Response to KCC's Consultation on Thanet Parkway from CPRE Kent

Overview

The Campaign to Protect Rural England is a charity that campaigns for a beautiful and living countryside. It works to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside is protected for now and future generations. CPRE has a branch in every English county, over 200 district groups and over 2,000 member parish councils, and is the country's main third party participant in the planning system. CPRE believes that good land-use planning is essential for facilitating the development we need in the right locations while protecting the environment. The Kent branch of CPRE has approximately 2,000 members and district committees in nearly all the districts and boroughs of Kent. It is the largest county CPRE branch.

CPRE Kent strongly supports the principle of sustainable public transport, particularly in rural areas, and particularly where this offers a viable alternative to car use. However we continue to question whether the proposed Thanet Parkway is the right solution to deliver the benefits that are claimed.

Thanet Parkway was originally promoted to support the use of Manston Airport, when the vision was for an expanding airport with passengers increasing to 6 million a year. Despite Kent County Council's support, which has now been withdrawn, the airport failed to increase passenger numbers over the last 15 years, so the fundamental reason for the Parkway scheme has disappeared.

The alternative generators of rail passengers, notably Discovery Park, are unlikely to generate the same number of rail passengers as the airport would have done, not least because one of the main promotional drivers for these sites is that they are intended to provide employment for people in the local area of east Kent. We also retain concerns over the potential knock-on effects of an additional halt: the rail system in East Kent works on a loop basis, so the extra station could delay trains on the whole network, adversely affecting not only the existing east Kent stations but many passengers between east Kent and London. We remain to be convinced that the Option Appraisal workshop has been adequate for a full assessment of these effects. It appears that the assessment has been largely based on passengers leaving Thanet for brighter prospects elsewhere, effectively making Thanet a dormitory area for employees travelling to work elsewhere, rather than supporting the generation of jobs within Thanet itself.

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1. **EMPLOYMENT & JOBS**

It is claimed that *"A parkway station will provide greater opportunity to access London via High Speed 1 (HS1) and improve access to employment in Canterbury, Ashford and the rest of Kent*[1]." However we question whether it would provide any greater access than is currently available, as people in Thanet & Dover have access to plenty of stations with the HS1 service; the Parkway could simply delay trains on the whole network while only providing better access to a relatively small number of people.

We are also concerned at the claim of: "*Improved accessibility to job markets in London and wider Kent area*[2]." The focus for Thanet should be the provision of local jobs rather than better access for commuting elsewhere. The climate change imperative requires less travel, not more.

Furthermore we question the claimed benefit of: "*Supporting housing and employment development identified in the Draft Thanet Local Plan to 2031 Preferred Option*[3]", since the existing stations will provide at least equivalent benefit if the facilities at existing stations are improved as we suggest.

2. **INVESTMENT**

We query the assertion of "*improved perception of East Kent for inward investment*[4]": people can reach East Kent by HS1 already. Whether they go to Ramsgate or Parkway makes little difference – they still have to travel to their destination by means such as taxi or shuttle bus, which can be achieved just as easily from Ramsgate and other east Kent stations.

As for investors' perceptions[5], we question the attractiveness of the proposed Parkway. If services were focused on Ramsgate station, for example, they would be more likely to support a better linking bus service, since such services would also be used by local people and visitors as well investors, increasing the viability of bus or taxi services and improved facilities for access by foot or bicycle. This would equally apply to other existing stations.

3. **JOURNEY TIME**

The claimed "*Journey time of about an hour to London*[6]" is the same as for the existing Ramsgate station, so it is not an improvement, and indeed the extra station potentially delays trains across the whole network.

So the improved journey time <u>to</u> London[7] is not a benefit of a Parkway – <u>that</u> improvement is

1 Consultation Booklet, Page 6
2 Consultation Booklet, Pages 6, 20
3 Consultation Booklet, Page 21
4 Consultation Booklet, Page 6
5 Consultation Booklet, Page 19
6 Consultation Booklet, Page 6, Box
7 Consultation Booklet, Page 19

happening without the Parkway. It could actually add to journey times for the majority of Thanet residents who live further away from Parkway than their current nearest station.

The planned Ashford-Ramsgate improvements will yield a 6 minute time improvement, achieving a 30 minute Ashford-Ramsgate time[8], but other figures[9] show the Parkway station would then increase that by three minutes to 33 minutes - so the Parkway would halve the benefit of that time saving, to the detriment of all those using the existing stations. This seems disproportionate, as far more people use the existing stations than would ever use the Parkway.

Furthermore the additional 3 minute delay in Thanet then affects all stations between Thanet and final destination, such as London. The recent changes to timetables to enable HS1 trains to loop round East Kent have already prevented (for example) Whitstable passengers from being able to catch two HS1 trains an hour, because the classic trains only link with one HS1 an hour at Faversham – the same one that comes through Whitstable. So, adding a station affects the whole network, and is not simply a small change to one or two other stations. We can see no evidence that this has been considered, let alone quantified.

