transfer rail capital funding other than through a devolved Major Local Transport Scheme budget.

Funding will need to be provided to reflect the cost of responding to growth. This may require the Government to provide substantial initial investment to provide the additional capacity.

Expressions of Interest

9. Expressions of interest are invited from sub-national bodies who would like to develop proposals to take on devolved responsibilities for rail services in anticipation of franchises being re-let.

The West of England’s Joint Transport Executive Committee on 7 March 2012 endorsed the response to the Great Western Franchise consultation. Under Question 8 the West of England expressed an interest in taking on devolved powers to facilitate delivery of the Greater Bristol Metro proposals.

The Joint Transport Executive Committee on 19 June 2012 will be asked to endorse Option 3 as the most appropriate decentralisation model for the West of England subject to agreement on levels of funding and for officers to continue discussions with the DfT over the decentralisation of rail powers.
**Appendix Two**

Table 4.1 How responsibilities might be assigned under various decentralisation models

<table>
<thead>
<tr>
<th>Activity</th>
<th>Option 1: LAs/PTEs as co-signatory</th>
<th>Option 2: 1 franchise, one specification</th>
<th>Option 3: 1 franchise, multiple specifications</th>
<th>Option 4: Principal franchise, with micro-franchises</th>
<th>Option 5: Entire franchise devolved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial terms</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT and LA</td>
<td>DfT and LA</td>
<td>LA</td>
</tr>
<tr>
<td>Train service specification</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT and LA</td>
<td>DfT and LA</td>
<td>LA</td>
</tr>
<tr>
<td>Investment required</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT and LA</td>
<td>DfT and LA</td>
<td>LA</td>
</tr>
<tr>
<td>Fares and ticketing policy</td>
<td>DfT (plus LA for increments / decrements)</td>
<td>DfT (plus LA for increments / decrements)</td>
<td>DfT and LA</td>
<td>DfT and LA</td>
<td>LA</td>
</tr>
<tr>
<td>Approval to procure, including affordability and vfm assessment</td>
<td>DfT (plus LA for increments / decrements)</td>
<td>DfT (plus LA for increments / decrements)</td>
<td>DfT and LA</td>
<td>DfT and LA</td>
<td>LA</td>
</tr>
<tr>
<td>Procurement</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Notice of intention to procure</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT and LA, or DfT on LA’s behalf</td>
<td>LA, or DfT on LA’s behalf</td>
</tr>
<tr>
<td>Pre-qualification of bidders</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT and LA, or DfT on LA’s behalf</td>
<td>LA, or DfT on LA’s behalf</td>
</tr>
<tr>
<td>Design of bid evaluation criteria</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT and LA, or DfT on LA’s behalf</td>
<td>LA, or DfT on LA’s behalf</td>
</tr>
<tr>
<td>Issue of invitation to tender</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT and LA, or DfT on LA’s behalf</td>
<td>LA, or DfT on LA’s behalf</td>
</tr>
<tr>
<td>Bid Evaluation</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT and LA, or DfT on LA’s behalf</td>
<td>LA, or DfT on LA’s behalf</td>
</tr>
<tr>
<td>Activity</td>
<td>Option 1: LAs/PTEs as co-signatory</td>
<td>Option 2: 1 franchise, one specification</td>
<td>Option 3: 1 franchise, multiple specifications</td>
<td>Option 4: Principal franchise, with micro-franchises</td>
<td>Option 5: Entire franchise devolved</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------------</td>
<td>------------------------------------------</td>
<td>-----------------------------------------------</td>
<td>-------------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>Contract Award</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT in consultation with LA</td>
<td>DfT and LA</td>
<td>LA</td>
</tr>
<tr>
<td>Mobilisation</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT</td>
<td>DfT and LA, or DfT on LA’s behalf</td>
<td>LA</td>
</tr>
</tbody>
</table>

