

TGKP response to the South Eastern Rail Franchise Public Consultation



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 in key industry sectors
- Supporting businesses – increasing innovation, enterprise and creativity
- Improving skills, qualifications and employability

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The Thames Gateway Kent Partnership welcomes this opportunity to respond to the Department for Transport's South Eastern Rail Franchise Public Consultation. We have responded to a number of the detailed questions below, but would like to highlight the following headline issues:

- **Immediate capacity improvements are needed** across the whole rail network in North Kent, but most pressing on the High Speed 1 network which is severely overcrowded through much of each day and particularly on peak services, with standing room only available for passengers at Ebbsfleet (and even Ashford). Failure to address this rapidly will start to impede growth in North Kent. Creative, innovative and fast solutions are required to deliver 12-car trains and to introduce shuttle services between Ebbsfleet and London St Pancras.
- The rail network is one element of a complex transport picture in North Kent and **investment decisions need to be informed by a strategic and holistic analysis**. The strategic road network in North Kent is under severe pressure. The A2/M2 and A20/M20 are critical parts of the UK's national infrastructure enabling traffic movements throughout the country to and from continental Europe. Improvements, both committed (such as the A2 Bean and Ebbsfleet Junctions) and planned (e.g. M2 Junction 5/A249 interchange), plus the Lower Thames Crossing, are essential to tackle congestion and capacity issues. But a key objective for TGKP is that growth should be accompanied by reduced reliance on the private car, to reduce congestion and improve air quality. Achieving modal shift from motorised to public transport (plus walking and cycling) is critical to sustainable growth, notably at Ebbsfleet Garden City. Achieving behavioural change depends on the quality of the public transport offer. Investment in and improvements to the rail network will benefit the region's road network: improvements to capacity, pricing and the service offer should aim to reduce the reliance on car travel, particularly commuter journeys to and from London. **The new south eastern franchise should acknowledge its role not just in catering for 'business as usual' passenger growth but also supporting modal shift from road to rail travel.**
- **The franchise award needs to treat the exceptional growth in North Kent, in terms of housing and employment, in an exceptional way.** Already infrastructure lags behind development: a rail franchise for the region predicated on under-estimations of housing and employment growth will exacerbate this further. Planning for the new franchise needs to take account of the growth that has taken place over

the period of the current franchise as well as factor in policy-driven population growth projections for the next 15 years and beyond.

- North Kent needs a long-term approach to infrastructure planning. The rail franchise is a fundamental part of that: potentially awarding a franchise for a period as short as seven years seems short-termist and inconsistent with other longer-term approaches to planning. **The franchise should be awarded for a time period – for example 15 years – that incentivises an operator to commit to the growth, development and success of the region.**
- There is significant **opportunity to increase passenger journeys from London to Kent**, particularly during the morning and evening rush hours (the “contra-peak” flows). With ambitions for 32,000 new jobs at the commercial centre of Ebbsfleet, and the possibility of an international-scale entertainment resort on the Swanscombe Peninsula involving 13,000 jobs on site and over 40,000 visitors per day, the scope for significant reverse commuting from central London and south London boroughs is considerable. The new franchisee should be incentivised to design ticketing and timetable options that encourage this.

There is only so much that the new franchise can achieve within the existing rail infrastructure. Extending Crossrail from Abbey Wood towards Gravesend offers the best prospect for securing the necessary uplift in system capacity, connectivity and resilience to the rail network in North Kent, supporting forecast growth and providing a crucial building-block for long-term ambitions for the Thames Estuary region. At the same time as planning for the new franchise we ask the Department to engage constructively with the C2G (Crossrail Towards Gravesend) Partnership in progressing the business case so as to optimise the investment outcomes for the rail system in North Kent.

