



Steve White  
Managing Director  
SE Trains Limited  
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London, SE1 2AU

14 October 2022

Dear Mr White

### **SE Trains Limited (trading as “Southeastern”) – timetable changes 11 December 2022**

We are writing to complain about the published changes in the new timetable for the withdrawal of the two Charing Cross services (via Bexleyheath and Woolwich) to/from Blackheath from 11 December 2022 (other than a limited weekday peak hour service on the Bexleyheath line).

Our fundamental objection is the lack of any consultation with passengers and other stakeholders. The fact that Southeastern currently has a Department of Transport exemption for Covid adjustments from the usual consultation requirement cannot have been intended to authorise the wholesale changes that you have published. Southeastern’s contract with the Department for Transport requires a consultation in the event of material changes.

There have been regular services from Charing Cross to Blackheath since the line was constructed in 1849. It is almost unthinkable to contemplate an abandonment of direct off-peak service to the better by far of the two central London termini for travelers from this part of south east London, albeit that for others, new lines that have been recently introduced have considerably eased their journeys.

The experience of many of our members is that off peak use is steadily returning to pre-pandemic levels. As you say in your Q&As *the number of weekend customers has recovered strongly . . . . weekday off-peak journeys are at around 77%*. It is also against all good practice to make decisions in the absence of sound evidence-based reasons and there are none to be found in the published information that is to be found on your website.

**This timetable quite simply fails to meet the needs of passengers relying on this line. Major changes have been presented as minor and a *fait accompli*. They should not be implemented until there has been a proper consultation, as required for other than minor changes by DfT, and a timetable developed which addresses the concerns and meets the needs of passengers and the economy of areas served by these lines.**

Our detailed objections are attached. A critique of the answers in the FAQs set out in your published information is being sent to you separately.

If Southeastern want to improve the operational efficiency of the service, then this should be done by consulting users and making the necessary investment (e.g. in flyovers and longer trains), not by designing a timetable which blights a large area of southeast London, causes hardship, difficulties, and inconvenience for the travelling public.

**We repeat that before this timetable is implemented there must be a proper form of consultation so that the issues that we and others have raised can be adequately addressed.**

In the meantime, a small group of our trustees and others from the Society, representing the interests of members and residents who are frequent users of your railway would welcome a meeting to gain a better understanding of the proposals and comment on them, beyond what is included in the FAQs. Will you agree to such a meeting.

We are sending a copy of this letter to local MPs and councillors, Travel Watch, local groups etc.

Yours sincerely

Paul Watts  
Chair

The Blackheath Society

cc The Rt Hon Anne-Marie Trevelyan MP, the Secretary of State for Transport  
The Rt Hon Sadiq Khan, Mayor of London  
Anthony Smith Esq, Transport Focus  
Ms Janet Cooke, London TravelWatch  
Local MPs and councillors  
Local Amenity Societies and Associations



Registered charity number: 1196292

## SE Trains Limited (trading as “Southeastern”) – timetable changes 11 December 2022

### Objections of The Blackheath Society

- In no way can this be described as an improved and simpler service. Simple and straightforward longstanding journeys to Charing Cross and Waterloo East are transformed into difficult, complicated, and inconvenient ones in view of the requirement to change trains at either Lewisham or London Bridge
- For the elderly and those with mobility issues, with heavy luggage and parents with children and babies in strollers or slings, a change of platform involving lifts presents time consuming and logistical difficulties; for some they may be a total barrier to travel into town; unlike the easy access at both Waterloo East and Charing Cross
- There is inadequate lift capacity at Lewisham and London Bridge to cope with the needs of these categories of passengers. Lewisham already suffers from severe overcrowding at peak times;
- The change may also influence decisions by some on whether to travel at all. It reduces easy access to the West End for shopping museums and exhibitions etc. during the day time; theatres, cinemas, restaurants, and other entertainment in the evening. In so doing it fails to achieve the government’s objective to stimulate economic growth.
- Furthermore, for customers who change at Waterloo East for a transfer to the mainline station or to Charing Cross for the Bakerloo line and Paddington for a main line train or Heathrow, there would be anxiety as to the possibility of delay at change points and therefore the need to allow extra time for the journey. The more so with one of the impediments referred to above
- The new service will be excessively slow – at least 32 minutes for an able bodied customer taking account of the change for a 7 mile journey that once took just 18 minutes. Possibly significantly longer for the less able.
- The need to change will also defeat the punctuality objective as it is likely to result in excessive dwell times at London Bridge and Lewisham because more people will be changing trains.
- Except for peak hour City workers, Cannon Street station is not conveniently sited for those customers who wish to finish their journey on the other side of the river, but cannot face a change. It has poor transport links for onward connections. Off peak demand has always been very limited.

