

**Tonbridge and Malling Borough Council's  
Response to the  
Department for Transport's  
South Eastern Franchise Consultation**

**10 September 2012**



Tonbridge and Malling Borough Council welcomes the opportunity to provide a comprehensive response to the Department for Transport's South Eastern franchise consultation.

We have been advocating improved rail services on behalf of residents and businesses within our area over many years. Despite this, what we have witnessed is a consistent deterioration in the service that the train operating company has been able to offer.

Our response is based on the key recommendations in the Borough Council's 'A Manifesto for Improved Rail Services' which was submitted to the Rt. Hon. Theresa Villiers MP in April 2012.

The Manifesto is appended to this response for reference.

Q.1	What improvements do stakeholders believe could be made on the combined franchise through partnership working between Network Rail and the new operator?	<p>We support the principle of a single franchisee/Network Rail alliance, or similar. We consider unified management of train and track would be in the interests of passengers, operationally when things go wrong and managerially when planning and implementing service and infrastructure upgrades. This seems to be supported in the McNulty Report - 'Realising the Potential of GB Rail'</p> <p>However if such an alliance is merely for financial arrangements then other partnership working opportunities should be developed to improve the journey experience for the travelling public.</p>
Q.2	What, if any, changes to South Eastern services need to be made given the likely changes in demand that could result from Crossrail?	<p>We strongly seek the restoration of the direct rail connections between Tonbridge and Gatwick and two an hour service during off-peak times. If this is not practical then appropriate connections at Redhill with adequate, but not excessive, gaps in train timings are required to allow for passengers changing trains with luggage.</p> <p>We also ask for the Tonbridge to Redhill and Gatwick line to be reintegrated into the Kent Franchise.</p>

Q.3	Are consultees aware of any other rail or non-rail development schemes that might affect the new franchise?	There are major new developments in the Medway Gap and surrounding area which are likely to lead to significant population growth during franchise period and this will clearly result in increased demand for rail services from West Malling and Snodland stations.
Q.4	What increments or decrements to the specification would stakeholders wish to see and how would these be funded?	<p>There should be no reduction in existing services levels to stations across the Borough.</p> <p>We support the DfT's expectation for the franchisee to demonstrate commitment to work with the Medway Valley Community Rail Partnership.</p>
Q.5	Which aspects of the specification, other than those services operating on the HS1 network, would stakeholders wish to see mandated and which aspects of the specification could be left to the discretion of the operator?	<p>Passengers primarily want services that are frequent and reliable, with good interchange and affordable fares.</p> <p>There should be improved off-peak and weekend services mandated within the new franchise.</p> <p>There should be peak and inter-peak Thameslink services from Maidstone East through Blackfriars and stations beyond. In addition, we would wish to see the inclusion of a true peak service to Cannon Street.</p> <p>At least 50% of trains to Sevenoaks via Otford should be sent to Maidstone, stopping at all stations after Kemsing.</p>
Q.6	What changes to services would stakeholders propose, why and would these provide economic benefit?	<p>Services should run regularly and reliably at all reasonable times of the day and week.</p> <p>Networks should provide good access, adequate capacity and offer easy and convenient interchange between different types of transport.</p> <p>Staff should be helpful, informed, attentive and committed to offering high-quality customer service.</p> <p>Information should be accessible, clear, relevant, up-to-date and accurate.</p>

		<p>Tickets should be easy to use, easy to understand, flexible and integrated between appropriate operators and modes of transport</p> <p>Stations should be well-designed, properly maintained, and fully accessible and offer a good quality waiting environment.</p> <p>Journeys should be safe and free from crime and the fear of crime.</p> <p>Carriages should be accessible, comfortable, clean, safe, quiet, and suitable for passengers travelling with luggage, cycles, shopping or children.</p> <p>The train operator should communicate clearly and properly with customers. Staff should be approachable, open to suggestions, take complaints seriously and have proper mechanisms for redress when things go wrong.</p> <p>Flexible working arrangements and longer working days will lead to the need for a train service which allows earlier arrivals into London in the mornings and later departures in the evenings and this will become increasingly important during the life of the long franchise with the franchise.</p>
Q.7	Do respondents feel that there are other destinations that domestic high speed services could serve that would support regional and national economic growth?	<p>The domestic high-speed (HS1) service between Maidstone West and St Pancras should stop at Snodland station.</p> <p>There are major new developments in the Medway Valley area which are likely to lead to significant population growth during franchise period and this will clearly result in increased demand for rail services from Snodland station.</p>
Q.8	How might better use be made of the capacity currently available?	<p>The operator should be required to monitor passenger demand on a continual basis with incentives to deal with overcrowding as and when it occurs.</p>

