

Kent RUS Consultation Response
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Dear Sir

Kent Route Utilisation Strategy (RUS) – Consultation Response

I am sending this officer level response on behalf of Tonbridge and Malling Borough Council but I would be grateful for your understanding for a few extra days to enable me to provide a Member endorsed response. The deadline misses the committee cycle by just a few days so I hope you can take on board any additional comments my Members might wish to make if I can send them to you by the end of July.

The RUS Draft for Consultation represents a thorough assessment of rail infrastructure in Kent and Network Rail is to be commended for producing such a comprehensive overview, irrespective of whether the results of your analysis are ones that ultimately this Council agrees with or otherwise. The process has also been one that has sought to be inclusive and I am sure my Members were appreciative of the pre-view presentation by Mr Richard Howkins to our Public Transport Panel just before the document was launched.

General Overview

Before commenting on the Options identified in the consultation document, I would like to make some general contextual observations on the broad assessments contained in the Kent RUS.

You intend that the Kent RUS should be an ambitious document, with its time horizon stretching out for three decades to 2039. However, closer examination shows that it does not really achieve that level of ambition. In reality it is a firm statement of what the rail industry should or might do until 2019 but it becomes misty and uncertain for the 20 years thereafter. This is hardly surprising since the constraints, pressures, demands and financial climate in which the rail industry will have to function make strategy preparation, so far into the future, a difficult task. Indeed, it could be that the rail industry will be set up more rationally by the time we get there.

There is recognition in paragraph 4.1.3 that the RUS is to be a flexible and living document, subject to alteration through time to meet fresh circumstances. So this will partially address the previous comment and this intention should be clearly flagged up as a firm commitment in the final draft.

The Planning Context

The basis of the strategy for the first ten year period appears to be based on the situation as it now is with a degree of growth added. The amount of growth appears reasonable and plausible but what this misses is that it is possible to create a strategy

that drives the agenda rather than follows it. An example of the thinking that this creates is illustrated in the 'optioneering' exercise where a number of alternatives are dismissed purely on the basis of narrow economic factors rather than on any wider assessment of the social or environmental reasons for specific actions.

This is demonstrated too by the focus on growth based on general TEMPRO outputs for the greater part of the RUS area. There is specific allowance for increase in residential units in the growth areas of the Thames Gateway and Ashford but not for other areas. In Tonbridge and Malling for instance, there is specific known information on developments planned for the Medway Valley at Kings Hill, Leybourne, Holborough and Peters Village, not to mention potential longer term development on the east bank of the Medway at Bushy Wood during the horizon of the 30 year RUS, that could be particularised rather than relying on generalised background growth data. This is quite apart from the enhanced growth figures of nearby Maidstone and it could be leading the RUS to an underestimation of the impact of development planning on the Maidstone/West Malling line into and out of London. This last comment is critical because the role of Kings Hill as a business park must be recognised as having a significant effect on reverse flows from London.

A corollary of this is that future demand is dynamic and may not fall where the RUS predicts it will and it leads me to recommend that the RUS must not close down options that might become essential in the future.

Similarly, the draft RUS asserts that it is paying heed to regional and local planning policy, yet it makes recommendations based purely on narrow economic analyses that fly in the face of these policies as demonstrated by the assessments of the Tonbridge to Redhill line, the West Malling/Maidstone East Line and the Tonbridge/Maidstone West Line.

The Scope of the RUS

A frustration in reading the draft RUS is that it should provide a fully comprehensive overview of all aspects of the industry but, given the way the railways are now organised, it is almost impossible to achieve such a document. So much of the passenger experience depends on the Train Operating Company that it is a pity some of its responsibilities cannot be reflected in an overall strategy. Matters such as timetable setting, ticketing arrangements, station condition and improvement, parking management, travel planning, interface with other public transport operators and many other similar items, all appear relevant to the RUS and it is a weaker document without them being considered and included. It serves to underline the disjointed nature of the rail industry and it does not seem possible in the circumstances to have an all encompassing strategy.

It is also relevant to the question of whether the 'gaps' identified in the draft are complete and all-inclusive but, for the reasons just described, I do not believe they can be. That said, taking the narrower focus the RUS has set itself to concentrate solely on the infrastructure side of things, the answer is that the six selected are the correct ones, subject to a query about how station and car park improvement initiatives are intended to be dealt with.

West Malling/Maidstone East Line

A matter of considerable current concern to the local community is the planned withdrawal of city services on the West Malling/Maidstone East line. I understand that this has been planned for some time as part of the Integrated Kent Franchise and, through the years, the Borough Council has advocated strongly and robustly against the proposal.

