Consultation Response

Williams Rail Review

Call for evidence: objectives and assessment criteria

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1. Introduction

1.1. The Urban Transport Group (UTG) represents the seven largest city region strategic transport bodies in England, which, between them, serve over twenty million people in Greater Manchester (Transport for Greater Manchester), London (Transport for London), the Liverpool City Region (Merseytravel), Tyne and Wear (Nexus), the Sheffield City Region (South Yorkshire Passenger Transport Executive), the West Midlands (Transport for West Midlands) and West Yorkshire (West Yorkshire Combined Authority).

1.2. We also have the following associate members: Tees Valley Combined Authority, Strathclyde Partnership for Transport, West of England Combined Authority (WECA), Nottingham City Council and Translink. However this response is on behalf of our full members only.

1.3. Our members plan, procure, provide and promote public transport in Britain's largest city regions, with the aim of delivering integrated transport networks accessible to all.

1.4. Our response to this consultation is informed by our initial response to the Williams Review which was a set of principles for the rail review. This can be downloaded here: http://www.urbantransportgroup.org/system/files/general-docs/UTG%20Rail%20Review%20principles%20-%20January%202019.pdf

2. Questions

Question 1. The evidence papers summarise the key themes and evidence on which the Rail Review will draw in the subsequent phases of our work. Are there other themes or areas of evidence that we should consider? If so, what are they?

2.1. The evidence papers are mostly succinct reviews of the facts and evidence on a number of relevant themes on which few conclusions are drawn. No persuasive rationale is given as to why these themes have been chosen whilst others have been neglected. The most notable areas which have been neglected are in relation to rail’s wider role in contributing to national and sub-national economic, environmental and social goals.

2.2. Thematic gaps which have not been addressed in the papers include:
   - Governance Models and Appraisal Methods that Support Local Decision Making;
   - Supporting good growth and contributing to wider public policy goals (such as meeting housing need).

2.3. We are also aware that the Williams review team has also consulted formally and informally which it will also have drawn on for evidence so we assume that the review team now has a good overview of the evidence and views by different parties.

2.4. As part of this process we also supplied the Williams Review team the evidence base we have assembled on the reasoning behind, and benefits of, devolution of rail responsibilities to devolved authorities and administrations. This evidence base is also gathered on the micro-site we have developed on the benefits of regional and urban rail devolution which can be found here:
2.5. We believe it makes a compelling case so we are disappointed that the devolution dimension gets so little attention in the main written outputs of the Williams Review hitherto.

2.6. There was also scope for far more explicit attention to be given to different ways in which devolution has combined with effective national coordinating structures in the international comparisons paper. These models (including in the Netherlands and Switzerland) show how more efficient outcomes for passengers, as well as for the objectives of regional and national authorities, can be delivered by combining an overall ‘guiding mind’ for the railway with greater local accountability for the specification for the delivery of sub-national priorities in very different local circumstances. There are also an instructively wide range of ways in which combinations of different formats of private and non-private, national and non-national bodies have been utilised in counterpart countries in order to achieve the objective of retaining the key elements of a successful and growing nationally integrated rail network with local rail services which form part of successful and integrated sub-national public transport networks which meet local needs and priorities.

2.7. We continue to engage with the process and we are always happy to seek to provide further evidence if there are points on which the Williams Review would like further information or clarification.

Question 2. Has the Review identified the right high-level objectives as set out in Chapter 2?

2.8. The objectives identified are all appropriate however focussing the ‘wider social goal’ objective on ‘the country’ suggests a one-size fits all approach to Great Britain, or a flattened-out aggregated approach to these benefits. In reality the nature of the way in which the railway serves different sub-national economies and communities varies markedly. So whilst the commuter rail networks of major city regions are of fundamental importance to the functioning of their core city economies (London being the most striking example) and the patronage volumes are high, many rural lines carry far fewer passengers but are highly significant to the local economy, for example in relation to tourism.

2.9. A better way of wording this point could be: ‘realising the potential of passenger services and rail freight to deliver more social, environmental and economic benefits across very different economies and communities throughout Great Britain

2.10. As in much of the Williams review written output so far the fact that one third of trips on the rail network are now made on services which are either wholly or in part overseen by devolved administrations and authorities is unrecognised. The success of fully devolved rail networks is also rarely commented on.

Question 3. Has the Review identified the key issues constraining the success of the railway in Chapter 3? What relative priority would you place on them?

