

# Board meeting 24.07.15

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## **Secretariat memorandum**

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Agenda item: 10

LTW587

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### London TravelWatch aspirations for the new Southeastern franchise

#### **1 Purpose of report**

- 1.1. To provide information on London TravelWatch's previously agreed stance on the Southeastern franchise currently being tendered by the Department for Transport (DfT)

#### **2 Recommendation**

- 2.1. Members are asked to note the report

#### **3 Background**

- 3.1. London TravelWatch submitted its' response to the DfT consultation on the Southeastern franchise in March 2017. The letter is attached as appendix A.

#### **4 London TravelWatch priority**

- 4.1. The Southeastern franchise constitutes a very large proportion of passenger journeys in the London TravelWatch area and so it meets with London TravelWatch's prioritisation criteria for activity.

#### **5 Equalities and inclusion implications**

- 5.1. There are no equalities and inclusion implications arising from this report

#### **6 Legal powers**

- 6.1. Section 248 of the Greater London Authority (GLA) Act 1999 places upon London TravelWatch (as the London Transport Users Committee) a duty to consider - and where it appears to the Committee to be desirable, to make recommendations with respect to - any matter affecting the functions of the Greater London Authority or Transport for London which relate to transport (other than of freight). Section 252A of the same Act (as amended by Schedule 6 of the Railways Act 2005) places a similar duty upon the Committee to keep under review matters affecting the interests of the public in relation to railway passenger and station services provided wholly or

partly within the London railway area, and to make representations about them to such persons as it thinks appropriate.

## **7 Financial implications**

7.1. There are no financial implications arising from this report for London TravelWatch.

## **Appendix A**

South Eastern Rail Franchise  
Consultation Co-ordinator  
Zone 4/13  
Department for Transport  
Great Minster House  
33 Horseferry Road  
LONDON  
SW1P 4DR

March 2017

Dear Sir/Madam,

### **Consultation on the new South Eastern rail franchise**

Thank you for the opportunity to comment on this important issue affecting passengers. London TravelWatch is the statutory consumer watchdog representing the interests of transport users in and around London, including the current Southeastern rail network that extends to Dartford, Swanley, Otford and Sevenoaks. As such we derive our views from a variety of sources such as research, secondary data, appeal complaints that we receive from individual passengers and from engagement with user groups and other stakeholders.

We should at the start record our disappointment at the failure of Government to devolve responsibility for local services within London to The Mayor (TfL), as the expectation has been that this would substantially improve the service offering as a consequence. We have however noted the Department's view that a 'conventional' franchise would have an equal or better chance of delivering passenger benefits. Passengers therefore will be expecting the Department to ensure that the improvements that would have arisen from devolution will instead be realised through this franchising process. London TravelWatch expects any future franchise for the Southeastern network to meet or exceed the standards set by London Overground and TfL Rail for frequency of services, station standards, operational quality and passenger experience

London TravelWatch notes that certain aspects of the proposals have attracted considerable public and passenger disquiet, in particular the proposed 'Metroisation' of services which involve a reduction in choice (of direct services to) central London termini. This proposal we think is premature, given the improvements heralded by the Thameslink programme have yet to materialise. Nor is it ready for public acceptance. So we recommend that the DfT should withdraw it, allowing the current range of Central London termini to continue to be served from stations such as Blackheath, Eltham and Bexleyheath. Instead the Department should concentrate on securing more immediate improvements for passengers in this franchise. Passengers on this franchise in the London area will have been subject to over a decade of disruption and poor services as a result of the Thameslink programme, and need a period of service stability and steady improvement, rather than further unnecessary and disruptive change.

Our responses to your specific questions are as follows:-

## Question 1: Do our priorities correctly reflect your views?

London TravelWatch does not disagree with the priorities you set out in your paper. However, we note that you have not set any objectives for improvement in passenger's experience of Value for Money, where Southeastern has a particularly poor record, and which passengers tell us is their number one priority for improvement.

