Following conversations between Trainline and Stonehaven, including Head of Transport Policy Michael Dnes and senior advisor Marianna Panizza, this proposal proposes how Stonehaven can help Trainline create a stable, open market for public transport tickets with a technological solution that can deliver government’s goals better. The proposal sets out how Trainline can make the case for creating a new integrated national ticketing platform that can:

* Lock in fair dealing, with an open-to-all market under industry leadership
* Provide a joined up ticketing and other better services to passengers
* Be more comprehensive and faster to introduce than a centrally-mandated approach
* Provide solutions at speed so that politicians can use the transport network to drive economic growth and win support

In order to reach this goal, a combination of policy, voter insights, economic modelling and advocacy campaigning expertise will be required – all of which Stonehaven is able to support you with. Stonehaven can also help orchestrate the setup of the steps necessary for delivery.



A way through for Trainline alongside the GBR App

A campaign for an Integrated Ticketing Platform

Michael Dnes, July 2025

# Context

Strategic uncertainty about the future of rail ticketing poses a serious risk to Trainline. While government has said that it wishes to maintain a competitive market for rail ticketing, the Government has been clear on its aspiration to create a GBR single retailing platform whose market position risks undermining other competitors.

This is happening at the same time as government’s wider ambitions on integrated ticketing across the rest of the transport network are high, and rising in political prominence thanks to thanks to promises by metro mayors such as Andy Burnham to create integrated ticketing in their areas. As currently envisaged these carry a degree of technical risk, such as creating bespoke, non-interoperable systems in the manner of Oyster; and create interoperability issues when franchises are passed from one operator to another.

These two positions do not add up – one a deepening of modal silos, the other founded upon broadening them out. As things stand, the government’s current position drifts towards a fragmented market where rail ticketing is in the hands of an institution that takes its customers for granted. This is a lost opportunity to improve services to the customer, achieve commercial efficiency, and remove barriers to policy goals. Handled right, it can also grow the economy and improve the prospects of politicians – especially metro mayors – ahead of a difficult political cycle.

# Changing the discussion

Government has already committed to developing a single ticketing platform via GBR and is unlikely to change its mind. However, there is a route for Trainline to retain its competitive market position if it can successfully promote an alternative that:

1. Serves the public better by delivering full integration of ticketing, not only for rail but for a full range of public and shared transport options;
2. Leaves space for the GBR app and for local mayoral approaches, supercharging their capabilities in the process;
3. Reduces costs on government and avoids risks for implementing the promised system; and
4. Delivers results before the 2028 mayoral elections

Our proposal is that Trainline spearheads a push for the creation of an integrated national ticketing platform, modelled on the National Parking Platform (see below), covering rail ticketing, bus, coach, micromobility and more. This gives access to not only GBR, but Trainline and other ticketing apps on an equal basis. It also means opportunities to deliver mayoral ticketing visions and enable other new, integrated services.

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| the National Parking Platform   * In 2021, government funded Manchester City Council to begin a four-site pilot of a system – the National Parking Platform – that connected together different parking apps to allow them to pay for the same site. This rested on a new data standard called APDS, which allowed the interchange of parking information in a consistent format. * Crucially – the NPP does not lock people or places into a particular app. Instead, it offers a level playing field where all participants can offer the same parking to their users on similar terms. This increases the utility of existing apps and opens the market to new entrants. * By May 2024, ten local authorities serving 4 million people were on the system, with payments possible via all the market-leading apps and full real-time integration with enforcement officers. This was despite a wide range of equipment and payment styles being available on the ground. * In May 2025, government passed responsibility over to an industry partnership, who will now oversee the system and scale it up to national operations. |

This may be a uniquely productive time to create an integrated ticketing system. In addition to a strong political appetite for action, experience from setting up the National Parking Platform gives precedents for solving many of the organisational questions in a way government has found acceptable. We know that in technical terms the two crucial things that make the model possible are a) a technical standard for exchanging ticketing information and b) business arrangements ensuring the correct reconciliation of payments across the sector – both of which can be developed from the NPP.

## How the ticketing platform would work

An integrated national ticketing platform would join up multiple parts of the public transport system through a common data language.

* Those selling tickets using the platform (service providers) can all sell tickets for any service provided by a participating transport provider.
* The platform passes on information about valid tickets to enforcement operators, ticket gates, etc; and keeps a record of what each service provider owes each transport operator.
* Outstanding payments are periodically reconciled, with the platform offering consolidating billing to service providers and ensuring that payments are made in full.

A consequence of this structuring of the market is that it also enables new arrangements and products that span across modal silos. For example, it becomes a much simpler matter to implement a multimodal fare cap in a city (provided a division of fare income can be agreed amongst participants), or to sell the kinds of capacity needed to make a Mobility as a Service package work. It also makes it much easier to ensure interoperability of equipment.

