

SRTA RESPONSE TO SOUTHEASTERN FRANCHISE CONSULTATION

Introduction

The Sevenoaks Rail Travellers Association welcome the opportunity to respond to the Public Consultation on the 2018 South Eastern Rail Franchise “Shaping the Future”.

The Sevenoaks Rail Travellers Association represents commuters and other rail users from the Sevenoaks area. We represent the stations of Sevenoaks, Dunton Green, Bat & Ball, Otford, Shoreham, Eynsford, Kemsing and Borough Green. The area generates 5.5m passenger journeys a year, with substantial growth coming from new developments at Dunton Green and, in the future, Fort Halstead. The area is on the boundary of the London Rail Area and so both mainline and metro trains are important services to many of our members as part of their journeys to work in the London area. Many of these also involve the use of TfL services to reach their destinations. The Sevenoaks area is currently served by Southeastern and Thameslink train operating companies, who have vied with one another to come bottom in successive independent customer satisfaction surveys.

This response to the consultation is compiled from the views of our members and supporters, including comments on draft sections posted on our award-winning website, emails about issues with Southeastern, articles and responses to articles on our website, and debate at our Annual General Meeting in October 2016 (at which DfT spoke to outline the issues for the new franchise and invite comments). It also expands on earlier discussions with DfT about the new franchise in the summer of 2016.

To help the Department we have structured our response under the headings of the specific consultation questions.

We would be delighted to expand as necessary on these proposals and to play an active role in the specification and management of the new franchise.

1. Do our priorities correctly reflect your views?

1.1 The priorities for the next franchise need to include meeting the capacity challenge to 2024 and initiating necessary investment and other steps that will address the further capacity challenge between 2024 and 2044. Paragraph 5.4 of the consultation paper implies that increasing demand is only an issue in relation to Greater London and High Speed routes. This is incorrect: there is also an impending capacity crisis on mainline services.

1.2 The West Kent part of the mainline route already generates a very significant share of Southeastern’s business – with Tonbridge (4.3m passenger journeys), Sevenoaks (4.1m) and Tunbridge Wells (3.8m) stations being the three busiest individual stations in Kent. The Network Rail Kent Area Route Study [1] shows that

by 2023 a 15% increase in demand is expected on mainline services and that by 2043 demand is expected to have increased by 47% compared to current levels.

1.3 The Study also states that on the Tonbridge route an additional 20 vehicles are required by 2024. Network Rail state that this cannot be accommodated by train lengthening alone and that higher density rolling stock would not be acceptable on these longer distance (and premium priced) routes. Network Rail also say that “beyond 2024, a strategy for providing additional capacity for Kent services is far more challenging. It points out (5.11.3) that there are multiple bottleneck points on the route, including the two-track section between Orpington and Tonbridge. It also points out that the pedestrian flows will also be challenging at a number of stations if additional services or units with higher passenger capacity were able to run.

1.4 Priority must also be given to introducing a new, more effective, franchise and management model. The conventional franchise model has not delivered, and cannot deliver, the improvements sought. It has lost the confidence of customers. A key problem is (perhaps unlike long distance inter-urban operators) Southeastern are a monopoly service provider to a largely captive market of commuters. The company are therefore incentivised to maximise profits by cutting costs, increasing non-regulated fares, and reducing customer service as far as possible within the franchise framework. **It is essential that:**

- **the performance and management framework aligns the interests of the franchisee and its shareholders with the interests of its customers**
- **there should be a supervisory board including genuine and effective representation of local authorities and of customers themselves.**

1.5 It is essential to ensure that the new franchise is under strategic local control and that the franchisee is required to be responsive to local needs and policies expressed through local democratic institutions. A further issue for South East London and Kent is that the rail service is not an end in itself but a vital component for enabling economic growth and sustainable population increase. In the franchise model it is unrealistic to hold the franchisee accountable for these wider issues. However there is no strategic oversight locally accountable for these issues in South East London and the commuter areas of Kent as there is in other parts of the London area (including services for London-based workers living outside Greater London itself). The January 2016 Prospectus envisaged not only strategic oversight of South East London services by the Mayor of London but also a greater role for Kent, East Sussex and Medway Councils in oversight of rail services in their area.

1.6 Apart from these points, we consider that the priorities stated in paragraph 5.4 broadly reflect our views and those of our members on the necessary outcomes.

[1] <https://www.networkrail.co.uk/wp-content/uploads/2016/12/Kent-Route-Study-Draft-for-Consultation.pdf>

2. Do you agree that more space is needed for passengers at the busiest times of the day?

2.1 It is essential that more capacity, in the form of additional seating, is provided on services from Sevenoaks to London starting immediately. There has been significant crowding on services from Sevenoaks for many years especially on services to Cannon Street, eg see Kent RUS Jan 2010. Nothing has changed since then. The recent Network Rail study notes the absence of growth potential without infrastructure investment on the twin track section between Orpington and Tonbridge and fails to suggest any solution that would create sufficient extra capacity for the post-2024 period. Section 3.12 of the Consultation document re-iterates the 2010 finding when it notes that “overcapacity” occurs at Sevenoaks on inbound services. Standing is already common on peak hour services departing between 0630 and 0830. Given that the journey time from Sevenoaks even to London Bridge is in excess of 20 minutes the DfT PIXC guidelines [1] would indicate the need for more “seats” not just more “space”.

2.2 It is also important that investment and other work is initiated to address the potential mainline capacity crisis after 2024, and the franchisee is required to facilitate the necessary infrastructure and rolling stock investment programmes.

[1]

<http://webarchive.nationalarchives.gov.uk/20100415103316/http://www.dft.gov.uk/foi/responses/2006/mar/congestiontrains/nicaldefinitionofexcessp2790.pdf>

3. What comments, if any, do you have on options for providing more space through:

a) Longer trains

3.1 Infrastructure and rolling stock investment, as recommended by Network Rail, is urgently required to create additional capacity to meet current demand and the additional demand expected by 2024. Most peak trains are already 12 car and hence of maximum length. The only exception are some semi-fast services to/from Tunbridge Wells that are currently provided by 465/9 units. These units are likely to be needed to lengthen Metro services. They also have a maximum speed of 75mph thus extending journey times on the mainline for all services. However replacing these by 375/377 stock in 12 car formations does not actually add many extra seats which, as noted above, are required for the journey times involved.

b) Metro style carriages with larger entrances and more standing room and handholds?

3.2 Increasing the numbers standing for over 20 minutes on Mainline services should not even be an option. Doing so would exacerbate the existing breaches of the DfT PIXC guidelines.