However, it is nonetheless a major problem for those local residents whose working life is entirely dependent on the service and who have only in recent weeks become aware of this impending disaster for them personally. It is welcome that the RUS previews off-peak Blackfriars services as part of Thameslink improvements from 2015 and it prompts the question, if it can be done then why is it not appropriate now? I understand that the RUS is unable to influence the decisions taken many years ago on the city services on the West Malling Maidstone East line during the 2009 to 2014 period of the existing franchise. This will be the subject of robust campaigning by local Councils, MPs and passenger groups in the immediate weeks to try and force a change of heart at the DfT.

The issue at stake is all the more pertinent because the Draft RUS mentions 'rail-heading' in a number of places and recognises how unwelcome such travel patterns are in broader transportation terms with drivers passing stations to go further afield to other stations where the choice of London destination is more suited to their needs. Removing city stations from the timetable can only exacerbate such travel patterns.

In the meantime, I cannot express how strongly my Members feel about the need to preserve and enhance services on this line and on the Tonbridge/Redhill Line that I will comment on below. They have consistently and robustly insisted in the strongest possible terms their view that the degradation of services on both of these lines as a result of recent and proposed timetables changes is intolerable.

Tonbridge/Redhill Line

Coming to the Tonbridge to Redhill line, the oft-repeated assertion is that there is a low level of demand on the line and that is echoed in the Draft RUS. This is a narrow view of the local importance of the line as a strategic orbital route. 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.

If relevant transportation policy were to be followed there would be no question but that this line together with connections from Tonbridge to Maidstone West and thence to Strood would be the focus of significant attention as part of the RUS. 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 to the west and eastwards to Maidstone.

The recent 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 is working 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 adopted Transportation Policy than the failure to promote this circumferential route from the Medway Towns, and indeed from Ashford, to Gatwick using the direct line from Tonbridge. We should also be opening opportunities out to the west beyond Redhill.

The lack of attraction for this line may in part have been and continue to be a result of the slow frequently stopping service and partly because the service has historically been poorly marketed. One thing is certain, having to change trains at Redhill to pick up a Gatwick connection, as has been the case for the past eight months, 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.

BAA reckons that there are 3 million passengers a year who travel to the airport from Kent. If the rail service is as poor as it currently is, there can only be further stimulus for an already fast expanding growth industry of private cabs using the M20 and M25/23 to access Gatwick, a travel pattern that is directly in conflict with the Gatwick Surface Access Strategy and which over the term of the RUS is unsustainable.

I firmly believe that serious thought needs to be given to whether this line should continue to sit within the South Central franchise area when the current set of franchises come up for renewal at the end of your Control Period 4 around 2014/15 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.

More critically the under-marketing of the line should be seriously addressed by the Train Operating Company as soon as possible. Given that the current operators of South Central and Kent are from the same Govia stable, it is vital that they work together on this because it is clear from BAA figures that there is a significant market to be exploited.

I can only repeat how strongly my Members feel about services on this line and the need to preserve and enhance them.

Station Accessibility

One of the gaps identified in the Draft RUS relates to station accessibility and I would simply signal a general agreement to the range of non-site specific improvements listed such as improved pedestrian access, adequate cycle parking and improved car parking. On this latter point, I must express surprise at Fig 3.12 which illustrates Hildenborough Station as one where the car park is at 70/80% capacity. As the local parking management authority on behalf of the County Council, this Council has been wrestling for some considerable time with a serious and growing overspill parking problem on the verges of the narrow lanes around the station. In the light of the Draft RUS, I believe this a problem that needs to be resolved by us jointly and urgently.

For a substantial period during the early years of the RUS, it appears that there will be significant but as yet unspecified disruption to many services from Kent, particularly on

the Tonbridge line as a result of the remodelling at London Bridge from the autumn of 2012 until 2015. I accept that such a construction phase is both essential and that some disruption is inevitable but it would be interesting and informative if this could be mapped out in more detail by the time the final Kent RUS is published.

West Malling Station

In Appendix B, the figures for West Malling Station demonstrate that it is one of the busiest of the stations associated with the smaller Kent towns. More critically it has a hinterland of development that singles it out as a station that is bound to become significantly busier over the early years of the RUS.

It is therefore concerning that there should be so little reference to it in the RUS. Indeed, the station figures nowhere in the current National Station Improvement Programme despite the fact that there is a confirmed developer contribution of £250,000 for station interchange improvement and this is also included in the Local Transport Plan. Preliminary ground work has been carried out on an additional station car park and it is expected that work on this will take place shortly. Consequently this is an important station in West Kent area that is already the focus of attention and it appears strange that it is not overtly mentioned in the Draft RUS.

The Draft RUS Options

Gap A - Committed capacity mismatched to future peak demand

You identify Gap A as the being committed capacity not matching up to future peak demand. This focuses on routes into the capital and, in terms of services operated and passengers transported it is by far the most significant of the gaps identified.