User interface and payment issues continue to be handled by service providers, leaving them in full ownership of the customer relationship, and fully responsible for providing a service that users wish to use.

## What is needed

The technical questions are understood, and broadly tractable. But in order to succeed, the model must achieve two critical stakeholder agreements:

1. There must be a broad industry consensus that this is the right answer. This requires the assembly of a coalition of the willing; and also a method to turn that consensus into action.
2. It also needs government cooperation, which is made harder by plans for a standalone GBR app for ticketing. Government must be convinced that the plan will not impede its own plans, and instead will increase the benefits with more certainty and fewer costs and risks.

The structure of the NPP showed ways to meet these needs. The heart of the system is that it is a common platform, shared between all service providers and transport operators – so a private company, a GBR app, a transport operator, a city’s travel app or more can all work on common terms. **This means that there is no scope for discrimination between participants, locking in fair dealing.** It also provides more functionality: each new feature of the platform is automatically shared with existing participants – meaning that an organisation selling rail tickets will automatically gain the ability to sell bus tickets as well when a bus provider comes on the system. So rather than providing access to a small silo of transport services, the integrated national ticketing platform gives access to the whole transport market in one go.

More specifically, individual players benefit as follows:

* GBR’s app is easier to set up, and offers connections to other transport modes that otherwise won’t exist
* Government’s vision for smooth integrated ticketing is delivered faster, providing better customer service and encouraging more public transport use
* Metro mayors are able to deliver new joined-up ticketing systems ahead of the 2028 mayoral elections
* Public sector players outsource the technical risk and cost to industry, while industry gets a guarantee of an open market and smooth interoperability of equipment
* Everyone has more opportunities to grow their business, whether an established entity or a new player.

This case can be made through a detailed model for bringing the approach of the NPP to public/shared transport, and a high-level business case to capture the full range of benefits.

# Delivery plan

The overall objective for Trainline through this proposal is:

Restore stability to the ticketing landscape, and create more opportunities for future growth

In order to achieve this we propose three key phases of activity between July-November. We have assumed Trainline would be the funder for phase 1, but that costs in subsequent phases could be spread across a wider alliance.

Phase 1: Creating a credible proposition

1a) Creating a core of support - policy and campaign development

1b) Building the business case

Establish the central reason why an integrated national ticketing platform makes sense, through core materials and initial outreach to likely allies to build an initial support group – in particular other transport ticket-sellers; transport operators (existing rail companies; bus companies; micromobility providers); and tech and payment companies more generally (e.g. Google, Visa). In parallel, build a business case to provide the most compelling case for industry and government to back the platform.

We recommend supporting this with economic modelling. In particular, we recommend demonstrating the economic value of the approach through an agglomeration model for a major city – calculating the likely gains to GVA, productivity benefits and reduced subsidy requirements from increasing the use of public transport, which can then be articulated in terms of user savings and rises in wages. We think this adds substantial value to the approach. However we could alternatively support the case for action through a literature review, reducing the programme cost.

Phase 2: Building sector consensus

Building a visible, politically powerful coalition of support for the integrated transport solution - underpinned by an engagement programme with ministers, officials, Metro Mayors and integrated transport authorities - to win widespread backing to the use of an integrated national ticketing platform.

The campaign would centre on positioning integrated ticketing as a better product which delivers tangible wins for Metro Mayors ahead of their 2028 elections. This should be particularly appealing to smaller mayoralities, who will struggle to deliver this service on their own. This will create a powerful coalition of regional leaders who can credibly advocate upward to national government. The narrative would emphasise how the platform enables mayors to deliver transport integration and new ticketing arrangements without the technical risk or cost burden of developing bespoke systems. This creates political pressure on DfT ministers both to support the platform and to drive forward rapid integration, to serve wider political goals.

Parallel to the mayoral strategy, we'd build visible industry consensus through a carefully choreographed sequence of sector endorsements - starting with passenger groups and accessibility advocates, then transport operators, technology providers. The key is demonstrating that this isn't Trainline protecting its commercial interests, but the entire industry coalescing around a pragmatic solution that delivers government's policy objectives faster and cheaper than a centrally-mandated approach.

We'd aim to begin this process around Party Conference season and other headline events as momentum builds toward the INTS publication. The aim being to ensure ministers consider the final INTS package with this identified as a clear political win, and an opportunity for them to take the credit for a material improvement in system capability.

Phase 3: Securing government endorsement

Turning general sectoral support for an integrated platform into an endorsement in the INTS. This centres on a joint letter from industry to the government, showing a strong level of support for an NPP-style model to deliver the entirety of the government’s integrated ticketing vision. This would culminate in the publication of the INTS with a commitment to the creation of the integrated national ticketing platform.

# Budget and timelines

Please find below an indicative budget for Phase 1 of the programme of work between Jul-Nov. We will work with you to refine the scope forward and adjust costs accordingly.

