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**Growth, Environment  
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**BY EMAIL ONLY**

Date: 9<sup>th</sup> July 2025

Dear Ian,

**KENT COUNTY COUNCIL REPRESENTATION TO ORR CONCERNING APPLICATIONS FOR DIRECTIONS UNDER SECTION 17 OF THE RAILWAYS ACT 1993 FOR ACCESS TO TEMPLE MILLS DEPOT**

1. Firstly, thank you for extending an invitation to Kent County Council to make a representation as a party with a wider interest. It is reassuring that you recognise that the outcome of the ORR's determination of Section 17 applications for use of Temple Mills International (TMI) depot could affect the likelihood of future international rail services calling at Ebbsfleet International and Ashford International stations. Furthermore that it may also affect the potential need for future depot and stabling capacity for the High Speed 1 rail link (henceforth HS1), which would likely include site options within Kent.
2. As you will be aware, Kent international stations ceased being served by Eurostar in March 2020 owing to travel restrictions to address the COVID-19 pandemic. Unfortunately, with only Eurostar as the operator of passenger services on HS1, Kent has been left with no services connecting with Europe. This was a significant shock given the previous 24 years of continuous services that reconfigured parts of the Kent economy and drove locational decisions by businesses and residents.
3. We recognise that competition, in general, would be a beneficial outcome given Eurostar virtually has a monopoly which has lead to a very substantial under utilisation of more than £10bn of rail assets (when converted to current prices and allowing for inflation). As the Transport and Environment NGO reported in 2024, based on their ranking system Eurostar was the worst rated international rail operator . The situation should be regarded as a failure for delivering growth in the British economy given that half the capacity is unused on the HS1 rail link and through the Channel Tunnel after 30 years of the continental rail link.
4. Competition creates choice and market forces that improve efficiency, innovation, differentiation of product and can lead to lower costs for consumers. These factors themselves are likely to provide a better environment on HS1 and through the Channel

Tunnel such that operators become more likely to serve intermediate stations such as in Kent put to use the substantial capacity available on the line and at these stations.

5. We also highlight that some section 17 applicants are stating plans for their services to call at stations in Kent. This is in contrast to the current operator Eurostar which has clearly demonstrated that serving stations within Kent does not form part of its plans in the medium term – having had the opportunity to reinstate services since 2022 and electing not to do so. Eurostar’s current stated position, which does not plan to consider (yet alone deliver) a return of services until 2026, would mean services at the soonest in 2027. This has been its rolling position for four years and so it is reasonable to conclude, therefore, that there is a very low likelihood of Eurostar re-serving Kent in the current non-competitive operating landscape.

6. We have welcomed the engagement that two of the section 17 applicants (VTE Holdings and Gemini TOC Ltd) have had with us and accordingly we have set this out to each given the principle of the competition they are trying to facilitate on the network and their consideration of returning services to Kent. These letters may be included by the applicants in their submissions to the ORR and reiterate some of the key points we have made in this detailed submission of our own.

7. We note that Eurostar’s response to your conclusions about TMI depot capacity recommends competitors deliver an alternative new depot along the HS1 rail link. We understand that long term capacity and stabling provision would likely be necessary for multi-operator services that run frequencies that utilise far more of the redundant capacity on HS1. We also consider, however, that this approach as a means to addressing the needs of any one of the Section 17 applications along with Eurostar’s own claim to TMI capacity is unfair for new competitors. Eurostar itself does not own the existing TMI depot which was funded by the UK government for c. £400m and so should not be entitled to all its capacity at the expense of competition.

8. A new operator deserves the opportunity to make use of TMI depot on a shared arrangement so that it can be demonstrated to the both the operator and passenger market what competition and innovation in service provision can provide. Furthermore, generating competition and enabling far better utilisation of the HS1 link and Channel Tunnel would likely be the best stimulus for creating a business case and commercial case for the state and operators to work in partnership on delivery of new depot and stabling facilities and attract private sector investment for that.

9. We note that the DfT representation to the ORR consultation expressed strong concern about whether the IPEX reported capacity at TMI was sufficient for even one new competitor and that a new facility would be the best outcome for the long term competition on the line. Whilst that may be true, we disagree with the conclusion that the TMI depot is incapable of accommodating a new operator – were that the case there would not have been multiple Section 17 applications sustained beyond the IPEX report publication.

10. If the DfT approach is taken that a new long term solution should be relied upon, rather than exploiting the capability and capacity of TMI in the fullest way, then it risks building in prolonged delay and works against generating competition. This would compound the long running failure of the DfT and successive governments to act in a

timely fashion to create a railway with a competitive market that best exploits the public investment in the infrastructure since the Channel Tunnel was built. The DfT approach could leave Eurostar in an overly advantageous position with a virtual monopoly for 5 to 10 years, making it capable of further dominating the UK-Europe rail journeys market and making new competition less likely.

11. We welcome that the ORR determination will consider criteria concerning the economic and societal benefits associated with the applications. Specifically that the ORR will make its determination by considering evidence to assess the benefits (e.g. to passengers) of introducing new services and the anticipated financial impact on existing operators. Our representation therefore focuses on providing support to the ORR to understand these benefits in respect of the Kent economy, constituents and passengers.

12. We also have included our view on the approach that the ORR should take concerning the criteria about performance. The ORR has indicated that it will consider evidence concerning promoting improvements in railway service performance, using evidence received concerning demonstration that operators' plans for more extensive use of TMI will not negatively impact operational performance. Our representation sets out our recommendation that performance considerations not be weighted above other benefits, given there appear to be clear and reasonable mitigations to any performance risks based on the IPEX report and recommendations by the section 17 applicants.

#### **Evidence of economic and societal benefits**

13. Our representation regarding this criteria is supported by an appended Public Interest Case that KCC prepared and submitted to the Secretary of State for Transport and Rail Minister in 2024, as amended in January 2025 following review and feedback by DfT Civil Servants. We consider that the evidence appended to and summarised in this representation clearly demonstrates to the ORR the weight of impact of the loss of international rail services in Kent. It should enable the ORR to balance the benefits that could be realised from competition, including services returning to Kent.

14. It was understandable that services suspended during the extensive travel restrictions of the Covid-19 pandemic in 2020. However, to be four years on with significant uncertainty about whether it will ever be possible to board an international rail service from Kent is clearly damaging to our economy and hampers the county's ability to effectively plan.

15. The costs to travellers in Kent has been a significant disbenefit from the lack of competition and the cessation of Eurostar services. Residents, business people and visitors have experienced substantially increased costs as access to services is limited to London St Pancras International. For a group of four people, this can be additional money out of their pocket of over £200 for a single return trip. Based on past demand that Eurostar has publicly revealed in engagement with the media, this could equate to c. £16.5m a year in unnecessary travel costs. These substantial real costs weigh down on Kent's economic prospects and thereby the country's as a whole.

16. This has been demonstrated through a business survey we undertook in 2023-24, in which businesses clearly told us that travel costs and increased travel times are detrimental to their growth prospects. The affected businesses that have reported their

concerns through our survey represent c. 30,000 jobs across Kent and the region, equivalent to c.£750m of GVA to the national economy. The full business survey results are appended for reference.

17. Businesses operating in the visitor economy have particularly raised concerns and described the damage that a lack of international rail services is doing. For example, Kent has a highly regarded, internationally recognised and award-winning viticulture and wine-producing industry. Producers have expressed concern about the lack of stopping services and the economic opportunity from being able to provide international connectivity back into the heart of Kent's wine-growing areas via Ashford and Ebbsfleet stations. Leading global brands such as Tattinger and Chapel Down, as well as smaller wineries such as Woodchurch, have described how their business models rely in-part on income from hosting visitors including from abroad.

18. Activity in the visitor economy in one area is linked to another – a visit to one attraction such as a winery can generate visits to other attractions and therefore the length of stay and spend. Destinations such as Canterbury City with its UNESCO World Heritage sites, the Lonely Planet award winning Kent Heritage Coast, Leeds Castle and many others all benefit from international visitors. Improving the prospects for businesses by ensuring that there is competition and particularly that which plans to serve Kent, should be taken into consideration by the ORR given the scale of the benefits and costs.

19. Clearly the current operator has demonstrated that with the capacity it already has available and aims to further secure at TMI, that it is not planning to use this for the purpose of services calling in Kent. Our evidence has shown the damage this is doing to the Kent and national economy and works against the public interest case that the government acted on in establishing (through the investment and regulation) the HS1 and Channel Tunnel assets, including TMI and the Kent stations.

20. Societal and economic benefits also arise from the environmental credentials of international rail. The ORR has the opportunity to take into account the prospect of enabling competition which could grow the passenger market. Market competition will improve the service offer, not just within the rail sector, but compared to its wider competitors. This will improve international rail's status as a strong substitute to the far more carbon-producing options of ferries (c. 30 times more carbon producing per passenger kilometre) and flights (c. 40 times more carbon producing per passenger kilometre) .

21. The more widely available new competitor rail services are, including the range of locations they call at, then the greater the likely carbon emissions avoided by attracting increased numbers of journeys to international rail. The ORR can facilitate, through its determination on the applications, an outcome which creates better conditions for achieving the government's carbon reduction targets legislated within the Climate Change Act 2008.

22. Lastly, there are societal benefits linked to the quality of life that international connectivity provides. Our evidence for this arises from the testimonials made by the c.65,000 people that have signed the change.org petition calling for a return of Eurostar service stops in Kent.

23. There are a wealth of testimonials to the petition that clearly describe the severance and cost barriers that have occurred between families and friends due to the removal of service stops in Kent. Over a 24 year period, people took locational decisions to capitalise on the international connectivity from Ashford and latterly Ebbsfleet. Combined with having to travel via London St Pancras International, people face either greater costs and more travel time to maintain those relationships, or increased isolation from reduced in-person time spent together.

24. The delivery of competition and the potential for that competition to bring service stops back to Kent would provide a significant reversal in the damage that has been done and help improve quality of life for constituents in Kent again. Whilst we cannot quantify or monetise all these benefits, they are fundamental to why we travel – to connect with others and experience other places. The ORR has the opportunity to take account of these positive outcomes from the determination it makes.

### **Evidence of performance impacts**

25. We have set out our view on this criteria to recommend that it is not given undue weight in the ORR decision. We understand that performance concerns expressed by Eurostar about the impacts of sharing depot capacity on service operations should be given consideration. There are, however, a number of factors that weigh against the concerns Eurostar has expressed. Those factors we have set out below and trust that the ORR will take into account when appraising evidence concerning the performance criteria.

26. Firstly, given Eurostar has operated with virtually a monopoly, it has never had to negotiate and manage its operations at depots on a shared basis on the English side of the Channel Tunnel. It is understandable that a change from a 30 year norm would trigger Eurostar to have concerns, however evidence from the European network clearly indicates that it is more than capable of operating alongside other operators such as SNCF at Le Landy depot in Paris and with SNCB in the Brussels Forest facility.

27. If Eurostar regard these as inappropriate examples, given SNCF and SNCB are co-owners of Eurostar and hence not strictly competitors, then we would suggest that this itself be taken into consideration as indicators that Eurostar may have a lesser need for TMI capacity given it is capable of relying on alternative facilities provided by its state-funded owners. This compounds the virtual monopoly and advantage Eurostar has, and arguably adds weight to ensuring that the TMI facility is provided on a fair-access basis to other competitors, arguably those not state-owned or state-funded given the advantages that brings to accessing alternative facilities elsewhere on their service network.

28. A second consideration for the ORR in respect of performance is the scope for mitigation of any performance risk. Section 17 applicants have stated (post IPEX report) that they consider the available capacity sufficient for their needs without any further assumed significant modifications to TMI. It follows, therefore, that any performance risks raised by Eurostar have potential to be designed out through revisions to working practices and infrastructure within the limits of the TMI depot site. Modifications would always represent the most efficient and economic approach to meeting the current needs of a Section 17 applicant, than resorting to delivery of an entirely new depot facility.

29. Lastly, an indirect but relevant outcome of the ORR direction will be the service routes and stations served by whichever section 17 applicant receives access to TMI. The

greater the range of routes and stations served, so the improvement in the resilience of the railway to continue to provide mobility and maintain performance when a section of route becomes unavailable.

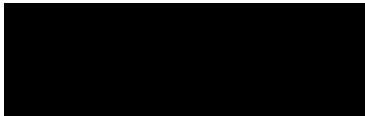
30. The events over the Christmas and New Year period of 2023, when flooding in the Thames tunnel brought services between the UK and Europe to a halt, demonstrated the lack of resilience in the international rail link when all demand is required to route through London St Pancras International. The ORR has the opportunity to make its determination cognisant of what section 17 applicants could provide as alternatives to the established services operated by Eurostar, which have not stopped in Kent for several years and have never served Stratford International.

31. We therefore recommend that performance impacts of the arising services from competition be recognised as having favourable and positive benefits and not solely the negative impacts expressed by Eurostar in its applications. Especially given that Eurostar is approaching the performance impacts from the perspective of the cessation of its c. 20 years of freedom and flexibility of operations at TMI due to a lack of competition.

## Conclusion

32. The evidence concerning the damage that a lack of service stops in Kent is doing is clear and our representation articulates how competition is likely to lead an improvement in these circumstances. Competition can be facilitated by the ORR through its determination on the section 17 TMI applications. We look forward to seeing the reasoning that the ORR sets out in its determination and trust that it will consider that applications that are most likely to lead to more stations in the UK and therefore more passengers being served, would carry greater societal and economic benefits.

Yours sincerely



Haroona Chughtai (Ms)  
**Director of Highways and Transportation**

# Eurostar Business Survey Report

**February 2024**

Oliver Vaughan, Analyst Officer

# 1 Executive Summary

In October 2023 Kent County Council launched a survey aiming to help promote the case for international rail services to resume within Kent, following a pause of Eurostar's Kent operations during the Covid-19 pandemic. The survey sought to understand the needs and experiences of businesses that travelled internationally to Europe for business purposes. After data cleansing, and screening questions 477 unique responses were identified.

Responses from the survey were compared to Kent business profiles, to demonstrate that they form a representative sample of the Kent population.

Businesses were first asked about their European travel.

- 40% had staff that travelled to Europe at least every two or three months, and 33% at least once a month or more. Over 94% of respondents said their trips were at least quite important to their business.
- Respondents explained why these trips were important and their responses were grouped to common themes, the most frequent was that their business either operates on European sites, supplies goods or services to Europe or has European customers, or needs to travel to, or receive Clients from Europe.

Businesses were next asked about Eurostar's services and their concerns around the cessation of services from Ashford and Ebbsfleet International stations.

- Over 99% of respondents were aware of the cessation of services from Kent stations.
- The majority of respondents (75%) were extremely concerned about Eurostar services not stopping in Kent in the future. 99% of respondents were at least quite concerned.
- Respondents had a variety of reasons for their concern, with the most prevalent being that "it would make Kent a less attractive place to live, work or visit". Additional opinions were also summarised.

The following topic was businesses use of Eurostar and the impact of Kent based service closures.

- 94% of respondents indicated that prior to March 2020 they, or those they received business trips from had used Eurostar services.
- Businesses answered which stations they had utilized when arriving or departing, 81% had travelled using Ashford International, and 32% had travelled from Ebbsfleet.
- 58% of respondents had been travelling via Eurostar from London St. Pancras since the March 2020 service closures.