If my understanding is correct, the response to this gap offers a rather bleak outlook particularly on the Tonbridge Line. Currently committed interventions will centre on train lengthening to 12 car units with little to be achieved from enhanced signalling or other such infrastructure interventions. The RUS is completely constrained by lack of capacity for any new train paths into London over the next decade and what there are will be considerably curtailed in the major works at London Bridge between 2012 and 2015. It appears to me that it is absolutely essential that you firm up the series of measures needed to accommodate both the 12 car units at the London terminals where there are currently capacity problems in being able to accommodate them at a number of the platforms and that full consideration is given to any boost to passenger capacity from using selective door opening.

Looking at Option 3.2, running 2 trains per hour in the peak from Maidstone East to Victoria, Blackfriars or Waterloo, I note that this is dismissed as not viable. However, I wish to clarify whether this option is additional to the Thameslink additional services identified on this line post-2015. If it is additional, then the analysis in Option 3.2 is accepted. If it is not, I would strongly urge that this analysis is revisited.

Option 4 to resolve this gap in future peak services to London involves a combination of train lengthening and selective door opening. It is essential that current overcrowding and the future expectation of this getting worse are dealt with so I am sure my Members

would wish to lend support to the increase from six to eight car operation on the West Malling/Maidstone East line (Option 4.1) and also that the measures needed to support the increase to 12 car units described in Option 4.3 using selective door opening.

You are dismissive in Option 5.1 of running the high peak service for a longer period as a means of resolving this gap but I wonder if you are being too hasty in doing so. In parking management work that the Council has been carrying out we have noted that there is a little more flexibility in the working day. People are not wedded to the nine to five structure as much has historically been the case and this could significantly change over the period of the RUS. Moreover, it could be that factors such as lack of parking at stations promotes a certain rigidity in peoples work patterns since if they do not arrive early enough all the spaces are filled. I believe you should be retaining Option 5.1, at least as a potential long term item to be revisited.

Option 5.2 involves running trains at maximum length during the shoulder peak periods. Given my view that there is some elasticity in passengers work patterns, provided there is sufficient parking and station access, and given also the severe constraints the RUS has in identifying any additional train paths in the peak, it seems to me that you are bound to retain this option for future consideration. I am sure my Members would wish you to exploit this to the full to address the otherwise serious situation on high peak over-crowding.

Option 6 is aimed at providing further capacity on the high speed line services to St Pancras. Many of the sub-options relate to north Kent passenger traffic that are not strictly relevant to this reply, but Option 6.4 certainly is as it concerns the Medway Valley Line and the potential for connection from Maidstone West through to St Pancras. This has a robust case in terms of the cost benefit ratio and is suggested for further development. I am sure my Members would very much support this and would particularly like to see more information at an early date about the impact this would have for services at Aylesford, New Hythe and Snodland. This could be a particularly attractive new service and there would need to be early consideration of parking capacity at each of those locations.

Gap B - non-London bound services in Kent.

The Draft RUS appears rather sceptical whether this gap actually exists. Given that the document is intended to express a thirty year vision, it is absolutely essential that full consideration be given to connections between communities within Kent and not just major on commuter services to London. Over the life of the strategy, this is an entirely valid gap that will grow in importance as climate change considerations and sustainable transportation options come to the fore.

Looking at the series of options, it will be clear from earlier comments that this Council very much supports route continuity on the Medway Valley Line from Strood through Maidstone West to Tonbridge and would urge that this be continued on with restoration of direct links to Gatwick. One quick look at the South East Plan would show that the infrastructure to achieve the 'spokes' between the 'hubs' already exists and such an inclusion in your strategy would echo regional planning policy.

Given these comments, it should come as no surprise that I disagree completely with the analysis for Option 7.2 (2tph service on the Tonbridge Redhill route) and Option 7.3 (2tph service between Tonbridge and Maidstone West) that concludes these options are not recommended through insufficient demand.

The Draft RUS makes mention of a number of potential routes where linkage is currently poor as a result of the historic development of the railway network in Kent and, indeed, actions by the DfT/SRA in more recent times. Tonbridge to the south coast is one linkage as is the general link from West Kent to the new station at Ebbsfleet. As a general comment, if the strategy is to have real weight as a framework for the period beyond 2019, it really must tackle the problem of train links between communities within Kent and to neighbouring non-London locations.

Option 7.1 indicates a West Malling/Maidstone East Line all-day city service as part of the Thameslink service specification beyond 2015. I am sure my Members would wish to strongly support this Option, particularly in the light of my earlier comments about the imminent elimination of the peak London Bridge service and the off-peak Cannon Street services.

