Rail and Urban Transport Review
Campaign for Better Transport submission
January 2024

Campaign for Better Transport is the national charity working across England and Wales to make transport better, greener and fairer. Our vision is for all communities to have high quality, sustainable transport that meets their needs, improves quality of life and helps protect the environment.

Introduction

We are the UK's largest sustainable transport charity and liaise closely with all levels of government and with all of the political parties. Whilst other contributors to this review are likely to highlight the technical and bureaucratic considerations for speeding up the planning process, we welcome this review as an opportunity to talk about the political processes and framework that underpin decision making in the UK. Many of the fantastic organisations that have been involved in this consultation will be able to speak with more authority on matters of engineering, delivery and expenditure — but few will have the same insight into government and politics as we do.

Encouraging modal shift — the concept of moving people away from low density, single or dual occupancy vehicles onto high-volume public transport — needs to be of critical importance to the next government. With 24per cent of domestic emissions stemming from transport, it is the largest polluting sector and one in need of more attention at a local, regional and national government level.[1]

We are delighted to have been asked to contribute to this review. If you have any further questions of our organisation or would like us to provide more evidence on any of these matters, we would be happy to oblige.

Growth opportunity through unlocking planning

1. What do you view as the current key challenges hindering the delivery of rail and urban transport networks and infrastructure?

Fundamentally, the way in which government views the delivery of large-scale infrastructure projects is wrong. This, in our view, is for two reasons — an undervaluing of the social, environmental and socioeconomic benefits that public transport brings to our cities, towns and villages in favour of the unevidenced merit of the private vehicle, and the failure of the Green Book to recognise the long-term merits of capital-intensive projects. In addition, there are specific problems that need to be addressed in the industry and government — particularly around spiralling overspend on many projects and the underlying issue of long-term certainty in decision making.

Few, even in the public transport world, would make the argument that public transport infrastructure and provision is cheap — but few could argue that the long-term economic gain is not great. We, of course, understand that there is limited money to be handed to different departments but believe that unnecessary road building is a barrier to increased investment elsewhere in the transport world. For the incumbent Prime Minister to cancel the Northern Leg of High Speed 2 and

[1] DfT (2022), 'Transport and environment statistics 2022', https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022

reallocate more than a third of the 'savings' to road projects is irresponsible and undermines confidence in the future of public transport infrastructure.[2] This was in addition to the £27 billion over four years allocated to the second Road Investment Strategy (RIS2) pipeline, which pales in comparison to the £3 billion promised for buses in the National Bus Strategy for example. Prioritising road building, which only increases traffic and resulting congestion, ahead of public transport, is wrong-headed.

Successive governments have put the want of the driver before the implementation of rail and local transport infrastructure — despite rail, bus and local transport expansion projects having significantly higher benefit-cost ratios (BCR). For every £1 invested in bus infrastructure, more than £8 in economic benefits are produced, in comparison some road building schemes have a BCR of just £1.91 for every £1 spent.[3] [4] There is no doubt, in our view, that these are political decisions that require urgent review, and the money needs to be reallocated to unlock the creation of rail, bus and other public transport infrastructure.

The root of this emphasis is a level of orthodoxy within the Treasury. There is a disconnect between the Department for Transport and the Treasury (and latterly, the Cabinet Office and the Prime Minister). Where the Department for Transport want to, broadly, see more investment, they are pinned back by a lack of long-term thinking by other departments. Calculations from the Green Book, the Treasury's tool for the appraisal and evaluation of projects, fail to adequately consider indirect economic growth or the social and decarbonisation improvements that public transport brings. The Treasury is a naturally risk adverse department, and has been progressively viewing the railway network, and its expansion, as a financial liability rather than as an essential public service and a necessary good that requires increased investment. In recent years – despite the undeniable economic, social and environmental benefits of increasing patronage on the rail network – Train Operating Companies have been asked to find cuts in their budgets, and funding for amenities has been threatened. Critically for the rail, and urban transport network, we need to ensure there is uniformity in Whitehall thinking – with the Treasury viewing public transport as needing investment, rather than subsidy. Short-sighted policy decisions, like the cancellation of High Speed 2b, are obviously detrimental to the future of passenger travel and movement of freight – but also to the industry and the supply chain. If this level of indecision and caution continues, companies will undoubtedly adopt a policy of withdrawal from the British market, which will only increase the cost of these projects. We have heard this evidence first hand from those in the industry.

