



Greater Manchester Combined Authority: Parliamentary Committee Call for Evidence Railways Bill Response (RB18A)

1. Introduction and Greater Manchester Context

Greater Manchester Combined Authority (GMCA) welcomes the introduction of the Railways Bill and supports the Government's ambition to reform the rail system through the establishment of Great British Railways (GBR) as a single guiding mind. This evidence builds on GMCA's submission to the Transport Select Committee and reflects Greater Manchester's long-standing position on rail reform, devolution and the integration of rail into the Bee Network¹.

Greater Manchester is a city-region of three million people and a £100 billion economy — the largest city-region outside London. The Greater Manchester Strategy sets a clear ambition for *a thriving city region where everyone can live a good life*. Achieving this ambition depends on a transport system that supports inclusive growth, enables regeneration and connects people to opportunity.

Rail is central to Greater Manchester's long-term growth. Over the past decade the city region has consistently outperformed national growth rates and is now using its Trailblazer devolution powers and a £1 billion Good Growth Fund to support the next phase of growth. However, without a phased and ambitious programme to improve the rail network, transport risks becoming a constraint on future growth.

Greater Manchester's Growth-Led Rail Vision (2025) sets out a 2050 ambition for a modern, integrated, carbon-neutral railway that supports jobs, enables new housing around stations, drives regeneration across all ten boroughs, improves access to Manchester Airport, strengthens regional connectivity and supports freight growth. Yet decades of underinvestment and fragmented governance mean the existing network is constrained, service resilience is fragile, accessibility remains poor, and decisions are often taken without sufficient regard to local economic, spatial or social priorities.

Against this backdrop, the Railways Bill represents a significant opportunity to remove long-standing structural and cultural barriers that prevent the railway from fully supporting Greater Manchester's growth and regeneration ambitions. For GM, the Bill is a key enabler for integrating rail into the Bee Network, improving accountability between national leadership and local democratic mandates, aligning rail investment with housing and regeneration priorities, and improving transparency, performance and the passenger experience at a regional level.

A place-based railway strengthens, rather than weakens national coherence - **the railway must be in service of local growth.**

2. GM's Core Position and Key Recommendations

In light of the role rail must play in supporting Greater Manchester's growth, regeneration and inclusive access, and the increasing expectations placed on Mayoral Strategic Authorities (MSAs) to plan and

¹ The Bee Network is Greater Manchester's integrated, publicly led transport system, bringing buses, local rail, tram, cycling and walking together under a single place-based network.

deliver integrated transport systems, GMCA's recommendations focus on ensuring that the Railways Bill provides the statutory clarity and certainty required to translate policy intent into practical delivery.

While the Bill represents an important step in establishing a single guiding mind for the railway, GMCA's assessment is that, as drafted, it does not yet provide the statutory framework required to support a genuinely place-based, partnership-driven railway. The duties on GBR to consult MSAs and to "have regard to" local strategies are an important step forward, but it is not clear that they provide MSAs with the clarity, consistency or a formal partnership role needed to align national and local priorities effectively. As MSAs hold statutory responsibilities for spatial planning, transport, housing and economic development, embedding a clearer, more fundamental decision-making role for local leaders is needed if the reformed railway is to truly deliver for local places and people.

Enhancing the Bill to provide a stronger statutory role for MSAs — including firm duties on GBR to co-develop its functional responsibilities with MSAs; stronger weight for Local Transport Plans (LTPs); improved regional financial and performance transparency; and a defined pathway to commissioning and devolution — would ensure the new system reflects both national and local priorities, and gives rail the stable foundations needed to support growth and public confidence.

Without this strengthened statutory role there is a risk that the Rail Strategy published by the Secretary of State is prepared in a vacuum, with no consideration of local needs. Subsequently, GBR are being required to deliver on the Secretary of State's high-level long term Rail Strategy but left to develop how this is delivered at regional and local level according to its own judgement. GBR's accountability for what it does, must be grounded in firmer democratic representation than this. MSAs are custodians of local requirements (through their statutory LTPs and democratic accountability), and the requirement to work to both these statutory processes must be more explicit both at the point of setting the Rail Strategy and delivery against it.

