Appendix A.

West Sussex County Council response - Network Rail Sussex Route Utilisation Strategy (RUS) Draft for Consultation

1. Introduction

West Sussex County Council welcomes the opportunity to respond to the Network Rail Sussex Route Utilisation Strategy (RUS) Draft for Consultation. Rail plays a pivotal role in the transport network of West Sussex for local residents and visitors, in promoting economic growth and as a more sustainable mode of travel. In particular, the connections that the rail network provides to Gatwick Airport are of national significance in supporting one of the UK’s major international gateways.

Our response is informed by: previous consultation with County Local Committees undertaken for the South Central Franchise renewal, and informal consultation and dialogue with local stakeholders, including our district, borough and neighbouring authorities, the County Council’s Strategic Environmental Services Select Committee, Gatwick Airport Ltd, Passenger Focus, the Sussex Community Rail Partnership, and the South East England Partnership Board.

From the informal consultation undertaken previously with County Local Committees for the 2008 South Central Franchise renewal consultation, looking back to the lifetime of the previous Southern franchise which is now coming to an end, common support was expressed for the importance of maintaining the notable improvements on-board carriages for the future: clean trains, improving punctuality and reliability, new rolling stock, enhancing the frequency of services and an appreciation for the faster Chichester to London service on the Arun Valley. It is important that improvements in service quality, capacity, journey times and reliability continue throughout the period of the Sussex RUS in order to meet the needs of existing and the predicted increasing numbers of future passengers.

This response summarises our key priorities in evaluating the Sussex RUS Draft for Consultation, and makes particular reference to the strategic gaps, and proposals presented in Chapter 8 of the Sussex RUS, as requested by Network Rail.

2. Specific comments on content of the Sussex RUS

Specific comments on the content of the Sussex RUS are outlined below:

2.1 Gatwick Express services - The County Council notes the issue of reduction in East Croydon and Clapham Junction interchange opportunities available for BML commuters following the December 2008 timetable change. It also notes the further work that Network Rail are proposing, to investigate the case for insertion of Clapham Junction stops into existing peak Gatwick Express services prior to the publication of the Final RUS.

The County Council has previously expressed a position on this issue which supports the retention of a dedicated service. The County Council has objected to proposals involving insertion of Clapham Junction or East Croydon stops within Gatwick Express services, as it is believed this would result in the loss of the premium service benefits of Gatwick Express services. This premium service is believed to be of significant importance to the economy of the Gatwick Diamond by providing a dedicated fast link for business commuters, both for those making connecting air journeys, and for those business commuters requiring a fast link to London or to the Gatwick Diamond area.

The County Council maintains this position subject to further consultation with stakeholders, and the findings from additional RUS modelling work. The County Council welcomes further information and consultation on any proposal for changes to Gatwick Express peak services once the proposed investigation work is complete.
2.2 Gatwick Airport station – The County Council seeks clarification on the baselining assumption that track work and platform 7 will both be delivered during Control Period 4, and in time for the Olympic Games in 2012. The County Council urges that wider station concourse improvements, including appropriate lift and escalator access to all platforms, should be delivered over this same time period, in order to provide much needed significant enhancements to station facilities at this key international gateway.

2.3 Gatwick Airport early morning services and links to Arun Valley Line, North Downs Line, West London Line and Redhill-Tonbridge Line – The County Council supports investigation of a number of other service improvements to and from Gatwick Airport, particularly during the morning and evening peak periods, in order to provide enhanced regional rail links to Gatwick Airport. It is considered that these services have significant potential to contribute towards achieving the public transport mode share target, contained within the Gatwick Airport Surface Access Strategy, of 40 per cent for non transfer airport passengers by the time annual passengers reach 40 million (predicted by 2015). The demand potential in the provision of these services can be encouraged by partnership working and increased marketing of travel options, Local Transport Plan initiatives, and workplace and station travel planning initiatives. Whilst the County Council understands there are significant pressures on train paths along the Brighton Main Line corridor and around Gatwick Airport, clear discussion on these aspirations are welcomed within the Sussex RUS to give clarity towards the short-, medium- or longer-term practicalities and potential of such proposals.

The County Council would like to see an evaluation of increasing provision of Gatwick Airport stops within services from the Arun Valley and West Coastway in the morning and afternoon peaks (there is currently only 1 direct service from the Arun Valley to Gatwick Airport before 9am on weekdays). The County Council also supports the extension of all First Great Western North Downs Line services from Redhill to Gatwick Airport (from hourly to half-hourly frequency in the case of the Redhill-Gatwick Airport section) and seeks clarification from the Sussex RUS on whether services can be retimed back from Guildford to address dwell time issues at Redhill.