With this said however, we have been aghast recently at the levels of overspend on infrastructure being completed and proposed by Network Rail. We simply have no answers for how the construction of the newly opened Reading Green Park station, with just two platforms and a bridge, was allowed to balloon to £20 million. Brent Cross West Thameslink, recently opened, cost £419 million — with budgets evidently not being audited and controlled carefully enough. We believe that

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[2] National Highways (2020), 'Delivery Plan 2020-2025', https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/910866/5-year_Delivery_Plan_2020-2025_FINAL.pdf

[3] National Highways (2022), 'A428 Black Cat to Caxton Gibbet improvements: Economic Sensitivity Test', https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010044/TR010044-001834-National%20Highways%20-%209.115%20Economic%20Sensitivity%20Test%20(November%202021%20TAG%20Update).pdf

[4] Arup and Greener Journeys (2018), Bus infrastructure investment, https://greener-vision.com/wp-content/uploads/2018/11/Greener-Journeys-Arup-FINAL-REPORT.pdf

urgent review of government spending and procurement needs to take place in consultation with the Treasury to ensure that this money can be saved to complete a greater volume of projects. Regardless of whether they are privately funded or publicly funded, we feel that it's important to ensure there are as few barriers as possible to other government departments asking questions of much-needed public transport infrastructure and provision.

2. **What spatial planning and associated policy and legislative changes would help unlock the delivery of rail and urban transport projects?**

Primarily, for rail, the most important step is to ensure the passage of the Draft Rail Reform Bill – which at the time of writing – remains in pre-committee stage. Ensuring that track, train and passengers are brought together under one entity is critical for creating the conditions for unlocking the delivery of rail projects. Transferring power from the Department for Transport to an arms-length body will ensure that decisions are expedited. Although there are different viewpoints about the next stages of the rail network – we think it is crucial to bring the various rail agencies together to ensure that the industry, insofar as is possible, can speak with a singular voice.

Greater emphasis also needs to be placed on bus infrastructure such as bus priority measures, with strengthened guidance for local transport authorities. One full bus can take up to 90 cars off the road. However, without priority measures and dedicated lanes, buses can be held up by congestion, lengthening journeys and making bus travel less appealing. It is vital to encourage more people to use the bus to maximise economic growth and to help achieve Net Zero. Bus priority measures in Brighton and Reading for example, have helped cut journey times, reduce operating costs, increase passenger numbers and make routes more commercially viable.

Reform of the National Planning Policy Framework (NPPF) is required to stop the practice of building housing developments which are largely car dependent. The NPPF should include the importance of constructing new housing near to existing rail lines and bus routes, and ensuring that developments have footpaths and cycle lanes to facilitate and encourage active travel.

The Fasttrack scheme in Kent has provided a framework for collaboration between councils, developers and local planning authorities. The scheme is a turn up and go bus service built into the plans of the housing development, which has encouraged a near tripling of all journeys in the local area moving to bus travel. By securing Fastrack-focused Section 106 contributions, Kent has been able to collaborate with developers on the Fastrack routing and priority lanes to make Fastrack an attractive and quick method of travel. Plans are in place for this to happen in Dover during 2024.[5]

3. ***Are there best practice or wider international examples that could be adopted to support growth through unlocking transport network and infrastructure delivery?***

In terms of international examples, while our national and local rail network may be more extensive than the French network, we can learn a considerable amount from France about enabling growth and consistency in local transport networks. By examining the success of their 'versement transport' a hypothecated urban local tax levied on all employers with over 11 employees, in regions with over

[5] Campaign for Better Transport (2023), 'New housing developments need public transport links like Fastrack', https://bettertransport.org.uk/blog/new-housing-developments-need-public-transport-links-like-fastrack/

10,000 inhabitants, to fund infrastructure investment. First rolled out in 1973 for regions with over 300,000 inhabitants, its success has led to its progressive expansion across the country. This offers a superb model of equitable devolution of funding and investment decisions. As an example of its impact, it has been used to fund nearly half of the transport provision in Paris, with an extensive network of modes combining metro, bus, several cross-rail lines and public cycle provision. Such an approach would reduce London's dependency on revenue, made so much more important since removal of its Operating Grant from central government, and would offer superb opportunities for regions across the UK.

