

## South Eastern Rail franchise consultation

### Response by Campaign for Better Transport

May 2017

1. Do our priorities correctly reflect your views?

There are three omissions.

Firstly, value for money is the number one issue for rail passengers, according to Transport Focus (<https://www.transportfocus.org.uk/news-events-media/news/rail-passengers-priorities-a-manifesto-for-improvement/>). However, this is not mentioned in the consultation document priorities. In the recent weeks, passengers have been angry at South Eastern raising off-peak rail fares just before the holiday period begins, making it more expensive to have a day out at the Kent seaside or elsewhere. We would like the next franchise to prioritise keeping travel rail affordable.

Secondly, we were surprised that improving the station environment is not listed as a priority. All journeys begin and end at stations and as it's the last thing people experience as part of their journey, the experience stays with people and colours their experience of the whole journey and of rail travel generally. Especially when journeys are disrupted, passengers can end up spending hours every year at a station and so how pleasant or unpleasant it is makes a real difference.

Finally, there is no mention of passenger representation. Passengers have deep experiential knowledge about what is needed on the line and how it is working. In line with the ethos 'Nothing about us without us', we would like a deeper level of passenger involvement, beyond just 'engagement'. A supervisory board, involving regular South Eastern passengers as well as local authority representatives, would truly 'put the passenger at the heart of the railway', in the words of various transport ministers.

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

Yes, although more space is only one aspect of dealing with overcrowding. There are some lessons to be learnt from how Transport for London (TfL) dealt with transport crowding during the 2012 Olympics and Paralympics (<http://www.railway-technology.com/features/featurecrowd-control-during-london->

olympic-summer/). Having plenty of visible, informed and helpful staff makes a big difference.

In addition, South Eastern used to provide information in poster format showing with a 'traffic-light' system how busy different trains were, so those with some flexibility on their train time could make informed choices about their departure (as London Midland still offer). We support re-introducing these posters at stations across the route.

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

- a) Longer trains; and
- b) Metro style carriages with larger entrances and more standing room and handholds?

Whatever changes there are to train design, passengers (including older and disabled passengers) should be involved in this from the earliest stages, not simply consulted at the end of the process. It's important that the trains have enough more space for luggage / folding cycles / buggies and spacious bays for mobility scooters and wheelchairs. The fact that wheelchair bays enable two wheelchair users to sit together on HS1 is valuable, and this should be replicated on other lines.

Ensuring all rolling stock has on-board toilets should be a priority.

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

Campaign for Better Transport supports removing First Class at the busiest times to make the most efficient use of the space available. One option would be to automatically declassify first class carriages once the train has set off so that people could still pay extra for 'first dibs' at getting a seat, generating extra revenue but still enabling more people to sit rather than stand.

We are against raising fares to compensate for any loss of revenue from removing first class seating.

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

To reduce overcrowding, we support extra carriages on shoulder peak services. Services should run later in the day, and on Boxing Day.

We welcome the intention to improve communication when things go wrong. This should include:

- Effective provision of information to staff, ensuring they are informed and are able to respond to questions from passengers
- Getting timely, actionable information to passengers. For example, if passengers know their journey is likely to be disrupted before they arrive at the station they will be more able to make alternative arrangements.
- Offering accurate real-time information on train times and delays at all stations, in both audio and visual formats
- Reducing reliance on automated announcements for non-standard information
- Investing in infrastructure so capacity and diversionary routes are available wherever possible
- Using all communications tools available, including personal communication from staff; email; and social media
- Ensuring that institutional knowledge about effective ways of dealing with delays is not lost with any change of franchise operator
- Where appropriate, making sure as many people as possible receive refunds either automatically via smart ticketing, or by applying on paper
- TfL mandates their Tube drivers to make an announcement within thirty seconds of any delay, explaining why there is a delay, how long it can be expected to last, and where relevant, alternative travel options

([https://www.whatdotheyknow.com/request/rules\\_for\\_tube\\_drivers\\_making\\_an](https://www.whatdotheyknow.com/request/rules_for_tube_drivers_making_an))

We would like the new operator to mandate this for drivers too – sitting in a stationary train is much more frustrating when one has no idea what's happening.

Train performance measures such as PPM do not properly weight the experience of passengers. We would like to see the operator record and publish alongside train-based measures like PPM new measures weighted by passenger, along the lines of TfL's "Lost Customer Hours" measure, so that peak-time delays that disrupt many people would be viewed more seriously than off-peak delays.

The new franchise must protect and where possible extend station staffing, so that there is 'slack' in the system in the event of an overtime ban or high levels of sick leave, as there were last year on Southern. Trained, visible members of staff increase both passenger safety and the perception of safety, as well as offering assistance and advice. CCTV cameras and automated Help Points are no substitute for staff presence.

