

Office of Rail and Road 25 Cabot Square LONDON E14 4QZ Transport Focus, Albany House, Ground floor west, 94-98 Petty France London SW1H 9EA

07711 319760 guy.dangerfield@transportfocus.org.uk www.transportfocus.org.uk

7 October 2024

Control Period 7 passenger train performance reset: Consultation on train performance measures for 2026-29

Transport Focus is pleased to be working with the Office of Rail and Road (ORR) and Network Rail to explore passengers' views to inform the decision about train performance measures for 2026-29. As you know, the quantitative phase of the research is not due to report until later in October, so please regard this as our interim response. We will confirm or amend our position as quickly as possible.

You have asked four questions, two of which are inextricably linked:

1. Do you agree with promoting 'Network Rail delay minutes per 1,000 miles train travel' to a success measure in our Control Period 7 outcomes framework?

This metric covers one organisation's element of train performance, and our preference is for 'whole industry' measures because passengers do not generally experience infrastructure performance in isolation. However, Network Rail's performance clearly plays a significant part in delivery of the end product. Even fast-forwarding some years, there will still be a need to understand the performance of Great British Railway's (GBR) infrastructure as part of its total product. And this will have ongoing importance for passengers using parts of the railway that will not be virtually integrated even after GBR is fully operational (that is, open access operators, Elizabeth line, London Overground, Merseyrail, Scotrail, Transport for Wales). Therefore, we support this proposal.

- 2. Do you agree with adding 'time to three minutes' to our Control Period 7 outcomes framework?
- 3. Should 'on time' be retained as our punctuality success measure for England and Wales, or should it be replaced with 'time to three minutes'? What is the evidence/reason behind this? Will a change result in improved train performance?

Adding 'time to three minutes' as *one* of the metrics ORR considers in holding the railway to account is not controversial. Indeed, Transport Focus would expect ORR to be considering train performance against a number of different delay thresholds. What divides opinion is whether the *primary* metric should be 'on time' (meaning within 59 seconds of scheduled arrival) or 'time to three minutes'.

Passengers were divided in the initial qualitative phase of research. For some, the question is black and white: on time means on time, not almost three minutes late. Those in that camp take the view that success should not be judged as anything other than truly on time.



They do not want the railway patting itself on the back for having, in their view, failed to achieve true success. When we explored the suggestion that a truly 'on time' metric might create a disincentive for the railway to minimise additional delay to an already-late train, these passengers were unconvinced. For others, up to three minutes late counting as on time is regarded as reasonable; viewed as understandable leeway given all the things that might prevent a train arriving within 59 seconds of schedule. The quantitative phase of research will provide further elucidation, including giving an understanding of how views differ depending on type of journey and other factors.

Previous Transport Focus research has shown a stark link between train punctuality and journey satisfaction, with the latter falling away sharply after the very first minute a train is late, particularly among commuters. That study showed that for every minute of lateness, overall satisfaction declines by one and a half percentage points, and among commuters the decline is steeper at three percentage points per minute. Unfortunately, because of discontinuation of the National Rail Passenger Survey as a result of Covid, it has not been possible to update that work. However, while there are fewer commuters and more leisure travellers post-Covid, it seems improbable that passengers' tolerance of delay has fundamentally changed. Indeed, Covid is said to have generally reduced tolerance in society.

Your sub question 'will a change result in improved train performance?' is *the* key issue. A change to 'time to three minutes' would, clearly, increase the *reported* level of punctuality. However, those parts of the railway currently ruthlessly focused on running a tight 'on time' ship are likely to relax, while those currently underachieving would no longer need to make the effort. And, looking at the 'within 59 seconds' data for April to June 2024, it is important to note that it can be done: Greater Anglia 87.2; Elizabeth line 83.1; Chiltern Railways 82.0; c2c 81.4 (all percentages). In short, we cannot see how a move from 'on time' to 'time to three minutes' will do anything other than worsen passenger experience.

Therefore, Transport Focus favours 'time to three minutes' becoming a supporting measure, but advocates strongly that ORR retains 'on time' as the primary metric by which it holds Network Rail to account for its performance on behalf of passengers.

Do you have any other views on the measures we should use to hold Nework Rail to account for passenger train performance in years 3 to 5 of Control Period 7?

First, you already include cancellations as one of the primary metrics and this should continue. However that measures only cancellations made on the day of operation, not those made in advance. In our response to ORR's consultation 'late notice pre-cancellations' this summer we made clear that pre-cancellations are still cancellations to passengers, late notice or otherwise. In the qualitative research just undertaken passengers were quite clear about this. If a train has been advertised as running and is subsequently removed from the timetable, it is a cancellation. That is, irrespective of how far in advance it was deleted, up to a cut off of about three months ahead, based on their experience that tickets are generally not on sale further ahead than that. Transport Focus therefore confirms its position that data showing all 'pre-cancellations'* should be published routinely alongside 'on the day' cancellations, attributed to the organisation requiring that pre-cancellation and with the reason identifiable.

^{*} Excluding trains removed from the timetable for engineering works where amendments were made according to Informed Traveller timescales.



Second, although outside the scope of your consultation, Transport Focus advocates that a strong measure of passenger experience sits alongside objective train performance in how the railway is judged. This is borne out in the qualitative research just completed. Clearly, whether a train runs and whether it runs on time is fundamental to passenger experience. However, other things matter to passengers as well. For example, day to day delivery of the softer elements of the product – is the passenger assistance and catering delivered, is the wifi/power power socket working at your seat; are the toilets working, clean and stocked with paper and soap etc. And ethos matters, too. Does the railway demonstrate, in the way it deals with passengers, before, during and after their journey, that it really cares about them as paying customers. In the industry reforms that lie ahead, these issues need to be considered alongside train performance as part of judging the railway's success at delivering for passengers.

Guy Dangerfield Head of strategy and intelligence