**Contract Management**

| Monitoring and Control       | DfT                               | DfT                                      | DfT and LA                                    | DfT and LA                                     | LA                              |
| Contract Variation           | DfT                               | DfT                                      | DfT and LA                                    | DfT and LA                                     | LA                              |
| Security of Service Continuity | DfT                               | DfT                                      | DfT                                           | DfT and LA, or DfT                             | LA or DfT                       |

From p 40-41 in Rail Decentralisation, Department for Transport, March 2012
Appendix Three

**Rail Fares and Ticketing Review – consultation questions**

Chapter 1: Principles of fares and ticketing regulation

Objectives

- Protect passengers from possible market abuse and ensure that rail travel remains affordable
- Allow more scope for innovation and make better use of capacity
- Ensure passengers are treated fairly
- Ensure the rail network operates as an integrated whole

1.1 Do you agree these are the right objectives? Is there anything we’ve missed?

Whilst the objectives appear broadly appropriate one key objective is missing - a commitment for a simple to use, easy to understand ticketing system that removes many of the complexities and confusion of the current fares structure.

Fares and ticketing have an important role to play in promoting sustainable travel and consequently carbon reduction and this should be recognised in the objectives.

With its focus on squeezing more out of existing capacity the review is not taking a sufficiently long term view and the need for this should be added as an objective.

1.2 How effective do you think the current system is in achieving the Government’s regulatory objectives?

The existing system may achieve the regulatory objectives but the overall fares offer is perceived to be complex and confusing by passengers.

Chapter 2: Smart ticketing and season tickets

2.1 Do you agree with the benefits and with the risks we’ve identified in relation to smart ticketing? Is there anything we’ve missed? How might we address the risks and issues?

Missing from the consultation document is the need to ensure smart ticketing is truly multi modal and usable on all local bus services. Franchise holders should be expected to agree to participate (under s137(2) of the Transport Act 2000) in any multi-modal ticket scheme set up by a local transport authority.

2.2 Do you agree with the issues we’ve identified with the current system of season tickets? Is there anything we’ve missed?

See the response to Questions 1.1 and 1.2 for missing issue regarding complexity.

2.3 What features would you expect to see in a smart, flexible and more tailored season ticket?
Operators should develop ranges of tickets that reward or provide incentives for different patterns of travel. For example carnets loaded onto smartcards could help passengers make better informed decisions. Although incentives are currently offered by means of cheaper fares for longer distance journeys through advance booking, often these are bound to a specific train and don’t allow passengers the flexibility of varying their plans on the day of travel.

2.4 Do you have any other suggestion as to how season tickets could be tailored to better meet the needs of particular groups?

Add-ons to train season tickets could be extended and promoted more widely such as PlusBus, station parking and cycle hire. With changing employment patterns season tickets for use on certain days of the week should be available for part time workers.

2.5 Could you work more flexibly?

Not applicable to this response.

2.6 Are there any other factors that prevent you from changing your commuting patterns?

Not applicable to this response.

2.7 Do you already, or could you in future, allow your employees to work more flexibly?

The four councils of the West of England all operate flexi time systems and encourage working from home.

Chapter 3: Using fares to achieve more efficient use of rail capacity

3.1 Do you agree that introducing new commuter fares could help the railway operate more efficiently by encouraging some commuters to change their travel patterns?

What is a reward for some passengers who travel on less busy trains becomes a penalty for others. Passenger Focus has raised concerns that many commuters have little or limited ability to change travel patterns in response to higher/lower fares. There is also the risk that this will disproportionately affect those on lower incomes who traditionally have least flexibility over start and finish times.

The DfT and operators should move to try everything first to tempt passengers to use less busy trains before penalising them for travelling in the peak. The regulated off peak fare should be the starting point for all fares with passengers able to trade up if they want to travel in the peak.

Price signals are unlikely to provide a long term solution to capacity issues. There has to be a concern that price signals whilst squeezing a bit more out of existing capacity are merely putting off making difficult decisions about major investment in increasing capacity and a recipe for inaction.
3.2 What do you consider to be the main benefits and the main risks/issues with introducing new commuter fares?