The effectiveness of the Parkway appears reduced further by the admission that travel time to the airport and business park zone is only 'slightly less[10]'. Similarly the Business Case document agrees that there would only be 'slight benefit' to rail users coming from the west if the Parkway were to be developed. This is in contrast to the large numbers of passengers having their journeys made worse by the additional time on existing routes. The business case also recognises that the extra stop could deter use of the train by those going from Ramsgate to Canterbury[11] .

4. DEVELOPMENT SITES

Although the consultation recognises the uncertainty of the airport ever achieving significant air traffic, other elements of the documentation still assume meaningful air transport activity. The projections made for the revenue generated by new passengers using the airport[12] should not be factored into any assessment of the effectiveness of the scheme.

Other development sites are highlighted in the map[13] but as none are adjacent to the proposed Parkway station, transport will be needed to and from the Parkway. This can be provided just as easily from existing stations such as Ramsgate or Sandwich.

5. IMPROVED RAIL SERVICE FOR RESIDENTS

Apparently "*Thanet Parkway will serve residential areas stretching from North Kent coastal areas*

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8 Business Case Figure 2.3
9 Business Case Figure 3.2, Page 8
10 Business Case Section 4.4
11 Business Case Section 8.1.5
12 Business Case Section 8.1.4
13 Consultation Booklet Page 7

to Dover[14]*"*. However these are already served by HS1 and other services.

In addition a much larger numbers of residents are nearer to the existing Thanet stations and those at Sandwich, Minster, etc., so the benefits would be limited to the few residents who are close to the Parkway site or those who choose to (or must) drive a longer distance to the Parkway.

6. **PASSENGERS**

We question the robustness of the Business Case which refers to 400,000 current passengers per annum at Ramsgate station[15], while simultaneously referring to around 1,100,000 passengers per annum[16]. If these figures are wrong this casts significant doubts on the whole analysis.

7. **ACCESSIBILITY**

The Parkway does not contribute to KCC's vision for rail accessibility[17] because all the aspects within that vision for accessibility can and would be achieved without the Parkway, and at a much lower cost. The existing line speed and re-signalling improvements will benefit all Thanet stations, not just a Parkway, while it is acknowledged that the Parkway will erode the benefits of those changes to passengers at existing stations.

The accessibility to development sites[18] is little changed; shuttle transport between these sites and the station(s) would still be needed. Similarly there is no improved access to employment sites or to the wider employment market[19] for Thanet or other local residents, so no added incentive for more inward investment, nor added benefit for local people. The claimed '*provision choice and access to High Speed 1*[20]' does not improve with a Parkway – there is already good access to HS1.

The cost of a shuttle bus is much the same for Ramsgate or a Parkway station[21]. As this bus is essential for arriving passengers (unless they can walk or cycle), it would make much more sense to operate a shuttle from Ramsgate, without incurring the costs and delays associated with a Parkway. The presence of the bus service to and from Ramsgate station means that local people in the '*Walking and cycling' catchment of the station*[22] could also use the bus, improving its viability. The importance of maintaining viable shuttle services is recognised elsewhere[23] In addition the need for such bus services to the employment areas is recognised in the Options Analysis. We therefore find it very strange that one option, (*Provide shuttle bus from Ramsgate Station*)[24] was not pursued only because it was perceived as 'not an attractive option'. This does not seem a

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14 Ibid.
15 Business Case Section 5.2.3
16 Business Case Figure 2.2
17 Consultation Booklet Page 8
18 Consultation Booklet Page 19
19 Consultation Booklet Page 20
20 Consultation Booklet Page 20
21 Business Case Section 4.4.14
22 Business Case Fig 5.2
23 Options Analysis Sections 1.2.1 and 1.2.2
24 Options Analysis Section 4.2

robust way to inform what should be a professional decision.

8. PASSENGER EXTRACTION FROM EXISTING STATIONS

Those data provided[25] suggest extraction from existing stations as well as loss of passengers. Any benefit from a Parkway station must therefore be offset by the extra driving incurred by those who drive to the Parkway and the potential loss of rail passengers who may make their whole journey by driving instead.

The proposed station is to be 'unstaffed'[26] – we question whether this is the appropriate image for the Vision of: "*improving the perceptions of East Kent.*" Sturry station is similarly unstaffed, and not at all user-friendly to most people.

We question the claim that: '*we are confident there will not be a reduction in services to or the closure of any existing station in the area*'[27] as there is inadequate evidence on which to base such confidence. For example, Minster serves relatively few passengers, which might increase the incentive for the train company to close it.

The maps showing catchment areas [28] show that Ramsgate station provides services for all the Ramsgate area as well as the low population density areas to the south-west and north-west of the station. As might be expected a '*Parkway with Parking Charge*[29]' abstracts those in the low population areas, but also impinges on the edge of the urban areas. That penetration of urban areas is naturally increased in the '*Parkway with no Parking Charge*'. This illustrates the downside of Parkway – the urban areas are those which can maintain viable bus services, so the abstraction is occurring in the areas which would suffer most. The effect on Sandwich and Minster is even greater: their catchment would be almost obliterated in any Parkway scenario, with grave implications for the future viability of those stations.

