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Dear Mr Mole

West Malling/Maidstone East Line – December 2009 Service Changes

You recently wrote to The Rt Hon Sir John Stanley (your letter of 27 November) conveying the ministerial decision on the future of services to the city stations on the West Malling / Maidstone East line.

Sir John has very kindly shared your letter with me and I have to say that the contents are deeply disappointing. This is especially so because you had clearly been presented with a sound case for preserving the services based on contributions from the local MPs, this and our neighbouring Council and the new rail users groups.

You had appeared to give the matter long and careful consideration. Consequently, I had hoped that some element of the services at least would have been saved as a result. I am grateful that you did give this matter such deliberation and while this Council might not have agreed with your conclusions, we may have acknowledged the reasons for it, had these been clearly explained in the decision letter. Sadly, they were not and I believe we now have a flawed and ultimately disastrous outcome that will have seriously adverse effects on the proper planning and regeneration of mid and west Kent and a backward step in terms of sustainable transport.

Without a proper service to the City stations the County Town of Kent, Maidstone, and the significant growth of settlements along the line such as Kings Hill are condemned to more difficult planning future until this flawed decision is overturned through the implementation of the Kent Route Utilisation Strategy, if not before.

I would like to offer some observations on your letter of 27 November to Sir John. In doing so, I will assume you are reading this in the context of the evidence we contributed towards Sir John's submission to you in August. This set out the planning context as far as Tonbridge and Malling is concerned that underpins the case for retaining at least some of the City services on the line.

The Role of the Strategic Rail Authority (SRA)



Director of Planning, Transport & Leisure Services: Steve Humphrey (MRTPI)



INVESTOR IN PEOPLE

Your mention of the SRA is interesting because it built the removal of the city services on the Maidstone East line into the franchise specification. This Council considered this decision wrong at the time and we believe that changing circumstances in the interim have made the position even less justifiable in regional and local planning terms. It is difficult to understand just why the team of ex-SRA people now embedded in the DfT continue to be wedded to it.

You say that the changes were 'extensively consulted upon'. Certainly, there were announcements of intentions but little evidence that responses had the capacity to change anything proposed; thus not really 'consultation'. This is evidenced by the fact that the thoughtful and constructive points made by many in these parts were simply not addressed in the response received.

Increased Capacity in West Kent

Apparently, capacity has been freed up in West Kent as a result of the new high speed services. Given that the high speed line and the new rolling stock represent the biggest addition of rail mileage for several generations, it would be surprising if some fresh capacity had not been created. The frustration is that it is entirely missing on the Maidstone East corridor where, instead, rail passengers are, since Sunday this week, experiencing a worse service than before.

Peak Services

I note your mention of peak services. An important element in considering services on this line has been the absence of true peak services. What we had until a few days ago was a poor substitute based on "shoulder-peak" trains that a significant number of passengers had built their working life around. A train from West Malling shortly after 9am and return at 7.15 pm is not a peak service although it was important for those who depended upon it.

More to the point, if there were proper peak services to the City, there would be a considerable reduction in the wasteful and unsustainable rail-heading that currently takes place to many places including Headcorn, Staplehurst and Sevenoaks. For example, at Hildenborough station we have seen, over the past decade, what started as some minor commuter parking with an odd few vehicles deteriorate to become a major wide-spread parking problem in the lanes for a considerable distance around the station.

Passenger Demand

Whether there are more than 200 or 300 passengers using the 'shoulder peak' service is a matter of measurement rather than conjecture and the local rail user groups have done some excellent work to demonstrate that the numbers are more than quoted in your letter.

But even if the numbers were to be taken as 200 or 300, since when did this number of passengers become an insignificant amount whose travel arrangements warranted little or no consideration by a monopoly supplier of rail transport services? It seems to me

quite extraordinary that the travel needs of such a significant number of people should be dismissed so readily under the justification of 'no business case'. I will come back to the concept of a 'business case' in a moment and simply suggest that the potential seismic impact on the lives of those 200, 300 or more people caused by the timetable changes merits more justification and explanation than you have provided thus far.

Additional Cost and Journey Time

So too does the reference to journey time disbenefits (without any acknowledgement of the additional cost, which is considerable over a year). The local rail user group has already provided full details illustrating just how flawed the disbenefit statement is. Some people may be able to alter hours to catch the much earlier Blackfriars services but many may not and their only alternative is to seek other employment either locally or at a location nearer Victoria station or, indeed to join the ranks of rail-headers who make a daily unnecessary but unavoidable journey to distant west and mid Kent railway stations.

Subsidy

You indicate that £637,000 of subsidy would be required to provide 'the services' on the Maidstone East line.

