

Transport East response to the Rail Reform Bill consultation

Subject: A railway fit for Britain's future – consultation response
Report by: Zishu Liu, Senior Strategic Transport Planner, zishu.liu@transporteast.gov.uk
Date 15 April 2025

The Government has launched a [consultation](#) on proposed legislative measures that will form part of the new Railways Bill, providing the tools needed to create and empower GBR, set up a new passenger watchdog, streamline the regulatory regime and carry out the systems structural reform. The measures include:

- Setting direction – Establishing a role for the Secretary of State in setting GBR’s strategic direction, while giving it the day-to-day operational independence it needs to get the most out of the railway and plan for the long term.
- Enabling GBR and driving delivery – Defining the role of GBR’s Board and the Secretary of State in holding the organisation to account for delivery, alongside a streamlined role for the Office of Rail and Road focused primarily on safety and efficiency.
- A new voice for passengers – Creating a new passenger watchdog empowered to advocate for passengers and hold both GBR and non-GBR operators to account for improving the passenger experience.
- A commitment to rail freight – Introducing an explicit, statutory duty for GBR to promote rail freight in line with an overall growth target set by the government.
- A clear role for the devolved governments - Ensuring that GBR can deliver the priorities of and be accountable to the governments of Scotland and Wales.
- Empowering local communities – Bringing decisions as close as possible to the communities they affect, with a statutory role for devolved governments and Mayoral Strategic Authorities in working with GBR to govern, manage, plan and develop the rail network.
- Making best use of the network – Giving GBR the authority it needs to manage access to the network in the public interest on a strategic, whole-system basis; backed by clear, transparent, rules-based decision-making.
- A new financial framework – Implementing a new funding process to facilitate joined-up decision-making and reflect GBR’s role as a single integrated organisation with responsibility for both track and train.
- An ongoing role for the private sector – Ensuring non-GBR operators continue to have fair access to the network, in addition to the statutory duty for GBR to promote rail freight.

The consultation opened on 18 February and closes on the 15 April 2025.

1. Transport East

- 1.1. Transport East is the Sub-national Transport Body for Norfolk, Suffolk, Essex, Southend-on-Sea, and Thurrock. The partnership provides a single voice for our councils, business leaders and partners on delivering our region's [Transport Strategy](#) and [Strategic Investment Programme](#), working in close collaboration with the government and the rest of the UK.
- 1.2. Transport East Responded to the Rail Reform Bill consultation in March 2024, emphasising the critical role of Sub-National Transport Bodies (STBs) in shaping and implementing transport strategies. We advocated for the inclusion of STBs in the Integrated Rail Board governance structures, ensuring that regional transport priorities are effectively represented and integrated into national planning.
- 1.3. Transport East aims to ensure that rail infrastructure and services align with broader regional and national goals, ultimately delivering social and economic benefits to the communities in the Eastern Region.
- 1.4. The Transport East response will focus on the broader strategic benefits and not focussed on the detailed legislative changes.

2. Detailed consultation question response

2.1 Leadership for Britain's Railways

Question 1: Do you agree that GBR should be empowered to deliver through reformed incentives and a simplified and streamlined regulatory framework?

Transport East welcomes GBR to be empowered to deliver through reformed incentives and a simplified and streamlined regulatory framework. The current system has hindered effective planning and delivery across the rail network and integration with other modes. Streamlining delivery of infrastructure improvements is paramount to realising any aspirations of delivering passenger and freight services as part of GBR's vision by the government. Empowering GBR with a whole-system view, underpinned by a less cumbersome regulatory structure, is essential to optimise the railway. However, the licence should ensure that decisions are transparent and timely.

To facilitate this streamlined process and ensure local and regional needs are considered effectively, new legislation is needed that will include a regulatory voice for local representatives. This could be either by the STBs or devolved Mayors. Transport East has long-standing partnerships with the Train Operating Companies, Network Rail and LTAs in developing long-term plans. It's vital that these relationships are built upon.

Decision making and delivery of regional, smaller to mid-level infrastructure enhancements or upgrades should lie with regional GBR structures and could see faster improvements more aligned with regional priorities. The current RNEP process is slow, unwieldy and in effect blocks, sensible "quick win" projects. This is exacerbated by the artificial funding divide between maintenance and renewals which drives inefficiencies and delays.

In particular, this reform will help ensure that local and regional rail services are more effectively managed and integrated into the national network, leading to better connectivity, improved service delivery, and a more passenger-focused railway. This could be achieved via well-designed interchanges, service patterns, ticketing and payment.

Rail is crucial for both passengers and freight, the government should ensure that GBR's duties explicitly require it to balance freight and passenger needs, and that frameworks be established to guarantee that freight interests are properly considered in GBR's decision-making processes.

Question 3: Do you agree that the Secretary of State should be responsible for setting a long-term strategy for GBR to align with government priorities?