3.3 Rolling stock with longitudinal seating would be unsuitable for the 50-60 minute metro journeys from Sevenoaks to London. On Metro services to/from Sevenoaks new Metro style rolling stock would be a significant improvement over the outdated 465 stock. The new Thameslink 700 series stock has been regarded as an improvement locally. But longitudinal seating would be unacceptable.

4. Would you support removing First Class seating on the busiest routes to provide more space?

4.1 The premise of the question is largely flawed. First class seats are provided only on mainline services. It is mainly used by passengers who wish to increase their likelihood of obtaining a seat. Ending first class seating would add no additional capacity on 375 stock which use the same seats and seat layout in both first and standard classes but would allow more efficient use of available seating by allowing currently empty First Class seats to be used. In the small number of 465/9 units a very small number (possibly just 4 seats per four car unit) would be added.

4.2 Withdrawal of first class must not result in higher fares for standard class passengers to recoup this lost revenue. Southeastern have told us that about £5m extra revenue a year is gained from first class season ticket holders.

4.3 Seating should be provided for all customers travelling over 20 minutes, whatever class they are using. Given the difficulty of getting a Standard Class seat on mainline services from Sevenoaks in the morning peak some of our members feel forced to buy a First Class ticket. This option will become increasingly important as passenger growth further out in Kent means that even more Standard Class seats will be taken by customers boarding south of Sevenoaks.

4.4 There must be more flexibility to allow unused First Class seats to be used by the standing passengers who most need them – for example pregnant women and those with priority needs. Those members wanting to end First Class are not so much concerned about “equality” issues as the fact that First Class seats often remain empty when many Standard Class passengers are standing. Currently not even holders of Priority Passes and “Baby On Board” badges can use empty First Class seats, and they are regularly forced to stand up again by guards if they do [1]. Although in theory guards can declassify First Class on crowded trains or use their discretion to allow others to sit this is left to individual guards without clear guidance; in practice it is rarely done.

4.5 First Class seats vacant on a segment between London Bridge and the first country stop in each direction should automatically be available to others after departure. This would allow any First Class ticket holders to take their seats and then any spare seats could be used by standing passengers.

[1] <http://srta.org.uk/wp/posts/1465>

5. What comments, if any, do you have on our plans to improve customer service and the overall passenger experience?

5.1 In his introduction to the consultation document the Secretary of State says “Passengers rightly expect to be treated as individuals and for staff to be able to respond quickly and effectively to their needs”. **We strongly support this aspiration.**

5.2 **However no details are given of DfT’s “plans” for improving customer service are given and so it is not possible to comment upon them.**

5.3 **We do not accept DfT’s assertion (page 19) that improving customer service is a “challenge”.** It is certainly necessary. But many other private sector companies and many other public services provide good services. Just because it seems to have been too challenging for Southeastern does not mean that it should be regarded as impossible to achieve.

5.4 **The basis of the operation of the franchise should be the principle that customers come first.** Incentives and penalties need to relate to the customer experience. Perverse incentives to improve measured performance by lessening customer experience (such as “station skipping” to reduce knock-on delay effects on Public Performance Measure scores) need to be eliminated.

5.5 Additionally we do agree with DfT that **action is needed in all the specific areas listed:** journey planning, ticket purchase, on-board experience, provision of information before, during and after the journey, communication during disruption, dealing with complaints and providing compensation when things go wrong.

Journey Planning

5.6 Major improvements are needed in the information available to plan journeys. This includes:

- **The abolition of obscure and opaque terms like “Any Permitted Route”.** If the average customer cannot work out whether her ticket is valid the system is simply too complex and too biased in the operator’s favour.
- **The ability to plan mixed mode journeys from end to end –** including bus segments as well as rail segments.
- **Proactive, free, alerts before leaving home if there is disruption affecting the journey.**

Ticket purchase

5.7 Please see response to Question 8.

On-Board experience

5.8 **All trains should be clean at the start of the day.** There is regular evidence of failures by Southeastern in overnight routine train cleaning.

5.9 More rubbish bins should be provided on class 375/377 stock, and all rubbish bins should be emptied with sufficient frequency. While class 465 stock has four rubbish bins per door pair, class 375 has only one bin.

5.10 More frequent toilet emptying and faster toilet repair; all train toilets should be working at the start of the day. To save money, Southeastern have told us that they only empty toilets every three days or so, and only repair toilets when the rolling stock is scheduled to be in a depot. This does not routinely happen every night and it is unacceptable for toilets to be kept out of action in this way.

5.11 Improved accessibility, including same-height carriage entrances and station platforms.

5.12 More provision should be made for the storage of folding bicycles, folded pushchairs and suitcases. Overhead racks are currently inadequate for these purposes and placing luggage storage at the end of carriages rather than near exits means they are often inaccessible to passengers during peak services. This leads to further congestion in doorways.

Provision of information before, during and after the journey

5.13 The new franchisee's website should be required to give accurate, up to date information orientated to the needs of customers. Southeastern's website fails to provide the information that customers need in the form that they need it. For instance, of the three forms of assistance available to pregnant women, two are on separate pages and one is not mentioned on the website at all. This shows a lack of customer focus. In addition some website pages are inaccurate, misleading and do not align with the needs of customers.

5.14 The provision of information should be regarded as a core part of the service included in the ticket price, and should not be treated as an opportunity to raise extra revenue. So:

- **All 0845 and similar Service Charge telephone enquiry numbers used by passengers should be ceased.** Customers using these numbers now have to pay both an Access Charge to their service provider and a Service Charge to Southeastern or their agent. To redirect callers **a telco-provided Changed Number Announcement should be given; this is free to the caller.**
- **All signage, posters, publicity material, websites, recorded announcements and staff manuals should be updated in a permanent manner to remove all references to 0845 and other Service Charge numbers.**
- **SMS alerts should be free of charge.**

Communication during disruption

5.15 Southeastern have failed to make a noticeable improvement in this area over the period of their franchises. Customers can still get better information from each other and from Twitter; different Southeastern staff give different explanations; giving

on-train and on-station information about disruption depends on the individual inclination of the staff involved rather than corporate standards; and information about diversion of services is patchy and often unrealistically late. It is not as though Southeastern have not had enough disruption to practice on. Therefore it is key that:

- **customers are given accurate, up to date and actionable information.**
- **customer communication needs to be given priority among the franchisee's management team and in the control room.** Customer communication is as important as getting the trains back on time.
- until this problem is solved, **communication during each major disruption should be reviewed, actions identified and relentlessly pursued.** To ensure an effective pressure to improve **each disruption review and the actions to be taken should be published.**
- **Information should be tailored to the passengers' needs.** They should not include "railway jargon" or vague terms like "**Delayed**".