- Over 50% of respondents identified the additional cost of travel and time lost to the business as an impact of services not stopping at Kent stations. A full summary is included in the report body.
- 89% of respondents believed that Eurostar services not stopping in Kent was having an impact on custom of their businesses.
- Businesses provided the reasons that services not stopping did or did not affect their business. The full results are summarised in the report body, but the most frequent responses are a combination of the following:
  - Increased travel time, or lost hours or productivity
  - Reduced business from Europe or reduced business growth
  - Increased cost of travel or operations.
- 83% of respondents indicated they knew either a few, or many businesses that had been affected by Eurostar services not stopping in Kent.

The final area of questioning was around businesses plans and future European travel.

- 63% of respondents were planning to grow their business in a way that travel of staff to and from Europe may be needed, and 26% were unsure. This was asked to all 615 respondents, including those that were otherwise screened out.
- Respondents that did not answer no to the previous question, were asked if they believed their plans to grow may create new demand for international rail travel, a summary of their answers is included in the report body. The most frequent responses were:
  - If services resumed from Kent
  - Yes, or if my business grows so will demand.
  - Ease of travel or European access would help create greater demand.
  - A less frequent theme was that respondents felt it was too risky to expand operations requiring European travel without a promise of services returning to Kent.
- When asked if there are any other improvements to the stations and train services that would encourage your business to use them, should Eurostar or a different international rail operator be stopping in Kent, the most frequent response was that the facilities are fine as they are. A full summary is included in the report body.
- Lastly, 99% of respondents agreed (7%), or agreed strongly (92%), that their business wants to see Eurostar services return to stopping in Kent.

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## 3 Introduction

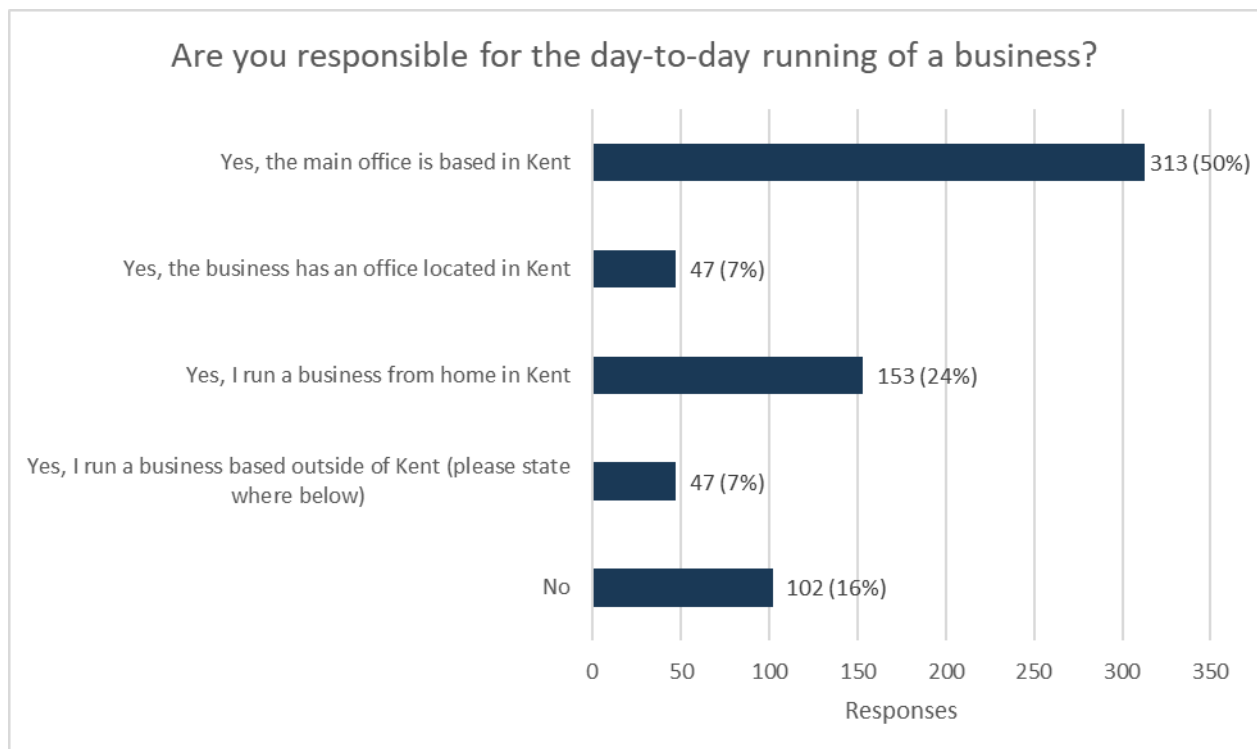
### 3.1 Project Overview

In October 2023 Kent County Council launched a survey aiming to help promote the case for international rail services to resume within Kent, following a pause of Eurostar's Kent operations during the Covid-19 pandemic. The survey sought to understand the needs and experiences of businesses that travelled internationally to Europe for business purposes.

This survey was open from 17/10/2023 until 15/01/2024 and had a total of 686 responses, some of which were removed due to being duplicates, leaving 630 responses before screening.

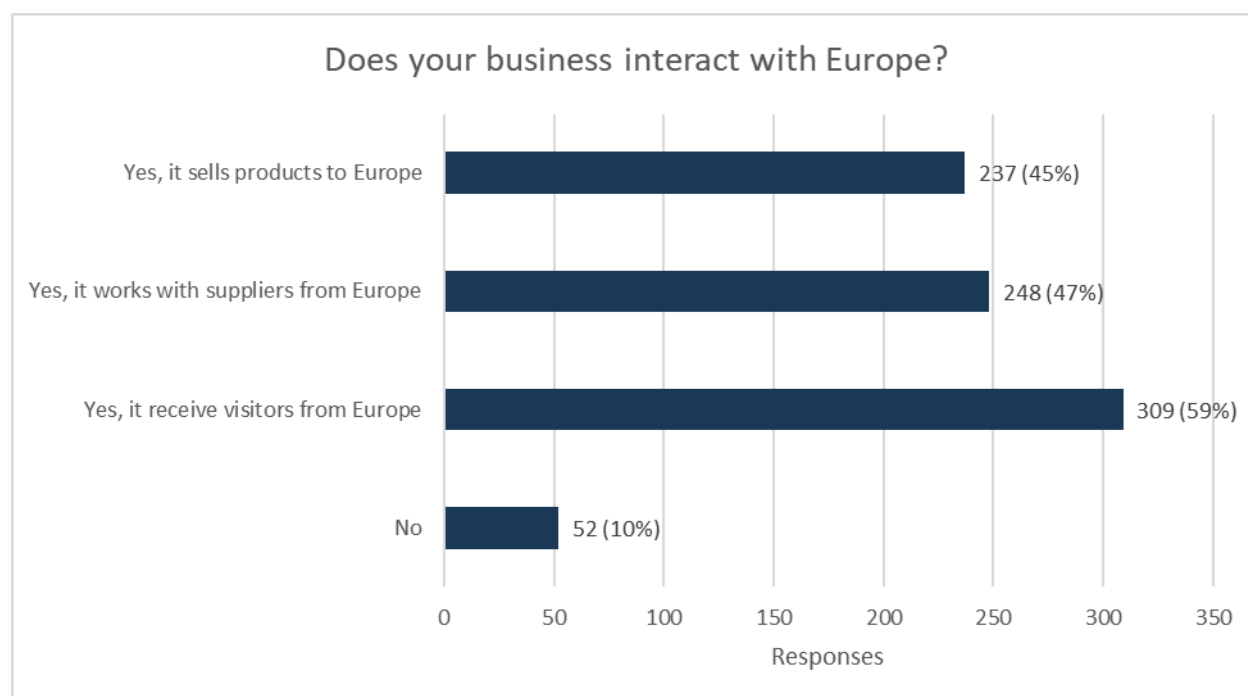
To aid in screening the data to relevant responses the survey asked the question, "Are you responsible for the day-to-day running of a business?". Respondents were able to select multiple options in their response according to what best fitted them, the responses are shown on the below chart. Those that answered no were then screened out, leaving 528 responses.

**Chart 1: Are you responsible for the day-to-day running of a business?**



The remaining respondents were asked a further screening question, “Does your business sell products or services to Europe, receive visitors from Europe or work with suppliers from Europe?”. As with the previous question, respondents could select multiple options that were applicable to their business. The results are displayed below.

**Chart 2: Does your business sell products or services to Europe, receive visitors from Europe or work with suppliers from Europe?**



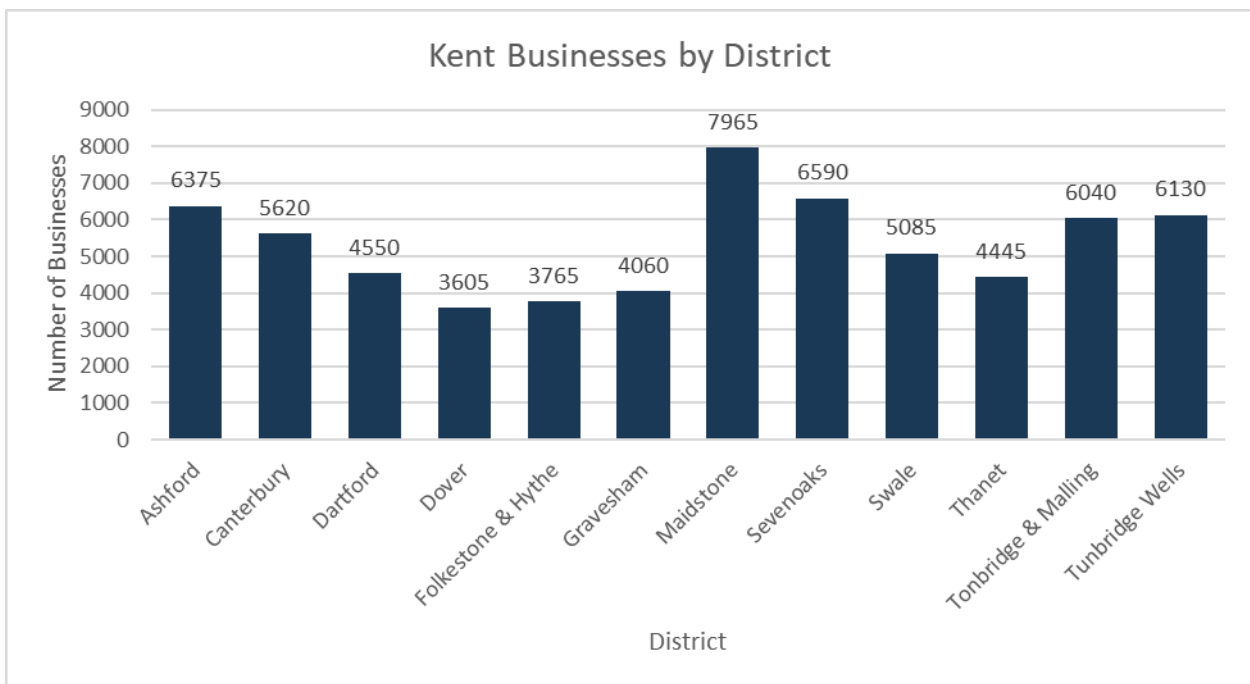
At this stage the data was filtered to remove any responses from those that answered no, which left a total of 477 full survey responses which will be considered by this analysis.

## 3.2 Kent Business Profiles

To add context to this report and give an example of representation, a basic profile of businesses within Kent has been included. This data is drawn from Kent Analytics analysis of the UK business count data, released by the ONS on 27<sup>th</sup> September 2023. A full report on this release can be found via the “Facts and figures about Kent” page of the KCC website, from the “Economy and employment” subsection.

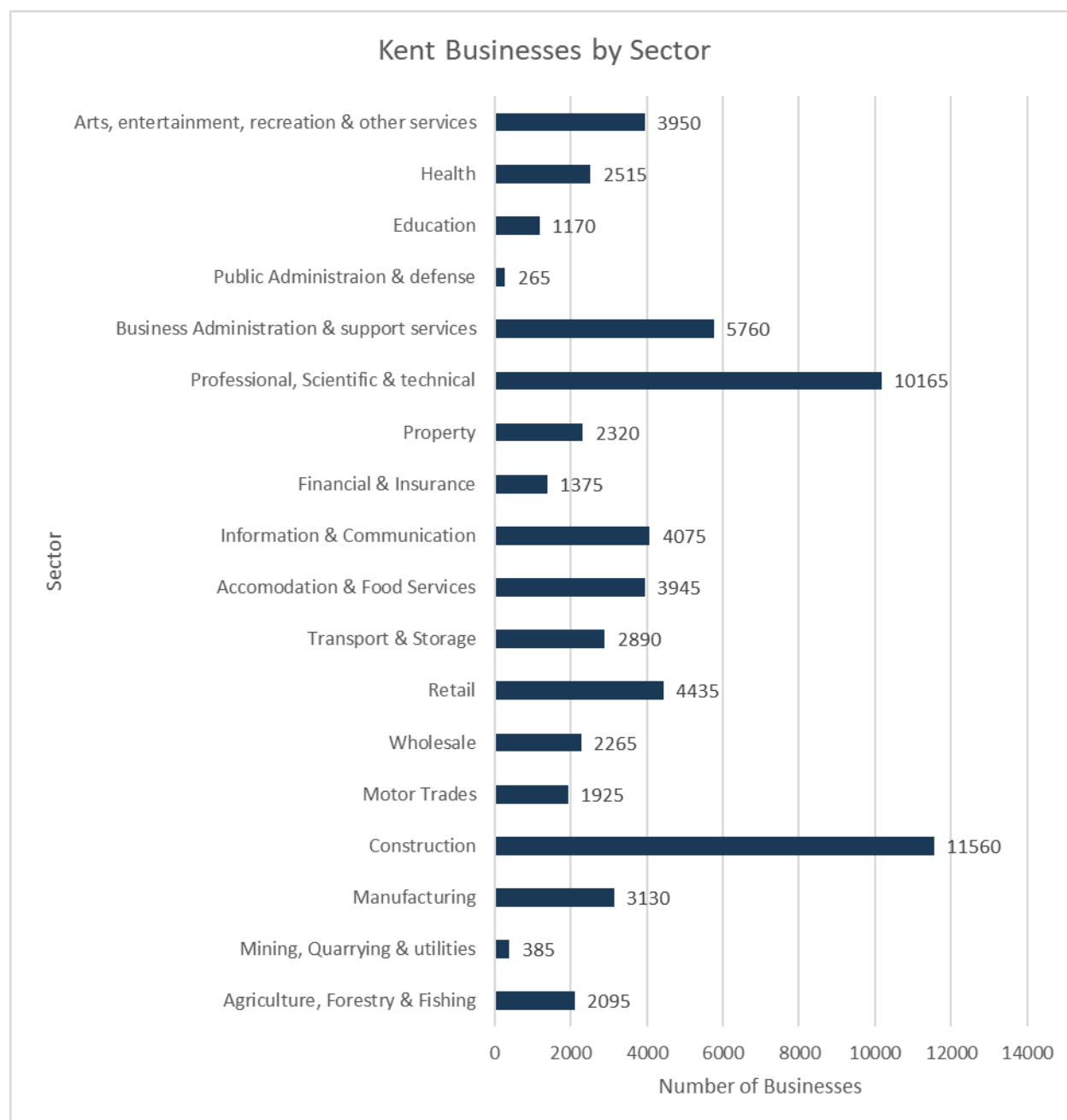
There are currently 64,230 businesses in Kent, split across Kent's twelve districts in the following distribution.