London TravelWatch has commissioned two pieces of research on this issue. These can be found at :-

[http://www.londontravelwatch.org.uk/documents/get\\_lob?id=3734&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=3734&field=file)

and

[http://www.londontravelwatch.org.uk/documents/get\\_lob?id=3896&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=3896&field=file)

Specifically for Southeastern work by London TravelWatch has indicated that improvement in passenger satisfaction in the short to medium term could be improved by:-

- Better promotion of the benefits and discounts available with annual season tickets and Travelcards
- Increasing evening and weekend Metro services to match the current minimum off-peak service provided on Monday to Friday daytimes.
- Providing services on Boxing Day or its Bank Holiday equivalent
- Ensuring that existing gatelines are staffed throughout the traffic day
- Better management of inner London station platforms to reduce station dwell times, crowding and safety of passengers. This would include the use of train dispatch staff and practical measures such as reducing step-gaps at stations such as Brixton and Lewisham
- Improving connectivity to Gatwick Airport by co-ordination with other rail services at London Victoria, London Bridge and London Blackfriars
- Provision of more litter bins at stations
- Provision of more seating at stations (e.g. St.Mary Cray, Chelsfield, Knockholt and Dunton Green, Eynsford, Shoreham and Bat & Ball) on platforms where the train service to a variety of destinations operates at less than three trains per hour. i.e. the potential wait is more than 20 minutes.

Improving longer term satisfaction with Value for Money in our view requires improvements in :-

- Giving passengers more information about advance fares and awareness of Oyster / Contactless fares
- Better publicising improvement works to let passengers know what is happening and what benefits will be for them, especially when these are not immediately visible or apparent
- Providing options to pay for annual season tickets in monthly instalments
- Addressing the 'hygiene factors' such as charges for the use of toilets at major stations and interchanges, perceived anti-social behaviour and poor layout of stations and carriages
- Continuing to invest in accessibility, especially in small scale improvements that help people with mobility impairments
- Improving station and train accessibility by reducing the stepping gaps between trains and platforms

- Providing gatelines at stations with footfalls over one million passenger entries and exits per year<sup>1</sup>
- Improving staff training and interaction with passengers
- Enhancing the environment of stations, especially with a smaller footfall, by providing toilets, covered waiting areas and heating, Wi-Fi, catering outlets and reassurance that CCTV images are being monitored
- Investigate the feasibility of providing extended canopies at busy stations.
- Improve the quality of information given to passengers, particularly in times of disruption and where multiple operators serve the same station
- Addressing issues of crowding both on trains and at stations. This might include provision of additional entrances and exits and passenger management system e.g. at Lewisham

Any Southeastern franchise tender should include a requirement to measure passenger satisfaction with 'value for money' and should contain incentives / penalties to ensure that any operator has objectives to improve this crucially important dimension of passenger satisfaction.

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

London TravelWatch agrees that additional capacity is required on the Southeastern network in particular on the Metro network. Some of this additional capacity can be achieved by better management of existing resources, but also by development of existing interchanges and of new ones. Examples of this would be Lewisham (an existing interchange), where additional entrances and exits would reduce journey times for passengers: construction of new platforms at Brockley on the Lewisham – Victoria route to enable interchange between services provided by Southeastern and London Overground / Southern: and by stopping Southeastern services at Clapham High Street for interchange with London Overground and the Northern line at Clapham North. These would enable more passengers to travel between South East and South Central / South West London without travelling via central London, freeing up capacity in the central area.

Similarly, we support proposals to run high speed trains to and from Hastings via Ashford as this would free up capacity on existing Hastings line trains in outer London and Kent.

**Question 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?**

London TravelWatch supports the provision of high capacity Metro style trains with wider entrances, standing room and handholds. Our research on the Travelling Environment<sup>2</sup> found that, at least for short journeys, passengers prefer open accessible layouts, even if this means the sacrifice of some seating capacity. We would also support the introduction of longer trains where this can be done without compromising safety or station dwell / sectional running / junction clearance times.