Dealing with complaints

5.16 Southeastern have demonstrated the lack of importance they attach to customer service and complaints by contracting the function out to a remote agency. Responses to complaints are usually bland boiler-plate text, and we have some examples where the agent did not even bother to read the original complaint. While statistics are sent to the company, and some high-level figures are published, there is no evidence that Southeastern use complaints as a driver of continuous improvement. Indeed when they established a "customer panel" they deliberately chose not to even read the complaints there.

5.17 Therefore:

- **The new franchisee should be required to show how complaints will be used to drive improvement, and to provide evidence showing how this has been done.**
- To improve transparency and to create a pressure to improve, **complaints should be published as reusable data, with personal details removed** unless the complainant requests otherwise.
- **There should be an independent "Southeastern Ombudsman"** to whom complainants can refer their issue if unsatisfied with the response and who has a right of access to all information held by the franchisee (including commercial information). In addition to making recommendations on individual complaints **the Ombudsman should be able to undertake general investigations and make general recommendations.** This role could be achieved by giving investigatory powers and additional resources to Transport Focus and London Travelwatch: despite their good work neither of these two bodies currently have powers to require information from operators or to make binding determinations.

5.18 The process of dealing with complaints needs to be improved. In particular:

- **there should be a maximum waiting time of 30 seconds for an agent to answer from the customer service centre.**

- **Passengers should not have to pay to complain.** All Customer Service telephone lines should have 080 numbers so that they are free of charge to the caller.
- **it should be possible to file a complaint by email.** Use of a webform is very difficult when on a train or on a mobile device. (The necessary technology to receive emails and automatically insert them into a CRM system workflow has been available for many years.)
- **a substantive response should be provided within one day** (rather than 10 days, often missed, currently).
- where follow-up action is required (for instance repairing a light at a station or a toilet on a train) **the complainant should be informed when the action has been taken and asked to verify that the problem has been resolved.** Currently Southeastern do not provide feedback or use their customers as their agents on the ground (see Question 20(a) below).
- **If the complainant is dissatisfied with the response they should be able to go to an independent Ombudsman** (see above)

Providing compensation when things go wrong

5.19 **There should be stronger incentives on the new franchisee to deliver the service correctly.** While compensation for extra expenses is essential, Southeastern present the availability of compensation as an excuse to fail to deliver the service correctly in the first place. There is no evidence that “Delay-Repay” has been effective as an incentive on the train company to improve their performance and that of their suppliers, including Network Rail. **It should never be cheaper to pay compensation than do it right in the first place.**

5.20 **The new franchisee should be required to ensure that any Schedule 8 payments received are either paid on in compensation to customers or reinvested in specific measures to improve performance in the future.** Part of the reason that Delay-Repay has not been an incentive to improve performance is that the amounts paid out in Delay-Repay are very substantially less (£2.3m in 2015-16) than the amounts paid to Southeastern by Network Rail in Schedule 8 payments (£18.3m). The difference (£15.9m) is retained as extra profit by Southeastern.

5.21 Moreover claims for compensation are bureaucratic and time-consuming to make and often denied on spurious grounds. Intervention by passenger groups such as local rail travellers associations and Transport Focus is needed more often than it should. It is suggested that:

- **Compensation claims that the franchisee intends to refuse in total or in part should be subject to (genuinely) independent adjudication and the franchisee should be bound by the result.**
- **The full set of rights under the Consumer Rights Act 2015 should be available.**
- **Payment of a successful claim of compensation should be accompanied by an ex-gratia payment to cover administrative and other expenses by the complainant.**
- **Compensation should always be available as a financial transfer (rather than a voucher for future rail travel).**

- **As Oyster and other smartcard fare payment are introduced, payment of compensation for delays should be automatic.**

5.22 In addition to Delay Repay for serious delays, annual and monthly season ticket holders should get a refund of a percentage (5%-10%) of their ticket price if right-time performance is below an agreed threshold during the period of their ticket. While the Delay-Repay scheme has been generally welcomed by customers, it is aimed at redressing major delays on occasional journeys. It does not compensate regular commuters for chronic delays less than 30 minutes (15 minutes in the new franchise). It should be possible to automate the payment of this refund since the relevant customer and ticket data is collected as part of the ticket issuing process.

6. Do you have any other ideas or priorities for improving customer service?

6.1 Improving the at-station experience should be added to the list of priorities for customer service improvement. The most significant omission from DfT's list is the "at-station experience". This is often the most dismal part of the journey, especially at unstaffed station and those with few waiting amenities. It is also often the most stressful part of the journey, with uncertainty about when the train will arrive and the lack of information. For specific recommendations, please see Question 9 below.

7. What changes to the fares structure would be of benefit to you?

7.1 The new franchisee should be required to accept any nationally agreed fare reform measures. We welcome the inclusion of fares structure in the consultation. It is widely recognised that the existing national fare system is too complex and needs a thorough revision. Therefore we were disappointed to hear at the stakeholder consultation meeting in Maidstone that it would be too difficult to pursue wider fare reform as part of an individual franchise; there is a converse risk that it could also be too difficult to implement national fare reform once a local franchise are in place.

7.2 In accordance with this guidance, we have focus our attention on fare structure changes that affect only journeys within the Southeastern franchise area. (It is unavoidable that they would also affect the limited number of Thameslink routes in the same area.)

7.3 The Transport for London Oyster/Contactless system should be extended to Dunton Green and Sevenoaks and be usable on mainline, metro and Thameslink services. Oyster was extended to Dartford and to Swanley in the 2014 Direct Award and, like them, Sevenoaks and Dunton Green are in the statutory London Rail Area. As paragraph 5.3 of the Consultation Document notes, "passengers within Greater London and beyond view their journey as part of the 'wider London transport system'" and want better interchange with TfL services. Most Sevenoaks rail users travel to London and onward within London on TfL services, so Oyster would give end-to-end integrated fares, immediate access to Pay-As-You-Go, and a guarantee of the lowest fare for the end-to-end journey actually made. Passengers using TfL Oyster would not need to buy tickets for each journey, and so

it would significantly lessen queuing times to buy tickets at Sevenoaks station, to the benefit both of Oyster users and of other passengers. As with the TfL network, it would also improve revenue collection. The TfL system could be quickly deployed.