**Chart 3: Number of businesses in Kent by district.**



A breakdown of businesses in Kent by the sector they belong to is also provided, with businesses split into 18 sectors according to the ONS' Standard Industrial Classification (SIC) hierarchy.

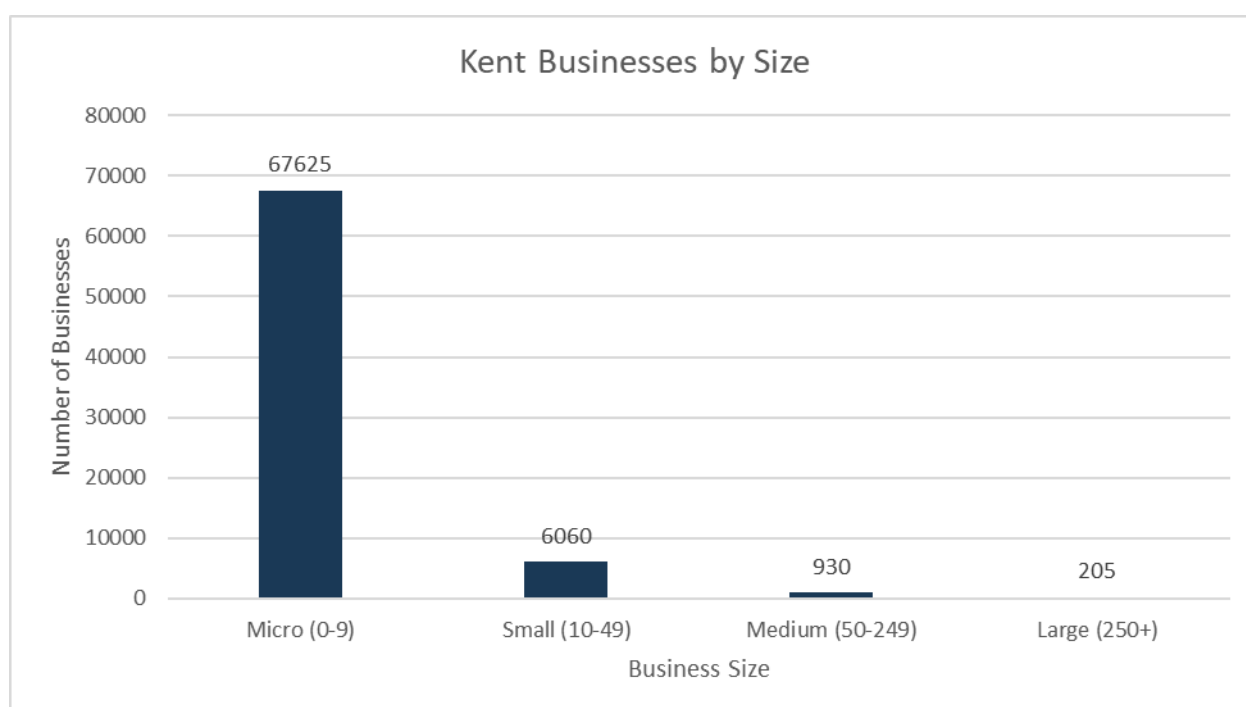
**Chart 4: Number of businesses in Kent by sector.**



Lastly, a breakdown of Kent businesses by business size, categorized in accordance with the Companies Act 2006 into the following:

- Micro-entity: fewer than 10 persons employed and turnover under £2 million.
- Small: 10 to 49 persons employed and turnover under £10 million.
- Medium-sized: 50 to 249 persons employed and turnover under £50 million.
- Large: 250 or more persons employed and turnover over £50 million.

**Chart 5: Number of businesses in Kent by business size.**



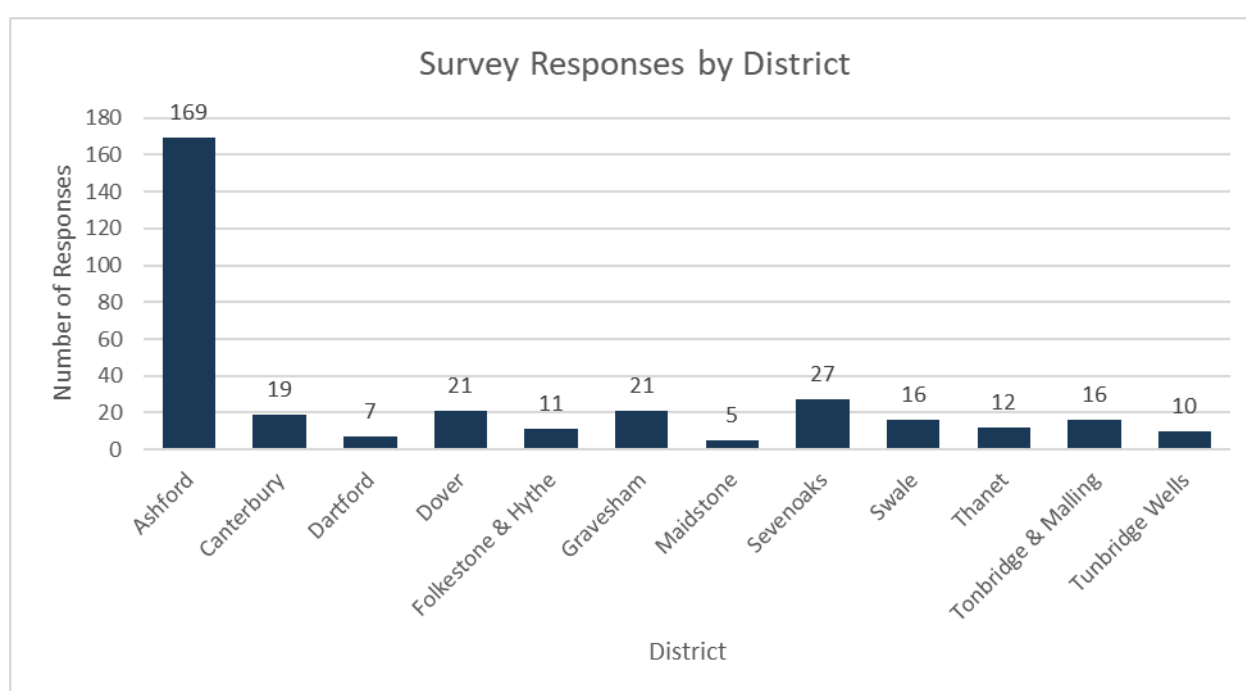
### 3.3 Survey Participant Profiles

Statistical confidence in the survey results is high. For instance, based on the answers to Q1 (i.e. 99% of the survey sample want to see Eurostar services return to stopping at Kent stations) we can be 95% confident that if asked of a larger sample of Kent businesses, the answer would remain within  $\pm 0.9\%$  of 99%. Even when based on a question/answer with a lower level of consensus (e.g. Q5: 94% of the survey sample think trips to and from Europe for their business are quite important, very important or essential) we can be 95% confident that if asked of a larger sample of Kent businesses, the answer would remain within  $\pm 2.1\%$  of 94%.

The survey had representation from businesses in all Kent districts, although Ashford was the most frequent business location by a large margin, representing 27% of total responses. This could potentially be due to its proximity to Eurostar services via Ashford International station, prior to the March 2020 closures, and the greater relative distance from London based alternatives.

As respondents were only asked to provide the first 4 characters of their businesses post code, and due to small sample sizes in some districts making businesses potentially identifiable, a more precise breakdown of business locations is not possible.

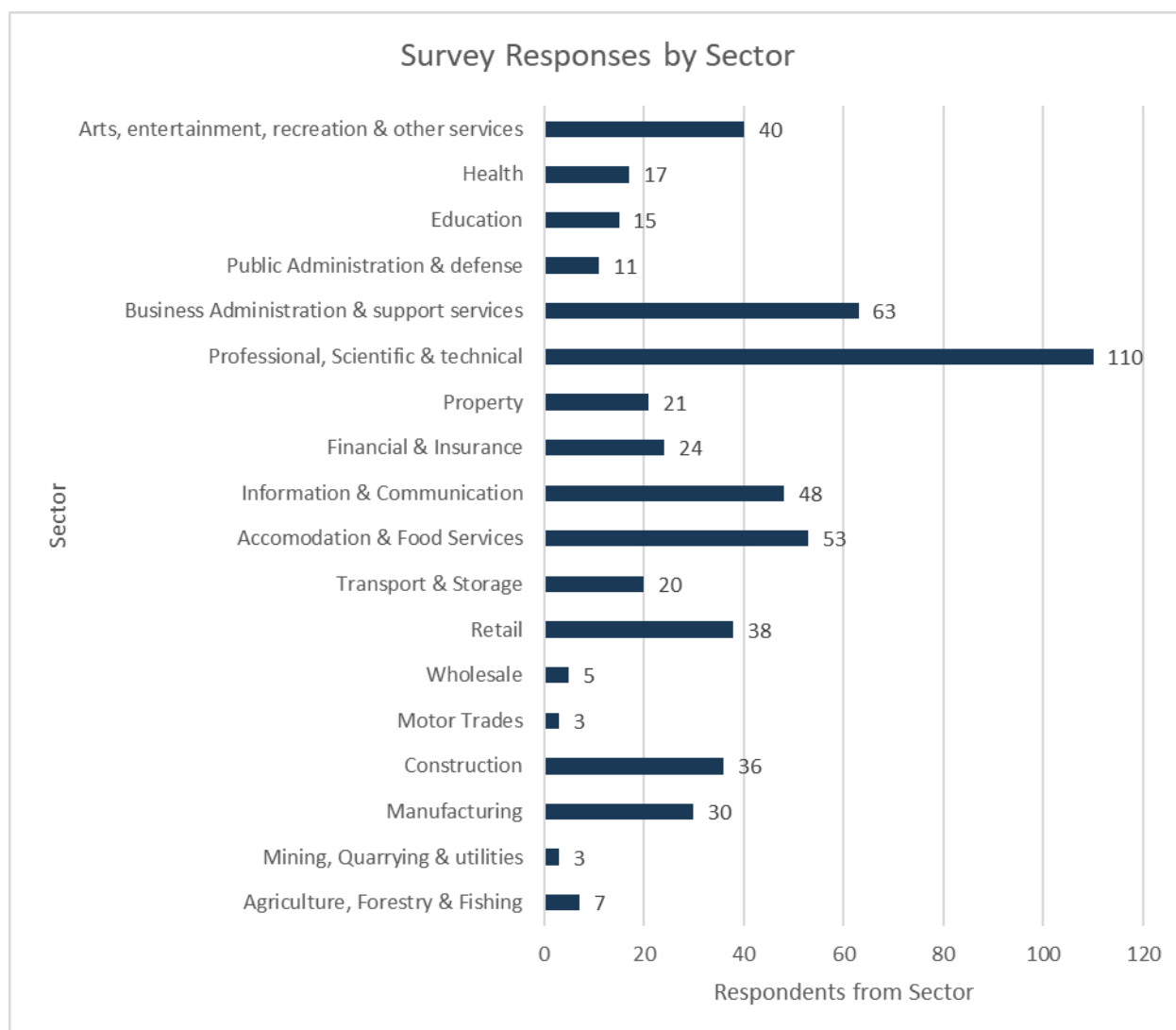
**Chart 6: Survey Responses by District**



Respondents were given the opportunity to provide the sector in which their business operates, these have been aligned with the ONS SIC hierarchies used for the Kent business profiles to allow for easier comparisons. Some businesses cross the boundaries of multiple sectors, and as such were coded to multiple SIC sectors as appropriate. All sectors had a minimum of three representatives that had responded to the survey.

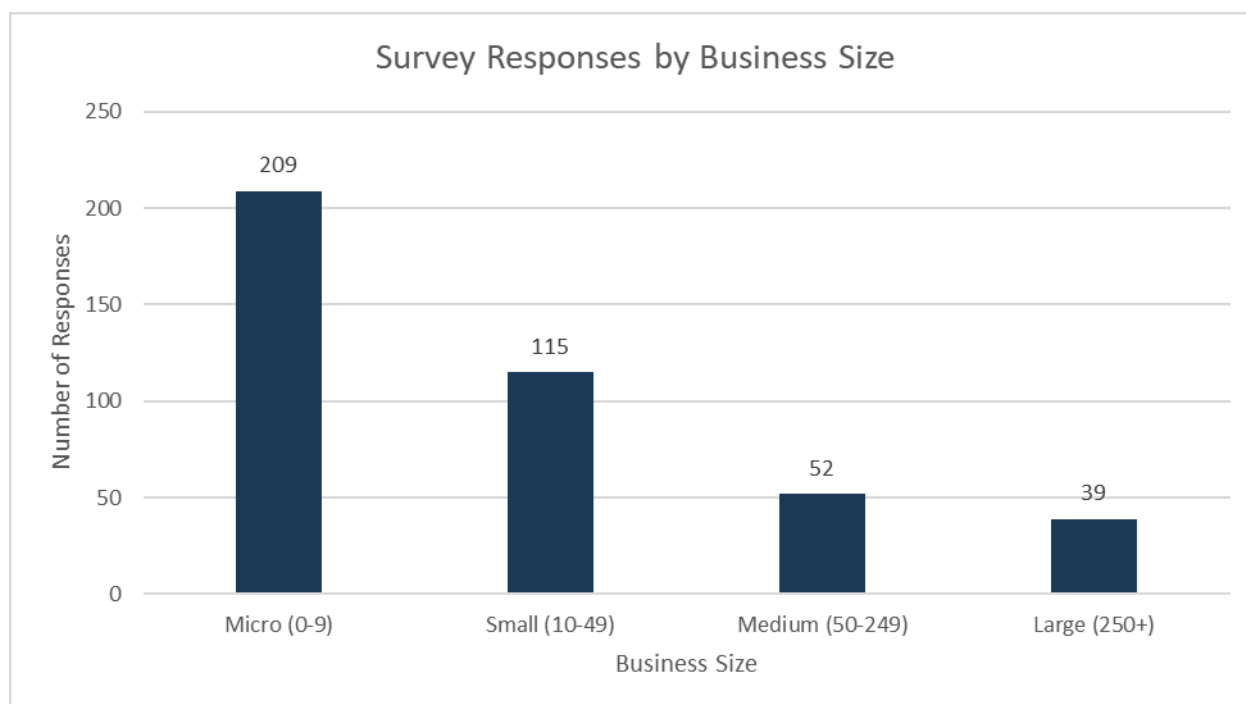


**Chart 7: Survey Responses by Business Sector**



Lastly, the size of respondent's businesses was plotted using the four business size categories from the Companies Act 2006. There appeared to be a smaller proportion of Micro sized (0-9 employees) businesses that responded to the survey than the Kent population.

**Chart 8: Survey Responses by Business Size**



Based on survey responses, the total number of business employees located within Kent or the greater South-East that are represented by this survey and have potentially been affected by the lack of international rail travel in Kent, has been conservatively calculated at more than 32,000.