Q.9	What steps might bidders be expected to take to meet passenger demand and what might be the most appropriate mechanisms for managing demand?	<p>The operator should be required to commit additional resources to increase capacity with more coaches, at the busiest points and times of day on the network.</p> <p>The operator should provide pricing incentives for travel at times outside of the peak, with discounted travel used to encourage passengers to use the shoulder peak or off-peak services where possible. However, many passengers have no choice but to use peak services, and we would oppose any measure to increase fares in the peak to attempt to price demand away from the peak.</p>
Q.10	What destinations on the current South Eastern network do respondents think should be served by Thameslink core services and what is the rationale for those services?	<p>The present level of service provided on the Maidstone East line is completely unacceptable and the new franchise must address this omission above all else.</p> <p>There should be an all day half-hourly Thameslink service to Blackfriars, Farringdon, St Pancras and beyond, with the Maidstone East line becoming the principal Kent route for the full Thameslink service south of the Thames.</p>
Q.11	What improvements would respondents like to see made to other South Eastern services, what is the rationale for them and would these provide economic benefit?	Extension of the services to large population bases in Kent, specifically to Ashford and also to the Medway Towns along the Medway Valley Line.
Q.12	Do respondents feel that Folkestone Harbour branch line and station should be kept open and maintained or would the rail industry be better investing the monies in other rail schemes?	We do not have any response to this question.
Q.13	How would you like to see performance information published?	It should be published by franchise as a whole, then by section separating the classic service from the HS1 service and also by individual station.

Q.14	How frequent should its publication be?	It should be produced monthly, quarterly and annually.
Q.15	What level of disaggregation of performance do you believe is reasonable?	We would also like to see performance measured and published by individual station.
Q.16	What are the priorities that respondents consider should be taken into account with providing passenger experience of using these services?	We would like to see passengers with a seat on the train and a fairer deal when fare increases are set and improved frequency especially on Sundays.
Q.17	What do stakeholders see as the most important factors in improving security (actual or perceived) and addressing any gap between the two?	It is probably fair to say this is a wider social issue rather than one that is strictly confined to train services. The security at stations should be raised, where appropriate, and Secure Stations Accreditation obtained. There should also be greater visibility of well trained and pleasant staff, secure car and cycle parking, good levels of lighting and CCTV which all contribute to improving perceptions of security.
Q.18	What is important to stakeholders in the future use and improvements in stations?	Pleasant atmosphere and less overcrowding combined with a well trained and pleasant staff. Even in today's technological age there is a need for staffed booking offices and the sale of paper tickets, the railway is complex and has a complicated fare structure and a lot of passengers and potential passengers require assistance from staff.
Q.19	What priorities would respondents give to car parking and cycling facilities at locations where these are fully used?	This should be increased where it is feasible, but prices should kept to a reasonable level and, perhaps, varying prices at different times of the day and on different days of the week.

Q.20	What sort of ticketing products and services would you expect to see delivered through 'smart' technology on this franchise?	<p>We would like to see the introduction of smart card technology and tickets available via smartphones. The quickest and easiest benefit would be from the introduction of print at home tickets that could be verified by on train staff.</p> <p>It must, however, remain possible to simply turn-up-and-go and purchase, without penalty, a ticket during the journey from an unmanned station without a ticket sales facility.</p> <p>Extension of a multimodal zonal fares structure for wider areas than the current London Travelcard boundary. The simplification is particularly important in connection with ticket vending machines where confusion of ticket type can lead to passengers not getting the best value for money.</p>
Q.21	What local accessibility and mobility issues do stakeholders see and how they might be addressed?	<p>The new operator should be required to adopt, as a minimum, the standards proposed in the 'Better Rail Stations' report. We believe that it is essential that minimum standards and not a passenger perception approach are used to monitor station quality and facility provision. This is because perceptions can vary substantially over time and by area for reasons that are unconnected with the standard of service. There are also absolute requirements in terms of facilities, which are not easily reflected in peoples' perception. We support the approach taken by TfL in the London Rail Concession such as on the London Overground network, which has very explicit minimum standards to adhere to.</p> <p>If this not practical then as a minimum we would wish to see a pragmatic approach taken to accessibility whereby stations which could be improved by means of simple and easy to maintain ramps at small to reasonable cost could be done so providing step free access. This should be funded by an alteration to funding streams to allow 'easy to do' and 'small cost' schemes to be brought forward, even if current passenger</p>