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<sup>1</sup> Herne Hill, Grove Park, Barnehurst, Beckenham Junction, Blackheath, Hither Green, Catford Bridge, Charlton, Chislehurst, Clock House, Deptford, Elmstead Woods, Greenwich, Lee, Mottingham, Penge East, Petts Wood, Plumstead, Shortlands, St.Mary Cray, Elmers End, Erith, Ladywell, West Wickham, Albany Park, Chelsfield, Maze Hill, New Eltham, Brixton, Falconwood, West Dulwich and Kidbrooke

<sup>2</sup> [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=3780&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=3780&field=file)

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

London TravelWatch researched the needs of First Class travellers<sup>3</sup> in 2010 and found that for journeys of less than one hours duration First Class was not considered to be necessary. For up to two hours duration there was a need for better leg room, more comfortable seating, power sockets etc. Only over two hours duration was there a perceived need for 'full service' items such as complimentary tea and coffee, newspapers etc. For most Southeastern services therefore First Class is probably not strictly necessary. For services within the London area, we do not think First Class is necessary at all – the space can be more efficiently used if all of it is available to Standard Class passengers.

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

All of the areas mentioned: journey planning, ticket purchase, on-board experience, provision of information, communication during disruption, dealing with complaints and providing compensation when things go wrong need to be improved. Specifically, in ticket purchase further extensions of Oyster / Contactless payment to Sevenoaks (via both Dunton Green and Otford) and Gravesend where these form part of the Metro service pattern and passenger expectation of the type of ticketing provided are a priority. Similarly, upgrades to ticket vending machines to allow the sale of tickets starting from stations (and boundary zones) other than where the machine is located (as practised by GTR, London Overground and TfL Rail) should be included in the franchise.

Compensation should also be provided through the Delay Repay process from 15 minutes delay and also automatically in the case of smart cards, Oyster and contactless payment cards.

**Question 6: Do you have any other ideas or priorities for improving customer service?**

London TravelWatch research on 'Value for Money'<sup>4</sup> showed that passengers want more options to pay for annual season tickets on a monthly basis. There is very strong support for the permanent removal of charges for the use of toilets at major stations (as has recently happened on a temporary basis at London Victoria).

Punctuality and reliability of services and the ability to respond to incidents that potentially disrupt services can be improved by Southeastern by better management and staffing of platforms. This particularly applies to stations in inner London<sup>5</sup> and stations that have become busier as a result of passenger growth in recent years, such that they have outgrown previous models of management. In addition, a high priority is for the new Southeastern franchise holder to improve on right time departures from 'country end' stations at the beginning of the day, as problems here often result in serious 'knock on' delays later in the day in the congested London area. We would also advocate the greater

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<sup>3</sup> [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=2217&age=&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=2217&age=&field=file)

<sup>4</sup> [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=3734&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=3734&field=file) and [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=3896&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=3896&field=file)

<sup>5</sup> Herne Hill, Peckham Rye, Denmark Hill, Brixton, Lewisham, Hither Green and Deptford are examples

provision of rolling stock stabling at locations closer to the places where demand is highest to reduce the need for empty coaching stock movements, and crew duty times. Examples of such locations might include Bickley (reinstate both 'upside' and 'downside' sidings), Angerstein Wharf triangle, Bellingham upside adjacent to station, Beckenham Junction adjacent to platform 1, Bromley North yard, Dunton Green – Westerham branch stub, Robertsbridge, Crowhurst – Bexhill branch stub, Shepherds Well – East Kent Railway, Hoo Junction on Southeastern. There is also scope to reduce the number of GTR trains stabled in locations on the Southeastern network. Examples of alternative stabling might include : Cheam (centre roads reinstated), Crystal Palace adjacent to platform 6, Epsom Downs branch – long sidings on former second track formation, Selsdon (Oil depot site), East Grinstead (Bluebell Railway), Eridge (Spa Valley Railway), Ardingly, Christ's Hospital (branch stubs) and Wimbledon down sidings.

**Question 7: What changes to the fares structure would be of benefit to you?**

As noted above we consider that extension of Oyster / Contactless to Sevenoaks (via both Dunton Green and Otford) and Gravesend where these form part of the Metro service pattern and passenger expectation a priority for passenger interests.