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

The new operator should, as c2c have done, introduce automatic Delay Repay compensation after two minutes of delay for those using smart cards and, as Virgin have done, automatically compensate those who have booked particular trains online. Compensation should be available as money and not just in rail vouchers.

Transport Focus and London Travelwatch should be given the power to make binding, and not just advisory, decisions in arbitrating disputes (e.g. on Penalty Fares).

As a priority, regular monitoring and unannounced inspections should be introduced to monitor whether the operator is adhering to franchise commitments and national standards, e.g. on the length of ticket office queues; on ticket office opening hours and staff presence; on the proportion of passengers claiming Delay Repay, and on the cleanliness of trains and stations. Genuine penalties including fines should be levied when franchise commitments are not met. In common with the concession on London Overground, structures to financially incentivise excelling on targets or increasing passenger numbers could be introduced. Franchise promises mean little without enforcement.

We would like the new operator to set out clearly a scheme to compensate passengers for failings in customer service. At present, under the Consumer Rights Act, customers are entitled to compensation for qualitative failings such as a dirty or locked toilet, but the mechanism for claiming this and how much the customer is entitled to is opaque. A form (online and on paper) and guidelines (e.g. We will make a 10 per cent refund for absence of wifi where it has been promised, and 20 per cent where an onboard working toilet is not available) would strengthen passenger rights.

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

As a priority, we would like to see the measures set out in the 2013 'Action Plan on Fares and Ticketing'

The franchisee must introduce a ticketing product which gives a *fair* deal to the growing number of people who commute less than full-time. This could be a carnet or a part-time season ticket. 80 per cent of part time workers are women and the lack of fairly discounted season tickets amounts to indirect discrimination. **It's vital that rather than simply requiring a product giving part-time commuters a better deal than they currently get, the tender stipulates that they must receive a similar level of discount to full-time commuters.** The train company c2c recently introduced a product aimed at part-time commuters, but the discount was only five per cent. South Eastern must do better than this. It is not acceptable for part time commuters, paying higher fares for the same journeys, to be subsidising full-time season ticket holders.

We would also like the franchisee to introduce multi-modal smart ticketing linked with local buses and TfL services, with fare capping. The Key, though billed as a smart card, has done little to make people's journeys easier and does not facilitate pay-as-you-go travel or multi-modal journeys. We recognise that developing multi-modal, pay-as-you capped smart cards may take time, and in the meantime, the Oyster card should be rolled out to everywhere in the London Rail Area.

As has been done on Virgin East Coast, passengers should be able to book Advance tickets up to two hours before departure.

Ticketing is currently too complex. The terms 'Valid as Advertised' and 'Any Permitted Route' and 'London Terminals' mean little to most people, and should be removed or explained – perhaps with a leaflet handed out with the ticket and posters at stations. TVMs should always clearly display the cheapest ticket for a journey. The Office of Rail and Road has estimated that one in five passengers are not sold the cheapest ticket for their journey, partly because of the way information is presented through TVMs ([http://www.orr.gov.uk/\\_data/assets/pdf\\_file/0018/24048/ticket-vending-machines-review-february-2017.pdf](http://www.orr.gov.uk/_data/assets/pdf_file/0018/24048/ticket-vending-machines-review-february-2017.pdf)). The Government should require that as happens on Virgin and Trans Pennine trains, passengers have a price guarantee and will be offered a refund if they accidentally buy a more expensive ticket.

South Eastern recently raised non-regulated fares. We would like a commitment from the new operator to freeze unregulated fares. High fares, at the same time as motoring costs have remained stable, deter people from taking the train. Encouraging modal shift away from driving is essential to reduce congestion, air pollution and mitigate climate change, and so ensuring that fares are affordable is very important.

We consider that the current fares structure unfairly disadvantages young people. 16-18 year olds must be in full-time education or training and cannot work a full time job; yet must pay adult fares. We would like the new franchise to introduce discounts or young people under 19. At an age when many young people are considering learning to drive or buying a car, encouraging people to use rail sets habits for the future and safeguards a passenger base for the future.

We support enabling bus pass holders to get a third off rail travel with their bus pass, rather than having to buy a Disabled or Older Person's Railcard. In 2013, the DfT published the results of a trial in which older people could use their bus pass to get a third off rail travel ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/301568/senior-concessionary-trial-final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301568/senior-concessionary-trial-final.pdf)). The results were very positive. 88 percent of those surveyed said they'd be more likely to travel by train if they could get a third off with their bus pass. Moreover, the scheme generated additional journeys, and is highly likely to have been revenue generative for the train company, as well as reducing car journeys with their concomitant pollution and congestion. In addition, generated journeys are likely to be off-peak, where there is additional capacity (especially if the concession was only made available at off-peak times. Evaluation of the trial found that 84 percent agreed that the trial made them feel more positive about train companies, and 80 percent felt more positive about DfT.