There is one comparable example in the UK, which is Nottingham. The Workplace Parking Levy in Nottingham operates on a similar model as the Versement Transport, being a levy on parking provision spaces by employers of over 11 employees. In ten years, this has raised over £1 billion to reinvest in transport, and it is no coincidence that Nottingham now has an integrated network of trams, trains, bikes and award-winning buses which is the envy of much of the rest of the UK. We would strongly recommend enabling a comparable model of regional revenue raising.

Secondly, tram and light rail can offer a holistic solution to regional transport challenges, providing safe, accessible, reliable and lasting services. In spite of progress in Nottingham, Manchester, Edinburgh and Blackpool, and with new stock arriving on the DLR, the UK is lagging behind Europe, the US and many other parts of the world in tapping into tram and light rail investment.

One issue is the lack of appropriate light rail standards, leaving promoters locally to adapt what is available to them – in most cases the local heavy rail standards. This, alongside the practice of the transport authority covering the cost of utility diversions, has contributed to making light rail more expensive. Germany is perhaps the most advanced country in defining standards through the work of VDV, leading to a wealth of materials providing a common and appropriate standard. In the USA, the Portland Streetcar scheme is an example of delivering lower cost light rail. Utilising a lightweight track slab has managed to minimise the utility diversions, generating savings on construction cost. Another example, referenced in the Department for Transport report *Green Light for Light Rail*, is the light rail scheme in Besançon, France. In the UK, the Coventry Very Light Rail project is an attempt to replicate this, and we urge the next government to support the scheme.

Finally, Wales is an example of a government administration which has prioritised sustainable transport investment in a variety of ways. The adoption of the Well-being of Future Generations Act in 2015 ensures that decision-making by public bodies take into account long-term impacts, including social and environmental outcomes.[6] This has led to an ambitious national transport strategy, which prioritises investment in sustainable transport and includes bold policies to achieve this, including a traffic reduction target.[7] Wales has also undertaken a thorough review of road building schemes, determined that no future road expansion will take place unless stringent emissions criteria are met and amended WelTAG, their transport appraisal guidance, to include an integrated well-being appraisal to ensure that social and environmental considerations are designed into a programme or project from the outset.[8] We would very much encourage the next government in Westminster to follow a similar approach.

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[6] https://www.gov.wales/well-being-of-future-generations-wales
[7] https://www.gov.wales/llwybr-newydd-wales-transport-strategy-2021
[8] https://www.gov.wales/welsh-transport-appraisal-guidance-weltag-2022-summary-html

Clarity and certainty of policy and funding

1. ***What are the key tenets of a successful, strategic long-term policy for the delivery of rail and urban transport networks, taking into account wider decarbonisation and transport integration goals?***

One of the key tenets of a long-term policy for rail and urban transport is to follow through on sensible policies. The Williams-Shapps Plan for Rail and the proposed arms-length body Great British Railways were sensible measures which would address many of the problems faced by the railways today. Similarly, the National Bus Strategy laid out measures to stop and reverse the decline of bus services as well as providing sustainable funding. The failure to implement the recommendations of both reports has undermined the possibility of delivery and reform in the long-term.

Moving forward it is vital that major national infrastructure projects approved by Parliament cannot simply be cancelled at ministerial will. The cancellation of all but Phase One of HS2 simply on the basis of a change in the governing party's policy has significant ramifications not only for capacity on the railway, but for the economy, both for domestic investment and attracting risk-free investing from overseas.

In order to achieve decarbonisation, it is not sufficient – as with current Government policy – to rely almost exclusively on a move from internal combustion to electric vehicles. There must also be a significant reduction in vehicle kilometres through modal shift from private vehicles to the use of public and active travel. Therefore, a national modal shift target should be established to guide a set of policies that move us closer to an achievable decarbonisation target. Evidence suggests that modal shift requires a two-pronged approach – both improving the available of alternatives to driving and nudges for driver to consider these alternatives. Just punitive policies would antagonise people if they feel they have no alternative to driving. But just improving public transport would be insufficient if drivers have no reason to seek alternatives to the habitual car journey. Such nudges can include changes to parking provision or charges, or paid congestion or clean air zones. It is important, however, to bring the public along the route to decarbonisation and the benefits of modal shift explained.