Transport East agrees that the Secretary of State should hold overall responsibility for the long-term national strategy for GBR to provide strategic direction and alignment with government priorities. The strategy should be published in the near future to ensure clarity, build confidence, and facilitate effective planning for the reform.

To create a truly integrated and responsive transport network, the Secretary of State's GBR Strategy should take due regard to regional and local strategies, policies, plans, and evidence, including those produced by STBs and LTAs/MSAs. This is particularly important over the next few years given that the level and pace of devolution will vary across the country. We propose that GBR should seek to deliver the outcomes and priorities of the STB Regional Strategies, which have been subject to public consultation and approved democratically through all constituent LTA Cabinet processes. STBs should also be consulted during the development of the long-term strategy, especially where MSAs are less established or engaged.

Clear accountability mechanisms are essential once the long-term strategy is established. To achieve this, delivery of the strategy should reflect the diverse needs and aspirations of each region.

We also recognise the importance of rail freight in delivering these priorities and we support the incorporation of rail freight in the Secretary of State's strategy.

2.2 A New Voice for Passengers

Question 4: What are your views on the proposed functions of the Passenger Watchdog?

Regarding the proposed functions of the Passenger Watchdog, we agree with the need for a strong, truly independent consumer voice, operates in a way that is clearly understood by passengers and possesses the authority to be genuinely influential in shaping rail services.

The remit should ensure representation of all rail networks including branch lines and rural services in addition to the mainlines. This ensures that passengers in less-served regions receive the same level of consideration and service improvements as those in more densely populated areas. This is particularly important for the East, where the rail network includes many rural and branch lines and poor public transport provision results in a high level of car dependency.

Furthermore, to ensure GBR is truly responsive to local needs, the new Passenger Watchdog should be responsible for monitoring how GBR delivers its investment and services against the relevant priorities of Mayors and regions.

Currently, the scope is limited to passenger services. We believe rail freight should be considered with the same level of attention, either under this new Watchdog or a separate Watchdog organisation, recognising their vital role in the economy and the need for their interests to be represented.

2.3 Making best use of the rail network

Question 7: Does the proposed new access framework enable GBR to be an effective directing mind that can ensure best use of network capacity?

The proposed new access framework has the potential to enable GBR to be an effective directing mind for ensuring best use of network capacity, provided its implementation and operation consistently prioritise the interests of both passengers and freight operators and are demonstrably aligned with the delivery of both government and local priorities. Safety and accessibility must be primary requirements underpinning all decisions. Transparency in GBR's prioritisation and decision-making processes will be key to its effectiveness.

2.4 Financial Framework

Question 12: Do you agree with the proposed legislative approach regarding a 5-year funding settlement for Great British Railways?

We are focusing our input on these strategic considerations rather than the specifics of the legislative changes at this stage.

We recognise the value of the proposed 5-year funding settlement in providing a foundation for efficient planning. However, to ensure the railway can effectively meet future challenges and opportunities, we believe the funding framework should support strategic planning beyond this 5-year cycle. We recommend incorporating an indicative funding plan for 10 to 15 years on top of the core settlement, or an equivalent mechanism, to balance the need for stability with the ability to develop and deliver long-term infrastructure improvements and service enhancements.

The process for finalising future 5-year plans should include the requirement for GBR to engage with the STB and Mayor to influence the details of the plan and ensure investment programmes are aligned with and informed by local and regional economic, social and environmental priorities. Alignment with Local/ Devolved Authority funding cycles would maximise the effective planning and delivery of a more integrated transport network.

Transport East has long-standing partnerships with the Train Operating Companies, Network Rail and LTAs in developing long-term plans. It's vital that these relationships are built upon.

2.5 Fares, Ticketing, and Retailing

Question 13: Do you agree with the legislative approach set out above to retain the Secretary of State's role in securing the overall affordability of fares and continuing to safeguard certain railcard discount schemes?

Transport East agrees with the legislative approach to retain the Secretary of State's role in securing the overall affordability of fares and safeguarding railcard discount schemes. The Passenger Watchdog should also be consulted as part of this process.

Ensuring affordable rail fares is crucial for public access to train services. According to the Transport East [Travel & Behaviour Survey](#), 48% of those surveyed reported that ticket affordability is the greatest barrier to rail travel in the East. Rail fares have increased faster than the cost of driving, exacerbating barriers to rail use and encouraging people to use the car for journeys. There should be a continued drive to keep pricing more favourable with sustainable modes of transport to encourage modal shift. The Secretary of State's role in setting parameters and guidelines for GBR's fare-setting activity is essential to balance the interests of passengers and taxpayers.

We support the continuation of discount schemes for young people, older people, and disabled people. Extending the boundaries of National Rail's Regional Railcards could further enhance accessibility and encourage rail use, given that most trips for residents in the East cross regional boundaries and require routing via London due to poor East West services.