In addition simplification of fares by reducing the need for 'split ticketing' should be attempted where these anomalies exist in this franchise. We also think that there is a case for removing the higher fares charged on or via HS1 for example by standardising Oyster / contactless fares between St.Pancras International and Stratford International in line with normal zonal fares applying on this section of route and acceptance of Travelcards with the relevant validity. Standardising fares would also free up capacity on non-HS1 services on the approaches to London therefore reducing crowding issues on these services.

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

As noted above, upgrading ticket vending machines to allow the sale of tickets from stations (and boundary zones) other than where the machine is located (as practised by GTR, London Overground and TfL Rail) should be included in the franchise. This is particularly important for passengers who hold Freedom Passes or Travelcard Season Tickets, who do not need to buy a ticket from their home station but who need to purchase tickets from other starting points.

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

Passengers tell us that the most important things that they wish to see investment in are the provision of step free access to stations and reducing stepping gaps between trains and the platform. Both provide serious disincentives to travel for passengers with limited mobility.

**Question 10: What more could be done to improve access and provide facilities for those with disabilities and additional needs?**

London TravelWatch supports the prioritisation of those stations where provision of step free access could be most easily achieved. In the case of Southeastern managed stations this should include West Dulwich, Sydenham Hill, Maze Hill, Clock House and Eden Park

that could have step free routes to their platforms achieved without the need for lifts, and similarly reducing stepping gaps at Lewisham and Brixton could have a positive impact on station dwell times and delays. Brixton is a major interchange, particularly with the bus network, and we would like to see step free access here, and eventually additional platforms on the 'Atlantic' lines to enable Victoria – Dartford services to call here.

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

London TravelWatch fully supports this proposal in principle. But it only makes sense on the basis that the route between Ashford (Kent) and Ore is electrified, and that the additional capacity released on existing Hastings services will relieve crowding closer to London, at places such as Sevenoaks and Orpington.

**Question 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?**

London TravelWatch would not wish to see a reduction in connectivity compared to the current service offer.

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

No comment.

**Question 14: Which journeys do you make today which are difficult? A) by rail, B) by road, which would be easier by rail?**

London TravelWatch supports the provision of additional trains in the evenings and at weekends to enable a standard off-peak service pattern throughout these times, so that overall there is a service offering that can be simply marketed, is understandable by passengers and will enable more journeys to be taken by rail.

We support initiatives to improve interchange facilities reducing crowding and journey times.

Within London there are a number of difficult journeys by both rail and road that changes to Southeastern services have the potential to significantly improve. Examples are :-

1. Between South East and South Central / South West London, road, bus and rail journeys can be particularly problematic without resorting to travelling via central London, thus adding to journey time and crowding at peak times. The South Circular Road (A205) is unreliable for journey time and is not really designed for the purpose that it is used for.

These journeys could be improved initially by improving connections and interchange at Beckenham Junction, Elmers End, Herne Hill, Denmark Hill and Peckham Rye, with Tramlink, Thameslink services to Wimbledon and Sutton, Southern services to Crystal Palace, Streatham and West Croydon, and London Overground to Clapham Junction.