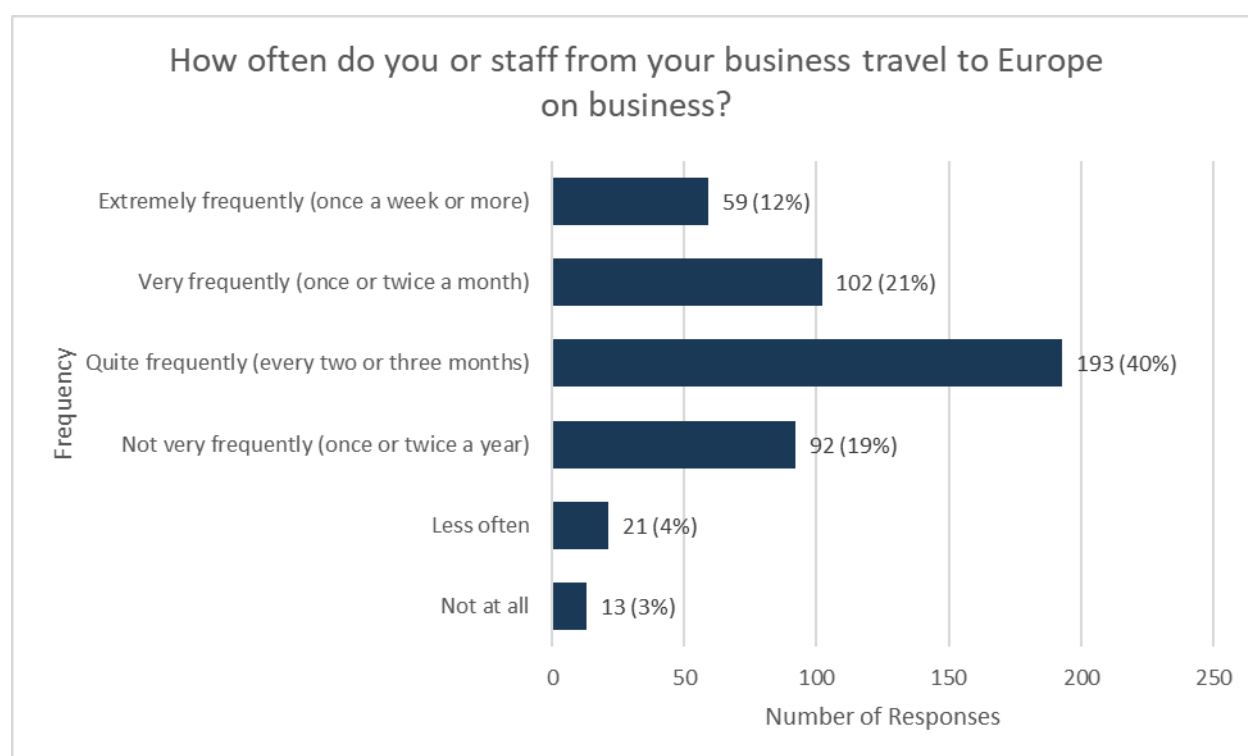
A small number of responses have been excluded from these calculations, due to data quality issues relating to their employee headcounts.

## 4 Analysis

### 4.1 Businesses European Travel

Initially, the survey explored businesses relationships with Europe. Firstly, asking the frequency with which the respondent, or staff from their business, travel to Europe on business. The survey allowed respondents to answer from “Not at all”, through to “Extremely frequently (once a week or more)”. The results are shown on the below chart.

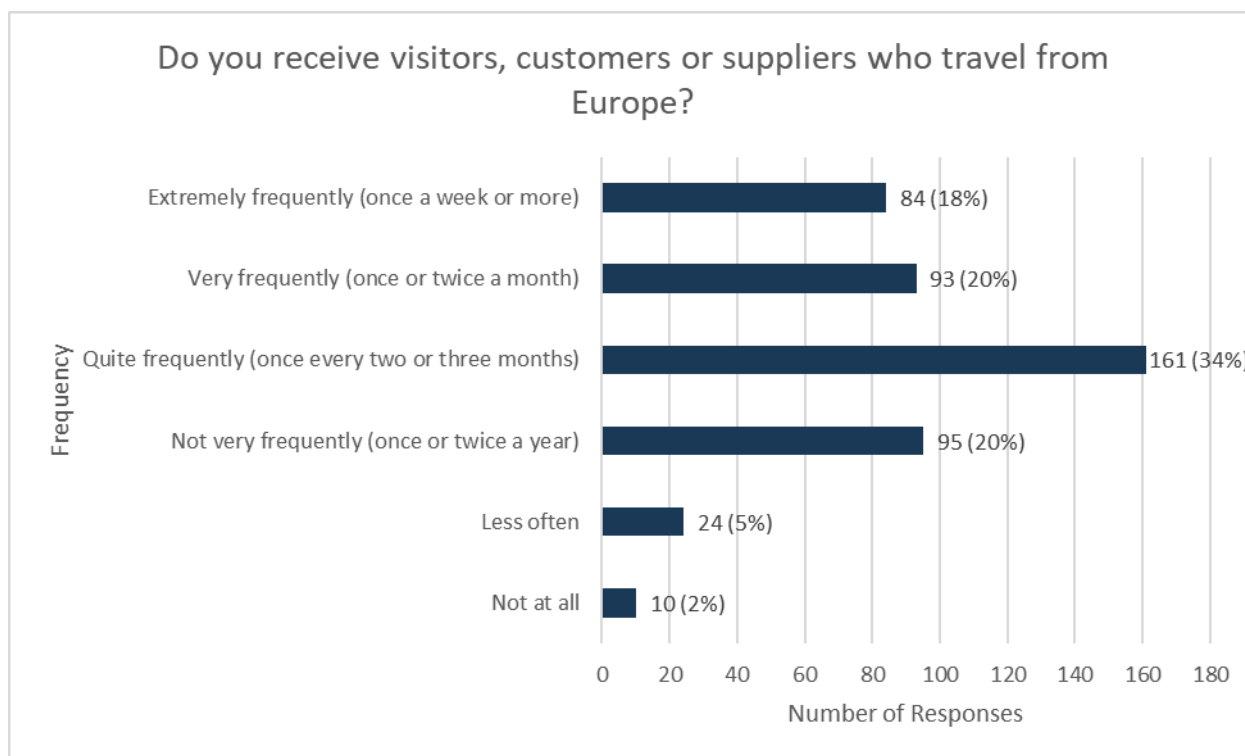
**Chart 9: How often do you or staff from your business travel to Europe on business?**



The most frequent response was from businesses that travelled “Quite frequently” or every two to three months, which was responsible for 40% of responses. A further 33% of businesses travelled to Europe more frequently than this, responding either “Very frequently” or “Extremely frequently”.

The next question asked how frequently businesses received visitors, customers or suppliers that travelled from Europe. This used the same scale as the previous question.

**Chart 10: Do you receive visitors, customers or suppliers who travel from Europe?**

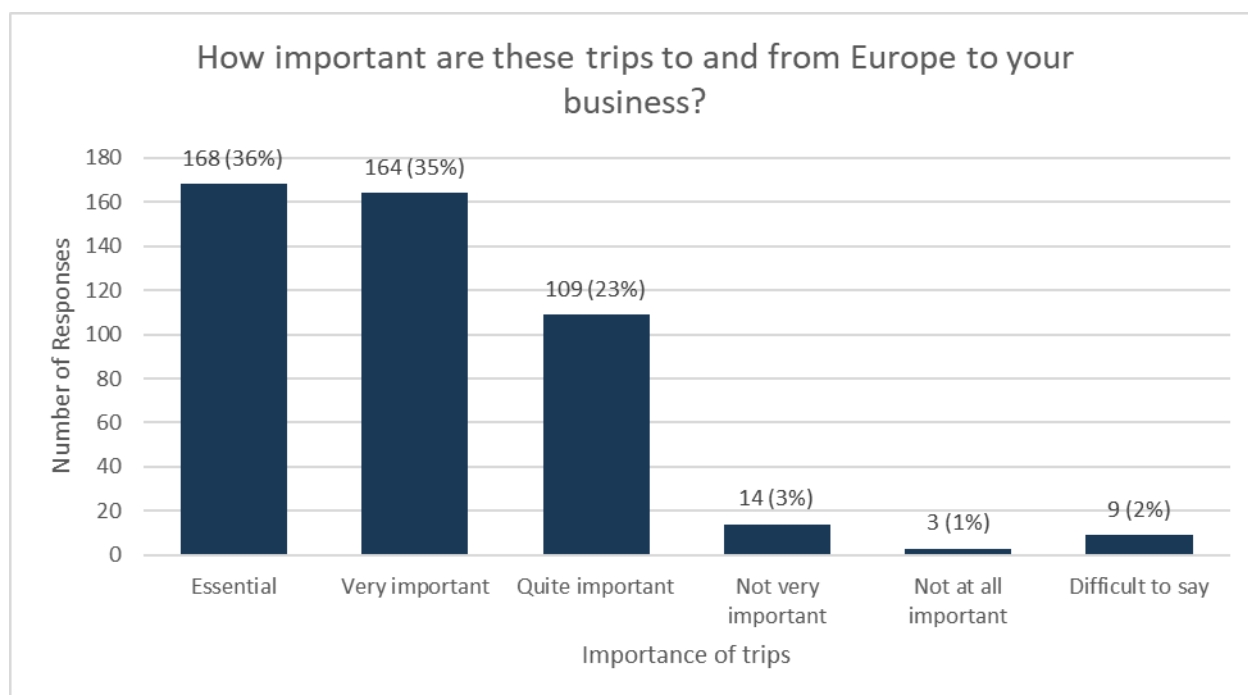


Responses to this question displayed a similar distribution to businesses visits to Europe, but with a higher proportion of Extremely frequent visitors from Europe at 18% versus 12% in this category visiting Europe.

Businesses were asked to rate the importance of their trips to and from Europe from “Not at all important” through to “Essential”. The results of this are shown on Chart 11 on the following page.

A small proportion of businesses ranked their trips to and from Europe as being of low importance, just 4% combined. Contrastingly, just over one third of responses answered that their trips were either “Essential” or “Very Important” in each respective category. Overall, 94% of respondents said that their trips to Europe were at least quite important to their business.

**Chart 11: How important are these trips to and from Europe to your business.**



Businesses were invited to optionally answer a further question asking them; please explain why they answered in the way that they did to the importance question. 357 respondents chose to do so and their responses have been coded to common themes which are shown below.

The most common theme was that the business in question operates on sites in Europe, supplies goods to Europe, or needs to either meet clients in Europe or have them visit Kent. Other popular themes were that European links were essential or beneficial to the business's success or building and maintaining relationships, and that face-to-face meetings are either required or preferable to online meetings.

**Table 1: Please explain why you answered with the option you chose at the previous question.**

Response Theme	Number of Responses
My business operates on site in Europe/ Supplies goods or services to Europe / Has customers in Europe / I need to travel to Europe to meet clients/suppliers / Clients need to visit Kent from Europe	105(29%)
My business relies on European visitors / European links are beneficial/essential for my business / encourage more tourists/visitors	66 (18%)

Face to Face meetings are preferable to Online/are required	60 (17%)
Building customer relationships / it's important to maintain business relationships	57 (16%)
It would be more convenient to be based at Ebbsfleet / Ashford International	43 (12%)
Travel via London isn't cost/time efficient / convenient	43 (12%)
Europe is a core market/growing market for my business / we want to grow our European operations	37 (10%)
We have lost trade since Kent services stopped / Loss of services is disrupting my business / Potential customers stay in London now- "The fare to/from Ashford offsets the more expensive accommodation costs"	27 (8%)
I work for a European organisation and need regular presence in Europe / My business has European branches/locations	23 (6%)
My business uses materials from Europe / my business cannot source materials from the UK / we rely on European suppliers	22 (6%)
Without Kent services I have to fly / use the ferry / use Eurotunnel / drive	18 (5%)
Loss of opportunity for "easy" or short notice visits to clients	16 (4%)
Less environmentally sustainable	14 (4%)
Loss of Eurostar services affects pricing of services / my business is less competitive/non-competitive	12 (3%)
My Business chose Kent due to European rail links (Negative) / My business is considering leaving Kent now	10 (3%)
Travel to London to come back past Ashford makes no sense/is frustrating / "embarrassing to explain to clients"	10 (3%)
My business sells tourism services in Europe / to Europe	6 (2%)
Travel options from Kent would make my business more competitive	5 (1%)
My business needs to operate in Europe early in the day, this now needs a hotel stay in London (additional cost)	4 (1%)

Some direct quotes showing the strength of feeling from respondents in this section are below:

"[...] going all the way into St Pancras & back out to Ashford is a ridiculous waste of substantial time: so, people just aren't coming."

"Students from Paris have more less disappeared since we can't go & pick them up at Ashford. This has seriously affected our small business."

"I am thinking of selling up and moving out of Ashford as the whole point was the Eurostar stop."

“If I can't see my customers, I can't deliver my services to them. That would be the end of my business.”

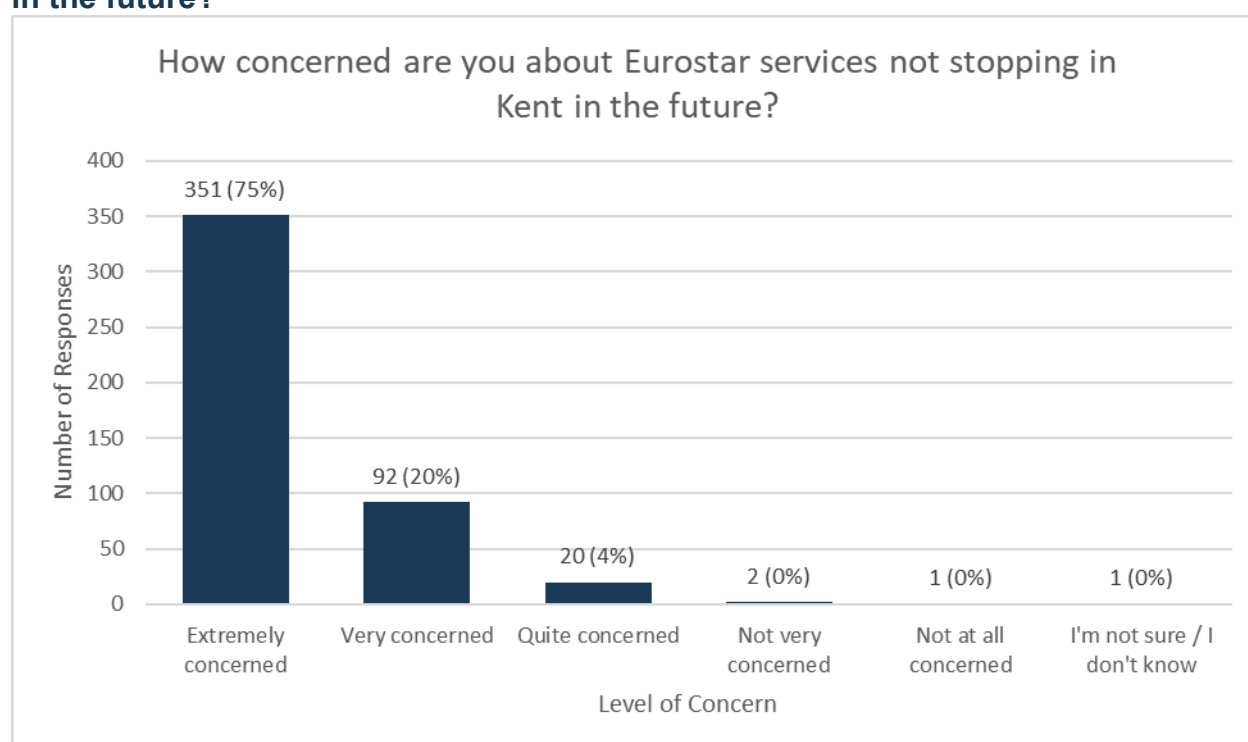
“We want and need to access Europe easier and more frequently to grow our business. It's on our doorstep and yet have to travel in the opposite direction (to London) before we can travel overseas. It's completely ridiculous, and highly embarrassing that we have to explain to new potential clients / suppliers that they go through Ashford International, but it does not stop!”