Furthermore, if integrated ticketing is to be implemented, discounted travel should be consistent across England and Wales and in line with Scotland to remove barriers for people to travel across Great Britain from the East.

Involving Mayors and regional transport bodies in the fare-setting process will ensure that pan-regional, regional and local transport priorities are considered, leading to a more integrated transport network, within a national fare framework.

2.6 Devolution

Question 15: The government intends that GBR's statutory duty in relation to devolved leaders should strike a balance between enhancing their role whilst also ensuring that GBR has the appropriate flexibility to direct the national network. Do you agree with this approach?

Transport East welcomes the government's approach to balance the role of devolved leaders with GBR's flexibility to direct the national network, for example passenger and freight services crossing regional boundaries. We believe STBs also have a crucial role to play in this approach as their Boards are comprised of democratically elected members collectively representing transport across sub-national geographies that align well (in Transport East's case) to functional economic and rail network geographies. Transport East already leads for the East's local authorities on strategic rail convening and co-ordination.

There should be clear and transparent accountability within GBR for a decision-making process (and named senior individual) at a regional/sub-national level, at a regional geography that is sensible

from a functional strategic rail area aligned to a functional economic area. For example, in the East, we recommend that GBR should be structured to have a sensible focus on connectivity within the East network area, considering connectivity onwards to the rest of the UK. The current Network Rail 'Eastern' region is from Northumberland to the Thames, and not a sensible geography on which to plan and engage with partners on a network to deliver economic growth in the East.

STBs are well placed to provide strategic direction over pan-regional and regional rail planning, rather than simply engaging with GBR. STBs have developed multi-modal strategies, and evidence bases and are well positioned to advise and represent the interests of local partners in relation to planning for the rail network, as well as bringing new MSAs over wider geographies together to work on common areas of interest. In addition, the Wider South East Rail Partnership brings together three STBs, (Transport East, England's Economic Heartland and Transport for the South East), Network Rail, GBRTT, DfT and TfL, to provide strategic oversight of rail across the busiest rail regions in the country. We propose that the Wider South East Rail Partnership be utilised by GBR as the recognised framework for convening local authorities, TfL and emerging MCAs across the wider south-east of England on common matters of strategic rail across a functional WSE rail geography. The Partnership is ready to go, having already been established by the 3 STBs with TfL, GBR, Network Rail and DfT, and has been designed flexibility to incorporate new MSAs as they are formed, alongside those authorities not currently going through devolution

GBR's statutory duty should explicitly include a requirement to support MSAs in their strategic planning, enabling them to realise their multi-modal integrated transport ambitions. However, there is a risk of imbalance: well-established MSAs may have advantage, such as receiving priority for support to deliver multi-modal ticketing, over less devolved areas. This could lead to disparities in resources, capacity, and capability to effectively engage with GBR. To mitigate this, STBs should play a stronger role in influencing and overseeing local commissioning with GBR, particularly in less-established devolved areas.

Furthermore, as they mature MSAs are expected to take financial responsibility for local services subject to performance and network use tests as indicated in the GBR Mayoral Partnership Framework. Not all MSAs will possess the necessary financial capacity or stability to assume such responsibilities, which could lead to essential local services being underfunded or discontinued, particularly in regions with less robust economic bases. Therefore, the government should ensure that mechanisms are in place to address these disparities and build capacity and capability within all regions, promoting equitable development across the country. The STB partnerships can be utilised to provide strategic rail support across sub-national geographies

Question 18: Do you agree with the government's approach of making targeted amendments to existing legislation to clarify the role of devolved leaders in relation to GBR?

It is essential that there is a clear legislative framework which enables GBR to deliver its duty whilst also supporting the role of devolved leaders across the country. We believe that these clarifications should favour greater influence of devolved leaders. This is essential to ensure that the railway is responsive to local needs and priorities, and that devolved authorities can effectively integrate rail into their broader transport strategies.

We also noted that the future role and funding for Community Rail Partnerships is not currently defined. These have been valuable in supporting railways locally and embedding rail within local communities, including supporting rail-led tourism. This needs to be considered to ensure ongoing support for locally-led smaller scale initiatives.

Question 20: Please provide evidence on anticipated transitional or ongoing costs or benefits for you or your business resulting from these proposals. For example, please provide evidence on the scale of transitional costs associated with familiarising with the new proposals and structure, changes to administrative burden resulting from these proposals, or any other direct impacts associated with the proposed changes

Transport East expects both transitional and ongoing costs associated with the proposed change. All LTAs within the Transport East region are part of the Devolution Fast-track programme and Transport East currently leads on strategic rail. Building the capability and capacity for rail across these authorities will require additional revenue resources to ensure effective engagement and involvement.

2.7 Others

While Transport East has provided detailed responses to the consultation questions most relevant to our region and expertise, we acknowledge the remaining questions. These questions have been carefully reviewed, and we have determined that they either do not apply to our geographical area or do not necessitate specific comments from Transport East at this time.

End