

TGKP RESPONSE TO THE NETWORK RAIL SOUTH EAST ROUTE: KENT AREA ROUTE STUDY

The Thames Gateway Kent Partnership welcomes this opportunity to comment on Network Rail's "South East Route: Kent Area Route Study". Our detailed comments are set out below, but we would like to highlight the following headline issues for Network Rail's consideration:

- The consultation draft appears to under-estimate the sustained population and employment growth expected in North Kent up to and beyond 2024. **We urge continued close engagement with local partners to ensure that analysis is robust and to avoid the risk of under-provision of rail network capacity.**
- Network Rail, the new South Eastern rail franchisee and Department of Transport need to **develop innovative solutions to deliver increased capacity and 12-car rolling stock on the HS1 network** as a matter of urgency to give passengers the service they deserve. Any proposals for extension of or additions to the HS1 network must be designed and delivered in such a way as to avoid detriment to existing services and customers.
- Investment in the rail network needs to make a positive contribution towards **encouraging modal shift from road to rail for both passengers and freight**, particularly to complement local ambitions to achieve more sustainable travel behaviours and development outcomes in key locations such as Ebbsfleet Garden City.
- We commend the **extension of Crossrail/Elizabeth Line towards Gravesend (C2G)** as a crucial strategic investment to support growth in North Bexley and North Kent, to deliver much-needed capacity, improve connectivity within the Thames Gateway and with destinations across and beyond London, and to relieve pressure on central London rail termini. **We urge Network Rail and Department of Transport to adopt C2G as a Government-led scheme.**
- Whilst recognising the complexities involved in securing the quantum of freight pathways to meet national and international obligations in the face of demand for increased passenger movements, the draft Study conveys a passive rather than proactive approach towards maximising the potential for rail freight. We suggest Network Rail and Department for Transport should be doing **more to incentivise and enable more modal shift of freight from road to rail, and to review the prioritisation given to freight system enhancements** that could ease capacity constraints on the passenger network.
- **TGKP does not support interventions that would limit the choice of central London terminals for rail passengers from North Kent.**

Detailed Comments

Chapter 3: The Capacity Challenge – Accommodating the Demand

1. Section 3.3 looks at passenger demand in the study area. We are not convinced that Network Rail has fully recognised the growth that has already taken place in North Kent, nor fully factored in the **expectations of future growth**. In the area covered by TGKP – the Kent boroughs of Dartford, Gravesham and Swale and Medway Unitary Authority – growth has exceeded national trends. In some parts of TGK the rate of growth has been nearly double the national rates, notably in Dartford as illustrated below:

Growth	Thames Gateway Kent*		Dartford*	
	Number	Percent	Number	Percent
New Homes (2001-16) ¹	+31,510	+14% (England 12%)	+8,100	+23%
Population increase (2001-15) ²	+74,500	+13.4% (E&W 10.6%)	+17,900	+20.8%
New Jobs (APS Workplace Analysis) 2015-16 compared with 2004-5 ³	+23,900	+10.7% (GB 9.7%)	+8,800	+17.3%

*Numbers for TGK are inclusive of Dartford

2. High levels of growth are forecast to at least 2031 (the planning horizon for a number of local plans), with expectations of 60,800 new homes, 146,700 more people and 63,200 new jobs in Thames Gateway Kent in the period 2011-31⁴. Around 40,000 of those new homes are already consented or allocated in local plans.
3. We therefore contest the assumption reflected, for instance in paragraph 3.3.3, that growth impacting upon the HS1 route is likely to slacken after 2023/24. That paragraph states: *“One of the main reasons provided for such high growth is that people are moving to live near the HS1 route so they can commute quickly to London. However it is expected that by 2023/24 this migration will have completed and so London employment could be expected to be the main driver for peak passenger demand.”* ONS 2014-based population projections suggest only slight diminution in the rate of population growth in North Kent beyond 2023/24 (from 1.0% annually to 0.9% annually, cumulatively 17.9%, 2014-2031⁵). However, Kent CC’s housing-led forecasts, which take account of housing delivery and allocations in local plans, suggest growth will continue at a higher rate for longer (cumulatively 20.1%, 2014-2031⁶). Subject to external factors that cannot be quantified (e.g. the impact of Brexit on the City of London and Docklands), **there is every reason to suppose that continued growth in North Kent and other parts of Kent with access to HS1 will translate into continued growth in peak rail journeys on HS1.** Future capacity on the network needs to be planned accordingly. See also paragraphs 7 and 11 below.
4. Paragraph 3.3.7 suggests that employment growth rather than people transferring to rail from other modes of transport, will be the key to driving further demand for rail. For TGKP partners, particularly the Ebbsfleet Development Corporation, designing new development to encourage modal shift from private car to public transport is critical to future sustainability. With regard to commuting driven by employment growth in London, the consultation draft does not appear to take account of policy-driven changes in Greater London such as the introduction of the Ultra Low Emission Zone in 2019, growing awareness of air quality challenges in and around the Capital and emerging proposals for extension of the congestion charging zone to cover the whole of London. We suggest it would be prudent for Network Rail to give greater weight to the **potential for modal shift** in modelling future growth in rail usage.
5. Section 3.8 refers to the effect of the new Crossrail/Elizabeth Line services to Abbey Wood from 2018. Please see comments below about the possible extension of **Crossrail towards Gravesend** (C2G, paragraph 22 onwards).
6. The pressure on **HS1 capacity**, particularly from Ebbsfleet, is a key issue in the South Eastern Rail Franchise consultation, and it is crucial that it is addressed effectively in the Kent Route Study (Section