2. There is a short walking route between Penge East and Penge West stations that could be improved to encourage the use of this little known modest interchange, between Southeastern and London Overground / Southern services. Similarly Kent House and Clock House stations and Beckenham Road tram stop are very close together, though the walking routes between these is marred by unmade roads and poor signage.
3. Clapham High Street station provides close interchange with the Northern line, and local bus routes towards Morden. Enabling Southeastern services on the Victoria – Dartford route to call at this station would open up significant connectivity to and from the Northern line / A24 corridor. There would also be benefits from connecting Clapham High Street to Lewisham, Bexleyheath and London Victoria. This would require platform extensions at this station to allow these trains to call. Providing new platforms on the lines used by Victoria – Orpington services here would enable a further area of South East London to be connected better to South West London.
4. The Victoria – Dartford route also passes directly over Brockley station without stopping as there are no platforms on this route. Providing these to form an interchange station would open up significant journey opportunities between Dartford, Bexleyheath and Lewisham to Forest Hill, Sydenham, Crystal Palace and Croydon by Southern / London Overground services at Brockley. It would also improve access to Victoria from stations such as Brockley, Honor Oak Park and Forest Hill, and to Denmark Hill (for the Kings College Hospital campus) from Anerley, Crystal Palace and Norwood Junction.
5. Similarly at Brixton the Victoria – Dartford service also passes directly over the station without stopping as there are no platforms on this route. Providing these to form an interchange station would up significant journey opportunities via the Victoria line and Brixton's extensive bus network. There would also be significant benefits from connecting Brixton to Denmark Hill, Peckham Rye, Lewisham and Bexleyheath, as the journey times by road or bus between these points can be quite lengthy whereas the train journey could be made in a matter of minutes.
6. Stations on the Catford loop line (Ravensbourne – Crofton Park) have poor frequencies and poor connectivity to the West End of London, and towards South West London, even though the rail network could provide these. There has been strong growth of usage on this route despite this poor service level. More can be expected in the light of major redevelopment at Catford. One way to meet this demand would be through the provision of an all day every day 2tph Catford loop to London Victoria service calling at all stations including Clapham High Street.

**Question 15: Which additional services would you wish to see provided in the next franchise?**

As noted above a new all day every day 2tph Catford loop to London Victoria service calling at all stations including Clapham High Street should be included in this franchise.

**Question 16: How far do you support or oppose options to simplify the timetable?**

London TravelWatch supports the idea of regular interval timetables as they are better for passenger comprehension and allow for regular interchange opportunities. However, we

would not wish to see a diminution of journey opportunities to the West End or City destinations from the areas served by Southeastern as a result of this process. We would want to review each timetable option on its own merits.

**Question 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 more regular, evenly spaced timetable, and a more reliable service?**

London TravelWatch does not support the proposals for 'Metroisation' in their current proposed form. There is a strong likelihood that passenger demand will substantially change following the full introduction of Thameslink services in December 2018 through Central London and the Elizabeth line to Abbey Wood also in December 2018. But the magnitude and nature of this change is hard to model at this stage. In our view it is highly likely that the outcome will be very different from that originally modelled for these projects, as a result of the very long gestation period between planning, building and completion.

As they stand, the proposals to 'metroise' services from many Southeastern stations will cause significant passenger detriment by reducing direct access to central London terminals. Any proposals to change services in this manner need much more careful consideration than is currently implied by this consultation, and it should not even be considered until the full impacts of the Thameslink and Crossrail services are known.

An example of how passenger trends can invalidate the assumptions used in planning service changes comes from the proposed replacement of the additional peak times trains that currently run from the Beckenham Junction via Herne Hill route to and from the Thameslink core to Blackfriars, City Thameslink, Farringdon and St.Pancras International. These services are currently proposed to be replaced with a Beckenham Junction to Blackfriars service from December 2018. This has caused widespread concern amongst users, as the proposed change was last consulted on in 2013, when many of those now using the service were not users back then, and so have had no knowledge of the previous process, let alone any opportunity to engage in it. The passing of five years effectively invalidates any previous consultation exercise. Many users will in the intervening period have made decisions on job, home and school location based on the provision of a through service. Any consultation needs to be done on the basis of timely data and operating assumptions, and in a way that is not a 'fait accompli', and allows the decision to be reversed if necessary.

For the Beckenham Junction / Herne Hill - Thameslink trains, an option could be to replace them with a higher frequency regular interval peak hour service at all stations on this route to Victoria, provided that these give cross platform interchange at Herne Hill with Thameslink / Southern services towards or from Blackfriars at the same timetable interval. On this route we would expect a change in frequency to a train every 7 ½ minutes between 0700 and 1000 toward London, and between 1600 and 1900 from London. There would also need to be assurances that sufficient capacity would be provided between Herne Hill and Blackfriars to accommodate displaced passengers, and that all Thameslink / Southern services would call at Loughborough Junction for access to Kings' College Hospital. Passengers would need to be consulted thoroughly on this and be assured that the interchange and capacity at Herne Hill would provide a better overall passenger experience than now.