The Bill should be strengthened in several areas to ensure it delivers this once in a generation reform programme with the right intent, culture and ambitious change that we have seen with Shadow GBR. Presently there are sections of the Bill that are ambiguous and too open to interpretation, with vague terminology not aligning with, or underpinning how a robust MSA statutory role / partnership with GBR will work. MSAs have a key role in enabling GBR and wider reform of the railways to be successful and this should be enshrined in the Bill. These include:

- **a stronger Statutory Mayoral role** — providing the foundation for local democratic accountability, direct commissioning powers, and supporting rail financial devolution where capability and strategic need justify it.
- **strengthened statutory duties** — these are twofold: firstly requiring the SoS to refer to MSAs formally before formulating the fundamental policies, directions and plans that will set the parameters within which GBR will function, which will secondly, result in stronger requirements on GBR to work with MSAs on the development and delivery of its core functional responsibilities, such as: access and usage, long term rail strategy, financial framework

settlement, timetabling and wider performance management, as will be required for successful Mayoral Partnerships.

- **mandatory regional financial and performance transparency obligations** — providing full visibility of costs, revenue, subsidy and outcomes; requiring GBR to co-develop and agree Statement of Funds Available (SoFA) with MSAs; and ensuring GBR's Business Plan and financial reporting adopt a regional / MCA structure to support scrutiny, accountability and any future commissioning.
- **a strengthened duty on GBR and the Secretary of State to align decisions with LTPs** — including a formal role for MSAs in the determination of the Long-Term Rail Strategy (LTRS) i.e. specifying the aims of, or principles for, the LTRS, so that national plans reflect local economic, spatial, housing and transport priorities.
- **a defined statutory Pathway for Local Rail Devolution** — including mechanisms enabling local delivery of local services; licensing pathways for MSAs; and provision for local railway funding to be devolved and/or delegated to MSAs.

3. Legislative Priorities and Proposed Amendments

GM wants the Bill and its implementation to be successful: we therefore propose a set of targeted amendments to strengthen the Bill to support its operation in practice. These focus on greater statutory clarity to support partnership working between GBR and MSAs, clearer accountability for the delivery of local rail outcomes, and alignment between national rail functions and locally accountable transport, spatial and economic responsibilities.

1.1 A stronger statutory role for Mayoral Strategic Authorities

GMCA welcomes the Bill's recognition of MSAs within the statutory rail framework, including duties on GBR and the Secretary of State to consult MSAs and have regard to local strategies. This represents a step towards recognising the role of local leaders in shaping rail outcomes. However, GMCA's assessment is that, as drafted, the Bill does not yet provide MSAs, with a sufficiently clear or consistent role in shaping rail service outputs, nor a durable basis for partnership working with GBR.

Proposed amendments

- **Clause 15 (Rail Strategy)**

GMCA proposes amending Clause 15 to require the Secretary of State, when preparing or revising the rail strategy, to:

- have regard to, and aim to achieve, effective passenger and freight connectivity both between and within regions;
- have regard to the Local Transport Plans of mayoral combined authorities and mayoral combined county authorities; and
- formally consult mayoral strategic authorities.

Justification: The Long-Term Rail strategy will be a highly significant document, yet the Bill currently provides limited direction on the principles informing it. This amendment ensures that

regional connectivity, freight, and statutory local transport priorities are embedded in the strategy, and that MSAs are formally engaged as representatives of regional interests.

- **Clause 25 (Designation of railway passenger services)**

GMCA proposes amending Clause 25 to require the Secretary of State, when designating, varying or revoking the designation of railway passenger services, to:

- have regard to statutory LTPs prepared by relevant MSAs;
- consider the implications for local connectivity, access to employment, housing and regeneration priorities; and
- formally consult the relevant MSA where decisions would materially affect services operating within its area.

Justification: Decisions on service designation have significant implications for local connectivity and growth. The proposed amendment introduces a proportionate requirement for regard and consultation, ensuring that service designation decisions reflect both national objectives and local needs.

- **Clause 31 - Contracts with GBR**

GMCA proposes an amendment requiring the Secretary of State to notify and consider representations from the relevant MSA before deciding not to secure the provision of a designated passenger service within that authority's area.

Justification: This provides a basic safeguard where decisions on service provision would materially affect local areas, without constraining national decision-making.

- **Clause 33 - Fares**

GMCA proposes an amendment requiring consultation with MSAs before directions, guidance or contracts affecting fares on services operating within their areas are made.

Justification: Fare levels and structures have direct implications for affordability, integration and demand management at a local level, and should not be altered without formal local engagement.

- **Clause 81 - Duty to consult MSAs**

GMCA proposes amending Clause 81 to provide greater clarity and consistency over when consultation with MSAs is required. In particular, Clause 81 should be amended to:

- remove reliance on a wholly discretionary or subjective test as to whether consultation is appropriate; and
- specify a defined set of decisions that must trigger consultation with the relevant MSAs where they would materially affect services within its area, including changes to timetables, service frequencies (both passenger and freight), stopping patterns, capacity and fares.

Justification: This amendment provides greater certainty and consistency over when MSAs should be consulted, reducing reliance on discretionary judgement.

