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My Ref:
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Date: 16th November 2020

Dear Sirs

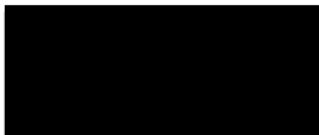
Kent Railway Strategy

Thank you for the invitation to comment on the Kent Rail Strategy 2021.

The questionnaire has already been completed but please find below Sevenoaks District Council's response in full.

We trust our views will be taken into consideration.

Yours sincerely



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Proposed comments from Sevenoaks District Council in regard to the Kent Rail Strategy 2021

Sevenoaks District Council (SDC) welcomes the Rail Strategy and sees it as an essential part of ensuring the retention of the network and ensuring that the needs of existing and new passengers are met now and in the future.

A. Sevenoaks District Council supports the following as laid out in the Strategy:

- That Sevenoaks has been identified as a growth area and it supports the identification of the need for an increase in the provision of rail services and an improvement of amenities for passengers to support this 'Gateway' town.
- The enhancement of Metro Services including new stock, standardising frequencies and increasing the number of cars.
- Development of Smart and mobile form of ticketing. This will improve customer experience and is overdue.
- Introducing flexible fares due to Covid.
- Swanley Station improvements.
- The proposed power upgrades.
- Signalling Upgrade between Sevenoaks to Orpington.
- Access for all.
- Improvement in your communication with passengers.
- Your understanding that stations are a gateway to towns and therefore the first impression that a station gives to visitors should be taken into account when redeveloping or improving a station.
- Your understanding that stations should reflect their local heritage.
- Clearer sign posts for stations
- Improving facilities for passengers

B. Sevenoaks District Council would however like to comment on the following:

1. Firstly, Sevenoaks District Council are extremely concerned that we are yet to benefit from new services to Cambridge via the Maidstone East line and the fact that this promised service keeps on getting delayed. We welcome the expansion of the Thameslink service, as it would improve connectivity and capacity on rail services throughout the Sevenoaks District. We are disappointed by decision to delay these services on four occasions as they were promised services when Thameslink were awarded the franchise. We are also concerned that it seems to indicate that the services will be now be cut short and terminate at Blackfriars.

We would ask that Kent County Council support us in raising the following matters:

- Pursuing the need for this new service.
- Asking why the promised upgrade of the Thameslink services keep on being pushed back?

- Ensuring that Thameslink honour its commitment to providing these new services and provide a clear timescale of when they are able to do so.
 - Following this upgrade, what future commitments will Thameslink make to the Kent part of the network.
2. Secondly, maintaining and improving train services is a key issue for the Sevenoaks District. We would also like to see the following issues addressed:
- tackling overcrowding on the mainline peak services between Sevenoaks and London and other stations within our District.
 - Ensuring that there are minimal reductions in services from the District to London Bridge when the redevelopment of London Bridge affects Southeastern lines.
 - retaining links between Sevenoaks and Otford, via Bat and Ball (KCC has previously proposed that this service is cut from 2 per hour to 1 per hour in the new franchise to improve services to Maidstone);
3. Thirdly, SDC understand that the provision of rail freight is a complex issue. The desire to increase freight on the network and encourage freight off the roads and onto rails is supported.

SDC would however be concerned about the impact that this increase in freight would cause on the amenity of residents close to these lines. We would therefore ask that, if freight is proposed to be increased on any lines through the District of Sevenoaks, that SDC would have the right to comment on this. We would also expect, as part of any such proposal, that the impact of noise and vibrations should be taken into account when considering any of these routes.

Any proposal that would increase noise and frequency which would have an unacceptable impact on local residents would not be supported. In addition, we would support any measures put in place to reduce the impact of noise on our residents.

4. It is clear from the current Covid crisis that demand for rail has significantly fallen and that patterns of travel has changed. SDC is concerned that the long term effects of the Covid pandemic has not really been reflected in any of the proposals as demand may never go back to pre-Covid levels. Whilst it is understood that it is difficult to predict, it is considered that commuting patterns might change and leisure passengers could become a prominent user group so SDC suggest that further work needs to be done to understand the potential long term changes that Covid may bring and that flexibility is built into any proposed projects to cope with unexpected changes.

C. Key Drivers for Demand for Rail Services in Kent

SDC note the total population forecast and the total dwellings forecast set out in Section 4 of the Draft Strategy. We have assumed that they are based on the housing figures, which we understand are set out here:

https://www.kent.gov.uk/data/assets/pdf_file/0010/59806/KCC-housing-led-summary.pdf

Unfortunately, however, we are not sure where the figures laid out for Sevenoaks have come from as the figures currently do not tally with what is being planned for in the emerging Local Plan.

It is noted that the second paragraph states *“The Housing Trajectory is based on information provided by each Kent local authority planning department but includes some additional assumptions made at the county level.”* It would therefore be helpful to know what these assumptions are so that we can understand how you have reached these figures.

Further, the fourth paragraph states *“Overall housing requirements for each local authority have been based on individual local authority Housing Local Plan Requirements or Objective Assessed Needs (OAN) as at the end of October 2019. Some local authority housing plans are currently subject to review and are in the process of being updated. For the purposes of the housing trajectory used in this population forecast we have used the most up to date plan figures as available at the end of October 2019.”*

This doesn't seem to be the case for the SDC figures. At October 2019 we had submitted our Local Plan 2019-35 with a total housing supply of 9,410 dwellings (against a requirement set by the standardised methodology) of 11,312. Or annualising it, our Local Plan housing supply is 588 dwellings per year against a requirement of 707 dwellings per year.

The forecasts in your document state the housing supply for the same period (2019-35) to be 9,071, with an annual figure of 566. This falls short of both the government requirement and what is being planned for.

We are happy to meet with you to discuss these figures, and as you can see we are keen to make sure they are correct to ensure that you can correctly plan for any increase population in Sevenoaks and serving this population.

We are also aware that objectively assessed needs (to which you refer) have been superseded by the government's standardised methodology for calculating housing need and housing supply has been over estimated for the year 2018-19 (forecasting 383 whereas 254 were actually delivered). So it would be helpful to understand your approach to ensure we understand what your figures are based upon and whether they need to be updated.

As stated above we are happy to meet with you to discuss our figures, as we are keen to ensure that you are planning for and making a strategy for the correct number of houses and populations in the District. This can only help make a stronger document.