- The unjustified withdrawal of the Sunday service from Blackheath to Charlton, Woolwich Arsenal and Dartford via Abbey Wood removes access to London City Airport and the Elizabeth line. In the opposite direction it removes access to leisure activities on Blackheath;
- Why has major investment not resulted in improvements but slower journey times and this degraded timetable? Over recent years, these include (at great cost and disruption):
  - adding platforms at London Bridge to improve capacity and reduce congestion;
  - building the Bermondsey dive under to aid crossover of trains;
  - dualling the fast line loop track at St Johns to increase access from Lewisham;
  - re-signaling the whole area to improve capacity and reliability;
  - making improvements to the crossover at Lewisham to improve reliability
  - lengthening platforms to accommodate longer trains (still not being regularly provided).
- In summary, the changes discourage rail travel, blights large areas of south east London where many new

**We need public transport by rail to be a viable alternative to using the car. Reducing frequencies and curtailing point to point journeys will only further deter people from using rail services, render major public investment nugatory, and deter private investment in housebuilding and business.**



## SE Trains Limited (trading as “Southeastern”) – timetable changes 11 December 2022

### A Critique of Southeastern’s FAQ’s

#### Will my service return to pre-Covid levels?

The pandemic has changed travel habits and we’ve seen substantial changes in customer demand for rail travel.

Government has provided funding of more than £16 billion for the rail industry nationally since the start of the pandemic, which is unsustainable in the long-term. It would not be fair to taxpayers for trains to continue to run with more seats than needed, given the cost involved.

#### Are these changes permanent?

We make two changes to the timetable every year, and we take customer and stakeholder feedback into account. This is the next timetable iteration as we recover from the pandemic and focus on providing a better railway for everyone.

*Please provide the “customer and stakeholder feedback” received to support the assertion that, in setting the proposed timetable it was taken into account. If it was received and taken into account, how do you explain the hostile rejection that the changes have received?*

*In relation to off-peak services, you have said below that your weekday services returned to 77% of pre-pandemic levels at a past date which has not been revealed. You have also said that weekend services have “recovered strongly”. Our members agree that there has been a steady increase.*

#### What can I do if I don’t like this new timetable?

We understand that timetable changes can be difficult to adjust to and may not always meet everyone’s specific needs.

We recognise even a minor change in timings might have a big impact at a local level. This timetable is the next iteration of our service following the pandemic, and we will be taking feedback on board for future timetable changes as we build on this base and can add more trains as customer travel habits change.

*Do you accept that the proposed changes in so far as they affect the lines through Blackheath and the Bexleyheath line generally are far more than “minor”?*

We have two timetable changes a year, in line with the rest of the rail industry. We'll continue to listen and take further feedback on board for future timetable changes.

If you have any concerns, please contact our Customer Services team via our app or website at <https://www.southeasternrailway.co.uk/help-and-contact/get-in-touch/contact-us>.

### **What is the new timetable based on?**

Since the pandemic began in March 2020, Southeastern, like many train companies, has experienced a change in peak-time demand. While the number of weekend customers has recovered strongly, weekday peak-time journeys are at just 56% of pre-Covid demand while weekday off-peak journeys are at around 77%.

Fewer customers with Season tickets are also travelling with us – compared with before the pandemic only 32% of journeys are purchased with Season tickets.