		<p>numbers make the case for improvement marginal. This is especially relevant with the under-reporting of passenger numbers making business cases harder to achieve.</p>
<p>Q.22</p>	<p>What environmental targets would stakeholders like to see within the franchise specification?</p>	<p>The rail operator should set environmental targets which should be subject to annual review and be linked into performance standards.</p> <p>It is desirable that those targets include:</p> <ul style="list-style-type: none"> <li>• reduction of energy consumption at stations and other railway buildings;</li> <li>• timescales for the removal of rubbish and overgrown vegetation;</li> <li>• noise levels for works being carried out at anti-social times to minimise impact on neighbouring residents;</li> <li>• requirement to liaise with local authorities in relation to prior consents for construction activities.</li> <li>• recycling targets</li> </ul>





April 2012

# Train Services for Communities in Tonbridge & Malling



Tonbridge Station

## A Manifesto for Improved Rail Services

Tonbridge & Malling Borough Council  
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## Introduction

Tonbridge and Malling Borough Council has been advocating improved rail services on behalf of residents and businesses within our area over many years. Despite this, our experience is a consistent deterioration in the service offered to local residents, businesses and the local economy by the train operating company. This is despite the demand created from significant levels of economic growth within the Borough, a prime example being the major development at Kings Hill.

The quality of rail services has been regularly debated and there is a strong partnership between the Council and other local authorities, business interests and most importantly with well organised local rail user groups.

The constant theme has been deep dissatisfaction with the way services operate. For this reason, in advance of the tendering of the new franchise from 2014, our rail manifesto calls for what we say should be the range and quality of rail services provided for residents, businesses and local communities by the new franchise.

Specifically what we seek are:

- A fairer deal for passengers when fare increases are set;
- The new franchise must include peak and inter-peak Thameslink services from Maidstone East through Blackfriars and stations beyond. In addition, we would wish to see the inclusion of a true peak service to Cannon Street;
- Restoration of the direct rail connections between Tonbridge and Gatwick and two an hour service during off-peak times;
- Extension of the services to large population bases in Kent, specifically to Ashford and also to the Medway Towns along the Medway Valley Line;
- The Tonbridge to Redhill and Gatwick line reintegrated into the Kent Franchise;
- The new HS1 service to St Pancras stops at Snodland station;
- Monitoring and performance separates the classic service from the HS1 service.

**We want to take this opportunity of setting out improvements as clearly as possible in the hope and expectation that we can influence the next franchise specification. We believe it is critical that the franchise tender has a detailed view of the local perspective and how best local growth can be supported by practical and achievable refinements in rail services.**

In doing so, we are adopting an entirely realistic approach because we are fully aware of the financial constraints on the rail industry.

We realise that there is little point in pursuing aspirations that would be ruled out on cost grounds. For that reason, we are concentrating on proposals that represent pay-back as far as the wider community is concerned. So too do we recognise that this next franchise will need to recognise the major impact of planned works at London Bridge. Threading the considerable number of services that have to go through this most congested part of the national rail network, while it is also a construction site, will be a most critical challenge.

Nevertheless, we believe there are opportunities to address some of the current service deficiencies in West Kent and that the Department for Transport (DfT) should be made aware of these when preparing the specification for the next franchise.

An excellent starting point for describing improvement opportunities in this Borough and in West Kent generally is the **Rail Action Plan for Kent**. This was produced by Kent County Council last year in conjunction with the District Councils and rail user groups and was formally presented to DfT at that time. It is a major piece of work covering the whole of the franchise area and importantly it reflects this Council's improvement aspirations for Tonbridge and Malling, subject to one proviso on a point of detail related to the Tonbridge to Redhill line which we will return to later in this document.

In essence, this submission sets out the Council's aspirations for the new franchise in four sections.