One radical but welcome change would be to tie fare increase formula to passenger performance, so that passengers who had experienced a year of poor performance would receive a discount on their fare rise. This would mean that passengers got a fair deal and it would put in place a clear financial incentive for good passenger service.

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

Ticket office opening hours should be protected and where possible, extended. Passengers value being able to purchase the full range of tickets including those not available from TVMs, and to get advice about purchasing the cheapest ticket. This is especially important because currently queues at South Eastern stations often do not meet national standards on queuing time (three minutes off peak, five minutes in peak).

Every station should have a minimum of two TVMs and at least half of them should accept cash as well as cards, so that passengers can still purchase a ticket if TVMs are out of order. When TVMs are out of order, extra staff should be deployed at the station to sell tickets.

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

Toilet opening hours at stations should be extended and toilets should be cleaned regularly. The importance of public toilets is often overlooked but for some people, being able to rely on toilets being open makes the difference between being confident to use the train or not using rail. Stations should be well-lit, both for accessibility and for maximising safety and the perception of safety.

The franchise should include financial incentives and a minimum standard for fixing problems (e.g. lifts, lighting, toilets, TVMs) at stations. Signs should make passengers aware of when they can expect a breakage to be fixed.

Comfortable waiting areas with seating (with a back), clean and sheltered from the elements, should be available at stations, and we oppose selling off waiting areas to retailers. While facilities to buy refreshments are welcome, it is vital that waiting areas are available to all passengers, not just those who are willing to buy something.

We would like the new operator to undertake a deep clean of all stations when taking on the new franchise. TfL Rail did this when taking over the run-down stations on the Shenfield line out of Liverpool Street. Simple things like repainting made a huge difference, making stations feel more pleasant and safe. Symbolically, undertaking this at the beginning of the franchise signals a new beginning and a commitment to paying attention to station quality.

Much more can be done to integrate South Eastern stations with buses, cycling and walking. Putting up signs to the bus stop and bus timetables, providing a map of the local area near the station exit and signposting (with timings) how to walk to the town centre and to local amenities are simple and affordable steps that make a big difference in integrating rail into a wider transport network. Our report Fixing the Link (<http://www.bettertransport.org.uk/sites/default/files/research-files/13.11.04.fixing-the->

[link.pdf](#)) provides examples of how this can be done well. The operator should ensure that secure and accessible cycle parking is provided at every station. In addition, the operator should work with the local authority and local bus operators to integrate rail better with bus services, including where appropriate moving bus stops nearer to stations or ensuring that timetables work well together. Hertfordshire's IntaLink project is a good example of how local authorities can work to link bus and rail well.

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

As a priority, assistance for disabled people should be available on a turn-up-and-go basis whenever a station is staffed. It is unacceptable that disabled people, with lives to live, jobs to do and friends to see, should be required to book journeys 24 hours ahead (and despite the wording of the current Disabled Person Protection Policy, it is a requirement rather than a 'request' or 'recommendation' in that they will often be unable to travel without pre-booking.)

Assistance can be very poor, with disabled people missing trains, left stranded on trains, or having to fall back on the goodwill of untrained members of the public when assistance fails. Failing to provide assistance is unlawful but happens frequently. The new operator should be required to monitor the number of assistance fails; survey passengers about their assistance experience, and report to ORR about what proportion of assistance requests are adequately met. Each failed assistance request should be investigated and learnt from.

Currently, there is very low awareness of the policy that when disabled people are unable to use a particular station (e.g. due to stairs) that the operator will book them a taxi to the nearest stepfree station. As a result, many people unnecessarily restrict their lives and journeys. This policy, currently hidden in the small print of the DPPP, should be promoted at posters in stations and stated very clearly on the website.

Seating, with a back, should be provided at all stations.

Much can be done to improve the physical infrastructure at stations. We would like to see a programme of installing accessible toilets, and of extending the opening hours of existing toilets. We would like the tender to set an ambitious target for the operator to make more stations step-free through lifts or ramps. Making stations step free has a strongly positive benefit-cost ratio (<http://www.steerdaviesgleave.com/news-and-insights/access-for-all-benefit-research-report-released>) and increases footfall, yet operators usually fail to invest their own money in station access, instead relying on limited public money through the 'Access for All' fund. Additionally, where possible, the gap between the train and platform should be eliminated through the installation of Harrington Humps, or the introduction of low-floor trains or trains (as in Vienna and Liverpool) with automatic ramps. This would enable many more people to travel independently without the anxiety of relying on a member of staff, and make boarding easier for many older and disabled people.