¹ DCLG - Live Table 125: Dwelling stock estimates by local authority district: 2001 - 2016

² ONS Mid-Year Population Estimates, 1 July 2016

³ ONS/NOMIS - Annual Population Survey - workplace analysis, July-June.

⁴ Sources: Kent & Medway Growth & Infrastructure Framework (revised data May 2017); KCC Housing-Led Population Forecast (Oct 2016), Strategic Business Development & Intelligence, Kent County Council.

⁵ ONS 2014-based Subnational population projections

⁶ Source: KCC Housing Led forecast (Oct 2016), Strategic Business Development & Intelligence, Kent County Council, measuring change from 2014.

- 3.10, CO3 & CO9). We echo the comments made in our response to the rail franchise consultation in pressing for 12-car trains to be introduced on HS1 as soon as possible. This increased capacity is needed now and innovative solutions are needed to enable the necessary rolling stock to be brought into operation.
7. Paragraphs 3.10.11-15 deal with **potential future developments in the North Kent area**, focusing on Ebbsfleet Garden City and the proposed London Resort Theme Park⁷. It should also be noted that a significant quantum of development, particularly in Dartford, is outside the Garden City boundary. Growth has been focused at mixed use locations north of the town centre, for instance at The Bridge and Northern Gateway (adjacent to Dartford Station). New housing completions in Dartford are running at around 1,000 per annum, and a central principle in accommodating this growth is trying to deliver substantial modal shift towards public transport. Capacity, connectivity and quality are going to be vital. TGKP would therefore support Dartford BC's request that **upgrading Dartford Station (section 3.16) should be given early priority**, linking with changes that would be needed to accommodate extension of Crossrail (see below, particularly paragraphs 22 to 24).
 8. Paragraph 3.10.11 surprisingly suggests that Ebbsfleet Garden City is not regarded as a committed scheme. Of the 15,000 homes proposed in the Garden City, over 500 have been built, around 1,500 have detailed planning consent and nearly 10,700 have outline planning consent. **It is clear that the Garden City must be treated as a committed scheme.**
 9. Where there may be less certainty at this stage is the scale and timing of the development of the commercial centre of Ebbsfleet. As well as 15,000 homes, the Ebbsfleet Development Corporation and partners have ambitions for 32,000 new jobs in the commercial heart of Ebbsfleet, as reflected in the EDC's draft Implementation Framework⁸. The shape of those proposals will become clearer in the second half of 2017 as viability and capacity studies inform negotiations around the development programme. **We welcome Network Rail's continued close collaboration with the Development Corporation and other stakeholders to update the analysis feeding into the final Route Study.**
 10. Of the scenarios suggested for travel patterns associated with growth at Ebbsfleet (3.10.12), the third is the only plausible one but only tells part of the story. It can be expected that these would involve a mix of local journeys and rail travel both from Medway, Ashford and points of origin further east as well as contraflow travel from London, including on North Kent Lines from London boroughs such as Bexley and Greenwich. Network Rail's planning and approach should also reflect local partners' desire to drive modal shift from road to rail (and other public transport), both to address existing congestion and air quality challenges, particularly around Dartford, and to **encourage more sustainable travel patterns and behaviours associated with growth.**
 11. We recognise that the current lack of certainty or detailed information about the proposed **London Resort Theme Park** (3.10.13-15) hampers detailed modelling of the impacts on the rail network. We welcome Network Rail's recognition of the need for more detailed analysis once more information is available which will hopefully emerge in the next few months. However, the existing assumptions that increased network demand arising from the Resort would be mainly outside peak hours and also mainly travelling in the contra-peak direction do not seem to marry with information produced by London Resort Company Holdings. Based on an anticipated workforce of 13,000 within the Resort itself, LRCH figures shared with TGKP suggest 44.63% of the workforce would come from locations east of Swanscombe (Gravesham, Medway, Maidstone, Swale, Canterbury, Ashford). Whilst a major portion of these - 28.52% - are expected to come from Gravesham, and therefore more likely to use local public transport rather than rail, it is reasonable to forecast that an appreciable proportion of the workforce will be travelling from origins east of Ebbsfleet. For those who utilise rail, the split between HS1 and