- We describe practical and achievable service developments and improvements.
- We look at issues related performance monitoring and passenger satisfaction.
- We consider policy on setting fares and
- We conclude with some consideration of other matters such as parking provision, station improvement and interference by Transport for London on Kent timetables and routes.

**Mark Worrall**

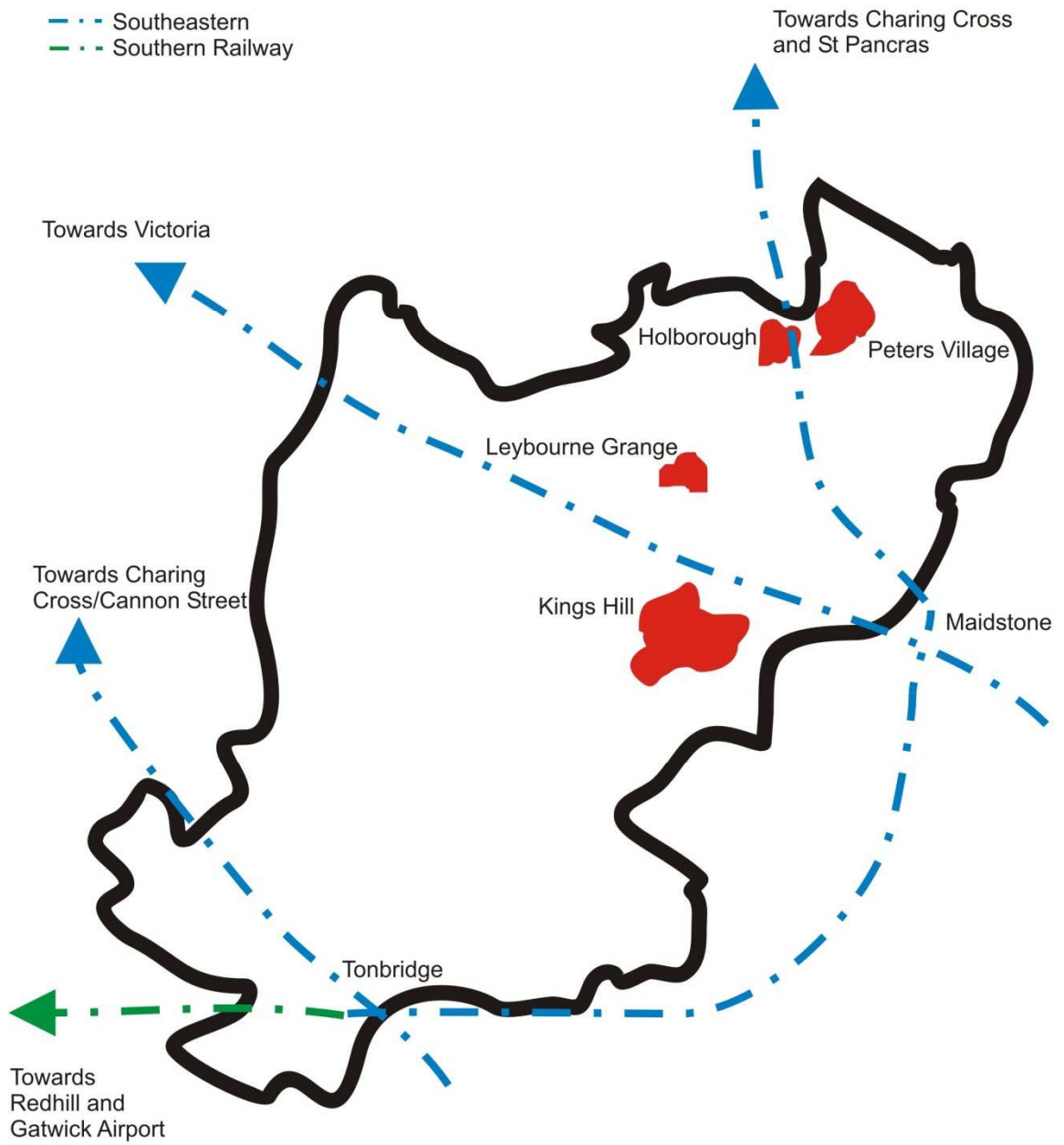
Leader of the Council

**Nicolas Heslop**

Cabinet Member for Planning &  
Transportation

Key

- Outline of Borough
- Major developments
- . - Southeastern
- . - Southern Railway