7.4 By contrast the recently introduced “Key” SEFT smartcard is only currently scoped to provide season tickets and is still suffering teething problems even in this limited mode; and while the RDG ticketing strategy might provide some Pay-As-You-Go service in the future there is no immediate prospect of this and it is understood that this will be a rail-only product, so still requiring passengers to buy separate TfL tickets or a “Travelcard” product.

7.5 It is understood that the extension of Oyster to Sevenoaks is well within the capacity of the current TfL system and infrastructure. It could be implemented by a zonal fare for Dunton Green and a special fare point for Sevenoaks so that it was interoperable on metro, mainline and Thameslink services (as has been done for Watford). It could make sense for the Darenth Valley Line stations between Swanley and Sevenoaks (Eynsford, Shoreham, Otford and Bat & Ball) also to be brought within the Oyster system; these stations are operated by Southeastern and are served by Thameslink trains from Sevenoaks via Swanley to London.

7.6 The new franchisee should provide part-time and flexible commuters with daily tickets priced at season-ticket rates and usable on the days required.

Paragraph 5.3 of the Consultation Document states that part-time season tickets are widely desired. In Kent there is a changing demographic of commuters needing to access services, and working families with flexible work patterns should not be priced out of a career working in London. However the current season ticket structure does not reflect the variety of modern, flexible, working patterns. In particular those who commute three times a week pay nearly the same as those who commute five times a week, even though their income may be lower. This is not only inequitable but constitutes discrimination against those whose caring responsibilities mean that they are unable to commute five days a week. Moreover it provides no incentive or recognition for others to move to more flexible working patterns, even though if passengers generally reduced the number of days that they travel this would free some capacity on the existing system and infrastructure, and so reduce the urgency of further investment beyond the 12-car standard already planned (and, in the case of Sevenoaks morning peak services, already the norm). Part-time season tickets was de-scoped from SEFT in 2014 [2] but other TOCs have implemented these innovations without smart-cards. It is important that part-time season tickets for non-contiguous days are priced at the same effective daily rate as season tickets for contiguous days. For instance a carnet of 10 daily tickets usable within a month, with a scratch-card or write-in space for date of travel (to prevent fraud) and each day ticket priced at 1/5th of a weekly season could be an attractive solution that would be easy to implement without advanced technology or delay.

7.7 The new franchisee should introduce one-month period returns from Sevenoaks area stations to London. The return ticket structure from Sevenoaks to London strongly disadvantages customers who do not return the same day, and these Sevenoaks area passengers suffer disadvantages that neither passengers nearer to London nor further from Sevenoaks face. For Sevenoaks returning the next day means buying two single tickets which, in the offpeak period, are each only 10p less than a day return ticket. Period (one-month) returns to London are not available.

Within Greater London the Oyster system provides single fares priced at half a return, whereas from Tonbridge and further out in Kent a period (one-month) return is available.

7.8 Farringdon and St Pancras should be added to the set of permissible London Terminals. Although they are important destinations from Sevenoaks (and will be more so once the Elizabeth Line opens) Farringdon and St Pancras are not “London Terminals” for Sevenoaks area ticketing purposes [3]. Special tickets to these specific stations have to be purchased: not only is there an extra 10p on the fare but the tickets do not have the flexibility to be used to start or finish journeys at “London Terminals” which are not on a direct route to St Pancras. This causes customer confusion and the possibility of penalty fares for very little legitimate revenue gain. The marginal lost revenue should be recovered in the general uprating of London Terminals fares.

7.9 Over no more than the first five years of the franchise the HS1 element of fares on classic routes should be phased out completely. For a number of years the Southeastern franchise had special fare increases of RPI+3% (rather than RPI+1% for other TOCs at the time) to finance the construction of HS1. These special fare increases were cumulative and became part of the baseline; as a result approximately 13% of current classic-route fares is the HS1 charge. Now that HS1 is built and customers using HS1 are charged a premium for doing so, charging customers on classic routes for HS1 costs is unnecessary and unfair.

7.10 The new franchisee should be required to lower Kent mainline fares to a level comparable with similar journeys on other TOCs serving London. Fares on the ‘classic’ Kent mainline are significantly higher than comparable services on other London commuter franchises. For instance the fare per mile from Sevenoaks to London is up to 39% more [1] than comparable services in distance and frequency from Reigate or Redhill on Southern. The difference is only partially explained by the HS1 charge and it is not clear whether the additional element is profiteering or lack of cost control by the current Southeastern operator.

7.11 Promotional fares should not expire at midnight. A common standard should be used for validity times for the start and end of offpeak and other discounted tickets.

[1] <http://srta.org.uk/wp/posts/415> quoting Sevenoaks Chronicle.

[2] <https://www.nao.org.uk/report/investigation-into-the-south-east-flexible-ticketing-programme/>

[3] <http://srta.org.uk/wp/posts/1208>

8. What else could be done to improve the way tickets are sold and provided?

General

8.1 The new franchisee should be under a contractual obligation to meet the existing national standard that customers should not have to queue for more than five minutes at peak times (3 minutes off-peak) to purchase tickets. This does not seem to have been enforced against Southeastern, where queues of 10 minutes or more are common-place. This is now more important since a “Buy Before You Board” policy has been introduced to remove the option of buying a discounted ticket on the train. **Customers who have had to wait more than the standard time should receive a 50% discount on their ticket price** (and this should count against franchisee profits).

8.2 There should be for each ticket a single web page with authoritative information about all limitations on the ticket, including routing, validity code, refundability and other factors; and customers should be able to obtain an immediate printout of the specific information related to their ticket on request at any ticket office and view it by entering a code at any TVM. Terms, conditions and limitations of tickets are hard for the customer to establish. Physical constraints mean that it is not possible to print clear, definitive, information on tickets.

8.3 Terms like “Any Permitted Route” or “Valid As Advertised” should not be used: they just beg the question of what is permitted and valid routes are sometimes disputed by poorly trained Southeastern ticket inspectors. Although some tickets now have a link to a National Rail webpage for their validity code, it does not cover other limitations.

Ticket Vending Machines

8.4 The software and user experience on the current Ticket Vending Machines (TVMs) are not fit for purpose.

8.5 The new franchisee should be under the same obligation to sell the cheapest ticket for the journey through a TVM as they already are for tickets sold through a ticket office. ORR research [1] has shown that TVMs sell 20% of customers an inappropriate ticket, overcharging 13% of customers and selling 7% of customers an invalid ticket for the journey that they are taking. The cheapest fares can be hard to find, and are not prioritised. There is additional evidence [2] that the screen order may be designed to actively mislead. customers.