## 4.2 Eurostar services and businesses concerns.

The following section concentrates on respondent's views around the operation of Eurostar from the Kent stations of Ebbsfleet and Ashford International, and the effects this has had on their businesses. The first question asked was if respondents were aware that Eurostar services ceased stopping at Kent stations from March 2020, when the COVID-19 pandemic caused the UK government to issue a stay-at-home order. Almost all respondents (99.4%) answered that they were aware of the services stopping.

Following this the survey stated that Eurostar have not yet made a commitment to stopping services in Kent in the future, and asked respondents how concerned they were about this. Respondents were able to respond on a scale from "Not at all concerned" through to "Extremely concerned", with responses displayed on chart 12 below.

**Chart 12: Eurostar have not yet made a commitment to stopping services in Kent in the future, how concerned are you about Eurostar services not stopping in Kent in the future?**

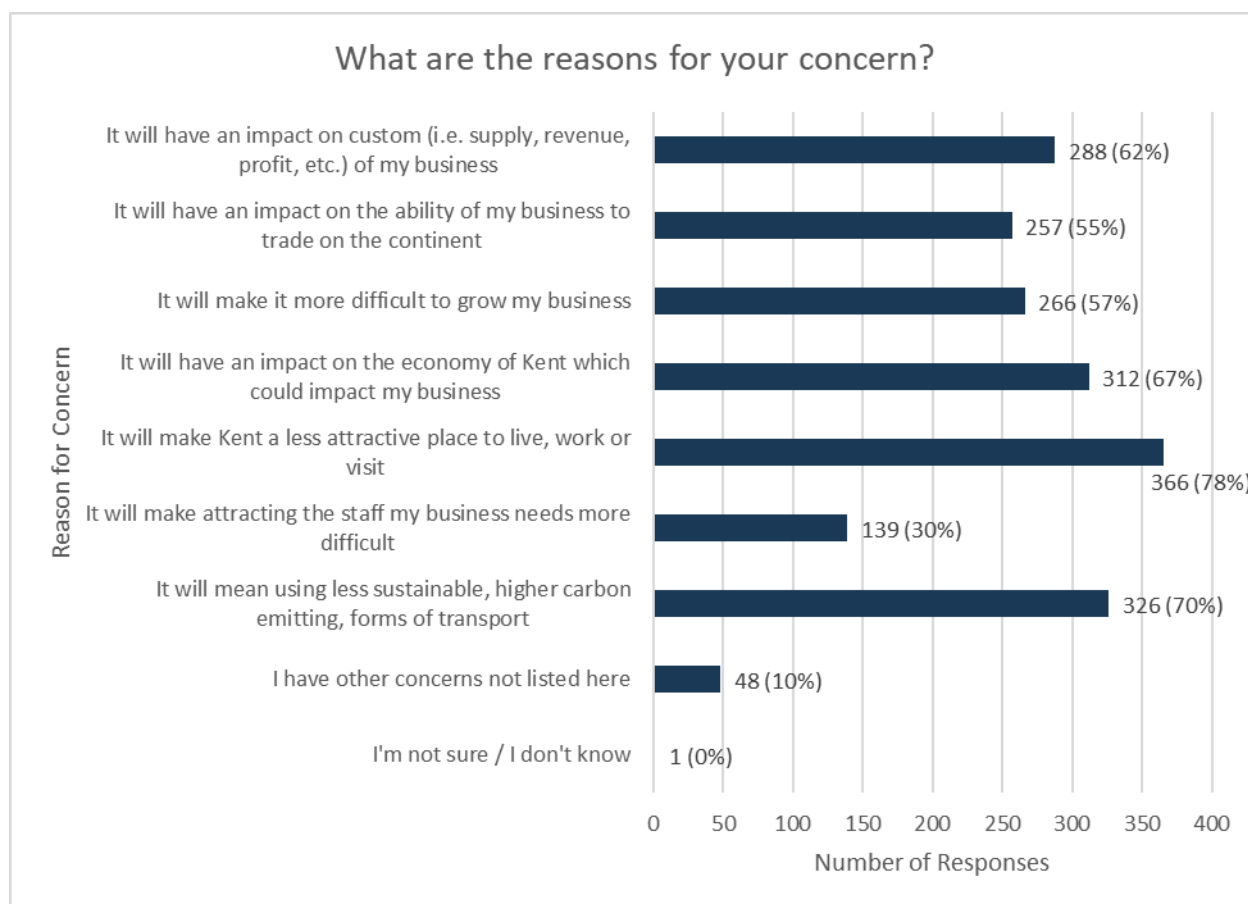


The majority of respondents (75%) answered that they were "Extremely Concerned" about Eurostar services not stopping in Kent in the future, with only 3 responses signifying they were either "Not very", or "Not at all" concerned.



Following on from this question, respondents were asked what the reasons for their concern were, with a choice from several pre-defined answers, as well as the option to use a free text field if they felt their answer did not fit within categories.

**Chart 13: What are the reasons for your concern regarding Eurostar services not stopping in Kent in the future?**



Businesses concerns were varied, with almost every category being selected by more than 50% of respondents, except for attracting staff becoming more difficult, which was selected by 30% of respondents. Alongside these categories, the 48 responses given that were not listed were summarised and are presented in the below table.

**Table 2: What are the reasons for your concern – other concerns.**

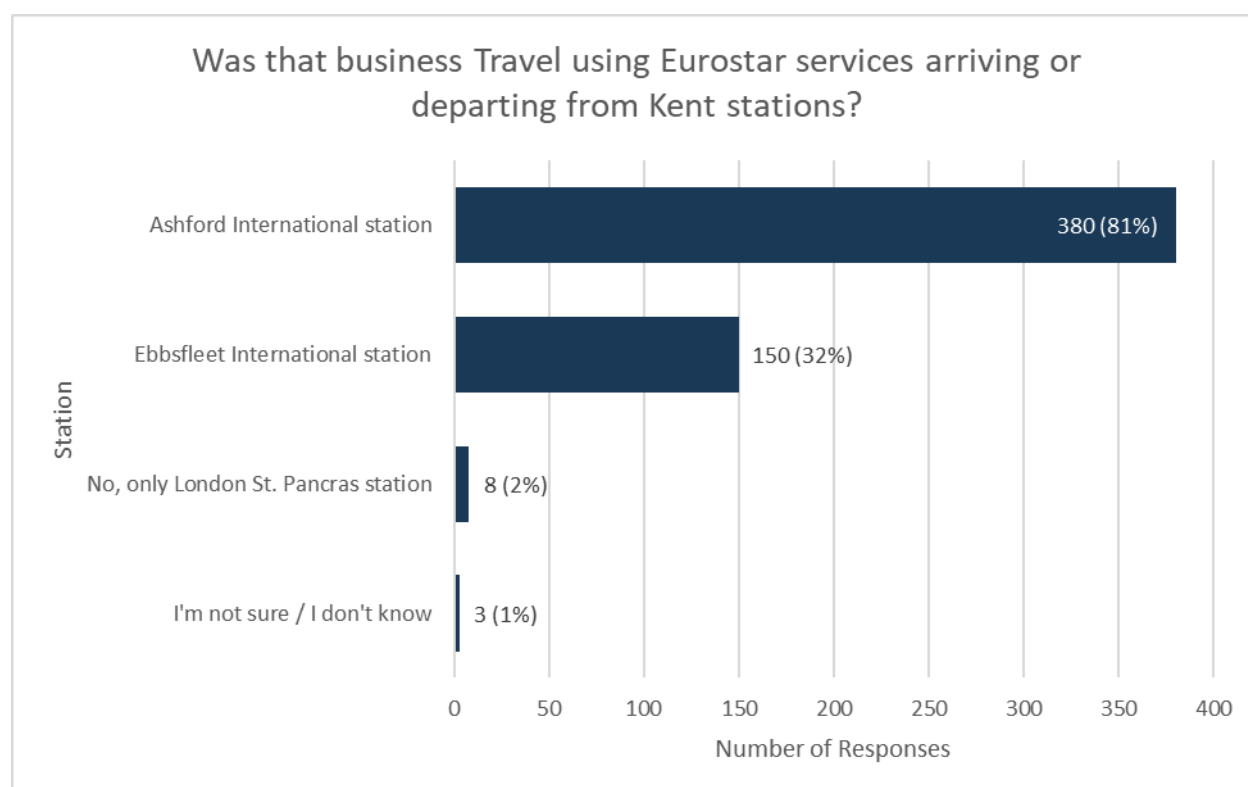
Reason for Concern
Unable to efficiently get to work / going via London adds unnecessary length / is a disincentive to doing business in Kent - "why go to Kent when you're already going to London?"
Seems counterproductive to travel to London, just to come back past where you started a few hours later.
Additional financial / time / physical barrier to access Kent Businesses.
Waste of taxpayer money creating Ashford International or Ebbsfleet if they aren't used / Promises to Kent taxpayers / businesses broken.
Damage to Kent towns from lack of visitation / cultural exchange
"My business will likely go bankrupt" / We are considering relocating business from Kent now
Ashford became popular to former Londoners due to its transit links, what is their future with the continental business link severed?
Increased business costs in transport to Kings Cross/airports and lost time per journey
Wider issue than just Kent- Sussex and Surrey well linked to Ashford by rail and now have to transit via London
Additional cost of re-opening might be repaid in economic growth, could KCC/Govt. provide initial finance?
Trains currently below capacity / Spreading border control might let more passengers on each train increasing utilization

## 4.3 Businesses use of Eurostar and the impact of Kent service closures.

Next, to better understand how businesses utilized the service, respondents were asked if their business, or those that it received business trips from, used Eurostar services for business travel prior to March 2020. The majority (94%) of respondents answered that they, or those they were receiving business trips from, did use Eurostar services previously. The remaining 6% were split between not having used Eurostar services or being unsure, or unable to recall.

Respondents were also asked if the business travel on Eurostar was arriving or departing from Kent stations, with the choice to select multiple options as applicable. Most respondents (81%) had engaged in travel using Ashford international, with a lesser proportion (32%) having used Ebbsfleet.

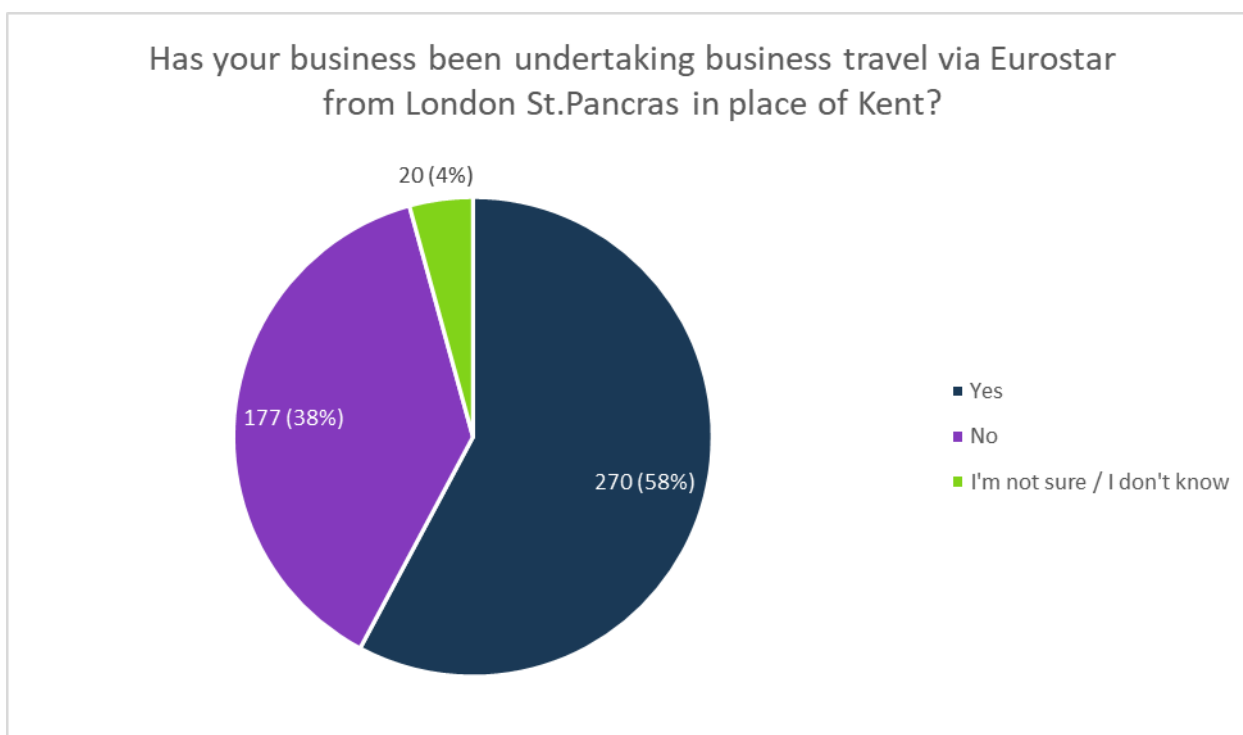
**Chart 14: Was that business travel using Eurostar services arriving or departing from Ashford International or Ebbsfleet International stations?**



In a similar fashion, respondents were asked if they had been undertaking business travel via Eurostar from London St. Pancras while there have been no Eurostar services arriving or departing

stations in Kent. 58% of respondents answered that they had been using London St. Pancras in place of the Kent stations, and 38% had not.

**Chart 15: Has your business been undertaking business travel via Eurostar from London St. Pancras whilst there have been no Eurostar services arriving or departing stations in Kent?**



Having established that some businesses are travelling via London St. Pancras, the survey next asked respondents if having to travel via Eurostar from London St. Pancras station, due to Eurostar services not stopping in Kent, had any impact on their business. Respondents were able to choose multiple answers as applicable to their business, as well as using a free text box for any other answers. The results are displayed on chart 16 on the following page.

More than 50% of respondents Identified the additional cost of travel and time lost to the business, due to the extra time of reaching London, as impacts on their business. Respondents also identified that they were undertaking fewer international business trips overall, as well as fewer trips using Eurostar and instead using alternative travel routes.

**Chart 16: Has having to travel via Eurostar from London St. Pancras station, due to Eurostar services not stopping in Kent, had any impact on your business?**



The 19 “other impacts” raised by respondents were summarised and are presented below in Table 3.