The County Council also supports the provision of earlier morning services from across the Sussex RUS area to cater for earlier morning trips to Gatwick Airport, both for airport passengers and employees. The Gatwick Airport Surface Access Strategy 2007 notes that in recent years there has been a shift towards early morning departures, particularly due to expansion of low-cost airline operations, whose passengers are more inclined to use public transport. Average September 2008 weekday departure profiles provided by BAA show approximately 25% of passengers departing on flights leaving between 5am and 9am. This does not take into account check-in time needed for flights – passengers will need to be at the airport much earlier than their scheduled flight departure times. Increases in security also require passengers to arrive earlier and currently the earliest West Coastway service arrives at Gatwick Airport at 6.25am on weekdays, which is too late for some passengers and employees. Therefore this issue should be recognised and discussed within Section 3.14 of the Sussex RUS. The County Council would like Network Rail, Train Operating Companies and Gatwick Airport Ltd to work together to explore opportunities for the provision of more early morning services from across the Sussex RUS, particularly given Network Rail ‘Seven Day Railway’ principals.

The County Council also supports the re-consideration of Tonbridge Line-Gatwick Airport services, potentially extended to Ashford or to serve Maidstone via the Medway Valley Line. It is understood that there are capacity constraints at Redhill and Gatwick Airport, however schemes for track improvements and new platforms at Redhill and Gatwick Airport should facilitate some additional flexibility in service provision.

The County Council also supports reconsideration of services which provide cross-London direct journeys between the Brighton Main Line, Gatwick Airport and the Midlands, via an
upgraded North Downs Line via Guildford and Reading (potentially facilitated by future major station layout changes at Reading), and/or via the West London Line linking to the West Coast Main Line and north. This is particularly important given the predictions of forecast capacity constraints at London Victoria, and on the Victoria Line London Underground towards the end of the Sussex RUS period.

2.4 Thameslink service network – The County Council seeks clarification on the realistic likely extent of the final Thameslink network by 2015. Indicative 2015 Thameslink network maps suggest Littlehampton and Eastbourne are to be included within this network [http://www.thameslinkprogramme.co.uk/cms/pages/view/31](http://www.thameslinkprogramme.co.uk/cms/pages/view/31). The County Council also welcomes the consideration of providing Thameslink services to Bognor Regis, as it is believed that they could play an important role in assisting multi-agency efforts to promote economic regeneration within the town. However information presented within the South London RUS suggest that these destinations will not be included. Whilst it is noted that these Thameslink Key Output 2 services are only likely to replace existing Southern services, the destination of these services at the London end will affect patterns of demand which would have implications for other Sussex RUS services and this requires careful consideration. Although it is noted that a consultation on this franchise and the final service patterns is likely to take place around 2013, any additional information on the likely future extent of this network would be welcomed to ensure the accuracy of the Sussex RUS demand modelling and to provide clarity to stakeholders.

2.5 South East Plan population growth figures, specific development pressures and future economic growth – The County Council notes that the demand forecasts presented in the draft Sussex RUS are based on draft South East Plan housing allocations, which subsequently increased before publication of the final South East Plan. The omission of the Shoreham Harbour Growth Point is particularly significant due to its indicative allocation of 10,000 homes (in addition to 2,100 allocation for Adur), whilst allocations for almost all other districts and boroughs across West Sussex are underestimates. It is assumed that these population figures will be updated for the final Sussex RUS publication and any changes to gap option appraisal will also be updated as necessary.

The County Council is concerned that the overall population growth figures for districts and boroughs derived from the South East Plan potentially overlooks location specific development pressures, for example car parking pressures around specific stations. Furthermore, the County Council is concerned that the modelling work and option appraisal potentially overlooks the additional demand that might be expected from improvements to local transport infrastructure which promotes use of the railway. In particular the modelling work and option appraisal do not appear to reflect wider multi-modal transport corridor pressures and the strategic planning context, for example economic development proposals for specific areas such as the coastal towns and the Gatwick Diamond area. Work is currently taking place to plan for the creation of approximately 7,500 jobs as a result of the Shoreham Harbour Growth Point, which is currently overlooked by the Sussex RUS modelling work.