Major developments in Tonbridge & Malling

## Service Development and Improvement

### Maidstone East/West Malling/Borough Green Line

The 2009 timetable changes have been a disaster for West and Mid Kent. For a great many commuters, Victoria station is an entirely inappropriate and very inconvenient city destination. We know from local rail user groups that many people now rail-head to the west Kent line to secure a seat to one of the city stations. Many more have had to change job at this difficult time for the local economy and lives have been seriously disrupted. Peoples' choices over jobs, schools and housing are long term in nature and are major life-time decisions. Set against this, the sudden and summary removal of services to the city on which many people depended has had an extraordinary impact on many people, families and commuters.

We advocated strongly through 2009 that these timetable and service changes should be cancelled but to no avail. We explained what we felt to be compelling reasons from a development point of view for preserving these services to and from the city. This Borough has forecast provision in its adopted Local Development Framework for 6,375 homes between 2006 and 2021, many of which are focused on the Medway Valley and reliant on the services through West Malling Station. Specifically, there is planned provision for the following:-

- Kings Hill; major business park and residential development – 1446 units
- Leybourne Grange (Chase) – 723 units
- Holborough - 938 units
- Peters Village – 1000 units



**West Malling Station**

In parallel, Maidstone too has considerable planned development reflecting its Growth Point status - 11,080 houses during the period 2006 to 2026.

Kings Hill in particular requires access to the City destinations in both directions to support the considerable business investment and activity that takes place. We are talking about two million square feet of business space and over 5,000 jobs. It is a significant generator of city based rail services and its continued success will rely on its accessibility.

To constrain its economic growth potential is clearly contrary to prevailing policy of this Government.



**Borough Green Station**

The case for continued city services on the Maidstone East/West Malling line was rejected and the new timetable was introduced in December 2009. The DfT response we received at that time was dismissive of the case we made and appeared to suggest that rail heading activity was acceptable transportation behaviour. Moreover, it was fairly sanguine about the impact of the additional cost and time of under-ground travel back in the direction of the city and offered another option by suggesting a change of service at Bromley South to catch a connection to Blackfriars. This is simply an unacceptable position both in terms of public policy on economic growth and transport and in respect of the cost of personal disruption caused. It is an important route for communities served by stations at East Malling, West Malling and Borough Green & Wrotham.



**Consequently, we are lobbying robustly for the next franchise to include peak and inter-peak Thameslink services through Blackfriars and stations beyond. In addition, we would wish to see the inclusion of a true peak service to Cannon Street.**

### **Tonbridge to Redhill and Gatwick L<sup>7</sup>**

The year before the 2009 timetable change it did such damage to the services from mid Kent, we witnessed a similar reduction in service level on the line from Tonbridge to Gatwick. First of all the line was taken out of the Integrated Kent Franchise and subsumed within the Southern franchise where it could only ever be little more than a branch line cutting across the predominantly radial pattern of services radiating south out of London.

Our aspirations for the Tonbridge to Gatwick line are as follows:-

- direct rail connections between Tonbridge and Gatwick;
- restoration of the two an hour service during the off-peak that was removed as part of the transfer of this line from the Kent Integrated Franchise to Southern Railway in 2008. Currently it runs as a one an hour off-peak service;
- extension of the services to large population bases in Kent, specifically to Ashford and also to the Medway Towns along the Medway Valley line. This latter route requires a critical examination of stopping patterns to ensure a reasonable journey time;
- recognition of the important role the line plays in current and potential employment commuter trips (including to Gatwick) and significant number of school journeys each day;
- improved marketing of the line and the destinations along it. For example, many locals are surprised when they learn that the line also provides a good route for Kent based travellers through to destinations such as East Croydon;
- consideration of the role of the route as part of a strategic circumferential route around the south of London to destinations in the west towards Reading and beyond;
- At a fundamental level, it is important to recognise that the changes sought do not require fresh infrastructure. The lines are already in place.

Previous work by the operator of Gatwick Airport estimated that about 3 million passengers a year travel to the airport from Kent. Clearly there is a market but the travel arrangements for many of these passengers are already built around an established industry based on private taxi cabs. New rail services will now have to break into these embedded travel patterns and provide an attractive alternative in terms of access, timing and cost.