**Table 3: Other impacts of travelling via Eurostar from London St. Pancras.**

Other Impacts
Arrive stressed and tired to meetings
Had to change business model entirely
Difficulty closing deals / less opportunities
Lost hours due to extra travel / security hold ups at Kings Cross/ St. Pancras
Flying instead of the train

Increased Carbon Footprint / less sustainable
impossible to get to early meetings in Europe now without staying in London overnight
Visitors not willing to visit Kent now, they visit London instead
Staff less willing to travel to Europe

Following this question the survey asked respondents, “Do you think Eurostar services not stopping in Kent is having an impact on custom of your business?”. The term custom was defined to include marketing, productivity, supply, revenue, and profit, but could also include impacts beyond how trips are made. 89% of respondents answered yes and only 2% answered no.

For those business representatives that answered yes, the reasons in which they felt their business was being affected were further explored by the next question, which was an open-ended question asking, “How is Eurostar not stopping in Kent affecting your business?”. Respondents’ comments have been coded to common themes which are presented in the table below. The 7 businesses that answered no provided very similar reasons, despite saying that they were not affected.

The most common reasons stated by respondents are that it takes longer to travel and causes lost productivity, and that it is more expensive to travel which has raised business expenses. Responses also frequently mentioned that their business travels less now, or visitors and tourists travel less, and that they have seen reduced business growth or a reduction in business with, or from, Europe.

**Table 4: How is Eurostar not stopping in Kent affecting your business?**

Description	Number of Responses
It takes longer to travel / time consuming / lost hours/productivity	67 (23%)
Reduced business growth/less profitable / business with/from Europe has reduced	62 (22%)
Its more expensive to travel / it has raised business expenses / more expensive to operate	61 (21%)
We travel less / it's a deterrent to travelling / Visitors travel less/less tourists	58 (20%)
It's inconvenient / less flexibility / more difficult to trade	47 (16%)
Kent businesses are less attractive/competitive / Kent loses trade to London	45 (16%)
Travelling via London is frustrating / wastes time/money / costs more / takes longer / is hassle (London Specific)	41 (14%)
My business switched to other means of travel	40 (14%)
Weakened/damaged client relations / harder to maintain relationships / less interaction / less F2F contact / less regular contact	37 (13%)

Harder to visit suppliers/customers/European offices / for them to visit Kent	23 (8%)
Less environmentally friendly	20 (7%)
Travel is no longer viable/worthwhile/practical / It's more difficult logistically	16 (6%)
Cannot market accessibility to the continent/Europe / lack of connectivity to Europe	10 (3%)
Kent is not considered for business now	3 (1%)
Harder to recruit / train staff	3 (1%)

Some direct quotes showing the context of businesses responses to this question are below:

"Travel takes too long and the additional time and expense of going via London makes day trips to continent for work unviable".

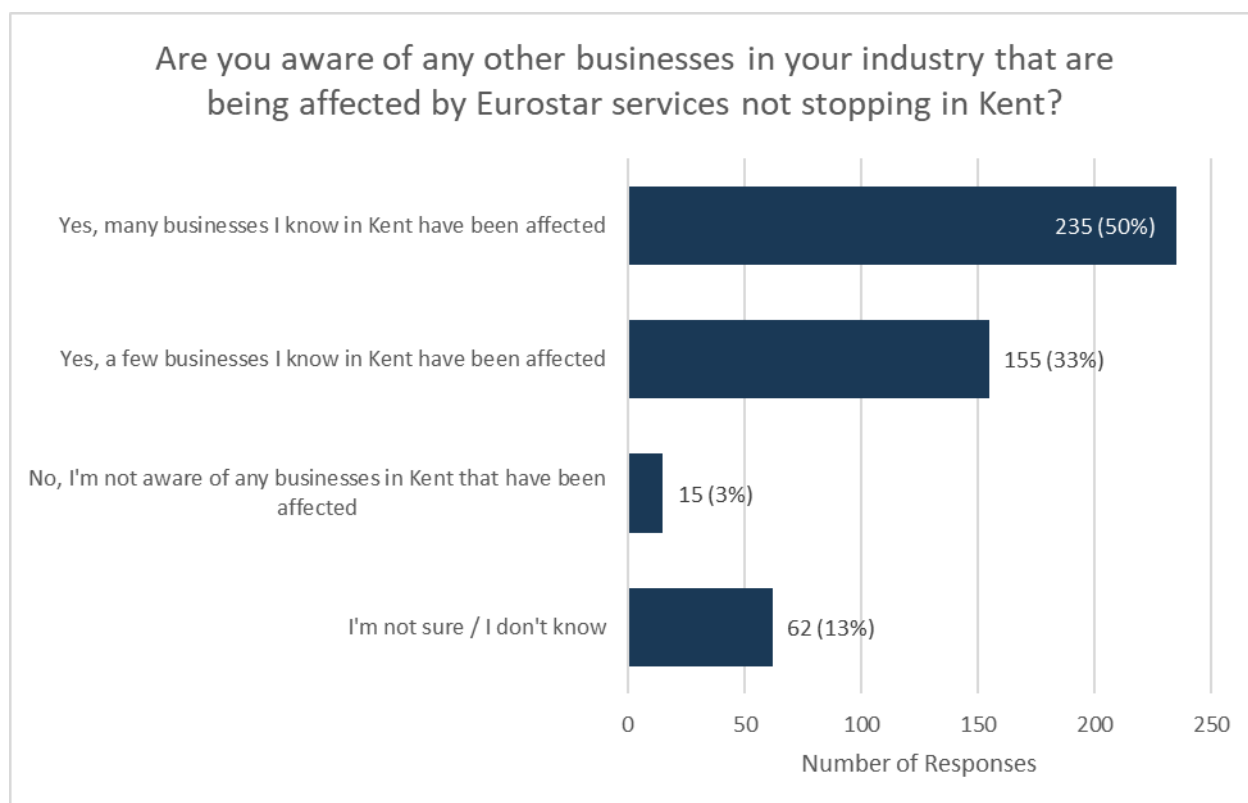
"More expensive and more time-consuming travels to Europe have made my business less efficient and less profitable."

"[...] It makes it more difficult to meet my clients - more time consuming, costly and frustrating. It means I spend less time with my family as I have to factor in all the extra time to travel to/from and check in/return at St Pancras."

"Clients/contacts spend more time in London, reluctant to travel 'back' to Kent. We were always their first stop before."

To form a basis of how widespread the effect of Eurostar services not stopping in Kent may be, respondents were asked if they were aware of any other businesses in their industry that are being affected. Their responses are shown on the chart below.

**Chart 17: Are you aware of any other businesses in your industry that are being affected by Eurostar services not stopping in Kent?**



83% of respondents indicated that they knew either a few or many businesses that had been affected by the Eurostar services not stopping in Kent, with very few businesses not knowing any businesses that had been affected.



## 4.4 Businesses plans and future European travel.

For the last three questions the survey focussed on the future for respondent's businesses and Eurostar services, starting with asking if respondents were planning to grow their business and trade such that travel of staff to and from Europe may be needed. This question was asked to 615 respondents, as it included individuals that may have been routed out if they answered that their business does not currently work with Europe, at the start of the survey.

63% of respondents answered that they were planning to grow their business in a way that travelling of staff to and from Europe may be needed, and 26% were unsure, with the remaining 10% not planning on expanding integration with the European market.

Respondents that answered they planned to grow their business in a way that travelling of staff to and from Europe may be needed were asked an additional open question; "Considering the future, please describe if you think your business plan to grow and invest may create new demand for international rail travel to and from Kent". Answers were coded into common themes which are presented in the table below.

**Table 5: Considering the future, please describe if you think your business plan to grow and invest may create new demand for international rail travel to and from Kent.**

Description	Number of Responses
If services are restored / more likely if services are restored / this can only happen if services resume / uncertain without services	108 (40%)
Yes / It should do / if my business grows demand will grow with it	88 (33%)
Ease of travel or European access would give broader market access/create greater demand / if we can easily access Europe / my business needs access to Europe from Kent.	58 (21%)
Limited Access is slowing or will slow our growth / it's too risky with no promise of a Kent service	17 (6%)
Possibly / limited / it might	14 (5%)
If it is convenient / cost effective / makes sense	13 (5%)
If travel is environmentally sound / need to factor in carbon impact	13 (5%)
I don't know / Hard to say / hard to plan	9 (3%)
Face for Face visits would help my business grow / we need more face-to-face meetings	8 (3%)
No / Unlikely to change	8 (3%)
It already creates demand	8 (3%)
No, due to barriers to easy international travel	6 (2%)
Yes, but without Eurostar costs will be far greater	1 (0%)

As with the prior free text answers, some quotes have been included to give greater context to the summarised answers above:

“Because of a new contract with the EU, I will need to travel more frequently to European destinations as will my staff. However, our costs will be far greater including the inconvenience and time wasted.”

“I’m certainly not looking to increase my business in Europe due to the non-billable time and expense now the Eurostar doesn’t stop in Ashford.”

“Yes likely to as staff more frequently are moving out of London along the high speed line, especially around Ebbsfleet with all the new development so that station being linked to Europe again will be extremely useful”

The two most prevalent themes were that businesses believed that their business would create additional demand for international rail travel to and from Kent if they were to grow, or that this would be likely to occur but was contingent on restoration of international rail services from Kent stations. Another popular theme suggested that ease of travel between Kent and Europe, or access to European markets, would create greater demand for Kent businesses. A less frequent theme which tied into other suggestions elsewhere, was that some respondents felt it was too risky to expand operations requiring European travel, without a promise of services returning to Kent.

As a penultimate question, respondents were asked a further open question, “If Eurostar services, or a different international rail operator, began stopping in Kent, are there any other improvements to the stations and train services that would encourage your business to use them?”. As with the prior question, answers were coded into common themes where are presented in the below table.

**Table 6: If an operator began stopping in Kent, are there any other improvements to stations and train services that would encourage your business to use them?**

Description	Number of Responses
The facilities are fine as they are / no	148 (46%)
More frequent services / timely services / guaranteed schedules / clearer schedules / Earlier Departures	49 (15%)
Improvements to facilities at or around the station e.g more Cafes and Co-Working facilities/ a dedicated business lounge. / Good WiFi at the station and on Trains / Good facilities to work while onboard / On train catering options	27 (8%)
Affordable pricing / cheaper fares / ticket discount incentives	26 (8%)
Better local connections / integrated transport links / local signposting	26 (8%)
More onward destinations / wider variety of destinations / links to sleeper services / night train services	24 (7%)
Long stay parking / better parking options / more parking / cheaper parking / seasonal	20 (6%)

parking tickets	
Faster customs checks / shorter check in times / automated check in / good border management / fast pass boarding options	18 (6%)
Taxi rank / shuttle bus services to the station / car hire nearby	11 (3%)
Improved lighting/security / it doesn't feel safe walking between the station and car park at night / general improvements to station / Better accessibility (less steps, more ramps)	8 (2%)
Inclusion of local trains under Eurostar ticket / One ticket onward travel (anywhere in Kent) / Flexible tickets	5 (2%)
More frequent cleaning	5 (2%)
Train carriages need refurbishment	2 (1%)
EV charging points	1 (0%)
Focus on sustainability	1 (0%)
Make it easier to travel with bicycles / overside luggage	1 (0%)

Close to half of responses (48%) were happy with the facilities at Kent stations as they were before the services stopped in March 2020. Another common theme was around the timing of services, with 15% of respondents wanting either more frequent services, or different timings of services, or a guaranteed schedule for departures or arrivals. Once again, some quotes have been included for greater context.

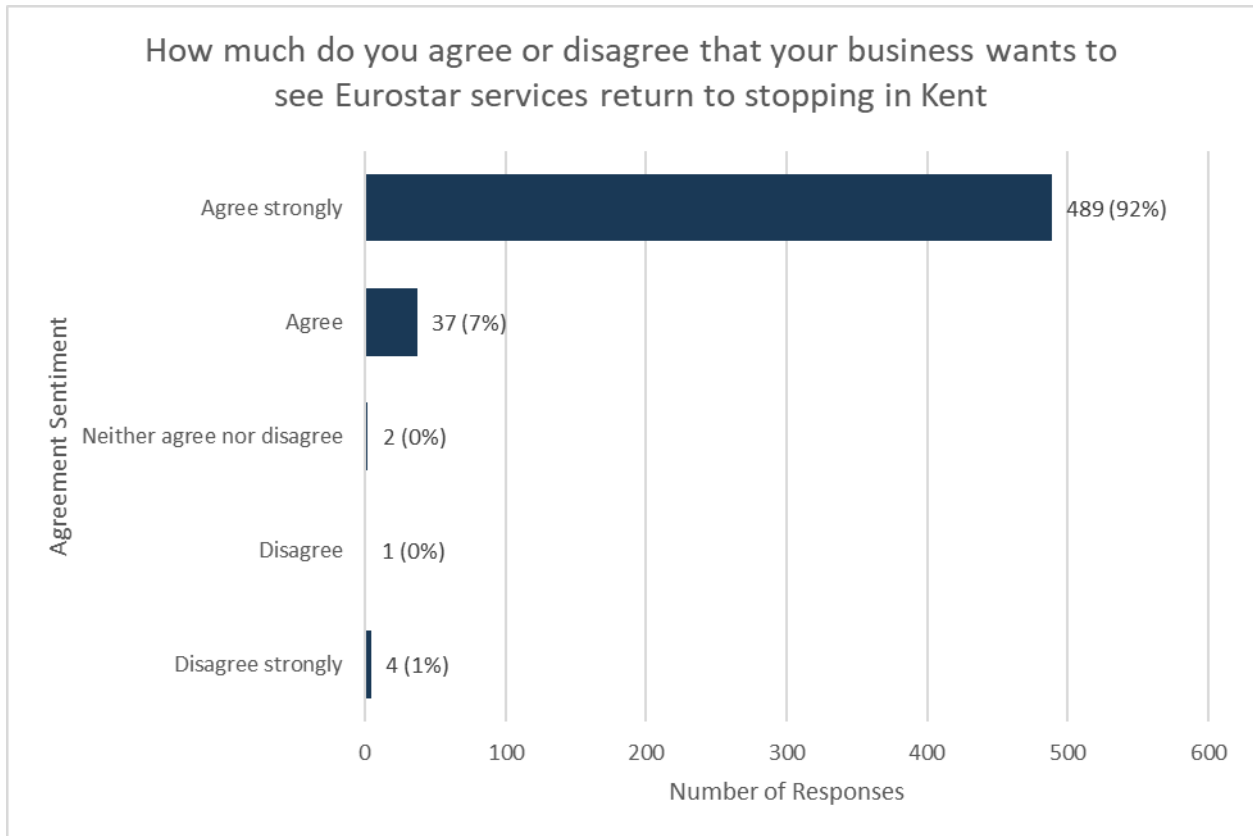
“The Eurostar services from Ashford already had a very efficient security team and a good enough timetable to work around. Even two or three services a day is better than none. Services to Paris and Brussels are desired significantly, particularly on the latter.”

“No. The service itself from Ashford was spot on - it just needs to run!!”

“We would be happy for the station simply to be operate as they did prior to 2020, any improvements can be made after.”

Lastly, respondents were asked “how much do you agree or disagree that your business wants to see Eurostar services return to stopping in Kent at Ashford International and or Ebbsfleet International stations?”. They were able to respond with “Agree Strongly” through to “Disagree strongly”, as well as options for “Undecided” and “I don’t know”.