Responses to individual questions

1. Do our priorities correctly reflect your views?

- Not entirely; priorities should not have equal weighting. The fundamental requirement for north Kent is increased passenger capacity, immediately. The new franchise should enhance passenger options and choice. On the issue of taking full advantage of the new Elizabeth Line, we consider that ultimately this requires full consideration of regeneration, growth and transport benefits of extending the Elizabeth Line eastwards from Abbey Wood through Dartford to Ebbsfleet (or Gravesend). We ask that the Department and, in due course, the franchisee should work closely with partners developing these proposals to maximise the benefits this could deliver for North Kent

2. Do you agree that more space is needed for passengers at the busiest times of the day?

- Yes; but the planning process for future capacity needs to be more sophisticated and needs to take account of i) all future developments and growth projections to 2031 at least, and ii) the positive impact that increasing rail capacity could have on the national strategic road network (especially the A2/M2 and M20). Much-needed roads investment may nonetheless make it attractive to people to stay in or choose their cars; rail investment is therefore needed in parallel to help secure modal shift that is critical both to relieve road congestion and to tackle air quality and other environmental disbenefits of traffic.
- Given the immediate need for additional capacity on all routes in north Kent, in particular the High Speed service from Ebbsfleet, DfT should consider creative solutions to deliver capacity improvements rapidly, rather than assume a procurement lead-in for the purchase of extra rolling stock which would not see any improvement until 2022 at the earliest.

3. What comments, if any, do you have on options for providing more space through: a) Longer trains; and b) Metro style carriages with larger entrances and more standing room and handholds?

- Given the importance of reducing reliance on car usage, not just on commuting routes, but also on journeys to and from stations at both ends of journeys, it would be helpful if the Department could consider the likely increase in bicycle use – and the need for extra bicycle storage on commuter routes both at stations and on trains themselves.
- Rolling stock design needs to accommodate the diverse nature of the travelling public – mobility, stature, disability, infirmity etc. For many people, their commute to work is the most arduous part of, or presents greater challenges than, the rest of their working day. Rolling stock design should aim to ease those challenges, though we recognise that this also depends on passenger behaviour (e.g. seating priority for those who most need it).
- The consultation document is predicated on a rail network almost wholly concentrated on transporting people in one direction during peak hours to and from London termini which are unable to accommodate the increasing numbers of passengers. One way in which additional capacity could be delivered, and which the franchise could help support and incentivise, is utilising contra-flow movement on what would otherwise be empty trains, connecting to employment and other opportunities in growth areas such as North Kent (e.g. Dartford, Ebbsfleet, Gravesend, Medway and Sittingbourne. At Ebbsfleet, for example, there has been a long standing ambition for a significant employment hub, with outline planning consent in place to enable this scale of commercial development to take place. Incentivising contra-flow journeys to employment hubs outside London, through high quality, convenient services with a good choice of starting points and routes and ticketing arrangements would support regeneration and growth centred on public transport rather than car use, thus contributing to wider sustainable development objectives.

4. Would you support removing First Class seating on the busiest routes to provide more space?

- If this helps to deliver capacity improvements, then yes.

5. What comments, if any, do you have on our plans to improve customer service and the overall passenger experience?

- Potentially another way of increasing capacity – or reducing demand – is the provision of information to signpost passengers to quieter trains. The new franchisee should be encouraged to do this.
- Journeys on South Eastern routes may involve longer journey times than on other parts of the system (e.g. London Overground) where high capacity trains have been introduced. This may need to be factored into rolling stock design (e.g. there should continue to be some toilet provision on board).

6. Do you have any other ideas or priorities for improving customer service?

- Good information / signposting and straightforward interchange with walking/cycling/public transport routes are fundamental to encouraging and facilitating modal shift. Collaboration between the franchisee and local authorities and other public transport providers, in particular bus companies, to deliver integrated transport solutions including Oyster card-type solutions beyond their current limits, will be important for improving customer experience of and confidence in public transport as an alternative to private car use.

7. What changes to the fares structure would be of benefit to you?

- The Department should consider maximising the potential capacity of London-Kent passenger journeys against the peak morning and evening flows, via incentivised ticket pricing (e.g. off-peak fares for outward journeys during morning peak and inward journeys during evening peak). Too many trains out of London carry little more than air: incentives for reverse-commuting could help utilise network capacity and support wider economic objectives, e.g. more dispersed employment centres and hubs.