8.6 The new franchisee should make the price promise suggested by ORR, and allow the promise to be redeemed through a simple process with reimbursement within 5 working days. ORR have called for a “price promise” that refunds overcharges, and this would be a good “long stop” if customers find out that they have been overcharged. But it can be a burdensome and time-consuming process to recover the overcharge from the TOC.

8.7 The new franchisee should be under a contractual commitment and penalties to ensure that 99% of TVM users are sold the cheapest ticket for their

journey. This will incentivise better TVM design, better customer information and other methods to reach this goal.

8.8 The new franchisee should allow tickets, including off-peak tickets, to be bought through a TVM at any time up to fourteen days in advance. TVMs do not currently allow tickets to be bought in advance – in particular same-day off-peak fares are deliberately not sold until very shortly before the departure of the first off-peak train. This is defended as a customer protection to stop the customer purchasing a ticket that will not be immediately valid. But this has never made much sense since a ticket can be bought earlier at the ticket office, and now that tickets can be bought in advance online and collected from the TVM in advance, it makes even less sense. If needed for off-peak tickets a prominent warning could be given to the customer that they are not valid until a given time (this should be technologically easy to achieve).

8.9 The new franchisee should allow tickets starting at any of its stations to be bought from a TVM at any other station on its network. TVMs do not currently allow tickets to be bought for journeys other than ones starting at the location of the TVM. So, for instance, it is not possible to buy a ticket from Sevenoaks to London and then a ticket from London onward to another destination in cases where a combined ticket with a break of journey would not be allowed.

8.10 Each station should have a minimum of two TVMs, at least half of which should also accept cash. The smaller stations in the Sevenoaks area are unmanned and have just one credit-card-only TVM installed. This means that it is impossible to buy a ticket if the TVM is out of order, as they regularly are, or if the customer only has cash. This is now even more important because of the new Buy-Before-You-Board policy.

8.11 Where 50% or more of a station's TVMs are out of order, the franchisee should open additional ticket office windows and/or deploy extra staff with hand-held ticket machines to sell tickets within one hour. This should apply equally to staffed and unstaffed stations.

[1] http://orr.gov.uk/__data/assets/pdf_file/0018/24048/ticket-vending-machines-review-february-2017.pdf

[2] <https://medium.com/@dannyyjeremiah/the-great-train-fare-robbery-db595aa7005b>

Websites

8.12 Online purchases of tickets is less attractive than it should be, and many risks under the control of Southeastern are simply transferred to the customer.

8.13 All tickets bought online should be immediately refundable online without penalty up to the point that they are used or collected. While ticket purchase is online, ticket refunds have not been modernised in parallel. It is not currently possible to cancel a ticket purchase, even if the ticket has not been used or collected.

8.14 All tickets bought on line for collection at stations should be collectable at any station on the franchisee's network. Currently tickets purchased online must be collected from the station nominated at time of purchase. This station cannot currently be changed. So if the TVM at the nominated station is out of order or the customer's plans change then the tickets cannot be collected. This can mean that the customer pays for the same journey twice. This should apply both to the collection of paper tickets and the loading of season tickets onto a Key smart-card.

8.15 There should be the option to print tickets at home or to load them onto a smartphone at home. The online channel still requires tickets to be collected at stations. This is time-consuming and can, as already noted, be difficult to achieve. For those customers with the facilities to do so, they should be able to print at home tickets that are valid for travel without needing any additional action at stations.

Ticket Offices

8.16 No closure of ticket offices or reductions in their opening hours or staffing levels should be permitted until it has been shown that alternative channels meet the stated requirements. The consultation paper states "Ticket buying habits are changing with more people purchasing from ticket machines and increasingly on smart media rather than purchasing at the station ticket office". However neither TVMs nor websites are yet able to meet the stated requirements of "provid[ing] passengers with widespread and easy access to the full range of tickets" and "ensure that [passengers] have all the information they need to select and purchase the most appropriate ticket for their journey". In reality we consider that the complexity of the current ticket system is so great (even the Southeastern Twitter team regularly give incorrect advice!) that ticket offices will continue to be needed unless and until the ticket system is replaced by an automatic fare payment system that guarantees that the customer only pays the minimum fare for the journey they actually made. This is one of the many advantages of the TfL Oyster/Contactless system for Sevenoaks.

9. What further comments, if any, do you have on our plans to improve access and facilities at stations?

Staffing

9.1 **All stations should be staffed**, and staff there should be able to sell tickets and give customer information and assistance. As noted below, this would also allow a “turn up and go” provision for assisted travel.

Toilets

9.2 **All stations should have free of charge toilets that are open throughout the hours of rail service.** Toilets are frequently closed from early in the evening (2000 at Sevenoaks) even though the station is still staffed.

Station Maintenance

9.3 **There should be a minimum standard for fault-fixing at stations, including a standard of “within 24 hours” for problems with lighting, toilets, doors, lifts and other frequently used items.** Station maintenance issues, including safety and security issues like lighting, are regularly ignored by Southeastern for months on end, especially at small and unstaffed stations. Toilets can also be out of action for months [1]. Although local staff are supposed to inspect stations daily, we understand this only happens when staff have no other duties to perform. The franchisee should be financially incentivised to meet these standards.

Car Parking

9.4 The operation of car parks has been sub-contracted by Southeastern in ways that reduce accountability and have poor customer service. So:

- **car parks should be a clear franchisee responsibility. The car parks and the payment collection should be clearly branded only in the identity of the franchisee.**
- **all customer communications, including customer service lines, complaints and appeals, should be via the franchisee’s main customer service channel and handled in an integrated fashion.**

9.5 Southeastern have recently removed the facility to pay cash (and the ticket payment machines altogether) at some stations. There was no consultation on this. Alternative methods of payment involve extra charges (either a transaction fee or use of a chargeable telephone number). Offering station payment only by phone is unacceptable because not everyone has a bank card plus a mobile phone, some areas lack usable mobile signals, and many stations do not have nearby payphones. Different car parks have different ranges of payment methods available. So:

- **all car parks should have the same range of methods of payment available throughout the network**
- **all car parks should have the option of purchasing a ticket at the car park allowing both the use of cash and a credit/debit card.**

- **car parking should have the same cost to the customer whichever channel is used to purchase it. There should be no transaction fees or use of chargeable telephone numbers.**
- **car parks should operate on a “Can’t Pay, Don’t Pay” principle: if the ticket machine is out of order then car parking should be free that day.** (Currently customers are given a penalty even if they were unable to pay because of the fault of the operator.)