Adjustments to peak fares should be undertaken carefully and price sensitivity taken into account. Potential consequences should be modelled to avoid unintended consequences where overcrowding is merely shifted from one train journey to the previous or subsequent one because too many passengers have opted to switch. This may also lead to a scenario of passengers giving up rail travel altogether or reducing the rail element of their journey for example driving all or part of the way. Not only would undermine policies aimed at addressing congestion and encouraging more sustainable ways of travel, particularly to employment and education, but it would also weaken efforts to stimulate economic growth.

3.3 How could we ensure that any new commuter fares structure was as fair as possible?

As indicated in the response to Question 3.2 modelling should be deployed and price sensitivity taken into account to ensure that, as far as possible, the end result of any changes to the structure is fair to passengers. Account should be taken of changes to the structure to minimise any significant adverse impacts on the overall amount of revenue that the train operator forecast as a part of its franchise bid.

3.4 How could we use fares to achieve more efficient use of rail capacity on intercity services?

Rather than raise the cost of off peak fares to prevent overloading of the last train before peak restrictions come in, the price of peak fares could be reduced to generate new business and spread loadings more evenly.

Chapter 4: Fares and ticketing complexities

Currently passengers with Advance fares valid only on one specified departure who miss that departure must buy a new ticket to travel on the next train. We are considering whether passengers could be allowed to “pay the difference” instead.

4.1 What do you see as the main advantages and disadvantages of such a change?

Passenger should be able to pay the difference between what they have already paid and the price of the ticket valid at the time. The advantages of this will be to address the frustration many passengers feel when on missing their train they are confronted with paying the full cost of the walk up fare. An expanded role of “help desks” at main interchange stations would assist passengers, who have missed their booked connection, to purchase the appropriate supplementary ticket and so avoid the need for them to queue at the ticket office for assistance.

There is evidence of an imbalance between fares in the London commuting area and other parts of the country and that passengers on higher yield services are effectively cross-subsidising passengers on lower yield services. We believe there is a case for reducing any significant regional imbalance in fares levels.
4.2 What would you see as the main advantages and disadvantages of such an approach?

There is also a case for addressing the imbalances on inter-city routes to London as Anytime single fares from Bristol, Bath and Swindon reported to be amongst the highest in the country. Research undertaken by TravelWatch South West as part of its “Greater Western or Lesser Western” paper illustrated this variance using Bath Spa to London as an example and comparing journeys of similar length:

<table>
<thead>
<tr>
<th>Destinations located approx 110 miles from London</th>
<th>Mileage</th>
<th>Pence per mile (ppm) based on Anytime Single Fare (cost as at September 2011)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bath Spa</td>
<td>107</td>
<td>74.3ppm</td>
</tr>
<tr>
<td>Birmingham International</td>
<td>106</td>
<td>70ppm</td>
</tr>
<tr>
<td>Leicester</td>
<td>111</td>
<td>63.1ppm</td>
</tr>
<tr>
<td>Grantham</td>
<td>106</td>
<td>51.9ppm</td>
</tr>
<tr>
<td>Norwich</td>
<td>114</td>
<td>48.6ppm</td>
</tr>
</tbody>
</table>

4.3 What steps could the Government take to protect passengers’ overall interests as part of providing open access to fares data?

The government could place a condition on franchise holders to:

(i) make fares data more widely available to the general public;
(ii) make the restrictions clearer on train operators’ websites and other media as to what tickets are valid or not valid on a particular train.

These steps would help passengers make a more informed decision about their prospective journey.

Chapter 5: Buying Tickets

5.1 Selling tickets through ticket offices is a major cost for the railways. How can we reduce this cost without deterring passengers from using the railway?

The scope for adding other retail facilities to ticket offices should be explored where appropriate locations show potential. Existing examples deployed by Merseyrail and abroad offer models for how parts of station buildings can incorporate small shops and enable other revenue streams to reduce overheads. Alternatively, at lightly used stations, nearby premises such as a local shop may offer a potential alternative site for ticket sales. Where provided the facility should be more than just a ticket machine recognising the importance of face to face advice on tickets.