**Chart 18: How much do you agree or disagree that your business wants to see Eurostar services return to stopping in Kent at Ashford International and or Ebbsfleet International stations?**



The majority of respondents (92%) indicated that they strongly agreed that they wanted to see Eurostar services return to stopping in Kent. A small percentage of respondents disagreed, or disagreed strongly with the statement.

## Further Information

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# INTERNATIONAL RAIL SERVICES FOR KENT

Public Interest Case for resuming  
International Rail services that serve Kent

Produced in partnership with Ashford Borough Council,  
Dartford Borough Council, VisitKent, Locate In Kent, and the  
Kent and Invicta Chamber of Commerce



Highways and Transport  
Invicta House, Kent, ME14 1XX

*Please note this document was updated in January 2025 to address a selection of comments fed back to the Partnership by DfT civil servants.*

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## Executive Summary

There is a compelling case for government intervention to secure a return of international rail services to Ashford and Ebbsfleet International stations in Kent. It was understandable that services suspended during the extensive travel restrictions of the Covid-19 pandemic in 2020. However, to be four years on with significant uncertainty about whether it will ever be possible to board an international rail service from Kent will be damaging to Kent's economy.

The challenges and opportunities explored in our case are clear.

Over £13bn<sup>1</sup> of public investment in international rail assets, including c. £0.25bn<sup>2</sup> invested in the Kent stations, is failing to provide the intended benefits. A key reason for this is because responsibility over service operations is with a private international rail operator, rather than driven by what is in the public interest of the economy and quality of life in Kent and wider nation. There is no obligation on operators utilising the High Speed rail assets that cost c.£13bn of taxpayer money to serve the purpose built stations on the route through Kent.

Notably, the high debt burden that the state has had to bear for the High Speed 1 link has arisen due to passenger demand on the line having been below forecasts made at the time of the relevant investment decisions. The current challenges with stations now not being served only compounds the likelihood of demand and use of the line and its services remaining lower than anticipated. Only a growth-focused strategy will ultimately deliver better value for money from the existing sunk investment.

The costs to travellers, be they residents, businesses or visitors, have substantially increased now that there is a reliance on travel from London St Pancras International or other routes such as the Ports or airports. For a group of four people, this can be additional money out of their pocket of over £200 for a single return trip, whilst for businesses they have told us travel costs and increased travel times are detrimental to their growth prospects. Based on past demand, this could equate to c. £16.5m a year in unnecessary travel costs.

The affected businesses that have reported their concerns through our survey represent c. 30,000 jobs, equivalent to c.£750m of GVA to the national economy.

The visitor economy in Kent is lagging behind in its recovery from the pandemic, which is likely to be driven by the loss of easy access to the county from international visitors.

The environmental credentials of international rail are unrivalled. Comfortably one of the most environmentally friendly forms of travel in the world, the lack of easy access to them in Kent pushes more prospective passengers onto far more carbon intensive

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<sup>1</sup> Cost based on NAO and DfT reported outturn capital costs and non-capital costs including outstanding debt and interest payments and net of concession sale receipts, adjusted for inflation to 2024 price.

<sup>2</sup> Cost based on reported cost of Ashford and Ebbsfleet International Stations, and Ashford Spurs projects, adjusted for inflation to 2024 price.

forms of travel such as ferry and plane. This is a backwards step in the reverse direction from the government strategy for Decarbonising Transport.

The events over the Christmas and New Year period of 2023 demonstrated the lack of resilience in the international rail link when all demand is required to route through London St Pancras International.

Kent stations should be kept ready to go for international rail services again – the infrastructure is largely in place and the facilities at stations should be kept to the functional standard necessary to they can welcome passengers as soon as the first scheduled train can arrive. Whatever form the changes to border controls through the Entry Exit System take, the Kent international stations should require relatively small works and can support the nation's international rail connections with Europe.

There is demonstrably widespread stakeholder support, business support and public support for seeing a resumption of services. This support should provide an onus for government to explore the options available to it to secure a return of services.

Relying on there being future competition to generate services returning to Kent is a high risk strategy. Thirty years of no competition has left Eurostar Ltd (a company that enjoyed the benefit of UK-French state backed ownership for its establishment and continues to do so today from the French and Belgian governments) with an effective monopoly as the bar to entry to the market is set so high. Action is needed now, and this is why we have set out the public interest case to justify government taking the following actions:

**Recommendation 1:** Government should commit to intervening to secure a return of services from December 2025.

**Recommendation 2:** Government should establish a working group immediately to develop the public interest case with local partners and determine the powers it can use ensure a return of services.

**Recommendation 3:** Kent stations should be invested in so that they are maintained to a functional standard and ready to go for the new Entry Exit System and a return of international rail services.

# 1. Introduction

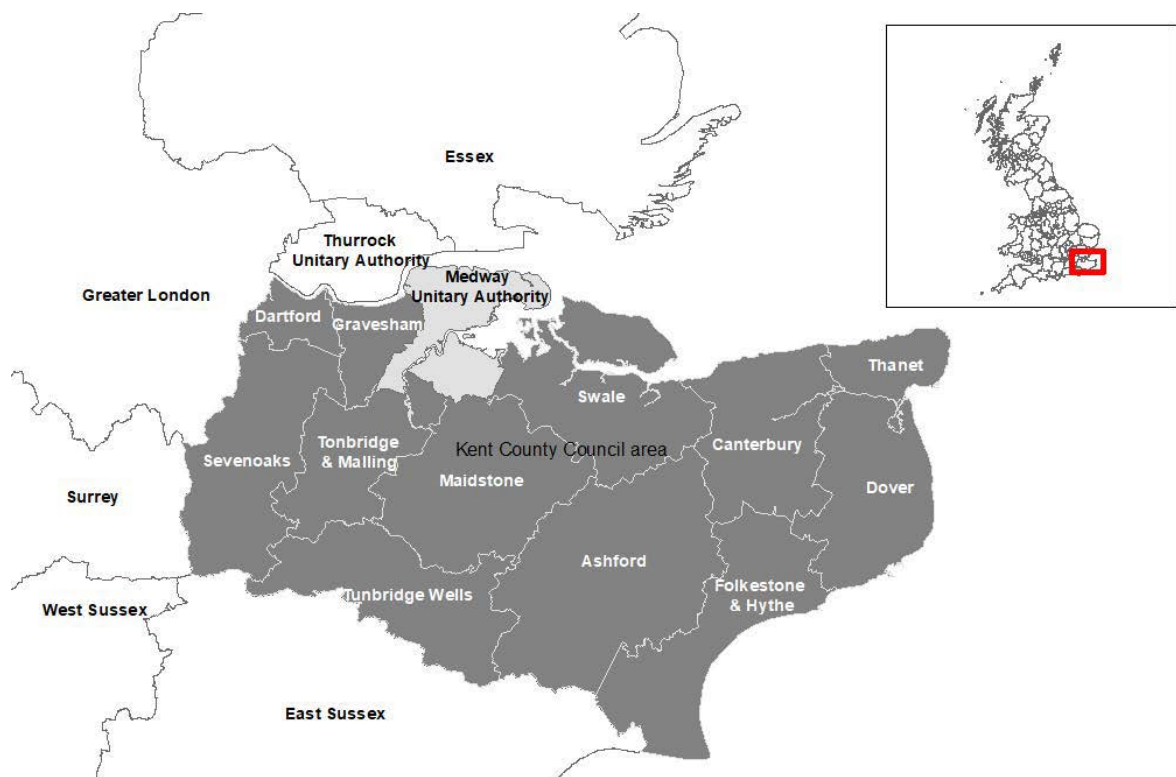
- 1.1. Kent has a long and close history with its European neighbours due to the short stretch of channel separating the white cliffs of Dover from the sandy shores of Calais. On the 6 May 1994, this was strengthened by the opening of the channel tunnel, and the commencement of passenger rail services shortly after, in January 1996.
- 1.2. Since that date, Ashford and latterly Ebbsfleet, have provided a gateway for British and European visitors and business people alike to quickly travel across the channel, leading to economic opportunities from trade to tourism. They provided convenient and low cost access to international travel for hundreds of thousands of passengers a year. Usage was highest when the train service provided an attractive route, given the alternatives of motorised crossings via ferries or Le Shuttle, or from regional airports – namely Gatwick and Heathrow.
- 1.3. Businesses and residents have made investments and located themselves in Kent following the international service having run for 24 years up to 2020. Now, however, they find themselves without this key access to Europe and uncertain of whether it may ever return.
- 1.4. The importance of this relationship has been recognised by government since day one of delivery of the international rail link. From routing the line through the centre of Ashford to best serve the community, to more recently with the spending of public funds to upgrade the station signalling and power systems ensure that the future generation of modern international rolling stock could continue to stop.
- 1.5. The pandemic caused a significant shock to international rail with strong travel restrictions across international borders through 2020 and into 2021. The financial impact on the only operator Eurostar, lead to the regrettable cessation of services stopping at Kent's international stations. What could have been a short-term impact of the pandemic has become a lasting legacy that risks continuing further harm to the economic success of Kent and the wider region on the basis of the evidence set out in this strategic and economic case.
- 1.6. This case has been prepared by the concerned local government authorities that have been collecting evidence of how the current situation may be harming both the economy as a whole and the quality of life and operations of residents and business people. The case is designed to inform decision makers about the clear public interest case that exists for acting to secure a return of international rail services to Kent.

## 2. The strategic case

### 2.1. Who we are

- 2.2. Kent County Council is the tier one local government authority, working with twelve tier 2 local government authority Districts within which Dartford and Ashford host the international rail stations of Ebbsfleet International and Ashford International respectively – see Figure 1. The county of Kent lies between the Greater London Authority Area and the international rail crossing to the continent of Europe via the Channel Tunnel. The High Speed 1 rail link between the Channel Tunnel and London routes through Kent.

**Figure 1 - Map of Local Government areas in Kent**



### 2.3. What we are responsible for

- 2.4. Of relevance to the issue of international rail connectivity, Kent County Council responsibilities include:

2.4.1. The Local Transport Plan making authority and the highway authority for the local road network. This includes delivering infrastructure investment into all parts of the transport network using funds delegated or approved for use by the Council by the government.

2.4.2. Kent County Council has an adopted Kent and Medway Economic Framework to deliver its Corporate Strategy priority of Levelling Up, by

supporting the Kent economy to be resilient and successfully adapt to the challenges and opportunities it faces over the coming years.

- 2.4.3. Kent County Council convenes the Kent and Medway Economic Partnership that includes substantial private sector business representation to deliver the aforementioned framework and support District authorities with the economic strategies tied to their Local Development Plans.
  - 2.4.4. Kent County Council provides funding support to the operation of the VisitKent organisation, which is a public private partnership operating as the official Tourism and Destination Management Organisation for Kent and Medway under the umbrella of Visit England.
  - 2.4.5. Kent County Council is member of the Kent Resilience Forum, a partnership of service providers, who work to appraise and mitigate risks including those associated with international transport of people and goods.
- 2.5. District Council responsibilities that lie with Ashford and Dartford Council include responsibility for planning and building control, parking, environmental health and waste collection, and leisure facilities. Ashford and Dartford Councils have a strong interest in the economic prosperity and regeneration of their districts, and there is a wider recognition from other Councils across Kent, such as Gravesham given the proximity of Ebbsfleet International to their authority area, and Canterbury City Council that has a large international student community associated with its universities as well as a strong tourism industry.
- 2.6. Visit Kent, Locate in Kent and the Kent and Invicta Chamber of Commerce are organisations and agencies that represent member and industry interests, focused on securing the right conditions for economic prosperity and growth. They collectively have campaigned on how the cessation of international rail services are affecting the specific industries they represent, and that is addressed in this public interest case.

## **2.7. International rail in its spatial context**

- 2.8. The international rail link to Europe via the Channel Tunnel runs from Folkestone via Ashford, past Medway to Ebbsfleet. The line then routes under the Thames to continue to its only current operational station in the UK at London St Pancras International station. On the route through London, near Stratford International station, which has never been used for international rail, is the UK-based international train depot called Temple Mills.
- 2.9. The international rail link provides substantial possibilities for rail connections across Europe, however currently the only main destinations served from London by the current operator, Eurostar, are Paris, Lille, Brussels, Rotterdam and Amsterdam.
- 2.10. Two existing but currently non-operational international rail stations are situated in Kent. Ebbsfleet International is at the heart of a major development area called Ebbsfleet Garden City, in north Kent just south of the tunnelled crossing of the international rail link under the Thames.
- 2.11. At Ashford the international station is located in the town centre, with the town creating significant development potential at the heart of eastern Kent, and as a hub on the strategic rail network linking 6 rail lines and with connections serving East Sussex and beyond. Although the international stations are not operational, the domestic rail services run by Southeastern trains are operational and provide links to London St Pancras International on the premium-pay High Speed train service.
- 2.12. There are no international airports in Kent, with the closest being London Gatwick – which is c. 12 miles from the western border of Kent, nearly 58 miles from Ashford and around 100 minutes or more by public transport. Access to Gatwick from Kent is most easily achieved via the M25 motorway network. There are coach services from some towns in Kent, and rail access is possible via a change to connecting services from central London or via Tonbridge and Redhill from Ashford. London Heathrow is 79 miles from Ashford and at least 95 minutes by public transport.
- 2.13. Additional international access to Europe from Kent is provided by the rail Le Shuttle service from Folkestone, which provides roll-on and roll-off services for cars, vans, coaches and heavy goods vehicles to Calais. The Port of Dover provides the most frequent and continuous international connectivity to Europe from Kent, with roll-on and roll-off ferry services also to Calais and Dunkerque 24 hours a day, 364 days a year, weather conditions permitting.
- 2.14. Ebbsfleet International and Ashford International stations are both served by the same Southeastern High Speed trains, which route from across eastern

Kent, providing catchment from coastal communities in north and east Kent such as Ramsgate, Margate, Whitstable, Folkestone, and Dover as well as the City of Canterbury.

- 2.15. Additionally, Ebbsfleet International has train connections to the county town of Maidstone, Medway, and Gravesend. Ashford has connections to Hastings and Rye in East Sussex, to the county town of Maidstone and to towns through mid-southern Kent such as Paddock Wood and Tonbridge, and to Canterbury and coastal towns in East Kent such as Folkestone and Deal.
- 2.16. Both Ebbsfleet and Ashford are connected by the trunk road network. Ebbsfleet has junction access onto the A2, which connects to the M25 under five miles away and is also close by to the current Dartford crossing and the planned Lower Thames Crossing.
- 2.17. Ashford has junction access onto the M20 which routes to both the Folkestone and Dover Channel crossing terminals, and in the reverse direction links to the M25 as well as major road network links to the A2 / M2 corridor that Ebbsfleet lies on.
- 2.18. Ashford and Ebbsfleet are, within themselves, modest sized towns. Ashford town, as a Built Up Urban Area has a population of c. 85,000, whilst the District as a whole has a population of c. 135,000. Ebbsfleet itself is a small, but growing area, but forms part of what has become a continuous conurbation with Gravesend and Dartford. Ebbsfleet growth has helped drive the borough of Dartford to having amongst the highest population increase anywhere in the country since 2011. Collectively the built up urban area has a population of c. 99,000 whilst more widely the whole of the boroughs of Dartford and Gravesham have a population of c.225,000.
- 2.19. Across the wider county of Kent including Medway, the total population is c. 1.88 million residents, and c. 73,000 businesses. The county of Kent is one of the single largest counties in both spatial area and population in England. Further on in this case, greater consideration is given to the wider regional population within reasonable travel times of the international stations in Kent. The case demonstrates that the locations of the international stations and their good transport network accesses mean that their use is not isolated to the passenger market in Kent but serves a wider market in the south east.
- 2.20. Kent and Medway are uniquely placed within the UK as the gateway to Europe for trade and travel. Given the proximity it is important that this economic advantage is capitalised upon, so that Kent and Medway are a priority location for businesses to locate in and for visitors to come to or travel from due to the connectivity between London and the continent. Action is being taken to help ensure the channel crossing terminals in Folkestone and Dover are fit for the future. But for residents and businesses that grew to rely on the 24 years of sustained international passenger rail services, these advantages are being



undermined by the current non-stopping of services at Ashford and Ebbsfleet. This will make it harder to attract and retain businesses and visitors as the country's strong ties with Europe continue into the future.