2. ***What reforms to current transport funding approaches would support the safeguarding and expansion of rail and urban transport networks and infrastructure? Does the Green Book allow for sufficient factors to be taken into consideration and what should any additional factors/considerations be regarding infrastructure?***

The Green Book does not currently consider all the factors relevant to expanding rail and urban transport to a sufficient extent. Assessment is too heavily weighted towards a strict cost/benefit analysis, which place too great a value on (sometimes negligible) journey time savings. Instead, greater weight should be given to the social, health and environmental impacts of projects. This means both an honest assessment of the carbon emission impacts of road capacity expansion in its totality and a recognition of the emission savings and health improvements created by investment in public transport and active travel. Our recent report compared the benefits and value for money of investment in different transport modes.[9]

Long-term funding certainty is also needed for public transport. In order to safeguard and expand the rail and urban transport networks, a sustained system of bus funding is required with long-term funding settlements for local transport authorities, in place of the current short-term approach which causes considerable uncertainty. A long-term investment strategy is also required for Britain's rail network, as recent extreme weather demonstrated its lack of resilience to climate change.

In addition, it is vital that fiscal signals and pricing reflect different modes' relative carbon intensity, to ensure that the greenest modes are always the cheapest. For example, it makes little sense that Fuel Duty has been frozen for 14 years and cut in the last two, while bus fares have increased by 64 per cent over the last decade, and rail fares by 38per cent.[10] Our *Place Speaking* report also makes suggestions for pricing and tax adjustments that would promote travelling by train rather than domestic flights.[11]

Alongside the points outlined, it is our view that bold political leadership is required to confirm and complete infrastructure projects — both regarding the inner working of government (particularly in relation to the oversight of HM Treasury) but also in the eyes of the electorate. Major infrastructure projects, like High Speed 1, the Channel Tunnel and the Elizabeth Line would simply not have been possible without senior politicians holding their nerve. One of the reasons that High Speed 2 was even allowed to get off the ground was because of the political consensus that was agreed between the three major political parties: the Liberal Democrats, Labour and the Conservatives. Theresa Villiers, Andrew Adonis and our former Director of External Affairs, Norman Baker as ministers agreed to ensure that High Speed 2 was not a contentious issue to be used against the other parties — and as a result the early stages were agreed. Ensuring that political agreement is in place is of particular importance to major infrastructure projects. There will always be a place for HM Treasury to have oversight of government spending – in order to best protect the interests of the taxpayer – but individual politicians also need to respect cross-party agreements based on the wider societal and longer-term benefits of investment rather than using projects as a short-term political football.

3. ***What mechanisms are available to facilitate effective public/private relationships and funding?***

The increase in passenger numbers and investment in the railways since privatisation demonstrates that public/private relationships can be successful, but proper oversight is needed. Replacing the current model with Passenger Service Contracts as proposed in the Plan for Rail would be an effective step towards delivering a more efficient and passenger-focussed railway.

In terms of buses, there seems to be a dichotomy of management approaches at the moment between Enhanced Partnerships (with voluntary agreements between commercial operators and local transport authorities) or franchising (with elected mayors taking on fill control of bus operations and contracting operators to deliver). However, this fails to recognise there is a plethora of

[9] Campaign for Better Transport (2023), Better Transport for Better Business, pp. 7-8, https://bettertransport.org.uk/research/better-transport-for-better-business/

[10] The RAC Foundation, 'Transport Price Index', https://www.racfoundation.org/data/cost-of-transport-index

[11] Campaign for Better Transport (2023), Plane Speaking: Moving journeys from air to rail, https://bettertransport.org.uk/research/plane-speaking-moving-journeys-from-air-to-rail-july-2023/

approaches in between such as: 'Gross cost' or incentive-based franchising (as proposed by CPT Cymru and being considering in Wales); part franchising/ franchise minus (franchising just a part of the network, while leaving remainder commercial); Enhanced Partnership Plus (EP+) (as being successfully implemented in Leicester); and municipal bus companies (as operating in Reading). All councils and city regions should have access to all these options and should be supported to consider the ones most suitable to their local needs.