9.6 Southeastern’s system of appeals against car parking penalties is unjust: the liability to pay continues despite an appeal, paying the penalty removes the right to appeal, and the appeal service is not independent. So:

- **Payment of a penalty and the increase in amount of the Charge Notice should be suspended from the time an appeal is submitted to the time that it is resolved.**
- **Payment of a penalty should still allow an appeal to be made, and previous payment should not affect the outcome.**
- **The appeal service should be independent of the franchisee, the car park sub-contractor and the rail industry.**

[1] <http://srta.org.uk/wp/posts/2562#comment-1231>

10. What more could be done to improve access and provide facilities for those with disabilities or additional needs?

10.1 The stations at Dunton Green, Bat & Ball, Shoreham and Eynsford should be made fully accessible. Smaller stations in the Sevenoaks area have only one accessible platform and the other platform can only be reached via a footbridge with stairs. Yet at each of the four stations listed there is unused land at the side of the inaccessible platform that could be used to construct a ramp to the public road.

10.2 The new franchisee should offer a ‘turn up and go’ assisted travel service at all staffed stations and at all station served by trains with on-board supervisors. While Southeastern have recently reduced the required notice for assisted travel from 24 hours to 12 hours they still recommend 24 hours’ notice. However this still disadvantages people with disabilities.

10.3 In the longer term the re-introduction of staffing at all stations would allow this service to be extended, as well as the other advantages of station staffing including a reduction in fare evasion and customer safety and security.

11. How far do you support, or oppose, the extension of High Speed services from London St. Pancras to Hastings, Bexhill, and Rye, where this would represent value for money to the taxpayer?

11.1 We support the extension of the HS1 route to Hastings (and Bexhill subject to the issues discussed in the Kent Route Study). The journey time improvements are significant and straightforward, and are significantly more than could be delivered by reducing stops on the classic line to Tunbridge Wells (where the single-track sections mean that trains may skip stops only to wait at signals). We note the suggestion in the Kent Route Study that this service could be provided by bi-mode IEP trains, which would very significantly reduce the infrastructure investment required.

11.2 The extension of HS1 would create much-needed genuine additional capacity on the classic line from Robertsbridge through Tunbridge Wells, Tonbridge and Sevenoaks. The importance of HS1 to Hasting for Sevenoaks is that capacity on the classic line is inherently constrained, and will be increasingly insufficient after 2024. Providing a fast service from Hastings to London via HS1 would remove peak hour ridership from the classic line (not just at Hastings but also at St Leonards and possibly as far north as Battle).

12. How far do you support, or oppose, reducing journey times to key destinations in Kent and East Sussex, by reducing stops at less well used intermediate stations to create hourly fast services?

12.1 We would support the principle of reducing journey times, but only if there is a genuine balance of the interests of all users of the services.

12.2 In peak periods maximum use must be made of all peak capacity even if this means retaining existing journey times and stops. While it might appear beneficial to reduce journey times for longer distance travellers, a return to the former situation of running trains with significant numbers of empty seats through stations with large numbers of commuters awaiting a following service that is consistently overcrowded is not acceptable.

12.3 In offpeak periods service frequency should be given priority over journey times. Transport Focus research showed that, for mainline customers, journey times were important but service frequency was more important. It follows that improving journey times at the expense of service frequency would be contrary to the views expressed by customers as a whole.

12.4 There should be consideration of other options, such as using shorter and perhaps more frequent trains on the Tonbridge to East Kent segments to provide 15 minute interval “feeder” services to HS1 at Ashford and to full mainline services at Tonbridge. There remains a problem of using full-length mainline trains to provide lightly-loaded segments of service to East Kent and the South Coast. This is an inefficient use of assets that could be used to provide more

and better services elsewhere. So we consider that re-designed timetable and rolling stock pattern might be able to offer more frequent services and similar journey times while improving the overall utilisation of the available capacity.

13. If you support this proposal, which services do you think would most benefit from this approach?

13.1 As suggested above, **shorter services between Tonbridge and Ashford could be developed as feeder services to HS1 at Ashford and classic mainline services at Tonbridge.** This could also apply to services beyond Ashford in east Kent.

14. Which journeys do you make today which are difficult?

a) By rail?

14.1 **Access to Docklands** – London has seen a major shift of employment from the City to Docklands. For commuters from West Kent no change has been made to transport infrastructure to reflect this. The only feasible route is via the heavily overcrowded Jubilee line changing at London Bridge. **We strongly support plans for a major new interchange in the Lewisham area connecting to the DLR and the Bakerloo Line Extension to increase travel options for West Kent.**

b) By road, which would be easier by rail?

14.2 **Access to/from Gatwick Airport.** Our region suffers from noise pollution from flights to/from Gatwick and pollution from motor vehicles; yet Kent is the only county in South East England without a through train service to Gatwick airport (or any other international airport). This generates large numbers of polluting road journeys from this area. The journey is only 30 miles. Although it is possible to reach Gatwick by train it is only possible either with two changes via Tonbridge and Redhill or with one change via London Bridge. Neither is attractive, especially with luggage. **A frequent semi-fast service to Gatwick would address this issue.**

15. Which additional services would you wish to see provided in the next franchise?

15.1 A frequent semi fast service to/from Gatwick. Alternate services should run from Canterbury via Ashford and Tonbridge to Gatwick airport and from Stroud (for Medway towns) via Maidstone West and Tonbridge to Gatwick airport. This service pattern would give good connectivity to many of the principal population centres in Kent, and would be better than a simple Ashford-Tonbridge-Gatwick service. For Sevenoaks there would be good connectivity via Tonbridge.

15.2 A night service on the Charing Cross to Tunbridge Wells main line running at hourly intervals in each direction calling at Orpington, Sevenoaks, Tonbridge and Tunbridge Wells. London is increasingly a 24-hour city and customers need to be able to get to and from work around the clock, in addition to being able to come home later from entertainment in London. The line is operational for freight, these stations are already staffed on a 24 hour basis and the rolling stock is available. Night trains would also serve to help keep the lines free of ice and snow in winter (cf the review of the freezing conditions in February 2016) – it seems silly to run empty trains for this purpose when they could be carrying fare-paying customers.