The slight qualification about the Rail Action Plan for Kent mentioned earlier is that the Borough Council considers that the transfer of this service out of the Kent Franchise and into the Southern area has been detrimental to it, especially as so much of the focus of the Southern Franchise is related to the London to Brighton mainline. **For that reason we would wish to see the line reintegrated into the Kent franchise.** We believe it would far better, especially if the aspiration for further extensions of the line to the Medway Towns and Ashford are realised.

Also, there are some operational resilience factors that support the line being with the Kent Franchise and these relate to driver training and expertise on the route when services are occasionally rerouted from the west Kent line for maintenance reasons. Currently both

franchises are operated by companies from the same Govia stable. If that is not the case in the new franchise beyond 2014, then operational difficulties could arise during such maintenance.

### **Medway Valley Line**

The Borough Council has been a funding contributor and supporter of the Medway Valley Line Community Rail Partnership for many years and we have been pleased to note the increased patronage on the line. We will continue to welcome service enhancements and assist through the partnership.



### **Snodland Station**

The change has been the recent introduction of HS1 services from Maidstone West to St Pancras. However, disappointingly, this has had little positive impact on this Borough because there is no stop within it. We had hoped for a brief halt at Snodland, desirable in the context of the town as it now is but also because of the further development at Holborough Valley with the 938 housing units mentioned earlier and a further 1,000 homes soon to be constructed at Peters Village near Wouldham.

**We will press for the new service to stop at Snodland through direct representations and through the Rail Action Plan for Kent. However, we hope that you are able to include this in the franchise specification when it is initially issued.**

The current HS1 has not had any positive impact for the reasons just stated. More to the point, it has contributed to a great deal of local frustration in that the level crossing in Aylesford now has to be closed for inordinate periods to accommodate the new service. We realise this is not strictly speaking a franchise service issue but we would ask that the DfT be

made aware of the extent and depth of local feeling on this matter and we would seek at least an examination of options to deal with this problem.

## Service Performance and Monitoring

The performance monitoring regime has been a source of great passenger dissatisfaction during the current franchise. The day to day experience of many people is that the current model does not accurately reflect the service they have been receiving and the penalty regime seems weighted in favour of the train operating company.

A prime example of this was the operator's performance during the severe winters of 2009/10 and 2010/11 when communications failed almost completely and the service offer was meagre to say the least.

Encouragingly, we perceived a step change in the commitment to deal satisfactorily with these winter conditions from both Network Rail and Southeastern when they came to a local rail Forum we organised in October 2011. This does provide an indication that lessons have been learned and we would like to see some real emphasis on performance and meaningful target setting and monitoring in the next franchise.

One particular area of dissatisfaction and frustration relates to the combining of performance figures on the new HS services with those on the classic services. There is a fundamental difference between these two independent operations not the least because a new 'train set' running with new technology on recently installed lines will inevitably have better service performance than the classic lines with its old infrastructure and trains.

The concern of passengers in west Kent has been that the aggregated performance of the new and the old has lifted the apparent performance of the classic services which are the staple of the services in this Borough. Last year the penalty performance threshold was missed by a fraction of a percent, wholly as a result of the beneficial impact of the better HS1 results. Without the HS1 factor the results would have reflected a miserable performance.

**We will be insisting strongly in the consultation period for the new franchise that the classic service be monitored separately from the HS1 service.**

## Fare Setting Policy

The most iniquitous aspect of the current franchise relates to the fare setting mechanism. The RPI+3% formula has been applied since the start of the franchise and only this year has there been a reprieve to RPI+1%. However, the increases have not been evenly applied and some passengers have experienced increases in their particular fare of several points above the average. Even for those who have not experienced such anomalous increases, the compounding effect over six years has been quite staggering.

We note the Government is on record as stating that the disproportionate increases built into the Integrated Kent Franchise did not result from any cross-subsidy of the HS1. However, there has been a consistent belief in Kent that this was the original intention and it explains why rail users have such a level of frustration and concern when, if anything, they have seen no benefit for West Kent from HS1. Indeed, the experience of some is that there has been service deterioration in West Kent to accommodate the changes required to integrate HS1 into local service patterns.

We consider that a stage is being reached when there will be a direct and consequential adverse reaction to fare increases. Passengers will no longer be able to tolerate the increase and will 'vote with their feet' and this could have the perverse impact of driving revenues down, resulting in a need for even more subsidy on this franchise area.