- There is no explanation of what these services are. It could be a complete peak and off-peak service mirroring the arrangements on the old timetable. If is, it would have been better to have had some break down into constituent elements to illustrate, say, what preserving the shoulder peak services might require by way of subsidy. Perhaps this could be achievable and it is possible that the needs of the majority of passengers using the line might be met at a far more modest level of subsidy. But we are not privy to this information so there is no way of knowing.
- Additionally, I understand that the franchise specification places the financial risks of new services onto the train operating company. We do not know if the financial risk has been priced into the £637,000 as an extra premium or whether the DfT has signalled that it is willing to carry that risk.
- There is no information on how the subsidy amount has been worked out; for example, whether South Eastern has simply been invited to name its price for a certain service that we do not have any information about.
- I understand also that Kent County Council had indicated an intention to contribute towards some of the costs of preserving at least some element of the City services but, again, from the statement that there would need to be a £637,000 subsidy it is unclear the extent, if any, such potential external monies might have figured in the assessments.

However the figure has been arrived at, there does appear to me to be a strong case for an independent assessment of the business case, even in its narrowest of definitions.

Business Case- Wider Considerations

You mention the 'business case' for a service. It appears to me to be entirely proper for any of the Train Operating Companies (TOC) to adhere strictly to its franchise specification and consider the business case to be focused on the ticket revenues minus the cost of running a particular train plus an element of profit.

I do not believe the same applies to a government department. It has a clear responsibility to consider a much broader picture consisting, among many other things, of such considerations as local economic regeneration and national, regional and local planning policies. The part of the DfT that was once the SRA has maintained its support for the decision it made many years ago and has felt no need to refresh in the light of the evolving planning environment. It is oblivious to the South East Plan, to the Local Development Frameworks, even to a document that it was instrumental in producing, the Regional Planning Assessment for Railways (2007), which quotes an aspiration to strengthen regional hubs.

It is difficult to reconcile service deterioration from Maidstone, a designated 'Growth Point' and Regional Transport Hub, with such an objective, not to mention the new and expanding settlement at Kings Hill with one of the largest business developments in the region and the considerable growth of housing development in the Medway Valley. The decision made is entirely contrary to managing these significant policy initiatives in a sustainable way.

The Planning Context

I am concerned that there might be another objective at play that is not enshrined in any local or regional planning context. If, say, the implicit intention is to build demand for high speed services from Ebbsfleet station from existing passengers and from the planned development in the area, it is a high risk strategy. The fact that there is substantial capacity in its 11,000 space car park hints at an element of 'build it and they will come'.

However, in practice there is a major constraint on access from any new developments to Ebbsfleet and it comes from the DfT itself. A significant proportion of any traffic from new developments would access Ebbsfleet using the trunk road network. There is a parallel part of the DfT that has very strong views about traffic growth on trunk roads and motorways engendered by new developments. The risk of it using its powers of direction against such planning consents is serious and real and, indeed, has already occurred. In such circumstances, it is surprising that there is so little concern elsewhere in the DfT and CLG about preserving services on the Maidstone East line to ensure a proper and attractive environment for future planned developments in mid and west Kent and, indeed, that what is planned in adopted regional and local planning documents can actually be achieved without coming up against refusal prompted, ironically, by the DfT.

Rail-Heading

I must return again to the subject of rail-heading. In transportation terms, this is highly undesirable as it would be better for passengers to get on a train that suits their needs at their nearest station. However, there is nothing in the franchise agreement that would give any reason for a train operating company to do anything to deal with rail-heading.

In general, a rail-heading driver will eventually become a passenger somewhere on the rail network and the TOC will generate income. The only concern for the TOC is when drivers are reducing the cost of their ticket by travelling to a station nearer London but even then the impact is lessened by the vagaries of the pricing structure.

Consequently, there is little pressure for the TOC to change service patterns to provide a better timetable or destinations for passengers already rail heading.

However, such perverse travel patterns certainly should be of concern to the DfT and it is a mystery why it did not seek to draft a franchise specification all those years ago to deal with this.

Future Considerations

Finally, it is a sobering thought how quickly the time passes on these apparently long franchises. We have now gone through the half way point on the Kent Integrated Franchise and thoughts will soon be turning to the next one which, though a long way off (December 2013 assuming a two year extension), will require a new service specification to be drawn up in the not too distant future. If this matter has not been resolved beforehand, it is a certainty that this Council and our neighbouring one in Maidstone will ensure the issue forms part of the consultations for the next franchise.

In the light of these further important observations and the continuing and measured representations of others in this area I would urge you to review this matter again urgently.

Yours sincerely

Steve Humphrey

Director of Planning, Transport & Leisure

cc: The Rt Hon Sir John Stanley MP
The Rt Hon John Denham MP
The Rt Hon Ann Widdecombe MP
Jonathan Shaw MP
Hugh Robertson MP
Mick Sutch (KCC)
Cllr Robertson (Maidstone BC)
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