16. How far do you support, or oppose, options to simplify the timetable?

16.1 We support timetable simplification that gives regular, clockface, services with the same number of services overall. Transport Focus research showed that, for mainline customers, journey times were important but service frequency was more important. The interval between fast offpeak trains on the Tonbridge via Sevenoaks to London line should be evened out to a standard 10 minutes, rather than varying between 5 and 15 minutes each hour.

17. How far do you support, or oppose, the choice of central London destinations served from individual stations

17.1 We would oppose anything which lengthens the already very long end-to-end journey times on South East mainline. We do not consider that changing the current distribution of mainline trains between Charing Cross and Cannon Street destinations would give significant improvement in reliability and would not justify the extra journey time of those passengers who wished to go to their original destination. In many cases Sevenoaks rail users have moved to the area in the expectation of fast train services to a particular London station.

17.2 An increase in interchange between Charing Cross and Cannon Street services at London Bridge is not an option. While the rebuilt London Bridge offers a better experience to customers starting or ending their journeys there, the time to change to/from Southeastern services at the new London Bridge is much longer than in the old station due to the length of the escalators/staircase, their lack of peak capacity, and the lack of segregation of terminal and interchange customers (in contrast to the old station design).

18. How far do you support, or oppose, plans for the train operator and Network Rail to form a close alliance with the aim of reducing delays and improving performance?

18.1 We support the principle that the franchisee and Network Rail should work closely together to reduce delays and improve performance.

18.2 However some elements of such an alliance already exist and have not resulted in resolving the chronic performance malaise on Southeastern. For instance there already is an Integrated Control Room and a “Galaxy” performance analysis and root cause identification tool. We are wary of purely “organisational” solutions to the problems of Southeastern; in most other environments they sap management energy and can increase bureaucracy, and we fear that the rail industry will be no different.

18.3 Very significant improvements could be made by each party addressing its shortcomings without an overarching “alliance”. The “Galaxy” performance analysis [1] has given both Network Rail and Southeastern a clear view of the underlying causes of poor performance, and there do not seem to be many performance issues where joint action is needed.

18.4 What is needed is carefully designed incentives for each to behave in ways that benefit rail travellers, including but not limited to working together where necessary. We share the scepticism of respected rail industry figures that an ‘alliance’ between the train operator and Network Rail will actually solve the problems. These are companies with very different business models, timescales and capital commitments. Sticking them together will not resolve their differences in objectives.

[1] <http://srta.org.uk/wp/posts/2471>

19. What are your views on how this alliance should be incentivised and held to account for its performance?

19.1 The current structure of incentives is misaligned with the real needs of customers and creates perverse incentives that adversely affect the customer experience. For instance:

- The Public Performance Measure (and the newer Right Time Measure) measure the performance of trains. Trains are given the same weight in the measures whether they are empty or full, and whether they are in the peaks or off-peaks.
- The Public Performance Measure (and the Right Time Measure) measure only the time of trains at their final destination. This leads to timetable “padding” on the final segment. For instance while timetable times from Charing Cross to Waterloo East are usually 3 minutes timetable times from Waterloo East are between 6 and 9 minutes – and trains usually only take 3 minutes for the journey.

- There is evidence that Southeastern have increased the amount of “station skipping” and short finishes to prevent knock-on delays and PPM penalties to subsequent services. While this practice improves headline PPM scores it has a real impact on customer inconvenience.
- The Schedule 8 payments mean that the poorer the Network Rail performance the more money Southeastern get. In the circumstances of Southeastern these payments do not make much sense: they are a monopoly provider to a captive market and so poor performance does not significantly affect fare box revenue and they have no interest in the long term value of the franchise beyond their current contract.
- Compensation (in the form of Schedule 8 payments) received by Southeastern in 2015-16 was £18.3m whereas the amount of compensation they paid to customers was only £2.3m. It cannot be right that Southeastern, rather than passengers, are the prime beneficiary of Network Rail compensation for passenger delay.

19.2 So we suggest as follows.

19.3 Performance measures should measure the experience of customers, not the experience of trains. So train-based delay measures need to be weighted by the numbers of customers on each segment of the journey, along the lines of TfL’s “Lost Customer Hours” measure.

19.4 All passenger compensation including Delay-Repay should be borne by the franchisee, wherever the cause. This would create an incentive for the franchisee to work with Network Rail to improve infrastructure reliability, for instance by making lines available for preventive maintenance (cf the major incident at New Cross in the evening peak on 23 November 2016 where a safety-critical repair had not been made because Network Rail could not get the necessary possession from Southeastern at a quiet time).

19.5 Schedule 8 payments should not be paid to the franchisee; instead they should be put into a ring-fenced fund for investment in performance improvement jointly controlled by the franchisee and Network Rail. While it would be more straightforward simply to abolish Schedule 8 payments and retain the money within Network Rail that approach would not ensure that money was re-cycled into performance improvements.

19.6 Compensation to passengers should be at a level that makes it cheaper for the franchisee to deliver the service correctly in the first place. Currently the Delay-Repay system does not provide a strong enough economic incentive on the operators.

20. How would you prefer the next South Eastern operator to engage with you:

(a) As an individual?

20.1 The new franchisee must treat their customers not only as the people who ultimately pay their salaries but also as their agents on the ground and a valuable resource for ideas for improvement. Southeastern often seem to treat individual customers as a cross between criminals and cattle. The company is secretive and does not engage its customers or demonstrate that they are considered to be valuable. The approach to fare enforcement is that the customer is a criminal – whereas TfL’s approach is “to help the customer pay the correct fare” (and TfL have been more effective in reducing fare evasion as a result). Suggestions for improvement of services from customers are often treated as “not invented here” and offers of help have been ignored.

20.2 The new franchisee must use a range of traditional and modern channels to reach and engage with their customers, and to co-create services with them. Southeastern established an online “customer panel” of 750 customers but did not interact with its members at all [1]. The new franchisee should be subject to outcome-related metrics for customer engagement.

20.3 The new franchisee must be prepared to engage constructively, including on Twitter and other social media, and accept and respond to robust criticism with facts and explanation. Southeastern initially made good progress in the use of Twitter, using it for active engagement (for instance “Tweet The Manager” sessions). However latterly they have withdrawn from active engagement and have seen Twitter as a broadcast channel and for individual travel enquiries. Customers are evidently frustrated by this change. **The franchisee must take delivery of comments and complaints through the channel the customer choose, not force the customer to submit the complaint again.**

[1] <http://srta.org.uk/wp/posts/1720>

(b) As an organisation (if appropriate)?

