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14th October, 2010

Dear Sir/Madam,

Reforming Rail Franchising Consultation

Thank you for providing us with the opportunity to comment on the above consultation. As the DfT is already aware, GATCOM has a number of concerns about rail services serving Gatwick, particularly in respect of the Gatwick Express.

Gatwick Airport is located on the busy Brighton Main Line and is served by three train operating companies, the principal operator being Southern Railway which also runs the premium Gatwick Express service. As one of the UK's key international gateways, ensuring good, efficient surface access links to the airport, particularly by rail, is a vital component in achieving the Government's aim of making airports better not bigger. However, changes to the structure of rail franchising in recent years has had a great impact upon the national connectivity of the airport. It is acknowledged that Gatwick is one of the UK's best connected airports by rail but GATCOM is concerned that the number of destinations reached by direct rail services has declined in recent years. It is important therefore that the Government ensures that there is an integrated rail policy which recognises the needs of Gatwick as an international gateway in order to help secure improvements to the rail network for air passengers.

The review of the current rail franchising policy is therefore welcomed which we see as the first step in securing improvements to future rail services. GATCOM also believes that there are lessons to be learned from the current Southern franchise.

GATCOM is most concerned that the current Southern franchise is preventing Gatwick Airport Limited from encouraging more air passengers to use rail services to access the airport because of the commitments that have been included in the Southern franchise agreement with little or no consultation with key interests. Our key concerns are:

- The franchise commitment to replace all the existing Gatwick Express rolling stock with Class 442 units by May next year. The phase out of the purpose built Class 460 units is already underway. Air passengers with large amounts of luggage and persons with reduced mobility have great difficulty boarding and

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alighting this type of rolling stock due to the single width exterior doors at each end of the carriage. GATCOM is continuing to urge Southern to ensure appropriate rolling stock (such as double exterior doors, adequate luggage storage facilities) is used for this important airport express service, particularly as the use of 442 units currently fails the test of accessibility for mobility impaired passengers.

- The franchise commitment to install ticket gates at Gatwick and platforms 13 and 14 at London Victoria by the end of 2011. GATCOM understands the commercial rationale for this but we do not believe that such a scheme is suitable for the rail station at Gatwick – the lack of space and nature of air-rail passengers i.e., unfamiliarity, luggage and group size. The current arrangements enable on-board ticketing on Gatwick Express services which is attractive for air passengers and other users of the premium service. The introduction of gating would also put Gatwick at a competitive disadvantage, as the Heathrow Express platforms at Paddington are not gated. GATCOM has therefore question why the Gatwick Express at London Victoria and Gatwick should be treated differently.
- Southern's decision to remove on-board toilet facilities on certain services without consultation with key interests or passengers.

GATCOM supports the proposal to afford greater flexibility, to devolve more decisions to train operating companies and award longer franchises as the new approach could give the airport and other stakeholders greater influence over the train operator on matters such as rolling stock, timetables and the incentive for operators to invest. However, the key to the success of the new approach lies in the DfT's base franchise specification and the requirements that are placed on franchisees over the life of the franchise.

It is vital that the base specification includes outputs to maintain and improve service quality and service features, as well as minimum requirements to ensure that appropriate rolling stock is used on services. In the light of current experiences we hope that the reforms will result in a greater duty being placed on the DfT to ensure that the rolling stock bidders propose to use as part of their franchise bid is appropriate for the services to be run and take into account accessibility and the present and future requirements of groups of passengers served. There must also be adequate safeguards put in place enabling the DfT to intervene where an operator is not performing effectively with a series of minimum standards specified.

As the Government is proposing longer franchises, it is essential that there is a requirement for effective consultation to take place with interested parties prior to the award of the franchise, and if necessary during the life of the franchise, if prospective franchisees propose procurement of rolling stock and other significant changes to service features and stations. In the case of Gatwick Airport, where the railway is critical to the airport's operation, a close involvement in specifying the franchise is needed. GATCOM strongly supports the proposal to engage earlier with pre-qualified bidders as this will ensure an improved specification which is workable and will meet changes in passenger profiles and service requirements over the life of the franchise.

There is also a need for the DfT to consider in developing its future policy how the award of longer franchises will take into account the aspirations of Network Rail's route utilisation strategies (RUSs). There will be instances where a franchise will have a different timescale to a RUS and as such the improvements to the network and services would be out of line. There must therefore be flexibility for franchisees to adapt to any changes flowing from the RUSs.

In terms of service quality, the proposed approach and core principles of how service quality is to be delivered is welcomed. The issues to be covered by passenger opinion surveys cover a number of areas of greatest concern to passengers but it is felt that an area omitted from the list is ease of train/station accessibility. The inclusion of this area

will help the franchisee and the Government to assess whether the right rolling stock is being used and will provide an incentive to franchisees to invest in appropriate rolling stock as well as station improvements.

We trust our comments will be taken into account.

Yours faithfully,

A handwritten signature in blue ink that reads "Paula Street". The signature is written in a cursive, slightly slanted style.

Assistant Secretary