4. ***What role does the maintenance of existing transport assets play in harnessing growth and how could the current approach be improved?***

Maintaining current assets to a high standard inspires confidence in the services they support and encourages the public to use them. Ensuring stations and bus stops are well maintained, fully accessible and user-friendly, as well as updating rolling stock and buses regularly, will make public transport a more desirable way to travel. Improving resilience to extreme weather and other incidents would also help prevent major disruption, as seen recently, costing the industry and damaging passenger confidence.

In order to harness growth and stimulate modal shift, like in Wales, the current programme of road building should be reviewed, with priority given to improving and maintaining existing roads, rather than building more. The money saved as a result should be invested in public transport and encouraging modal shift.

Devolution and sustainable partnerships

1. ***What role does devolution have in supporting and accelerating the delivery of rail and urban transport networks and infrastructure fit for the future?***

There is an important role for devolution in delivering rail and urban transport in the future. At present, many of the devolved regions and nations are making much more progress on networks and infrastructure than HM Government. Transport for London is of course the archetype for devolved transport, demonstrating the effectiveness of permitting local decision making, accompanied by devolved funding, rather than relying on central government-driven strategies. It is encouraging to see Greater Manchester and Liverpool City Region progress their enhanced devolution agreements with moves towards bus franchising and control over suburban commuter rail.

However, devolution in itself is not a silver bullet. Local decision-making needs to be accompanied by local revenue raising powers, appropriate governance arrangements and bold leadership. On the first point, local transport authorities should be enabled and incentivised to utilise revenue raising tools at their disposal (such as Workplace Parking Levies, charging congestion or clean air zones and Mayoral transport precepts) to enable funding certainty for local transport investment. However, whether these will work depend on the other two factors. For example, in London the Mayor had the resolve to progress the implementation of the Ultra Low Emission Zone expansion as it was the right thing to do for Londoners as a whole. On the other hand, the Sustainable Transport Zone in Cambridge failed to progress beyond consultation stage because of the complicated governance arrangements that split decision-making. Another proposal that the next government should consider is central government match-funding any receive raised at the local level for transport investment for a certain period of time, to incentivise local action towards such schemes.

2. ***How can effective relationships be facilitated between all tiers of government, to help accelerate growth and deliver rail and urban transport networks and infrastructure?***

Primarily, it is important to ensure that funding for transport is in the right department in Westminster — and that the money allocated is ringfenced for the transport measure that is designed to be spent on. Most prominently, a proportion of local authorities' block grant of around £1.88 billion allocated by the Department for Levelling Up, Housing and Communities is meant for supporting local bus provision. However, because it is not ringfenced, many cash-strapped authorities often choose to reprioritise it for urgent and statutory funding needs unrelated to buses, such as social care. It is our belief that the Department for Transport or local authorities, should oversee transport funding and spending. Therefore, the proportion of the grant meant for buses should be split out and administered by the Department for Transport, ringfenced for buses. The guidance on socially and economically necessary bus services should also be strengthened so the provision of such services is a statutory requirement.

With this, long-term funding settlements are needed to ensure that relevant authorities are able to plan for the future. The most obvious example of short-term decisions affecting investment is the delay to upgrades to the Piccadilly Line after central government were slow in confirming Transport for London's latest short-term funding deal. If we are to protect our city regions and local transport bodies – certainty of funding is of critical importance. Politicisation of the debate, on all sides of the debate, is unhelpful for passengers. Long-term certainty is of critical importance to the planning and execution of these projects – whether they be administered by central government or local government. Encouragingly, the government recently introduced Local Integrated Transport Settlements (LITS) for local authorities outside of mayoral combined authorities to mirror the latter's City Region Sustainable Transport Settlements (CRSTS), but this provision is only limited to authorities in the North and Midlands as announced in Network North.

Furthermore, as we outlined in Treasury manifesto submission to the political parties, ensuring there is agreement on spending priorities cross-department is of paramount importance. Infrastructure projects, like the Elizabeth Line in London, are often calculated with an underestimated benefit cost ratio — and are not regularly reviewed following the completion of the project. The current government, and current ministers in the Treasury and Number 10, view public transport as needing to be subsidised, rather than invested in — which is of critical concern to the industry.

