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Dear Sir

South Central Franchise Consultation

Thank you for the opportunity to comment on the consultation document for the new South Central franchise that is due to commence on 20 September 2009.

Context for Tonbridge & Malling Comments

My comments focus entirely on a particular item in the document, the connection between Tonbridge and Redhill and the journeys onward to London or Gatwick. Please be aware that this Council objected in the strongest possible terms to the imminent timetable and route changes proposed by Southern and which it will be introducing from December this year. It is a matter of deep concern that the consultation document appears to consolidate the changes that Southern is just about to introduce and casts an even greater threat over a service that for many compelling reasons should be protected and enhanced rather than destroyed, which will be the inevitable outcome of the less than lukewarm support it receives in the proposed franchise specification.

For this reason I must reiterate that this Council objects in the strongest possible terms to what is proposed in the consultation document for the Tonbridge to Redhill line.

Off-Peak Service - Tonbridge to Redhill

The DfT is proposing an off-peak hourly service to Charing Cross. Of extreme concern is the statement that this "will be continued for a trial period" but it is not at all clear from Table 10.2 what constitutes this trial period or what level of increased patronage will be a factor in assessing success or failure.

I acknowledge that there are commercial imperatives guiding the proposed base specification and that advocating an existing or enhanced level of service could legitimately be met with a request to provide the evidence to support such a stance. However, this applies equally in the other direction because the specification being proposed for the Tonbridge to Redhill line is founded on the statement "in view of the low level of demand in the off-peak" without any supporting evidence about passenger flows to justify such a position. It may well be that figures for off-peak demand on the

line could be categorised as “low” on a narrow commercial assessment. However, even if that is so, it is wrong to assume that this should be the only factor in deciding the future of this element of the South Central Franchise. It neglects to take into account a whole series of fundamental issues and fails to consider the opportunities that such a strategic orbital route presents.

This line and the service on it are an important regional transportation asset that could and should be contributing significantly towards achieving national, regional and local transportation policy objectives.

Train Operating Company for the Line

The fact that the service runs between two franchise areas, despite the companies involved being members of the same parent company, has not helped it to thrive.

This has been compounded by its transfer from the SouthEastern Railway in the current timetable review to Southern where the concentration on and priority towards radial routes out from the capital is manifestly clear and can only be at the expense of orbital routes. Such an operational policy is further short-sighted because it can only result in yet further undesirable passenger loading at the central London terminals.

Serious thought needs to be given to whether this line should sit within the South Central franchise area or whether it would best be returned to the Southeastern area where it could be far better integrated into the Kent pattern of services and provide future opportunities for service enhancement to Gatwick and the west of the region.

National and Regional Transportation Policy

More worryingly is the way that the imminent service reductions on the line and the proposed base specification fly in the face of all relevant transportation policy. Tonbridge/Tunbridge Wells is identified in the South East Plan as a Regional Hub and there is a clear indication in the associated diagrams in the Plan that one of the spokes lies along the corridor of the Tonbridge to Redhill line.

The imminent removal of the direct line from Tonbridge/Tunbridge Wells to Gatwick Airport and the threat placed over the future of the off-peak line through Redhill to London will work in an entirely opposite direction from national and regional policy and positively encourage reliance on the private car. I can think of few proposals more calculated to subvert current transportation policy than the failure to restore the Gatwick direct line from Tonbridge and Tunbridge Wells and the threat of a “trail period” over the off-peak service.

Furthermore, we should be looking at proposals to enhance the services on the Tonbridge to Redhill/Gatwick/ London line by linking out to Ashford, Maidstone and the Medway Towns in the east of the region and opening opportunities out to the west beyond Redhill. Instead, the Base Specification represents at best faint support for the line and at worst slow strangulation.

Connections from Tonbridge/Tunbridge Wells Hub to Gatwick

Southern's contention and justification for removing the current direct service from Tonbridge and Tunbridge Wells to Gatwick is that the service is not well used. In part this may be a result of the slow frequently stopping service and partly because the service has historically been poorly marketed and had little focus on improving the links within Kent generally. One thing is certain, having to change trains at Redhill to pick up a Gatwick connection, with the range of indeterminate waiting times for the onward connections, provides a deeply unattractive service for rail passengers from Tonbridge wanting to travel to the airport sustainably and conveniently.

In parallel with this point are the representations made forcefully by BAA to the Department for Transport in the context of its concerns about the seriously adverse impacts the current timetable changes and the proposed Base Specification will have on its Gatwick Airport Surface Access Strategy.

BAA has set itself targets for modal shift that should be achievable provided that the service on the Tonbridge to Gatwick line is not degraded. The fact is that the line is being degraded and BAA risks a far harder task in trying to encourage more of the 3 million passengers a year who travel to the airport from Kent to travel by public transport. They will not travel to London and out again on the Gatwick Express; they will drive along the M25 and M23 corridor, a perverse result in transportation policy terms where we should be striving instead to improve access by public transport and reduce reliance on the private car.

Recommendations

Summarising my comments, this Council wants to see the Base Specification for the new franchise to do the following:

- strongly require the new franchisee to support the service on this line with an at least hourly off-peak service to Charing Cross,
- the complete removal of any "get-out" clauses that would permit the franchisee to remove the service after a trial period,
- restoration of a direct line from Tonbridge/Tunbridge Wells to Gatwick Airport,
- Reinstatement of the Tonbridge – Redhill/Gatwick/London line into the Southeastern franchise,
- Extend the reach of the Tonbridge – Redhill/Gatwick service into Kent to bring in the potential pool of passengers at Ashford, Maidstone and the Medway Towns,
- Include an overt requirement that the line be better marketed, including assessments to determine refinements that could make the service more attractive to a wider group of potential passengers.

Passenger Focus

In closing, I consider it also worthwhile to mention an important local aspect of the usage of the line born of the fact that Tonbridge has a high concentration of schools serving a wide area around the town. The Redhill line service is particularly important for school access by pupils and students and the reduction of the service from half hourly to hourly from December this year will adversely affect pupils' journeys, especially in the afternoon off-peak period. Consequently, any further reduction would have serious implications for school journeys from the west of the area towards Tonbridge.

I have focused for good local reasons on the particular contents of the Base Specification related to the Tonbridge to Gatwick line. However, the document ranges far more broadly than this on matters such as accessibility, station security, parking at stations and much more. These matters are certainly important and of genuine interest to this Council. However, I am going to refrain from commenting directly on them to avoid diluting the clear message I want to provide about the Tonbridge to Redhill service save to say that Tonbridge Station is one of the busiest in the South East of England and its current state certainly merits some improvement. I realise that the incumbent train operating company is Southeastern but if there is any opportunity for station enhancement as part of this current refranchising exercise, that opportunity should be exploited. You will in any event have already received a comprehensive submission from Passenger Focus that says all that needs to be said from a passenger perspective and I would just like to express this Council's support for its submission.

Yours sincerely

Steve Humphrey

Director of Planning, Transport & Leisure

cc: Sir John Stanley MP
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