8. What else could be done to improve the way tickets are sold and provided?

- Passenger journeys are likely to be increasingly across a number of modes (for example, train and bus, possibly extended river services). There should be smart ticketing and fares co-ordination between rail and other transport providers both within and outside the TfL boundary, allowing flexible interchange and choice between different modes that comprise an overall journey and also catering for part-time and flexible work patterns e.g. flexible and transferrable season tickets or carnet-style deals.

9. What further comments, if any, do you have on our plans to improve access and facilities at stations?

- Station facilities should encourage the use of non-car transport (cycling/walking/public transport) for onward journeys. Improved information systems and exchange between different operators (e.g. rail and bus) would help towards more integrated journeys and better responses to disruption. Some stations in North Kent (e.g. Rochester and Gravesend) have seen significant investment in recent years, but the consultation document disappointingly lacks indications about priorities for other station improvements.

10. What more could be done to improve access and provide facilities for those with disabilities or additional needs?

- There is an urgent need for increased capacity across the rail network in North Kent: additional capacity for those with disabilities, including step-free access at stations, is a key part of this.

11. How far do you support, or oppose, the extension of High Speed services from London St. Pancras to Hastings, Bexhill, and Rye, where this would represent value for money to the taxpayer?

- The Department has confirmed that the High Speed 1 services are among the most challenged in terms of capacity numbers and are subject to the most significant increases in demand in the future. It therefore does not seem the best use of the High Speed rolling stock to extend its use outside of the High Speed track infrastructure – which could both exacerbate capacity problems and potentially affect service reliability further up the line. Rail-related housing and commercial growth along the Ashford-Hastings corridor seems unlikely to justify the upgraded infrastructure that would be required, but we would not be opposed provided this did not impact negatively on HS1 services in North Kent.

12. How far do you support, or oppose, reducing journey times to key destinations in Kent and East Sussex, by reducing stops at less well used intermediate stations to create hourly fast services?

- It is unclear whether these proposals would impact upon North Kent specifically. It is important that planning around this issue is co-ordinated with proposals in the Kent Route Study – for example, whether there is scope to link this with proposals to improve north-south Kent connectivity.
- Analysis of the options should take careful account of identified growth potential e.g. significant new housing developments that would logically be served by intermediate stations.

13. If you support this proposal, which services do you think would most benefit from this approach?

- No comment.

14. Which journeys do you make today which are difficult? a) By rail? b) By road, which would be easier by rail?

- Key generators of car-based journeys include Bluewater shopping centre, which attracts around 27 million visitors per year. One incentive is free parking. Proposals are being developed to improve connectivity by public transport include enhancement of the Fastrack service linking directly to Ebbsfleet International. But though Bluewater is served indirectly by Greenhithe Station, many visitors from South London and across Kent would not currently see rail as an attractive or even viable choice. This question should really be turned around: the re-franchising process should be joined up with the Kent Route Study and examine journeys that are currently easier by road but could or should be made easier by rail to incentivise modal shift.
- We support the observation made by Medway Council in their response that improvements to services on the Medway Valley line, with appropriate ticketing incentives, could encourage commuting in each direction between Medway and districts to the south by rail rather than car or van. We suggest that the franchise specification should seek innovative and constructive proposals for enhancing provision on this route.

15. Which additional services would you wish to see provided in the next franchise?

- There is an urgent need for increased capacity – more trains and greater frequency – across the rail network in North Kent. This should be the overwhelming priority in awarding the new franchise.

16. How far do you support, or oppose, options to simplify the timetable?

- The urgent need for increased capacity across the rail network in North Kent should be the overwhelming priority in awarding the new franchise, and without detriment to service levels elsewhere in Kent or in South London. The notion of simplification should not be a strategic driver in determining solutions for increasing capacity.

17. How far do you support, or oppose, options to reduce the choice of central London destinations served from individual stations with the aim of providing a more regular, evenly spaced timetable, and a more reliable service?