Option 8.2 suggests a combining of the Medway Valley Line with the Sittingbourne to Sheerness line. The option is not recommended for operational and demand reasons and I would concur with that conclusion because there is unlikely to be a need for such a linkage and it can be better addressed using the bus network.

Options 8.4 (combine the Medway Valley line and the Tonbridge/Redhill Line into a single operation) and 8.5 (New service between Tonbridge and Gatwick) have already been commented on in detail earlier in this response. For the avoidance of any possible doubt, my Members would support these options in the strongest terms. There is already a considerable taxi driving industry ferrying plane passengers from Kent adding to congestion on the M25 that proves the assertion "insufficient demand" to be invalid.

The final option in this group relates to reducing journey times. No specific schemes are identified but this Council would support this overall aim.

Gap C - accessibility to the railway network.

Car parking provision at stations is a prime element of this gap and I have already mentioned the concerns about road safety in the lanes around Hildenborough station as an example of such apparent under-provision.

Over the past two decades I have observed on street parking increase from the odd car in Noble Tree Road to the situation where there are substantial numbers of cars parked on verges in the rural lanes out to a considerable distance from the station. There are similar problems at other stations and I mention Barming in this context because the Council is currently installing waiting restrictions near that station to manage overspill parking there. Shortly the Council will be considering similar problems arising from commuter parking in East Malling. This is a valid gap for the strategy and this Council will support actions that help alleviate road safety problems on local roads around stations where there is particular pressure.

Over the life span of the strategy, access to stations by bike is likely to increase substantially and with it the need for safe and secure cycle parking. Again, this Council would be keen to support and endorse plans to address this.

At paragraph 8.17.2, the RUS supports roll out of joint marketing initiatives such as 'Plus Bus' and integrated timetabling. I would echo support for this as this Council, through the regular meetings of its Public Transport Panel, has consistently advocated such initiatives to make bus and rail travel as seamless as possible.

Figure 8.5 comments on aspirations for new stations. There are none proposed within the geographical area of this Borough but I would like to comment indirectly on Rochester Station. If there is to be major work at this station, the case for doing so in conjunction with parallel work at Strood Station in the context of the Medway Valley Line should also be considered to avoid missing an opportunity of enhancing the infrastructure there.

Gap D – Evening, weekend and Public Holiday services.

You say that specific interventions are likely to be required to respond to this market. I would suggest there is no need to qualify this by saying that it is 'likely'. You are setting out a strategy stretching over a number of decades and a step change in the quality of provision outside the peak periods is essential if rail is to take its proper place as a mode of choice in peoples' lives.

Granted that maintenance works are unavoidable and it is understandable that these will be carried out at times when the network is at its quietest. In that context I would support the proposed ways of mitigating the effects of such works through alternative train paths and proper detailed planning and phasing of the operations and a minimal use of replacement buses which act as a disincentive to rail passengers.

Gap E – Rail Freight considerations.

The detailed difficulties with respect to freight capacity appear to focus on the Thames Gateway area. However, in general terms this Council would support measures that assist with a modal shift from lorries to train as means of addressing and mitigating pressures along the M20 corridor, in particular the declared Air Quality Management Zone through the Ditton/Aylesford stretch.

Gap F – Future Service Performance

Gap F relates to future service performance on the railway and the threat to this performance as the capacity is pushed near its limit. The Draft RUS is short on detail about how this will be achieved. Nevertheless, it can be taken as a given that my Members would wish to support in broad terms the principle that you should be seeking in the RUS to achieve service improvement and to promote the range of measures required to ensure that it is secured.

Concluding comments

The impression I have in reading the Draft RUS is that much of the proposed intervention owes a lot to the additional capacity created by the new high speed line. Without this, the outlook for the strategy would have been bleak indeed. As it is, there must be concern about peak capacity and crowding difficulties on the Tonbridge Line in the period up until 2019 and even more concern that the only seemingly viable way of resolving this beyond 2019 is the release of some additional capacity through the Hayes Branch conversion. I do hope that the final version of the RUS is able demonstrate a more positive picture of how this can be successfully resolved.

In closing, I do hope you will find these comments helpful and not overly critical. They are intended to be constructive and aimed at contributing to a long term rail strategy that will have real value and usefulness and which reflect ambition to lead change and present a sense of vision.

To a degree, the RUS appears to be restoring us to an earlier position and making up for the damage done in the present round of franchises and it certainly validates what the Council is currently doing in supporting the case for retention of city services on the West Malling line.

As an over-riding comment, recognising the thirty year reach of the strategy, I would urge you to keep all options for the future as open as possible so that opportunities are preserved.

I will follow up very shortly with any additional Member comments and I will of course be happy to expand on any of the observations in this letter.

Yours sincerely

Steve Humphrey
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