**We urge the tender exercise to pay the most serious of attention to the issue of the fare increase mechanism in the next franchise and express our concerns that we may now be reaching a tipping point as far as passenger tolerance of fare increases in excess of RPI is concerned.**



## General Matters

### Franchise length

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Recent policy statements from the DfT have indicated a presumption in favour of longer franchises with far greater control of lines and infrastructure within the franchise. We would wholeheartedly support this. A longer franchise and integration of the infrastructure and service provider would encourage longer term investment by the train operating company and it would also assist in overcoming the deficiencies that arise currently at the interface between Southeastern and Network Rail. We acknowledge that things have been improving between these two organisations in recent years, but there is only so much that can be done to overcome the fundamental structural problems created by having the rail service and the rail infrastructure under separate ownership and management. This being so, we would urge that this model for integration during the next franchise period is reviewed.

### Parking

**In recent weeks we have learned of rail industry plans to increase the amount of parking at Tonbridge Station. It is our experience generally that parking at most of your stations is problematic because, simply put, there is not enough of it. For this reason we urge the tender exercise to look beyond Tonbridge and consider resolving the serious under-provision at other stations in the Borough.**

Hildenborough station provides a paradigm example of the problem. Some 20 years ago, the 'overspill' from the station car park was shown by a few commuter cars parking along Noble Tree Road. The immediate neighbourhood of the station, even by that time, had to be protected by waiting restrictions. In the years that followed, rail heading to the station grew consistently to the extent that, today, considerable lengths of Philpots Lane, Nizels Lane and Lower Road are semi-obstructed by commuter vehicles for much of each work-day.

This pattern is repeated to a lesser extent at stations across the Borough and we believe there should be specific requirements within the next franchise to deal with station parking capacity. This is not simply about resolving traffic disruption at stations. There are also good transportation planning reasons for providing sufficient station parking because it would help support service growth during the inter-peak period that is currently stifled by lack of parking.

### Transport for London

On occasion during the current franchise we became aware of proposals to introduce changes in the stopping patterns and timetables of Kent services within the capital. There are also issues related to fare setting and the passing on of the impact of lower increases within the metro area to Kent passengers.

We appreciate that there has to be some balance between the needs of passengers within London and those coming in from outlying areas and that rail capacity and infrastructure have ultimate limitations.

**What we are very keen to ensure is that any sharing out of scarce resources, rail paths and opportunities generally is carried out as transparently as possible. It should not**

**be at the whim of the Mayor and TfL and we would wish to see overt mechanisms within the new franchise to ensure fairness for Kent passengers. What we cannot accept would be significantly increased journey times for travellers from West Kent nor any further increases in fares as a result of changes in London.**

### **Station Improvement**

We have already mentioned parking at stations and we would like to extend this specific aspiration to a more general wish for a direct commitment by franchisees to station improvement.

We have been impressed by the willingness of the rail industry to engage with us to promote a current scheme at West Malling Station. The project involves a major remodelling of the forecourt and approach road and we believe this provides a model way of working. Disappointingly, financial contributions from the rail industry and the DfT have been absent. Nevertheless, we are looking to fund works through creative use of Section 106 monies from developments in this area.



**Artists impression of new interchange at West Malling Station**

We will wish to engage with potential train operating companies during the tender period for the new franchise and we will be keen to hear what they have to say about the standard and maintenance of stations and their environs, customer service, cleanliness, comfort and security and passenger information. We are hoping that there will be specific stipulations requiring investment on these elements of the new franchise in the tender documentation.

Recent improvements to Tonbridge station are also welcomed. Representatives from both Network Rail and Southeastern gave presentations to the Borough Council.

### **Train Capacity**

Rail patronage has been increasing consistently over the years despite the economic recession in recent times, resulting in considerable over-crowding on peak services from this Borough. There is standing room only for many passengers departing from stations where this was never a problem in the past.

We realise there is no prospect of additional train paths during this next franchise period to introduce additional capacity. This makes it all the more important that the measures related to increasing train lengths outlined in the Route Utilisation Strategy a couple of years ago are brought forward as swiftly as possible. **We need, as soon as possible, 12 car capability at all stations on the west Kent line and 8 car capacity on the Maidstone East/West**

**Malling line. Ideally this should be through station enhancement but selective door opening options should be pursued in the interim.**