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| ACTIVITY | DELIVERABLES | FEE (EXCL. VAT) |
| Phase 1a: Creating a core of support | * Initial policy and proposition pack developed * Campaign development and planning * Early outreach to key allies (4-5 bilateral meetings) | £40,000 |
| Phase 1b: Building the business case | * Strategic case for a platform * Economic modelling to support policy report and case (ridership impacts; productivity impacts) * Operational outline * Outline ownership model & development model | £75,000  descoping economic modelling would reduce cost by £20k |
| Phase 2: Building sector consensus | * Interim findings launch support * 2-3 industry workshops * 8-10 bilateral meetings (1hr) * Party conference presentation / standalone round-table | £50,000  potentially shared |
| Phase 3: Government endorsement | * Media launch of policy/proposal report * Engagement of key DfT directors and ministers * Secure position for INTS | £40,000  potentially shared |
|  | Phase 1 (assumed one funder)  Phases 2+ (potentially shared) | £115,000  £90,000 |

Please note that this does not include technical development work for the platform itself. Stonehaven can initiate this if there is a wish to do so.

# Your team

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|  | Michael Dnes  Head of Transport Policy  Michael spent 18 years working at the Department for Transport, including two years as Head of Future Roads Technology. His last role was to create the National Parking Platform, taking it from a two-authority pilot to a national operation with 280 members queued to join. He is still closely involved with ongoing efforts to make the NPP a success. |
| A person in a suit and tie  AI-generated content may be incorrect. | CHRIS LOY  Director, Transport and Infrastructure  Chris has 15 years’ experience across the agency, corporate and public sectors, on challenges ranging from the high-profile Heathrow expansion campaign, to crisis communications responses to the COVID-19 pandemic and national disasters, grassroots campaigns, and efforts to promote UN-backed deforestation schemes. Today he heads up our Transport and Infrastructure Team. Prior to Stonehaven, Chris worked at Heathrow Airport, where he was Head of Reputation and Campaigns and digital lead for their high-profile expansion campaign. Chris also led on their Crisis Communications protocols and team. Originally from Australia, Chris worked as a senior press officer for the award-winning Queensland Police Service Media & Public Affairs team prior to moving to the UK. |
|  | MARIANNA PANIZZA  Senior Advisor  Marianna is a strategic communications and engagement specialist with deep expertise in policy and reputation campaigning for complex organisations, including the Rail Delivery Group where she was Director of Communications from 2020-2023. She co-wrote [Easier Fares for All](https://www.raildeliverygroup.com/files/Publications/2019-02_easier_fares_for_all.pdf) on behalf of RDG, setting out a pathway towards fares simplification for the railway, and spearheaded the successful effort to fund real-world testing of the vision. Previous senior roles include reputation turnaround campaigns for rail, and driving Heathrow’s successful third runway campaign. |
|  | BEN SAVOURS  Senior Economist  Ben is a senior economist focussing on making the case for infrastructure investments and better housing policy. He previously worked for the engineering consultancy Arup providing cost benefit analysis for transport, energy and infrastructure investments to unlock government funding and planning permissions. Since joining Public First two years ago he has worked on behalf of clients including Uber, the Home Builders Federation (HBF) and Water UK. |

# Case study

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| UBER | |
| PROJECT GOAL | To establish supportive regulatory conditions that drive electric vehicle uptake and charging infrastructure development across London. |
| PROBLEM | London was a global leader on the uptake of Electric Vehicles, with EVs accounting for more than a third of new cars being registered by mid-2024 and the city playing host to 30% of the UK’s public charging points. However, momentum was slowing and an end to the Cleaner Vehicle Discount in the Congestion Charge Zone – scheduled for Christmas Day 2025 – risked stalling, and even reversing the progress being made. |
| STRATEGY | With Uber’s commercial goal of going fully electric by the end of 2025, they commissioned us to write a report outlining what was needed to move London from a successful ‘Generation One’ of EV policy aimed at early adopters to a ‘Generation Two’ focused on average users.  We began with a series of seven focus groups with residents, small business owners and drivers, and nearly twenty stakeholder interviews with experts from across the sector. Alongside this, our economics team worked with Uber’s economics team to model new data on the effects of an end to the CVD. Our report outlined three recommendations – maintain city-level incentives; ensure equal access to affordable charging; and make EVs affordable for all.  Launched in May 2025, the report was sent to key stakeholders across London and industry, resulting in a series of meetings, follow-ups and roundtables. It also formed a central part of the Evening Standard’s *Leading the Charge* campaign which used our report as the bedrock. A second phase of work has been signed off which is focused on building an ‘Electric London’ coalition ahead of local elections in London in May 2026. |
| OUTCOME | Only a few weeks after the report was launched, TfL launched a consultation on the future of the Congestion Charge Zone in central London. This consultation is currently live until August 2025, and we are helping not only Uber coordinate their own response, but multiple players from across the industry who we are drawing in to the Electric London coalition. |