Our customers have changed the way they travel and are now commuting only a few days a week. While off-peak travel has recovered faster than peak-time travel, hybrid working is here to stay.

*We accept that peak hour services have been significantly affected by the pandemic, leading to increased home working, although we understand that that is steadily reducing. However, many of the peak-hour customers on our lines are City workers, who travel to Cannon Street (CST) when the station is extremely busy. Off-peak the station is little used.*

*On the other hand, the off-peak direct services to Charing Cross (CHX) are taken by most customers who wish to travel beyond LBR – it must be quite exceptional to see a voluntary change from a CHX service for one heading to CST. As we have said elsewhere, your customers rely on a direct service to CHX for easy access to the West End for shopping, museums and exhibitions etc. during the day time; theatres, cinemas, restaurants, and other entertainment in the evening.*

We have therefore balanced train services to meet the changes in travel preferences that have come about because of the pandemic. The timetable will continue to meet customer numbers, whilst prioritising the good performance customers expect and need

*Please explain and justify this statement.*

### **What is the purpose of this new timetable?**

Our new 'standard hour' timetable means a more predictable all-day service with most trains leaving stations at broadly the same time each hour, making the timetable simpler and easier to understand.

The new timetable, jointly developed with Network Rail, will also improve the ability to recover from disruption meaning services are more reliable for our customers.

It also delivers operational changes that will improve our overall punctuality, providing a more reliable service for our customers and the flexibility to adapt services to changes in travel habits in the future.

*Without detailed supporting information, it is not possible to understand what lies behind this answer. Please will you supply.*

### **Why has my service been changed?**

Most routes will see no reduction in service levels compared to the current May 2022 timetable.

*There is a withdrawal of direct off-peak service on the Bexleyheath line and provision of services to CST that are not required. That is an overwhelming change.*

As we recover from the pandemic, we need to ensure our train services meet the needs of the way our customers travel now. We have developed timetables that match customer demand, whilst delivering the good performance customers expect, and providing value for the taxpayer.

*In view of the above, how have you assessed “customer demand” for off-peak travel and that you will be offering the “good performance that customers expect”?*

This new timetable reflects the way people now travel and delivers operational changes that will improve our overall punctuality, providing a simpler and more reliable service for our customers and the ability to grow in the future.

*Please provide evidence to support the proposition, if that is what is advanced, that a forced change of train for customers travelling to CHX (the bulk of those travelling off-peak on the Bexleyheath line) “reflects the way people [currently] make their journey?”*

The timetable has been created to match today’s customer numbers with the flexibility to adapt services in the future as demand grows.

*Off peak travel has steadily increase and may now be achieving near normality Unlike peak time numbers ,which seem to be slower in recovery due to the new pattern of office working*

We’ll provide a more consistent service which reflects the change in peak-time demand following the pandemic and the new preference for travel, but still maintains peak time space on trains to match demand from those who need these services.

*Off-peak customers for CHX have “no preference” for a change at London Bridge(LBG). However, if their final destination is Waterloo East or CHX, it is to the contrary.*

We'll have the flexibility to adapt as customer travel habits change in the future.

*In terms of restoring a CHX service, your statement would have to be rigorously tested in the course of a consultation.*

The success of the Elizabeth Line has reduced demand on our own train services, and we therefore need to adapt our timetables accordingly.

*We accept that services on new lines, including the Elizabeth Line, will generally improve transport links in the south-east; however, for customers on the Bexleyheath line, there can be no direct benefit – different interchange stations would be likely to increase journey times to central London*

The new timetable provides space on trains for more customers arising from key developments, such as new housing. We're able to make alterations to our timetable as customer travel habits change.

*On the face of it, this statement has no relevance to changes with which Bexleyheath line customers are concerned. It is another statement that can only be properly tested in a consultation*

### **Will you be running fewer trains overall compared with today?**

The new timetable will have a very similar number of train services to today but will be structured to better match space on trains with demand and therefore be more efficient.