3. ***How can the capacity of public bodies be enhanced to effectively partner, procure and deliver urban transport and rail networks and infrastructure and provide value for money?***

A research report we did in 2021, commissioned by the Department for Transport, found local authority passenger transport teams in particular (but this is true of the wider transport departments) are short of capacity and capability to implement reforms.[12] Many teams are too small,

[12] Campaign for Better Transport (completed 2021, published 2023), National Bus Strategy: Capacity and Capability, report for Department for Transport, https://bettertransport.org.uk/research/national-bus-strategy-capacity-and-capability-july-2021/

struggle to recruit and have insufficient capacity to implement government policies, or to apply for competitive government funding pots. This is then reflected in funding allocations, with higher allocations favouring larger authorities with more experienced and knowledgeable teams.

One way to address this is to move away from competitive funding pots towards longer-term funding settlements. Another is to devolve further revenue-raising powers so they are not dependent on intermittent central government funding. In addition, government needs to invest in training more transport professionals and increasing overall capacity in the sector.

Private Sector and Industry Capacity

1. ***How can effective private sector investment be best leveraged in the long term to unlock growth?***

The outstanding success of the Elizabeth Line offers a superb example of the potential of private sector investment to unlock growth in transport projects, with two thirds of the project being funded by London businesses and future passenger revenues, including an element of Land Value Capture.

The Channel Tunnel also serves as an inspiring example of the power of private investment, being funded entirely by private capital, including funding from five major European banks. The proposals by several of the Midlands and Northern city regions to revive the scrapped legs of HS2 with private investment is a sensible and practical solution to delivering an important infrastructure project and should be encouraged and assisted by the next government.

However, rail freight and open access operators are examples of untapped potential for private sector investment. With HS2 curtailed, capacity on the West Coast Main Line remains severely constrained, restricting growth in rail freight, and preventing the applications for open access operators (which would increase competition and improve the passenger offer) on this vital corridor. Such impacts need to be considered when such important decisions are being made.

2. ***What can be done to build resilient and efficient supply chains and necessary skills to accelerate infrastructure delivery and maximise value/job creation to local communities?***

For the private sector, including supply chains to prosper, certainty and economic stability are paramount. However, these have been in short supply recently. In rail, as the Railway Industry Association made clear in a recent report, the lack of a clear rolling stock strategy or a pipeline for procurement has resulted in an extremely uneven pattern of orders for trains at UK factories.[13] This has resulted in the prospect of factories closing, supply chains broken, and jobs and communities being affected due simply to the lack of forward planning in this vital area. This need not occur. Through working with industry experts, the next government should develop a clear rolling stock and rail network investment strategy and ensure clarity is given to the supply chains.

The bus industry is currently facing a skills shortage which includes – but goes beyond – a lack of drivers. The Bus Centre of Excellence offers training and development opportunities for those in the

[13] Railway Industry Association (2023), The UK Rolling Stock Industry: Making 2023 the year of opportunity not crisis, https://www.riagb.org.uk/RIA/Newsroom/Publications%20Folder/The%20UK%20Rolling%20Stock%20Industry.aspx

bus industry, but more must be done to encourage people to consider careers in the industry, as drivers, but also in the wide range of roles which ensure bus companies and networks function on a day-to-day basis. Rail Forum has recently launched a collection of rail-themed lessons for Key Stage 3 pupils which aims to raise awareness of the vast array of careers available in the rail industry and encourage future generations of rail professionals. This should be promoted and a bus equivalent developed.

3. ***How to best harness the benefits and be adaptable to future technological trends in the sector?***

Fates and ticketing is an obvious area where technology can be harnessed for public good, and our recent report *A fare future for rail*, made a number of recommendations for reform in this area.[14]

Public transport works best when it is seamless and integrated across modes. Some large cities have integrated ticketing with season passes and capped Pay As You Go (PAYG) but many do not or the offer does not include national rail services. The next government should set a target and provide funding for all major cities and city regions to implement multi-modal smart card and contactless pay-as-you-go ticketing with capped pricing, and work towards a national, interoperable model.

Using technology to reduce fare evasion is also important to protect revenue for investment in reform. Fare evasion across Great Britain costs the railways an estimated £240 million every year. The government should work with the industry to eliminate fare evasion by making best use of tools such as ticket barriers and innovative ticketing technology. An industry-wide fraud forum already exists and should ramp up revenue protection measures across the network.

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[14] Campaign for Better Transport (2023), *A fare future for rail: a blueprint for fares and ticketing reform*, https://bettertransport.org.uk/research/a-fare-future-for-rail-a-blueprint-for-fares-and-ticketing-reform/