9. TRANSPORT

Our interpretation of the proposals[30] is that the Parkway is a country car park for the railway and would greatly increase car traffic, contrary to all planning policies. The concept of '*supporting rail growth*[31]' is not necessarily a good objective in itself if it just increases emissions and resource use. Rail growth which <u>replaces</u> car journeys is clearly beneficial, but the Parkway is predicated on providing more car parking places, not fewer.

The provision of '*Park and Ride*'[32] is claimed as a benefit. However, CPRE has long shown that P&R

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25 Consultation Booklet Page 7, Map
26 Consultation Booklet Page 12
27 Consultation Booklet Page 17
28 Business Case Pages 24 to 29
29 Business Case Figure 5.3
30 Consultation Booklet Page 7
31 Consultation Booklet Page 20
32 Consultation Booklet Page 21

has more downsides than upsides, in particular that it increases car traffic and abstracts passengers from existing bus services. We have provided extensive evidence on this matter to Canterbury City Council, for example, which we can supply if needed. There is furthermore no evidence that the P&R aspects have been designed in accordance with best practice[33].

The claims that the Parkway station will reduce the number of future car trips passing through the residential area around Ramsgate station, which will in turn lead to improved air quality and reduced noise pollution in the area is contradicted by the KCC evidence that the Parkway would abstract passengers from existing stations such as Ramsgate and the attraction of additional passengers, many of whom no doubt would live in Ramsgate. The majority of these people would be driving through Ramsgate, so the net effect on Ramsgate would be insignificant, while the overall road transport emissions would increase as the result of the increased number and length of road trips generated to the Parkway. In contrast, if access to Ramsgate station for example, was improved by more sustainable modes, then that station would receive increased patronage with lower emissions and hence generate modal shift and air quality benefits.

The modes of access to the station[34] are notable in that 71.3% walk to the station, with an appallingly small percentage going by bike or bus. This indicates how relatively small changes to cycle and bus access could significantly reduce the use of cars. Improvements with regard to cycling, such as a 'Brompton' scheme as successfully implemented at other stations, could also help those arriving at the station.

We are concerned at the use of 'Trip Rate' methodology, because (as admitted[35]) it does not explicitly model modal shift. This is a major shortcoming because transport policy is focused on achieving such shifts away from car use. In addition the methodology hides the potential for the existing stations to provide capacity without adding large car parks, or the Parkway, hence the economic and environmental impact of this would be very significant.

It is noted that "*As this is an initial vfm* (value for money) *assessment (as defined in the DfT guidance note) there are limitations to the appraisal. No environmental impacts have been monetised, but the predicted mode shift would drive additional benefits in reduced greenhouse gas emissions and noise and air quality benefits*"[36]. The acknowledged 'limitations' of being unable to show modal shift means that the claimed modal shift change is unquantifiable, and we consider that in reality increased numbers would use the car to a Parkway which would exacerbate rather than reduce environmental impacts.

The cost of a shuttle bus is much the same for Ramsgate or a Parkway station[37]. As this bus is essential for arriving passengers at Ramsgate (unless they can walk or cycle), it would make much more sense to operate a shuttle from Ramsgate, avoiding the cost and delays resulting from the

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33 See for example, 'Redefining car-bus interchange to reduce traffic', Stuart Meek, June 2010 https://dspace.lboro.ac.uk/dspace-jspui/handle/2134/6328

34 Business Case Page 12 table 4.2

35 Business Case Section 4.3.1

36 Business Case Section 7.4.5

37 Business Case Section 4.4.14

Parkway.

We note that Parkway is projected to need up to 223 parking spaces in 2031 if parking charges are not imposed[38]. As Ramsgate currently has 44 spaces[39] this represents a large increase in car traffic. As might be expected, the effect on walkers and cyclists covers a smaller area[40], but both Minster and Ramsgate show loss of custom.

Improving Ramsgate station assumes that "*Future housing growth in and around Ramsgate will generate new demand for car parking at Ramsgate*[41]". However a good sustainable transport plan would reduce both existing car use and the new car trip generation, thereby enabling the station to cope.

10. **ENVIRONMENT**

A major omission from the Environmental Impacts Report (EIR) is the impact on climate change emissions. As transport is one of the major sources of climate change emissions, they should be adequately assessed in order to comply with and support the Climate Change Act.

We note that the proposed site is flat Grade 1 Agricultural land[42] and stress the vital importance of safeguarding such land resource for agricultural use.

The list of potential environmental impacts[43] seems to focus on positive benefits, with no recognition of negative impacts, and it appears to ignore the need to assess the consequential and wider impacts as required by an EIA.

11. **COSTS**

In view of our concerns above, we have significant concerns about the adequacy and robustness of the costs provided so far.

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38 Business Case Table 5.5
39 Business Case Section 8.3.12
40 Business Case Section 5.5
41 Business Case 6.2.14
42 Environmental Impacts Report Section 13.2
43 Environmental Impacts Report Page 27