2.6 West Coastway and assessment of Option 6.1 'Improve off peak by providing a fast West Coastway to Brighton service' – The County Council seeks further clarification on the rationale and assumptions behind the option testing undertaken for the Option 6.1 strategic gap, and in particular why Littlehampton has been included in the appraisal of a 'fast' West Coastway service. Given the high volume of interchange journeys made at Barnham (to/from the Arun Valley, Littlehampton and Bognor Regis), and the 'Growth Point’ designation for Shoreham Harbour above, it is assumed to be more logical for a fast service to call at Barnham and Shoreham-by-Sea.

The County Council also seeks clarification as to why no infrastructure improvements were considered within the appraisal work for this option, for example rail level crossings, passing facilities, or signalling headways. The County Council seeks a more in-depth discussion on the longer-term practicalities and potential for providing upgraded infrastructure along the
West Coastway. This would allow an appropriate balance to be sought between stopping services and faster longer distance services which can more effectively meet the long-standing need to improve connectivity between south coast towns.

The County Council also wishes to highlight local stakeholder aspirations for the construction of an Eastleigh Chord to facilitate faster Southampton-West Coastway services as part of this issue. Although the intention to consider this issue in more detail within the publication of the London and South East RUS in summer 2010 is noted, the County Council would like to see stronger reference to this issue within the option appraisal for Option 6.1.

The County Council welcomes the Sussex RUS recommendations for extensions of 3-car electric services to 4-cars, and extension to a small number of First Great Western diesel car services, for West Coastway services between Brighton and Chichester. The County Council seeks clarification on the longer-term strategy for increasing capacity for West Coastway services (including services to Littlehampton and Bognor Regis), given that development proposals will place further pressure on services in the Shoreham Harbour area.

3.7 Splitting of East and West Coastway services at Haywards Heath – The County Council notes the comments on Page 107 of the RUS regarding the practice of splitting services at Haywards Heath. The County Council would welcome clear guidance from Network Rail if there are genuine options to review this situation in order to facilitate faster services between the West and East Coastway Lines and London. However the County Council is concerned about the constraints on available BML train paths, capacity and the need to ensure reliability of services.

2.8 Access to the network – The County Council supports investigating of increased potential access to the network for the provision of later evening, earlier morning and weekend services across the Sussex network facilitated by developments associated with Network Rail ‘Seven Day Railway’ principals. Aside from the need for additional early morning departures to Gatwick Airport, as discussed above in section 2.3, it is felt that there is demand for later evening departures across the Sussex RUS area in order to provide for evening leisure journeys. As examples, the latest departure from Southampton Central serving the West Coastway is 22:22 during weekday evenings, from London Victoria for the Arun Valley Line and Chichester the latest departure is 22:32, whilst from Brighton towards Chichester, the latest direct departure is 22:33. It is believed that increased access to the network at weekends would increase the number of leisure journeys by rail benefiting the local economy, and potentially open up rail travel to a wider audience of potential new travellers.

2.9 Other local stakeholder aspirations – Arundel Chord has been identified by local stakeholders as an aspiration over a number of years, not only to provide a diversionary route for when the Brighton Main Line is closed due to engineering work disruption, but to facilitate direct journey opportunities between Brighton, Shoreham and Worthing and the Arun Valley Line, Horsham, and as an alternative route to London. Local stakeholders have also highlighted the use of the Horsham-Dorking Line as a potential alternative route for West Sussex services into London.

Whilst the County Council is supportive of the general principals of both proposals, it is understood that line and infrastructure capacity constraints and unfavourable business cases are likely to make both proposals unfeasible. It would be helpful to have these stakeholder aspirations and the pros and cons associated with the proposals discussed within the Sussex RUS, even if the practicalities make the proposals unrealistic, so a clear message can be provided to local stakeholders to advise that they are not feasible options, at least in the short and medium terms.

3.9 Wider strategic transport and planning context (Highways Agency key corridor capacities and future strategic development)
3.9.1 Strategic development context and option appraisal approach – Whilst it is understood that TEMPRO population and employment growth forecasts have been used as the basis for the modelling work to consider future rail demand across the Sussex RUS to reflect local authority housing growth requirements, the County Council is concerned that the Sussex RUS overlooks the wider strategic transport and planning context which sets the framework for the Sussex RUS. The County Council is concerned about how well the Sussex RUS appraisal methodology process captures the contribution of options towards delivering wider public policy objectives, in particular the Government’s statutory spatial planning framework and Delivering a Sustainable Transport System (DaSTS) policy objectives, and wider environmental, social, economic, and regeneration aims for West Sussex.