⁷ This scheme is currently referred to by London Resort Company Holdings as an "Entertainment Resort". For the purposes of this response we are adopting Network Rail's descriptor.

⁸ Ebbsfleet Implementation Framework, October 2016

North Kent / non-premium fare lines is likely to favour the latter and will add pressure to network capacity, particularly in the morning peak (less so in the evening)⁹.

12. TGKP adopts a neutral stance regarding proposals affecting other parts of Kent. However, in relation to the Brighton to Ashford (**Marshlink**) route (section 3.14 and 5.13.1-15), we would reiterate the point made in our response to the South Eastern Rail Franchise consultation that, given rolling stock and performance constraints, extending the HS1 network to cover this route could exacerbate capacity problems and service reliability further up the line. **We would not be opposed to the upgrade provided this did not impact negatively on HS1 services in North Kent**; but chapter 5 seems to indicate that other incremental measures might be more cost-effective. Similarly, we are neutral about the proposals for a new station at Thanet Parkway (covered in paragraphs 5.15.8-10) but have some concerns that any adverse impact this might have on HS1 capacity should be offset by timely upgrading and delivery of additional 12-car rolling stock.
13. Section 3.15 deals with providing sufficient capacity for **freight**. The impression given by this section is that whilst Network Rail is honouring the relevant Usage Contract, there is a massive under-realisation of freight traffic levels on the network. For instance, paragraph 3.15.5 refers to forecast utilisation on Channel Tunnel freight paths rising to only 38% by 2044. This indicates significant scope to accommodate much greater shift of freight from road to rail, thus relieving capacity on the strategic road network, and possibly to utilise under-used freight paths for additional passenger services. This approach might also be applied to the Grain freight line on the Hoo Peninsula. We would urge Network Rail – and the Department for Transport – to take a **joined-up approach to examine how modal shift of freight from road to rail might be incentivised and to identify and address any barriers** that stand in the way of delivering that modal shift.
14. With regard to section 3.16 on Stations and passenger circulation, see paragraph 7 above and 15 below.

Chapter 4: Improving Connectivity

15. We note the position taken in this chapter (4.2) regarding off-peak trains to London from stations within 30 miles. Whilst based on current metrics we would not dispute Network Rail's findings or intentions, it will be critical to join up thinking about the future of Stone Crossing, Swanscombe and Northfleet in relation to both the possibility of the London Resort Theme Park (intended to be operational by 2022/23) and the longer-term possibility of the C2G extension of Crossrail.
 - Whilst Ebbsfleet is likely to be marketed as the arrival point for rail passengers visiting the Resort, Swanscombe station could be particularly important for access by employees at the Resort as well as a proportion of visitors. In both cases passengers could be arriving during off-peak periods and travelling in both 'flow' and 'contra-flow' directions. The current station is non-DDA compliant and has very poor access. **We would urge Network Rail carefully to review proposals for Swanscombe station** in light of further information and analysis relating to the Resort proposals, as well as reappraisal of growth projections for the area, and to plan for whatever upgrading can be achieved within the physical constraints of the location;
 - **Further consideration should be given to the positioning of and access to Stone Crossing station**, so as to maximise its potential to serve Crossways Business Park and nearby developments such as The Bridge (the other side of the A282 Dartford Crossing approach, but linked a dedicated Fastrack rapid transit service route), and Stone itself. The existing station has poor access and is rather close to Greenhithe station. If there were potential to re-locate the station up to half a kilometre further west it could play a more strategic role in supporting growth and sustainable travel patterns;

⁹ Technical work on travel demand carried out in 2014 (WSP Consultants, shared with TGKP) showed an expectation that 30% of staff would travel by rail, with a significant proportion of arrivals between 6-8am but continuing through the morning, including the 8-9am 'peak' hour.