2.11. We agree that the issues identified are key. Although the summary is admirably concise it could be argued that it does not fully capture the challenge for devolved authorities and administrations around the linked problems of poor performance from the industry in
delivering schemes on time and to budget which in turn hinders wider housing, transport and economic programmes as well as deterring future investment in the sector by devolved authorities and administrations. These challenges are particularly acute on networks where there has been historic underinvestment.

2.12. The focus on customers (which are defined as ‘passengers and freight’) loses sight of the equally important role for the railways which is how well they serve the wider economic, social and environmental objectives of the places they serve. For example it is possible for the railway to serve existing passengers and freight customers well whilst simultaneously failing to address wider challenges around carbon reduction and climate resilience, contributing to meeting housing need, and offering new services which will help reduce road congestion on parallel road corridors.

2.13. Whilst we agree that an overarching strategic direction is important this again suggests a centralised and one-size fits all approach and fails to capture the need for the railway to be responsive to the very different markets it serves and the reality of a devolving Great Britain where one in three rail trips are already made on services which are responsible in whole or in part to a devolved authority or administration.

2.14. We do not believe that there is merit in attaching relative priority to these factors given they are all of key importance.

**Question 4. Do the broad assessment criteria in Chapter 4 capture the right issues against which the Review should test its proposals? What priority should we attach to each and**

**Passengers**

2.15. We agree that the assessment criteria are appropriate with the caveat that it is not always the railways’ responsibility to lead on journeys across more than one mode in major urban areas. For example though it has a role to play in London it is clearly the role of TfL as a whole, rather than that the current operator of London Overground, to lead on integration across bus, tube and rail. It would be more accurate and constructive to say that the railways should work with other public transport providers and transport authorities to enable the whole journey including across modes.

**Value for money**

2.16. Local authorities and devolved administrations are one of the biggest investors in the rail network but high costs, cost over-runs, scheme slippage and excessive bureaucracy are major concerns. Again there is a lack of recognition of anything but national considerations despite the reality that one third of all trips are on wholly or partially devolved networks. The value for money section should explicitly recognise the need to improve value for money for sub-national government and reduce the costs and inefficiencies in the way that their schemes are progressed.

**The fundamentals**

2.17. We agree that these are fundamental criteria.
2.18. There is an argument that continuing to improve the skills and diversity of the workforce should be added given that the railways do not reflect the diversity of the places they serve, the skills shortages in the sector and the aging profile of employees in key sub-sectors of the workforce. If the railway is to achieve the wider objectives of the review then we need a railway which offers an attractive career structure, which attracts and retains the best people and where staff feel engaged and motivated.

2.19. Overall we are disappointed about a) the inward-facing nature of the criteria, and b) the centralised (as in one national size fits all) approach.

2.20. On a), other than for the environment, there is no recognition that the railway is more than an end in itself and plays a wider and crucial role in determining whether or not much broader national and sub-national policy goals are met. These include economic goals (such as facilitating greater concentration of businesses in core city centres) or social goals (such as enabling the socially excluded to access opportunities like jobs and education).

2.21. On b), none of the criteria relate to the need for the railway to more effectively serve the very different needs and markets which exist in different parts of the country. Nor is there any recognition of the reality of a devolving GB and that decision-making over the nature of the service it provides is already no longer solely determined by GB-wide bodies based in London. Local rail franchise specifications are now set by the devolved authorities or administrations for Scotland, Liverpool City Region (for Merseyrail Electrics) and London (for the London Overground). In the West Midlands, throughout the North of England and in Wales the franchise is part the responsibility of the devolved authority or administration.

2.22. A further category of outcomes could therefore be added which would address both the devolution issue and rail’s wider economic, social and environmental role. This could include items such as:

- Supporting good growth: the decisions made for investment and operations in the railway should recognise rail’s role in supporting and enhancing sustainable economic growth through capacity and connectivity;
- Supporting (or enhancing) local communities: the criteria should reflect the importance of ensuring the railway is at the heart of supporting and improving the social fabric of the communities it serves, through providing journey opportunities which enable access to education, training and leisure opportunities as well as employment;
- Agility and flexibility: the rail industry and its governance must be agile and flexible to respond to local circumstances, decision-making and priorities.

2.23. Overall we do not believe that there is merit in attaching relative priority to these factors given they are all of key importance.