Taken together, these amendments would move the Bill beyond a purely consultative approach and establish a clearer, more consistent statutory role for MSAs where decisions materially affect local rail outcomes, while fully preserving national system leadership.

1.2 Strengthened statutory duties on Great British Railways, mandatory regional transparency and fair access to the network

GMCA supports the Bill's objective of establishing GBR as the single guiding mind for the railway. However, GMCA's assessment is that, as drafted, the Bill does not yet provide a sufficiently robust statutory framework to ensure that national rail decision-making is consistently informed by, and accountable to, place-based priorities where these materially affect local rail outcomes.

Given the statutory responsibilities held by MSAs for transport, spatial planning, housing and economic development, GMCA considers that the Bill should place clearer duties on GBR to work in partnership with MSAs in the exercise of its core functions. This must be supported by mandatory transparency over costs, revenues, subsidy and performance at a regional level, and by safeguards to ensure fair treatment of local and regional passenger services within the access and charging framework.

Proposed amendments

- Clause 5 - General duties of GBR**

GMCA proposes amending Clause 5 to require GBR, in the exercise of its statutory functions, to work jointly and in partnership with relevant MSAs in relation to the development and delivery of:

- rail strategy and long-term planning;
- access and use of the network insofar as it affects local and regional passenger services;
- service specification, timetabling and performance management for local and regional services;
- fares, ticketing and customer experience on services operating within MSA areas; and
- the financial framework for rail services where this relates to services secured, funded or co-funded by an MSA.

Justification: Strengthening this clause would embed partnership working as a core operational principle, improve alignment between national rail decisions and locally accountable priorities, and reduce reliance on informal or discretionary engagement. It is also vital to ensure the right culture and behaviours are embedded from board room to train.

- Schedule 2, Paragraph 2 - Annual report and accounts**

GMCA proposes amending Schedule 2, paragraph 2 to require GBR's annual report and accounts to include mandatory regional and MSA-level reporting, covering:

- operating costs, revenues and subsidy disaggregated on a regional and MSA basis;
- performance information for passenger services presented at a regional and MSA level, including reliability, punctuality and service delivery outcomes; and

- sufficient narrative explanation to enable scrutiny of how financial inputs and performance outcomes vary between regions.

Justification: National-level reporting alone does not provide sufficient transparency to support regional accountability or scrutiny. This amendment would ensure that Parliament, MSAs and passengers can understand how resources and performance vary across the network, and whether taxpayer money is being spent effectively.

- **Clause 65 - Business plan**

GMCA proposes an amendment requiring GBR's business plan to:

- adopt a regional or MSA-based structure for relevant sections; and
- set out how investment and service decisions align with LTPs and regional priorities.

Justification: Strengthening Clause 65 in this way ensures that decisions on funding, services and performance are transparent at a local level, supports informed decision-making and accountability, and provides a practical link between national rail and place-based delivery.

- **Clauses 59 and 66 – Access and use decisions and ministerial directions**

GMCA proposes amending Clauses 59 and 66 to require GBR and the Secretary of State, when preparing the Access and Use Policy or issuing directions or guidance relating to network access, to:

- have regard to the impacts of such decisions on local and regional passenger services; and
- consult relevant MSAs where decisions or directions materially affect their areas.

Justification: Without clear statutory requirements to consider local impacts and engage affected MSAs, there is a risk that access decisions or directions are taken without sufficient regard to the consequences for locally important passenger services.

- **Clause 64 – Access and use charging safeguards**

GM proposes amending Clause 64 to ensure that railway passenger services secured, funded or commissioned by an MSA or Mayoral Combined County Authority are not subject to higher access and use charges than other comparable passenger services.

Justification: This amendment ensures fair and consistent treatment of locally secured passenger services within the national charging framework, while preserving GBR's ability to manage network access, efficiency and cost recovery at a system-wide level.

- **Clause 72 - Access and Use Policy**

GMCA proposes amending Clause 72 to require the Access and Use Policy to:

- explicitly recognise the importance of local and regional passenger services, particularly in dense urban areas;
- set out the principles and methodology by which competing demands between long-distance, freight and local passenger services will be balanced; and
- require formal consultation with relevant MSAs where the preparation or revision of the Access and Use Policy materially affects local or regional passenger services.

Justification: Strengthening Clause 72 in this manner would ensure greater transparency in how access decisions are made, provide clarity on how competing priorities are balanced, and embed place-based input into decisions with significant local consequences, while preserving GBR's responsibility for managing the network in the national interest.