- As part of the C2G scheme Northfleet station is under consideration as one of the options for the **location of a Crossrail station or terminal linking to Ebbsfleet International.**
16. In all three cases, **the prospect of Crossrail services could improve the viability and increase the intensity of development in the vicinity of these stations.** More detailed thinking about specific stations will be set out in the C2G strategic outline business case and **we would urge Network Rail to engage fully both in providing expert input into the business case and planning proactively for the outcomes it proposes.**
17. We concur with the observation in 4.6.3 that connectivity between North and South Kent is poor by both road and rail. The draft Study gives relatively little attention to the Medway Valley line. At face value this would appear to have potential to play a greater role in employment-related travel between Medway and Maidstone, which is one of the most active travel-to-work zones in Kent. For example, analysis and modelling by Kent CC based on 2011 census data showed 3,900 Maidstone residents travelling to Medway for work, and 8,730 Medway residents travelling to Maidstone (this does not include journeys to and from other districts to the south of Medway). Although those figures relate to travel from any point of origin and destination within those authorities' areas, it is significant that the most direct road link between Maidstone and Medway – the A229 – suffers some of the worst peak congestion on the local network, affecting M20 Junction 7 and M2 Junction 3. As we have commented in our response to the South Eastern Rail Franchise consultation, **improvements to the performance of the Medway Valley line could complement other incentives to encourage more people travelling between these centres to use rail rather than road.**
18. The suggested southern approach to Ebbsfleet (paragraph 4.6.5 and 5.13.16-19) is interesting and potentially worth exploring further. However, Network Rail will be aware that the necessity to cross the A2 close to the Ebbsfleet junction could pose a number of physical and policy challenges. These include the necessary upgrading of the Ebbsfleet junction to support the development of the Garden City, the possible location of an access road linking the proposed London Resort Theme Park to the strategic network, and the Development Corporation's plans for the phased development of the commercial centre as well as complex archaeological and environmental constraints along the route. These make this a difficult proposition in practice. We will be interested to see the assessment of costs and benefits in the final Route Study.
19. Paragraphs 4.7.4 and 4.7.10 allude respectively to the potential for Crossrail to enable improved access from North Kent to Heathrow Airport, and for new journey opportunities from the North Kent lines. In our response at paragraph 24 below we highlight the greater potential that extending Crossrail towards Gravesend would offer in terms of connectivity from Kent to Heathrow. The draft possibly overstates the likelihood of contra-flow journeys to Abbey Wood from stations on the Greenwich, Sidcup, Bexleyheath and North Kent lines. There is clearly something counter-intuitive about travelling in the 'wrong' direction (away from London) in order to connect to other services taking you back into London. Much would therefore depend on ticketing and timetabling as to whether these alternative journey patterns were worthwhile. The C2G group estimates that a greater benefit would derive from capacity on these lines being relieved by passengers from stations between Gravesend and Dartford being able to travel directly into London via Crossrail without needing to use North Kent lines west of Dartford nor the central London termini at Charing Cross or Cannon Street. **TGKP is, however, keen that both the South Eastern franchise and the Kent Route Study should look at ways of incentivising contra-peak flow to destinations outside London, notably in the Thames Gateway, to support employment growth and regeneration particularly in our town centres of Dartford, Gravesend, Medway Towns and Sittingbourne as well as Ebbsfleet.**

Chapter 5: Strategy and choices for funders

20. In relation to high speed domestic services (section 5.7), see the comments at paragraphs 1 to 3 above regarding the expectations of sustained, above-average growth beyond 2024, and paragraphs 6 and 7 above in support of lengthening HS1 trains to 12 cars as a matter of urgency.