The extension of the Bakerloo line to Lewisham, and onward on to the Hayes (Kent) branch provides a much better longer term opportunity to provide more capacity into

central London than the 'metroisation' proposals. This is achieved by the extension itself and by the ability to reuse train paths into / out of Charing Cross and Cannon Street released by the replacement of Hayes (Kent) branch trains with trains to other destinations e.g. more local services on the Bexleyheath route or a local service linking London Bridge, Hither Green, Grove Park, Chislehurst, St.Mary Cray and Swanley.

On a smaller scale, but able to produce significant reliability benefits for passenger services would be replacement of the current junction of the Angerstein Wharf freight branch with a new south-facing junction. This would produce a more direct freight route for the current trains using the branch, freeing up capacity on both the North Kent and Sidcup routes for passenger services.

**Question 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?**

London TravelWatch supports closer working between the train operator and Network Rail where this will improve the passenger experience. However, our experience of Network Rail in this region is one of underinvestment in reliable infrastructure, and neglect of basic attributes of the railway such as vegetation and rubbish clearance, graffiti removal from trackside structures: all of which impact on the passenger experience either through poor reliability or through poor passengers perception of the cared for nature of the railway.

The train operator needs to actively manage their relationship with Network Rail, setting service standards and incentives in a way that improves the passenger experience on a daily basis. An example to follow would be the practices of TfL Rail.

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

London TravelWatch thinks that the current Public Performance Measure is not necessarily the right way of accounting for and incentivising performance. We think better measures would be Right Time at all station stops for all trains, and also a metric based on the impact on passengers similar to London Underground's 'Lost Customer Hours', that measures delay against passenger numbers. Network Rail managers must also be held accountable for performance in such a way that 'schedule 8' compensation payments are used as incentives to improve responses to delays and disruption , and not viewed as a simple 'occupational hazard'.

**Question 20: How would you prefer the next Southeastern operator to engage with you: a) as an individual and b) as an organisation (if appropriate)?**

London TravelWatch wishes to continue the practise with the current operator of regular meetings and dialogue. This should include sharing of key performance indicators, being open and transparent about problems that arise, and allowing a frank exchange of views. They should consult with us at an early stage when changes are planned that would impact passengers, and react actively to concerns raised through our casework.

**Question 21: What approaches to customer services in other companies could be adopted by the next Southeastern train operator?**

We would like to see the pro-approach that TfL take to providing redress to passengers when major incidents occur that disrupt passengers journeys, with direct refunds to passengers known to have used any affected services through their Oyster / Contactless or smart cards.

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

London TravelWatch has no view on this.

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

It is difficult to understand where this might apply on the Southeastern routes apart from some very isolated parts of the network away from London.

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

As noted above in our introduction, London TravelWatch is disappointed at the decision not to devolve responsibility for Metro services to the Mayor of London. Experience shows that smaller franchises and concessions e.g. c2c, Chiltern, London Overground, TfL Rail (and open access operators such as Hull Trains and Grand Central) consistently deliver better services for passengers, because of their more focused attention to detail, appreciation of local market conditions and accountability to passengers. The current franchise risks are not having that focus. The 'metro' market is a distinctively different one from that for longer distance and high speed services into Kent and East Sussex.

We would expect that during the course of this franchise, preparations are made to allow for 'metro' services to be let as a separate arrangement at a future date, and that this preparation should be a requirement on the next franchisee.

**Other comments**

London TravelWatch notes that the consultation and prospectus documents issued by the DfT do not give any prominence to the importance of the 'metro' part of the franchise, or the nature of the suburban passenger experience. The documents do not even show any visitor attractions based in South East London. This is despite the fact that many of these have worldwide interest such as Greenwich, Downe House, Eltham Palace or Dulwich Picture Gallery. Travel to these and many other South East London and Western Kent attractions can form a significant income stream for this franchise if marketed properly.

If you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely

**Tim Bellenger**  
Director Policy and Investigation