The government has recently put far greater emphasis on the need for thinking about wider linkages through the development of its approach to strategic transport planning for 2014 and beyond; namely in its Towards a Sustainable Transport System” (TaSTS). TaSTS and the emerging Developing a Sustainable Transport System (DaSTS) sets out the five broad goals for transport and the challenges that need to be overcome at local, regional national and international levels: reducing carbon emissions, supporting economic growth, promoting equality of opportunity, contributing to better safety, security and health, and improving quality of life and a healthy natural environment.

The New Approach to Appraisal refresh has now also been aligned to these new key objectives set out in DaSTS, and the County Council is concerned that the RUS appraisal methodology process does not reflect this DfT NATA refresh.

3.9.2 Key corridor transport studies for the Sussex Coast corridor and the London to Gatwick national corridor – The South East England Partnership Board (SEEBP) are proposing to under transport studies of the Sussex Coast (A27 corridor) and the London to Gatwick Corridor as part of their ‘Delivering a Sustainable Transport System’ works programme. In terms of the Sussex Coast (A27 corridor), there is a long-standing need to improve connectivity between coastal towns in order to unlock the economic potential of the coastal economy, against the backdrop of long-standing road congestion issues at Chichester, Worthing and Arundel. Combined with the substantial population growth which is expected along this corridor, it is felt that inadequacies of both road and rail infrastructure, which lead to long and unreliable journey times, constrain economic growth along the West Coastway.

Significant population and economic growth is expected through to 2026. At Shoreham Harbour in particular, achieving the highest possible public transport mode share will be a key component of the transport strategy for accommodating high density development and is key to unlocking the potential of the area. A long term strategy is required for accommodating additional demand from development on the Sussex coast, for example in the provision of longer services for the West Coastway beyond that proposed in the Sussex RUS. The County Council also feels that the Sussex RUS should make stronger reference to the issue of the large number of level crossings which constrain rail capacity on this route, particularly in relation to Shoreham Harbour.

In terms of the strategic London to Gatwick national corridor, continuing concerns over the pressures on both road and rail infrastructure have previously been identified as long-term concerns, particularly given the importance of the Gatwick Airport international gateway, given the planned investment and significant economic and population growth in the Crawley-Gatwick Diamond area, and given the Redhill/Reigate Growth Point designation.

The County Council would welcome a wider multi-modal approach to modelling and appraisal of the RUS options which examines benefits to users of all transport modes in order to address some of the wider strategic transport issues across the region. In addition the County Council would like to see close engagement between the County Council, SEEPB, Highways Agency and Network Rail regarding the regional corridor studies.
2.10 Development related growth pressures at specific locations (future growth, station improvement schemes and level crossing projects)

2.10.1 Specific development related pressures - Although the County Council understands that the Sussex RUS sets the strategic framework for investment in the rail network up until 2019, the County Council is concerned that the TEMPRO population growth information lacks more specific information about specific development pressures and issues that will need to be addressed by Network Rail over the period of the Sussex RUS. A number of these issues are highlighted below. The County Council is also concerned that the presentation of demand forecasts using a 3 hour peak period in the Sussex RUS masks high-peak hour pressures which are known to exist across the network.

2.10.2 Network Rail identified specific station schemes (Appendix B, Figure 2) – The County Council seeks more clarity within the Sussex RUS on the specific list of station car park, interchange, capacity and improvement proposals (listed in Sussex RUS Appendix B, Figure 2). This information should be updated to more clearly explain progress/project development, stakeholder involvement, local consultation and discussion, and expanded to show how these link to the RUS strategy for future service provision on particular routes, and local authority Local Transport Plan proposals.

2.10.3 Car parking at stations - Insufficient car parking capacity at railway stations leads to overspill onto local roads and can contribute to pressure on parking space in residential areas near stations. The County Council recognises that providing too much car parking capacity would encourage the practice of railheading and would like to see a balanced approach which does not encourage unrestrained growth in car travel and encourages the use of sustainable modes of transport through station travel planning.

Encouraging use of sustainable modes of transport is a central component of the County Council’s transport policy and the proposals outlined in the RUS may not be sufficient to meet current or future needs in West Sussex. The County Council request that Network Rail and the Train Operating Company work closely with local authorities to develop station facilities including car parks which are shown by robust evidence to meet these current and future needs, to develop a strategy of what is needed, funding required, and a delivery plan.