- This is not an acceptable proposal from TGKP's perspective and we do not support it. The simplification that the Thameslink programme was meant to achieve has already been compromised by re-routing of Greenwich line services, that now only terminate at Cannon Street, in order to alleviate pressures on another part of the Thameslink network altogether. The specification for the South Eastern franchise should not introduce further pathway 'simplifications': the benefits for passengers as a whole are largely illusory.
- Para 5.3 suggests that passengers within Greater London view their journey as part of the 'wider London transport system'. It has to be recognised that, aside from buses, the core public transport network north of the river is the London Underground (with London Overground providing additional options) covering a dozen lines, several of which have multiple branches. South of the river, there is no core network: east of London Bridge there are only three underground stations in total on a single line, complemented by one stretch of London Overground and a handful of DLR stations. The backbone of provision serving South East London and on into Kent is therefore rail, and having a range of termini options compensates in part for the lack of integrated network options, particularly east-west,

compared with the underground serving London north of the Thames. Proposals to rationalise routes so that they served a single terminus would be detrimental to passenger experience:

- This would increase the need for interchange, adding to journey time and inconvenience;
 - It would bring passengers onto the tube network who can currently rely on rail-only options, thus increasing congestion on the tube and journey cost to passengers;
 - It would stretch capacity at key interchanges such as London Bridge which, even when fully open, would struggle to cope with the level of interchange at peak times that would result from route rationalisation.
- Clearly people make a range of life choices that affect their travel patterns. And whilst central London is, almost by definition, a cosmopolitan mix, there is quite marked differentiation between the markets served by different rail termini on the south eastern network. For example, Cannon Street primarily serves the City of London (Square Mile), Charing Cross serves the West End and Victoria serves Westminster; London Bridge is, apart from Lewisham, the main South East interchange for accessing Docklands. So rationalisation of lines and termini would result in many existing passengers being disconnected from the markets they currently access, other than by enforced interchanges that increase journey time and hassle. It is highly unlikely that journey time improvements arising from route simplification would outweigh the additional time 'penalty' and other dis-benefits arising from interchange.
 - Another perverse outcome could be that people would drive to a different local station in order access services to their preferred central London terminus, thus creating more local congestion and negative social and environmental impacts.

18. How far do you support, or oppose, plans for the train operator and Network Rail to form a close alliance with the aim of reducing delays and improving performance?

- It is obviously important for there to be a close working relationship between the new operator and Network Rail. It is equally important for the new operator and Network Rail to work closely with Highways England and local /regional transport bodies to ensure that investment in the rail network can bring maximum benefit to the strategic and local road networks and overall improvements in travel outcomes achieved through investment, particularly in North Kent.
- Page 24 states “We recognise that, as far as possible (our underlining), passengers will want to retain the overall frequency of service and connectivity they currently enjoy, whichever operator runs the trains they use”. Anything that does not, as a minimum, retain current levels of frequency and connectivity cannot be regarded as an improvement: that should be the baseline for the re-franchising specification and a guiding principle for the collaboration between the new operator and Network Rail.
- The Department will be aware of proposals being developed by the C2G partnership (Crossrail Towards Gravesend) for extension of the Elizabeth Line eastwards from Abbey Wood to Ebbsfleet or beyond. This would provide greatly enhanced capacity on the North Kent rail network and new direct connectivity pathways to Docklands (particularly Canary Wharf), central London and westwards to Heathrow, at the same time relieving pressure on central London rail terminus capacity. Our aim is that those proposals should ultimately be finessed and progressed as a Government-led scheme. The interaction with the South Eastern franchise specification, and Network Rail’s involvement in forward-planning the significant infrastructure upgrade this would involve, will be critical. The terms of this franchise will be especially important for delivering immediate and medium-term capacity and connectivity improvements at a pace to support growth ambitions and expectations in Thames Gateway Kent over the period spanning the development and construction of any C2G scheme, as well as complementing such a scheme once delivered. It will also be crucial that the appointed operator for this franchise works closely with relevant partners to optimise the benefits of this investment, if secured, and with the operator of the C2G services.

19. What are your views on how this alliance should be incentivised and held to account for its performance?

- In order to deliver the ambition to reduce the number of car journeys, it may be appropriate to provide the new operator/Network Rail with incentives to encourage public take-up of rail journeys instead of using cars.

20. How would you prefer the next South Eastern operator to engage with you: a) As an individual? b) As an organisation (if appropriate)?