- **Clause 73 - Directions and guidance on access**

Amend Clause 73 to require the Secretary of State, when issuing directions or guidance to GBR in relation to network access, to:

- have regard to the impact of such directions or guidance on local and regional passenger services; and
- consult relevant MSAs where directions or guidance would materially affect their areas.

Justification: This amendment provides additional assurance that access decisions consider local service implications, without constraining the Secretary of State's ability to manage the network in the national interest.

Taken together, these amendments ensure that decisions on rail services, funding and performance that materially affect local areas can be scrutinised by democratically accountable local leaders, rather than relying on informal engagement or discretionary processes. This provides clearer accountability, supports more transparent and predictable decision-making, and strengthens the practical implementation of the reformed rail system while maintaining national coherence.

1.3 Stronger statutory alignment with Local Transport Plans

GMCA considers that the Railways Bill should provide a clearer statutory link between national rail decision-making and statutory LTPs prepared by MSAs. LTPs set out how transport will support economic growth, housing delivery, decarbonisation and social inclusion, and rail is integral to achieving these outcomes.

While the Bill introduces duties on the Secretary of State and GBR to have regard to local strategies, GMCA's assessment is that, as drafted, these provisions do not yet provide sufficient assurance that national rail strategy and long-term investment decisions will be consistently aligned with locally accountable transport and spatial priorities. Without clearer statutory alignment, there is a risk that national rail decisions are taken without sufficient regard to the wider policy framework within which MSAs are required to plan and deliver growth.

Proposed amendments

- **Clause 16 (Long-Term Rail Strategy)**

GMCA proposes amending Clause 16 to require the Long-Term Rail Strategy to:

- have regard to statutory LTPs prepared by MSAs and mayoral combined county authorities; and
- set out how national rail priorities, investment choices and service objectives align such plans

Justification: The Long-Term Rail Strategy will shape rail investment and service priorities over multiple control periods. Given the statutory role of MSAs in preparing LTPs, stronger alignment is necessary to ensure that national rail strategy supports locally accountable objectives for growth, housing delivery, decarbonisation and connectivity.

1.4 Statutory mechanisms to enable local rail delivery and devolution

GMCA considers that, in addition to strengthening partnership working, transparency and strategic alignment, the Railways Bill should include clearer statutory mechanisms to enable local rail delivery and support future devolution where capability, readiness and value for money are demonstrated. As drafted, the Bill does not provide a sufficiently defined framework to support the evolution of local roles in rail in a consistent and transparent way.

Proposed amendment

- **New statutory provision: Pathway for local rail devolution**

GMCA proposes the inclusion of a statutory mechanism enabling MSAs to submit proposals for enhanced roles in rail delivery, including full devolution of funding, or asset responsibilities, where capability and readiness are demonstrated.

Justification: A defined statutory pathway would provide a transparent and evidence-based process for considering proposals for local rail devolution, reduce reliance on informal arrangements, and allow for phased and proportionate evolution of local roles without requiring further primary legislation.

- **Clause 24 - Memorandum of Understanding**

GMCA proposes amendments to Clause 24 to require a statutory Memorandum of Understanding (MoU) between the Secretary of State and each MSA, setting out agreed arrangements for governance, partnership working, information sharing and integration of rail services.

Justification: A statutory MoU would provide greater clarity and consistency in how national and local bodies work together in practice, supporting more effective delivery and reducing reliance on informal or discretionary arrangements.

- **Clause 28 - Exemption of designation**

GMCA proposes amendments to Clause 28 to enable MSAs to propose specific railway passenger services to be exempt from designation.

Justification: The proposed amendment introduces a proportionate, transparent process for considering exemptions, while preserving the Secretary of State's discretion and maintaining the integrity of the national system.

- **New statutory provision: Transfer of railway assets**

GMCA proposes the inclusion of a statutory power enabling the transfer of railway assets from GBR to an MSA, where agreed.

Justification: Asset transfer powers would support local delivery, integration with the wider transport network and rail-led regeneration, while appropriate safeguards would ensure protection of network integrity and value.

While the new Right to Request (RTR) guidance gives Mayoral Combined Authorities the ability to seek devolution of services and assets such as stations, the stringent criteria and multiple tests make local rail devolution highly challenging. Moreover, the guidance explicitly rules out financial devolution. RTR should be a mechanism for progress, not a set of hurdles — it risks becoming a 'Right to Refuse' rather than a genuine 'Right to Request'.

Taken together, these amendments would provide a coherent and practical statutory framework to support place-based rail delivery and managed devolution over time, while maintaining a nationally coherent railway.

GMCA would welcome the opportunity to continue working constructively with Government and the Parliamentary Bill Committee as the Bill progresses, including through sharing detailed technical amendments for the above clauses and having further engagement on those to support the Bill's effective design and implementation.

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