21. We recognise that paragraphs 5.12.4-7 describe rather than advocate South East London Metroisation, but we would want to reiterate our concerns about aspects of the metroisation concept. In particular, **TGKP does not support the proposal for reduction in the choice of destinations, having regard to the impact of interchange penalties on journey times and the different employment markets served by the different termini.**

Crossrail/Elizabeth Line extension towards Gravesend

22. We welcome the consultation document's acknowledgement in 5.12.8-12 of the project examining the business case for extending Crossrail (Elizabeth Line) from Abbey Wood eastwards towards Gravesend (C2G), listing this as a third party proposal. We also welcome the fact that Network Rail is now represented on the project group developing the strategic outline business case. It is slightly disappointing that C2G is treated as a third party scheme whilst proposals with less stakeholder interest, such as the southern approach to Ebbsfleet, are being explored as part of Network Rail's core analysis. **We suggest that the time has come for Network Rail and the Department for Transport to recognise C2G as an official scheme to be planned and scheduled as part of Network Rail's forward programme.**
23. Much of the focus on C2G is what it offers by way of improved capacity and connectivity for North Kent and LB Bexley in particular. One aspect that perhaps deserves more attention is the contribution it could make to **further reducing pressure on terminus capacity in Central London.** Throughout the route study, and distilled in chapter 5.11, the scope to improve service frequency and journey times on the North Kent lines is constrained by the absolute capacity limitations at Charing Cross and Cannon Street in particular. The extension of Crossrail to Ebbsfleet/Gravesend offers an alternative pathway into – and through – the Capital for customers travelling from stations east of Abbey Wood, without the interchange penalty that will exist at Abbey Wood when the Elizabeth Line itself is fully open (as described in 3.8.7-10). Migration of a greater proportion of journeys from North Kent lines onto Crossrail would relieve pressure on existing termini and some of the over-crowding pressures affecting stations closer to central London. The cost benefit analysis for C2G needs to capture the potential contribution the scheme would make towards removing – or significantly delaying – the need for major re-build costs at Charing Cross and Cannon Street or, more radically, the need to find and build an additional London terminus. **We would welcome Network Rail's engagement with examining and appraising these effects in developing the strategic outline business case for C2G.**
24. C2G would also improve North Kent's direct connectivity to London City Airport and Heathrow Airport and thus increase the scope both for improved journey times by rail but also, e.g. through interchange between HS1 and C2G at Ebbsfleet, enable customers across east Kent to travel to Heathrow by rail rather than car. This would in turn relieve pressure on the A2/M2, M20, M26 and M25 strategic road networks, reducing congestion and improving air quality.

Other proposals

25. Regarding Marshlink (5.13.1-15) and Ebbsfleet Southern Link (5.13.16-19) see the comments at paragraphs 12 and 18 above respectively.
26. Turning to proposals to enhance **freight infrastructure**, the suggested Angerstein Wharf link (paragraph 5.14.1-2) is outside the TGKP area, but **it seems to us to deserve a proper appraisal as a potential priority in the period to 2024** rather than beyond, given the impact that current routing and movements have on the timetable for North Kent lines. Similarly, we do not have a direct locus in respect of the proposed Howbury Park Freight Terminal described in 5.14.5-6. However, we note that Dartford Borough Council, one of TGKP's partners, has refused planning permission for those aspects of the development within their boundary, chiefly because of the negative impacts on local transport networks and air quality. We are also of the view that whilst it may be technically compatible with the proposed extension of Crossrail, it would certainly complicate delivery of that scheme. **TGKP would therefore not welcome the proposals for Howbury Park to be taken further.**

Conclusion

27. TGKP and its partners are keen to work with Network Rail to deliver shared ambitions for sustainable development and growth. Major rail infrastructure investment is required in North Kent in order to accommodate the high growth levels already delivered and projected into the future. We suggest that a transformative upgrade in infrastructure is needed to unlock sustainable development benefits. Accordingly, we would reinforce the message that the potential of an extension of Crossrail towards Gravesend should form an integral part of the final Route Study. We would also welcome ongoing engagement with Network Rail, Department for Transport and the chosen South Eastern Rail franchisee to help ensure that service improvements and investments in both the short and longer terms make the optimal contribution towards fulfilling the strategic objectives for the Thames Gateway.

TGKP

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The Thames Gateway Kent Partnership is a public-private partnership, established since 2001, promoting sustainable economic-led growth and regeneration in North Kent.

The top priorities in our *Plan for Growth 2014-20* are:

- Delivering growth in key locations
- Attracting and retaining investment
- Focusing on quality
- Supporting businesses – growth key industry sectors
- Supporting businesses – increasing innovation, enterprise and creativity
- Improving skills, qualifications and employability

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