2.10.4 Station Travel Planning, Access for All, travel integration and promoting sustainable mode links – The County Council would like to see Station Travel Planning initiatives developed throughout the period of the Sussex RUS to manage the impacts of travel to and from stations, and to promote increased access to the rail network. The County Council welcomes ongoing partnership working with the rail industry to deliver ‘Access for All’ DDA improvements at stations across West Sussex. A more active engagement and flexible partnership working approach between Network Rail, the Train Operating Company, bus operators and local authorities through Station Travel Planning initiatives is welcomed to better plan and provide for sustainable transport links. This should include promotion and marketing of journey opportunities to both existing and potential future passengers to fully utilise service enhancements across the network.

2.10.5 Holmbush station, West of Bewbush, Crawley – The County Council understands that developers are already in discussion with Network Rail regarding development west of Bewbush and the potential for a new station at Holmbush. The County Council welcomes reference within the Sussex RUS to these proposals and reference to the impacts that this will have on a strategy for timetable service planning around Crawley and Horsham, should this development go ahead.

2.10.6 BML peak capacity – The County Council notes the comments of the Sussex RUS in reference to limited additional future BML train path capacity and the fact that it is believed that there is ‘no case in this RUS for recommendations for strategic interventions to develop
major new park and ride sites, or a whole series of new large car parks, as peak on-train capacity is likely to be reached between 2019 and 2023 on the BML. The County Council would like to draw Network Rail’s attention to the strategic planning context for the BML corridor, and aside from proposals for Gatwick Airport station, proposed developer projects at Three Bridges and Haywards Heath in particular. These developments are needed to help meet the increased demand for rail travel resulting from new housing developments planned at these locations throughout the period of the RUS (up to 2019), and they will require funding and close working with Network Rail to deliver over the time period.

2.10.7 West Sussex Road-Rail Partnership and level crossings – The County Council is in discussion with Network Rail to tackle issues associated with the large numbers of level crossings across West Sussex, and particularly along the West Coastway line, through the Road-Rail Partnership Group meetings. The County Council would like to see the RUS strategy refer to this work and the practicalities of potential proposals that open up additional train capacity, facilitate faster trains, increase train punctuality along routes, but which also reduce highway traffic congestion, maintain or provide suitable alternatives to important Rights of Way crossings, and balance safety requirements.

2.10.8 Other specific development sites - Other specific development site proposals are also likely to place pressures on particular locations which will require enhancements to station capacity, access and parking throughout the period of the Sussex RUS. For example, at Littlehaven it is understood that there are current parking issues around the station, as well as overcrowding concerns at peak times on the narrow platforms, which will need attention in order to cope with additional demand pressures at this station. As noted above, the County Council is concerned that TEMPRO based population figures used for modelling may not provide sufficient level of detail to highlight these issues. The County Council urges Network Rail to discuss within the Sussex RUS flexibility within the rail industry planning process to provide investment scope (along with partners) to enable improvements to rail capacity and facilities when location specific development related growth pressures are identified in due course.

2.12 Rail growth over the 30-year horizon and future implications for destinations – The County Council welcomes the longer-term focus of the Sussex RUS strategy to the 30-year horizon, particularly given the demand predictions the peak on train capacity will be reached between 2019 and 2023, with all available train paths utilised and all peak trains extended to 12-car where needed.

Consideration of issues such as the need for new lines into central London are welcomed, however the County Council urges that early planning for this is essential and needs to begin now and welcomes the London and South East RUS setting out the issues and potential options, and the major levels of investment, planning and construction consideration that will be required to cater for future demands. The County Council would also welcome a coordinated large scale travel planning focus involving Network Rail, Highways Agency, DfT, TOCs, local authorities and businesses to further manage and spread peak demand for rail and road commuting.

The County Council notes the comments of the Sussex RUS regarding the limited overall value in re-opening rail lines due to the fact that this would be likely to exacerbate capacity constraints at East Croydon and Clapham Junction. The County Council would also likely to see wider consideration given to the scenario of peak London rail commuting being reached around 2019 and the corresponding implications of this for other strategic economic growth locations outside of Central London, for example the Gatwick Diamond. It is believed that developments to the capacity, extent and journey times of the regional rail network will be required to facilitate the corresponding increasing attractiveness of alternative economic and employment locations outside of Central London.

2.13 Opportunity to comment on later draft of Sussex RUS – The County Council notes that there of a number of areas within the draft strategy that are unclear, with
conclusions subject to further work, for example changes to peak time Gatwick Express services, faster service appraisal for the West Coastway and North Downs Line service extensions from Reading and Guildford to Gatwick Airport. The County Council welcomes being consulted on any findings and conclusions from further work, particularly bearing in mind stakeholder comments to this consultation, before the strategy is finalised.