We note that there are several stations along the South Eastern route (for example, Dunton Green) where step-free access could be provided with minimal cost and disruption, by installing a ramp on railway land. It is our belief that at these stations where step-free access can be provided relatively cheaply and easily, installing a ramp is a reasonable adjustment.

The operator must be required to engage substantially with older and disabled people throughout the region, for example, by employing a designated full-time Access Officer.

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?

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?

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

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

a) By rail?

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

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

We support the Sevenoak Rail Traveller's Association's proposal for services to Gatwick, to increase the proportion of people arriving at the airport by public transport rather than by car.

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

We support timetable simplification that gives regular services with the same number of services overall. However, timetables must allow enough flexibility to enable freight paths on occasion.

17. How far do you support, or oppose, options to reduce the choice of central London destinations served from individual stations with the aim of providing a more regular, evenly spaced timetable, and a more reliable service?

We oppose such proposals, as they will mean that more passengers will have an extra change on their journey. Passengers generally say that they prefer a slightly longer journey with fewer changes, as this is less stressful. It's worth noting that boarding and disembarking are particularly stressful for older and disabled people, particularly those

relying on assistance, and so any change that increased the number of people having to change trains would have a disproportionate effect on these groups.

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?

By and large, the rail network is a shared passenger and freight network. So, because of the socio-economic benefits of rail freight to UK Plc, it is crucial that the needs and aspirations of the rail freight operators and their customers are fully taken into account in any close alliance and in the franchising process. Network Rail and the DfT must issue governance criteria to protect rail freight in the NR system operator function and in DfT Rail Strategies.

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

The franchisees must be incentivised to support both existing and future rail freight flows in franchise agreements.

The franchisees must also be incentivised to allow train flitting so that rail freight paths can be part of the timetable.

In order to fulfil this, the following points need to be taken into account:-

1. The existing rights of freight users and customer must be respected
2. Capacity for freight growth must be protected in line with funded commitments
3. Capability requirements must also be taken into account.
4. Rail freight services must be taken into account when possessions are being planned for maintenance and upgrades

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

- a) As an individual?
- b) As an organisation (if appropriate)?

The operator should be required to meet at least twice a year with each rail user group, and to include their contact details on its timetables and website. The operator should hold regular Meet the Manager sessions at different stations throughout the network, advertised in plenty of time, as well as Tweet the Manager sessions.

The current operator holds regular forums. However, these are often in the middle of the day, limiting the attendance of people who work during the day (the majority of commuters). In addition, the agendas are determined by SouthEastern and the forum

tends to be more for information broadcasting rather than for genuine co-creating and consultation – indeed, policy changes like Buy Before You Board were introduced without any consultation. The next operator should be required to genuinely consult on important changes.

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

C2c convenes a Customer Panel, where panel members meet regularly in person and high-level managers with decision making powers attend. This enables genuine discussion rather than frustrating promises to ‘feed that back’ to the relevant person. In addition, passengers are able to directly email the Customer Panel so that they can get a good sense of the issues across the network.

Thameslink worked with Cambridgeshire County Council to introduce a 50 per cent discount for local students <http://www.bettertransport.org.uk/blog/rail/cambridgeshire-50-cent-discount-student-rail-fare-national-standard>

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

There is potential to leverage third party investment to improve access on the railway, e.g. requiring a developer to fund a lift in exchange for planning permission at a station (as TfL did to fund the lift at Tower Hill station).

In addition, property developers stand to benefit from improved railway services, and there is potential to reach arrangements where developers part-fund improvements to stations or lines in the expectation that this will increase the value of new housing developments which link people to jobs. Crossrail’s agreements with Berkely Homes is an example of this.

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

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?

We support splitting the franchise into smaller franchises with distinct types of service. For example, a metro-style service for South London; the Kent lines and HS1. Smaller franchises would enable new entrants to the market (few companies can take on the financial risk of franchises the size of the current South Eastern franchise). Additionally, it allows operators to focus more tightly on the needs of passengers and encourages improvement, as there is less to manage. Smaller franchises (e.g. c2c, Hull Trains and

Chiltern) consistently perform better than larger ones. In addition, the experience with Southern shows that franchises should never be 'too big too fail'.

Additionally, we consider that 'flipping' the Invitation To Tender by setting what premium the Government requires, and inviting operators to bid on quality, could radically improve passenger experience. The present structure, which incentivises operators to bid on cost, incentivises a 'race to the bottom'. Inviting bids based on quality would encourage creativity and innovation

(<http://cbtthoughtleadership.org.uk/TracksReport60pp.pdf>)

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Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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