*This does not, of course, apply to the demand of your Bexleyheath line customers. However, if there is a balance to be assessed between competing interests of other lines, it is yet another matter to be explored in the course of a consultation.*

### **I have accessibility needs, what support will I have when changing trains at LBG (LBG)?**

Extra staff will be on hand at LBG to provide assistance to you on your journey. You can also book Assisted Travel for your journey here.

*There is probably a quite limited number of customers who require Assisted Travel and only one or two who travel on a regular basis. But, as we have said elsewhere, there will be many regular travellers who are elderly, with limited walking ability, or with babies and children in strollers or slings. It is doubtful that the lifts will have the capacity to accommodate the increased numbers that will inevitably need to change platforms. Apart from the inconvenience, their journeys will be lengthened well beyond the 7 to 10 minutes that we calculate should be the time taken for a change. As it is there are sometimes queues of passengers waiting to use the lifts.*

*We also wonder whether, and if so to what extent, account has also been taken of lift failures. Which we understand are not an infrequent occurrence, at least at Lewisham. If a platform lift were to be out of service, it would likely make journeys for some impossible to continue.*



*Account should also be taken of assisted passengers requiring ramps for carriage access, additional dwell time and possibly additional staff. That is unlikely to be significant issue at the CHX terminus.*

### **Why was there no consultation?**

We don't underestimate the impact that changing our timetable will have on our customers who rely on travelling on a specific train. Throughout the pandemic we've had to move at pace to re-write our timetables and we are still coming out of a fluctuating situation with customer numbers. It takes many months to design and consult upon a timetable change - which we simply haven't had as we continue to respond to the variations and fluctuations in passenger numbers.

The new timetable matches emerging demand and we've based these changes on feedback we've had from customers and stakeholders on what to prioritise and we'll continue to listen and take further feedback on board for future timetable changes. This is a base timetable from which we can change as required.

The Department for Transport has agreed to allow train operators to continue to implement, demand-led timetables without consulting formally during this period.

*The Service Contract between The Secretary of State for Transport, DfT OLR Holdings Limited and SE Trains Limited, dated 16 October 2021 provides as follows;*

*3.1 If the Secretary of State is of the opinion that the proposed alterations to the Timetable represent a material alteration, the Secretary of State will require the Operator to undertake a consultation exercise, the scope of which must be agreed in advance with the Secretary of State.*

*On the face of the Contract, the timetable changes amount to material alterations, which would require a consultation in accordance with clause 3.1. Will you therefore please provide a copy of the full terms of the agreement with DfT to which you refer above..*

*In the current absence of any further information, but on the basis that such agreement as may exist only relates to the implementation of "demand led timetables", please provide evidence of the demand that led to the decision to make such material changes to the timetable.*

*We assume that you would not be prepared to challenge their materiality within the terms of clause 3.1), but please confirm.. you will, of course, recall that when in 2017, SET consulted on a not dissimilar proposal to change the Bexleyheath line terminus from CHX to CST for operational reasons, the proposal was subject to wholesale opposition and the proposal was withdrawn.*

*Please will you tell us why in relation to the service in issue the alterations are not regarded as material, particularly having regard to the known objections to a change of terminus from CHX to CST that had been demonstrated in the 2017 consultation on such a change, which had then led to the withdrawal of the*

*proposal. [Some may think that in making the changes, SET would now achieve the 2017 objectives by other means.]*

*Although what we have requested above could be the subject of a Freedom of Information request for the DfT agreement to which you refer and surrounding documents of the new timetable, we hope that you and DfT will agree that this should not be necessary.*

### **Bexleyheath line**

#### **Why are there no services to Charing Cross during the day and Saturdays?**

The new timetable reflects the change in peak-time demand following the pandemic and the new preference for travel, but still maintains peak-time space on trains to match demand from those who need these services. There are peak-time only services to Charing Cross.

*Unlike specific questions in relation to many other lines, this is the only one posed for Bexleyheath and your response does not adequately answer the question. At weekends, there is virtually no demand for travel to CST; reasons for direct travel to CHX are set out above.*