- The Thames Gateway Kent Partnership (TGKP) brings together the public and private sector to promote the interests of North Kent, working to encourage, facilitate and enable economic growth across the region. As the Department looks at achieving a more local focus in the franchise, we would emphasise the importance of the franchise being seen not just as about transport solutions but supporting delivery of broader strategic regeneration, economic growth and employment objectives across North Kent. We would welcome closer engagement from the Department as the proposals for the award of the new franchise are developed and an ongoing relationship as a key stakeholder with the appointed operator.
- We welcome the references under “Improving the rail industry’s contribution to South East economy” (p.28) to the need to take a balanced view on future demand informed both by historic trends and specific plans. For reasons we fully understand, the consultation paper does not refer to the Nationally Significant Infrastructure Project proposal being led by London Resort Company Holdings, to develop an international-scale entertainment resort on the Swanscombe Peninsula. Until the development consent order application has been submitted, or at least published for statutory consultation, there is not a specific proposal to factor into the franchise process. Nonetheless it is clear that, if that proposal went ahead, it would have far-reaching implications for rail demand in North Kent, for both visitors and workforce, within the lifetime of even the shortest franchise that might be awarded. Based on the most recent information issued by LRCH, 24% of both visitors and workforce would be expected to arrive by rail, adding around 9.5 million journeys to the North Kent rail network annually¹. We therefore urge the Department to be both proactive, through its engagement with the scheme promoters, and flexible in helping to bring some certainty about how these radical implications would be taken into account in the franchising process.
- In promoting sustainable economic growth in North Kent, we would like to see even stronger emphasis on how this franchise might help stimulate employment growth and support an enhanced reputation for key centres such as Dartford, Gravesend, Ebbsfleet, Medway and Sittingbourne as destinations for business location and investment, drawing strength from their rail connectivity and accessibility.

21. What approaches to customer service in other companies could be adopted by the next South Eastern train operator?

- It would be good to see the franchise specification and culture of the appointed operator reflecting best practice from across the world for rail systems serving major urban areas and inter-regional travel.

22. Where do you think private sector investment would be of most benefit to the railway?

- The consultation poses the question as to whether the franchise should cover a longer timeframe. The standard model of 7 years seems too short a period to incentivise the kind of investment needed to deliver the desired improvements and delivering an acceptable return to the operator and the taxpayer. We suggest that the Department should look at a longer franchise period of 10-15 years or more. At the

¹ Based on average “operational day” of 41,700 visitors and 13,000 workforce, making return journeys.

same time, the terms should build in incentives, penalties and review mechanisms to ensure that the appointed operator delivers on all undertakings that secure them the franchise and continues to evolve the offer in response to demographic, technological and other drivers for change.

- However secured, there is an urgent need for additional rolling stock. We would like to see innovative forward-funding and procurement solutions offered which can enable the requisite stock to be brought on stream very rapidly. There could be immense opportunities here also for UK-based advanced manufacturing and supply chain industries, tying in with objectives in the Government's Industrial Strategy.
- The C2G proposal (see response to Q18), including linkage to the delivery of Ebbsfleet Garden City centre as a major employment and commercial area (with 32,000 or more jobs by the late 2020s) could be a candidate for exploring private sector investment potential – this is already under consideration by the C2G Partnership.

23. Should we consider using the more lightly used sections of the railway in a different way? If so, how should this be done?

- Thought should also be given to maximising the use of “lightly used” time periods, such as during the contra peak flows (see our response to questions 7 and 8).

24. Looking to future, beyond this franchise, what, if any, benefits do you consider there would be for passengers from a franchise with a different geographical boundary?

- The geographical boundary for the franchise is less important than the proposed time period for the new franchise. As observed in response to Q.22, a longer franchise time period would ensure that the train operator had a longer-term commitment to the long-term growth, development and success of the region. We are interested to see the Thames Gateway specifically referenced in this context and would welcome opportunities to explore this further. In principle, though, the key issues are connectivity – between people, places and markets – and better integration of public transport provision. A different geographic focus would need to bring demonstrable benefits without risking further fragmentation or complexity in the rail network.

TGKP

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