20.4 The new franchisee should have an active programme of stakeholder engagement including the sharing of detailed information and the use of stakeholders for co-creation of solutions to customer issues. Southeastern have had a good programme of engagement with stakeholder groups. However these have tended to be the provision of information and answering questions. The other TOC with whom we work (Thameslink) have a more active programme including using stakeholder groups as a resource for co-creation of solutions and sharing more information to enable stakeholder groups to explain developments to their stakeholders.

20.5 The new franchisee should be required to have a general “duty to consult” with stakeholders on any changes affecting customers. Many important decisions have been taken by Southeastern without consultation – in recent months the introduction of the Buy-Before-You-Board policy (with only

undiscounted fares available on trains) and the removal of cash ticket machines in some station car parks. Southeastern's analysis, decision making and communication would have been improved by early and thorough consultation with local stakeholders beforehand.

20.6 The new franchisee should be required to have a general “duty to provide information”. Despite promises of transparency Southeastern still do not regularly share information that enables stakeholders to be “critical friends” and to help co-create better customer service. Indeed information formerly supplied, such as “How Busy Is Your Train”, is now withheld. While there can be some commercial sensitivities, since the franchisee is effectively a monopoly provider and that there would be an equality of information to bidders for a future franchise, this concern is overstated. While as a private company it could be inappropriate to make the franchisee legally subject to the Freedom of Information Act, they should have a similar obligation to provide information in relation to the public service they provide and in relation to the public-facing functions of their business.

21. What approaches to customer service in other companies could be adopted by the next South Eastern train operator?

21.1 The new franchisee should look widely at other companies and be strongly incentivised to adopt best customer service practice from elsewhere. Some such practices are given in the rest of this response under the specific questions asked, but additional and more general approaches would include as follows.

21.2 A fare system and enforcement model designed at helping the customer pay the right fare (as on TfL) rather than penalising them. TfL's approach is a simpler system so customer do not have so many chances to make genuine mistakes; staffing all stations with well trained staff not only to help customers but to discourage fare evasion; and an automatic maximum fare but one that is easily waived (in a single phone call) for genuine and occasional mistakes. Perhaps surprisingly this approach results in a lower level of fare evasion than on Southeastern, and by giving innocent customers the benefit of the doubt and by only penalising those who have clearly and deliberately evaded, has a large measure of customer support. As part of this approach and to create the right incentives **income from fare enforcement should be recycled for customer service improvement rather than retained as extra profit by the franchisee.**

21.3 Automatic delay compensation on a minute by minute basis as implemented by c2c.

21.4 Delay compensation for season ticket holders at the same level as occasional travellers as implemented by Chiltern.

21.5 Staffing at all stations as implemented by TfL. This would improve fare compliance, improve station security, and provide on-the-spot assistance to customers with disabilities and other mobility issues.

21.6 Carnet tickets for flexible and part time workers as implemented by Chiltern.

22. Where do you think private sector investment would be of most benefit to the railway?

22.1 It is not clear that other private sector actors would want to invest in the railway without strong incentives and high returns, which ultimately would be at a further cost to taxpayers or customers. Ultimately all investment in the railway needs to be recovered from the farebox or from the taxpayer. Since private sector borrowing rates are higher than the Government private sector investment is not necessarily beneficial to customers.

22.2 We do not consider that a longer franchise would incentivise more investment by the franchisee. By 2018 Southeastern will have had the franchise for 12 years and it is not clear that they have invested significantly in the railway: most of the claimed “investments” such as train and station refurbishment were merely dealing with accumulated lack of routine maintenance or required periodic refurbishments. We understand that there is a mechanism in the current franchise for the exiting franchisee to cover residual value from investments that have been made, but it appears that this has not been a sufficient incentive for Southeastern to make real investments over 12 years.

22.3 We consider that other factors and risks, such as poor performance and poor customer service, can ultimately only be managed on commuter franchises by having relatively short franchise periods (such as 5 years) in order that the franchisee faces the real prospect of losing the business when renewal become due.

22.4 Further consideration should be given to private sector investment in stations, with provisions to ensure a good experience to rail users as well as better returns on assets. We do consider that there is a possibility of changing the model on stations and car parks. The current model, where Network Rail own the asset and the franchisee manages it during the period of the short-term, militates against timely asset maintenance and fault repair, and does not give a financial structure in which longer-term investment can be made in the properties. Paradoxically Network Rail-managed stations seem to be better at exploiting the opportunities by targeted investment (such as in retail facilities) than Southeastern-managed ones. A greater role for the non-rail private sector could lead to the expansion of stations as retail and leisure hubs, investment in additional car parking through decking (at Sevenoaks it is the District Council that have invested in their car park, not the railway in theirs) and better utilisation of land for housing and employment.

23. Should we consider using the more lightly used sections of the railway in a different way? If so, how should this be done?

23.1 While there are some lightly used sections of the railway and lightly used stations they often provide essential connectivity for their communities, and are important as feeders to busier sections. It is important that DfT do not make the same mistake on this as the Beeching Report!

23.2 That having been said, there are opportunities to change train services to give better and more cost-effective feeder services to and from less heavily used stations. See our response to Questions 12 and 13.

24. Looking to future, beyond this franchise, what, if any, benefits do you consider there would be for passengers from a franchise with a different geographical boundary?

24.1 **The Kent Integrated Franchise should be split into three separate, more manageable, more clearly focused, franchises: South East London Metro, Kent Mainlines and HS1.**

24.2 Most successful operators focus on doing one job: they run urban metro services (Overground), longer distance commuter services (Chiltern or c2c). or long distance inter-urban express services (Virgin). They don't use the same management system on a mixture of urban commuters, long distance commuters and inter-urban services like South Eastern, Southern or GTR.

24.3 It is also recognized that large franchises are more difficult to run and to oversee, and that the consolidation of a wide range of services into GTR was a mistake. The same applies to the "Integrated Kent Franchise" that covers London-area metro services, Kent mainline services and HS1 services. The proposed devolution to TfL would not just have brought different oversight of the franchisee but the ability for metro and mainline services to develop in different ways related to the needs of their specific customers. It is also not clear that combining HS1 and mainline services into a single franchise allows the sort of service differentiation and fare competition that would allow the economic and social value of the different infrastructures and capacities of the two systems to be maximized.

24.4 Splitting the Integrated Kent Franchise into distinct and distinctive parts could, as suggested in paragraph 6.22 of the consultation, new, more innovative, more agile and more focused operators to enter the market.

Sevenoaks Rail Travellers Association
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