5.2 What are the costs/benefits of reducing ticket office opening hours? What would you consider to be an acceptable alternative to the ticket office that met most of your ticket requirements?

Passenger Focus has demonstrated the most popular way to buy a ticket remains the ticket office (42%) (Great Western Franchise – Key findings from passenger research, 2012). The West of England’s response to the Great Western Franchise consultation stated that the franchise holder must retain all existing ticket offices and peak hour ticket
sellers (as set out in Appendix Two of the Great Western Franchise Replacement Consultation document) with no reduction in opening hours or staffing. New technology should not be used as an excuse to reduce the role of the ticket office.

Passenger Focus research found that passengers are more confident with ticket offices than any other sales channel and associate a staff presence at stations with higher levels of security. The DfT should use this as a starting point for reviewing ticket offices and not one simply driven by reducing cost.

If the role of ticket machines is to be increased they should offer as wide a range of tickets as possible and if they do not then there should be clear information stating what a passenger should do if they are unable to purchase a ticket. Ticket machines must provide Information about restrictions and routes in an easily understandable format. Card only machines should tell passengers without a card what to do with for example a departure only ticket to enable the passenger to pay on arrival or on the train.

5.3 What safeguards would need to be put in place for passengers in the case of changes to ticket office opening hours?

Reliable and convenient alternative facilities for obtaining a ticket should be provided during the times that the ticket office is unmanned. The range of fares offered by ticket vending machines would need to be expanded to equate with those are available when a ticket office is manned.

5.4 How important is it for passengers to be able to buy train tickets from a wider range of outlets (e.g. post offices or retail outlets away from the station)?

Extending the range of outlets is broadly supported but this should not simply be at the expense of closing or reducing the hours of existing ticket offices. Their role should be to augment rather than replace ticket offices.

5.5 What other improvements would you most like to see to make buying rail tickets easier?

Further development of other media for ticket sales such as mobile telephone and printing at home technology should be encouraged. This could help make ticket purchase convenient to the passenger and reduce industry costs but again this should not be at the expense of existing ticket offices. It is also important that passengers obtain accurate information on ticket validities at the point of sale so that unwitting purchase of an incorrect ticket can be minimised.

Chapter 6: Next steps

6.1 Do you have any other comments about the impact of anything in this consultation document on passengers or potential passengers, including by income group, equality group(s) or any other group?

Any changes to regulated rail fares and ticket purchase arrangements that are pursued should take into account the impact on equality groups, particularly any potentially adverse consequences for passengers with low incomes. Design of ticket vending
machines at stations should take into account the needs of those with physical and sensory impairments. The range of Railcards that currently offers a 1/3 discount to groups (e.g. young persons, disabled, families, elderly) should be retained.

6.2 Are there any other comments you would like to make about anything else in this consultation?

There are no references to the importance of revenue protection and the use of more revenue protection officers. The less fares evasion that takes place the higher the revenue and the greater the opportunities to reduce costs and/or invest in rail services. Given this importance it is somewhat surprising that it is missing from the consultation.

It is difficult to see how any of the proposals in the consultation document will reduce the complexity faced by passengers on buying a ticket. For example a passenger travelling in the peak could potentially face three fares in the peak – normal peak fare, a lower later/earlier peak fare and a high peak fare for the busiest and most convenient trains. Far from reducing complexities the DfT is simply adding to them.
Appendix Four

Greater Bristol Metro

Greater Bristol Metro Phases 1 & 2

Proposed Rail Network

- **Existing rail services** (local and inter-regional)
- **Services - Phase 1**
  - Portoishead to Severn Beach (hourly)
  - Portoishead to Bristol Temple Meads (hourly)
- **Phase 2**
  - New turnback
  - Weston-super-Mare service to Yate
  - Possible new stations (subject to business case)

- **Additional stopping services** (Cardiff to Taunton) to call at:
  - Bath Spa
  - Bath City Riverside Enterprise Area
  - Freshford
  - North Somerset Council
  - South Gloucestershire