## **2.21. Strategic policy context**

### *2.22. Government policy*

2.23. The Government has a Levelling Up mission and has ranked authorities across the UK. Whilst often termed as a rebalancing between the north and south, the Levelling Up agenda has placed due focus on locations in the furthest southerly parts of mainland England, with Districts in Kent along the east coast and inland being ranked in the highest priority and medium priority categories.

2.24. To overturn the deficits these locations face, the Levelling Up strategy set a plan aiming to boost productivity, pay, jobs, and living standards by growing the private sector. To enable this, the plan's mission for transport has been to bring local public transport connectivity closer to the standards of London, with improved services, simpler fares and integrated ticketing.

2.25. The Government's export strategy called Made in the UK, Sold to the World, states that the government will continue to work to connect UK businesses to overseas buyers, international markets, and each other. The international rail link through Kent provides the means to do this and has done prior to 2020.

2.26. Global companies such as Coty Rimmel and Givaudan in Ashford who both host the company's largest UK production facilities in the town due to the international links to their other facilities in Europe, shows the past investment decisions made by companies exporting large quantities of products into Europe. Currently, there has been a reversal in the quality and ease of connection owing to the loss of access to the international rail stations presenting a threat to future investment from companies.

2.27. The Government's Decarbonising Transport plan has a commitment to build extra capacity on our rail network to meet growing passenger and freight demand and support significant shifts from road and air to rail. The plan recognises the exceptional carbon efficiency of the rail network and in respect of the international rail link, it is 100% electrified and hence capable of both moving large volumes at a low energy cost per trip, as well as the capability to draw significant volumes of its power from renewable sources.

## *2.28. Sub regional policy*

2.29. The sub national transport body Transport for the South East, of which Kent County Council is a funder and constituent member, has a Transport Strategy. The strategy has three priorities concerning environment, economy and social. Within these, the priorities are to reduce the volume of carbon emissions from travel to net zero 2050 at the latest, and improving connectivity between major economic hubs, ports and airports.

## *2.30. County council policy*

2.31. Kent County Council's strategy Framing Kent's Future focuses on a theme of 'infrastructure for communities' alongside 'levelling up' and 'an environmental step change'. Within these the strategy has a clear and specific commitment to strengthen the Council's position and levers in regard to strategic transport links in the county (e.g. Eurostar, Eurotunnel and HS1), to maximise opportunities and benefits for Kent. The strategy commits to doing this through actions such as lobbying advocating for the reintroduction of international rail stops at Ashford and Ebbsfleet. Our strategy has driven the action we have taken including the composing of this public interest case.

## *2.32. District authority policy*

2.33. Ashford Borough Council's corporate plan has set an objective (TG1), within a theme of 'targeted growth', to increase productivity and job opportunities and to establish sustainable, knowledge-based and creative industries in the borough. The council intends this to help attract and grow businesses and industries that innovative and sustainable, benefiting local employment and incomes. The plan sets out actions to achieve this and, specifically to attract inward investment to the borough, the Council has committed to action to lobby for a return of Eurostar services at Ashford International station equivalent to service levels prior to the December 2016 timetable<sup>3</sup>.

2.34. Dartford Borough Council recognises the importance of Ebbsfleet International station within the borough, stating that the station is one of the key gateways due to its continental connections. The Council seeks to maximise the potential of business development close to Ebbsfleet International Station to support the productivity of investment and knowledge based employment in the Borough. The council has acted alongside Kent County Council and Ashford Council to highlight the impact of the loss of international rail services, including supporting the undertaking of a business survey.

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<sup>3</sup> Note from December 2016, service levels were reduced at Ashford as Eurostar managed its new fleet of trains due to their incompatibility with the station's signalling and power systems – a factor resolved by an upgrade funded by the government and completed in late 2019. Consequently, further services were planned to be re-introduced to Ashford International by Eurostar from May 2020 onwards, but never came to operate due to the Covid-19 pandemic.

### **2.35. Challenges and opportunities - What is the problem?**

2.36. There are no international rail services stopping in Kent despite two modern purpose-built stations. This follows services having operated for just over 24 years prior to their cessation in March 2020. Having services, operated by Eurostar, for a sustained period of 24 years and on the expectation that they would continue for decades to come, has presented a significant challenge to the international travel opportunities for residents and businesses across Kent and the wider south east region. These groups had established patterns of behaviour and located on the basis of the international connectivity.

2.37. Furthermore, services have been withdrawn but there is no clarity on whether Eurostar, as the only current operator, intends this to be permanent or prolonged. There is no obligation on Eurostar to serve Kent stations, and therefore their decision making is entirely driven by their own timescales and considerations, especially given they have effectively had a monopoly on passenger service operations since the rail link opened in 1996. The lack of clarity leads to uncertainty for all those former and potential users or beneficiaries.

### **2.38. Challenges and opportunities - Why has the problem arisen?**

2.39. International rail services have stopped serving Kent stations because the only international rail operator, Eurostar, has decided to withdraw services owing to its aim to reduce costs and prioritise capital to capital journey times. This has been driven by the debt burden Eurostar incurred arising from a loss of patronage for a prolonged period due to Covid-19 travel restrictions over 2020 to early 2022.

2.40. The further cause of the problem is the changes to border controls post full withdrawal of the European Union on the 31<sup>st</sup> December 2020. The resumption of the need for full checks at the border for entry into the European Union at international stations in England, due to juxtaposed border controls, created inefficiencies for Eurostar. Each traveller takes longer to pass through the border control passport checks, which reduces the quantum of passengers that can be processed per border control officer.

2.41. Eurostar has clearly explained to Kent County Council that given a decline in the volume of passengers processable by each officer, to maintain throughput the priority has been to ensure that border personnel made available to Eurostar by the French Authorities are prioritised for London St Pancras International operations. This is because London St Pancras International processes over 90% of the historic passenger departures from England, when Kent stations were operational.

2.42. To compound the problem, the establishment of the need for border checks on departure will increase with additional biometric data requirements as part of the European Commission's introduction of the Entry Exit System for third countries (those outside of the European Union and the Schengen Area) in 2024. The systems and infrastructure needed to facilitate the Entry Exit System checks on departure from UK-based international rail stations may create new delays and inefficiencies on the throughput of rail users.

2.43. Until the Entry Exit System is fully defined and rolled out, with the impacts known, Eurostar has stated it cannot determine whether it will resume stopping services in Kent. Both Eurostar and HS1 Ltd (owners of the high speed rail link and the international station infrastructure under a concession to 2041) are calling for support in implementing new infrastructure and having available border force personnel for all stations if Kent International Stations are able to be re-opened. This poses a threat if these resources and investment are not forthcoming.

#### **2.44. Challenges and opportunities – what impacts has the problem created?**

2.45. With the loss of services are a range of impacts detailed below. They are varied and demonstrate the scale and importance of international rail to Kent, the region and the national economy, which follows from having had 24 years of sustained international rail services in Kent prior to 2020.

#### **2.46. *Travel Costs (in cash terms)***

2.47. At least twelve trains a day lost from stopping in Kent, leading to higher costs due to the travellers having to purchase additional rail tickets for use of High Speed premium fare services or standard national rail services to London for access to London St Pancras International services. For some journeys, costs of travel on the Transport for London managed network may also be necessary e.g. journeys arriving at London Victoria from Kent.

2.48. Costs may also push journeys towards flights, bringing costs associated with travel to airports, potential car parking charges, and air fares. Similarly, some journeys may also be pushed to the Folkestone and Dover crossings, bringing fuel costs from vehicle use and Le Shuttle and Ferry fares, as well as adding to existing congestion at peak times. For vehicle users, it also brings the need for necessary vehicle insurances and equipment legally required for driving on many European roads including safety and first aid equipment.

2.49. For many Kent based companies who continue to use international rail services via St Pancras International, they are now not able to do day trips to Paris or Brussels previously achieved through Kent Stations due to the additional travel times, this has therefore led to these businesses incurring additional overnight accommodation costs to achieve the same journeys, which in turn has additional time costs for employees. These all have an impact on the productivity of the business and its staff as well as increased costs for the business.

2.50. Lastly, in the current situation where costs increase, then inevitably for some passengers that either were formerly using international services or could afford to do so if they chose, they will now not be able to afford the cost of travel. This creates an economic barrier for those seeking to access European markets.

#### **2.51. *Travel costs (time and comfort)***

2.52. The proximity of south east England to Europe meant that the journey times between destinations via international rail services were relatively low – significantly lower than the time to reach many destinations across England and the wider British Isles. These factors meant the international rail services from Kent enabled continental travel to feel like relatively local regional travel,

bringing access to jobs, leisure, tourism, and residences within easy reach, and return journeys possible within a single day.

- 2.53. A journey to Paris from Ashford, for example, was just 1 hour and 52 minutes long – the same time it takes to reach Cambridge and an hour less than the 3 hour journey to reach destinations like Birmingham or Southampton. Furthermore, these journeys could be made at similar cost to travel to Paris or Brussels.
- 2.54. The loss of international rail services from Kent forces rail passengers to journey to London. Doing so can add substantial additional journey time. Whilst Kent has a range of rail routes, including High Speed premium fare services to London, as a principle the additional journey leg can be as much as an additional 2 hours, factoring in the wait time at the origin station, the journey time to London, and the long arrival time passengers must give owing to capacity management of the space-constrained London St Pancras International rail departures terminal and lounge.
- 2.55. Lastly, the time on-board international services to transit from London St Pancras International back down the high speed rail link past the currently non-operational Kent international stations at Ebbsfleet and Ashford which could otherwise have been used by passengers:
- 2.55.1. A return journey takes around 20 minutes between London St Pancras International and Ebbsfleet International.
  - 2.55.2. For users that would otherwise have caught services from Ashford International, around 70 minutes is unnecessarily spent on the train when services could have been accessed direct from Ashford International, were they stopping.
- 2.56. These travel time costs alone are very substantial and significant relative to the journey times prior to cessation of international services stopping in Kent. They can be a doubling of the journey time. The result from the current problem of non-stopping services is either travel not being made at all, routing via less convenient, more costly and less sustainable means of travel or, for those remaining using rail, passengers paying more to access a service that can take double the length of time.
- 2.57. Businesses that have located themselves in Kent to take advantage of the quick journey times into Europe by train, will no longer have that reason to locate their business in Kent if services are not reinstated. This risks a considerable impact on the economy moving forward, as detailed further in section 2.59.

2.58. Rail travel has unique advantages to the alternatives. With the loss international services from stopping in Kent, access to a high comfort, more spacious, catered form of transport is lost. Modern international rail services, including the Class 374 E320 Eurostar trains, have wifi services, every seat has a power socket, flexible reading lamp and accessible luggage areas throughout the carriage. These conditions make rail a uniquely productive and high quality means of travel that has very widespread appeal to the variety of demographics within a population.

### **2.59. *Quality of life and opportunity***

2.60. Since 1992, a few years before international services began, Kent and Medway's combined population has risen 20% to 1.88 million people. Dartford borough alone, host of Ebbsfleet International station saw the second highest rate of population increase (at 19.7%) in the decade to 2021. Kent's offer as a place to live was significantly enhanced by the international rail connectivity. It provided an easy access means of travelling to Europe, removing reliance on reaching the airports that required circum-navigating the London area. The system enabled lives to be established in Kent that have close and easy access to Europe, with family connections and friendship networks, increasing the richness of life and providing opportunities on a global stage yet just around 2 hours from Kent.

2.61. The cessation of services has abruptly severed ties between friends and family or made them harder and more expensive to maintain. Campaigners in both Europe and Kent have articulated the impact on their own personal lives and demonstrate the degradation it has made to the quality of a life lived in or with close connections to Kent.

### **2.62. *Business, trade and investment***

2.63. Businesses have located and established operations in Kent on the basis of 24 years of access to international rail services. Some of these businesses are head quartered in Europe and now have greater costs in operating owing to the time and travel cost impact aforementioned.

2.64. Global companies such as Coty Rimmel and Givaudan with major UK operations in Ashford have used the service over many years to connect to offices in Paris and beyond, demonstrating the connections the service has created over many years. The problems those businesses experience from the primary effects of non-stopping services can cause secondary problems for Kent and the region associated with the deterrence effect on future business growth and investment.

2.65. These risks to businesses have been illustrated by a business survey targeted at users of international rail services. Kent County Council undertook the survey

between October 2023 and January 2024 – a full copy of the survey findings is appended with this case. The findings show that the majority of respondents (75%) were extremely concerned about Eurostar services not stopping in Kent in the future, and 99% of respondents were at least quite concerned. These concerns arose from, principally, over 50% of businesses responding stating that the current non-stopping of services meant they incur higher time and costs associated with international travel. Given these impacts, 89% of businesses responding to the survey believed that Eurostar services not stopping in Kent was having an impact on custom of their businesses.

- 2.66. The economic strategy for Kent and the region has been built upon an expectation of continued access to international rail services. As late as 2019, c. £8.5m of investment was made, with the support of rail industry partners and Eurostar's endorsement, into ensuring the continued future of services calling at Ashford International by upgrading signalling and power at Ashford International station so that the new generation of Eurostar trains could stop at the platforms. These efforts signalled a future that led to new businesses exploring and planning to locate into Kent, in part to take advantage of the international rail connections. The loss of the stopping services and the lack of any certainty about whether they will return creates uncertainty for businesses and the risk of loss of investment into the county and region.
- 2.67. This makes delivery of Local Development Plans to realise land uses enabling investment and locating of businesses in Kent more difficult to achieve. Finally, that further causes the lost opportunity of a growing business and employment population generating local tax income and local earnings which would be spent on town centre high streets, at retail parks, in hotels, local hospitality and leisure amenities, and tourism attractions.
- 2.68. The current operator, Eurostar, is being non-committal about returning services which creates uncertainty for business planning and decision making in Kent. It weighs against the investment made to secure that certainty in the future of international rail services and is not in the best interests of residents and businesses who should be benefiting from the investment by government. Businesses and local government cannot plan as effectively and that will lead to a loss of trade and investment that erodes the potential to level up through targeted growth in the county. As the levelling up agenda has made clear – it is not about addressing local issues purely for local benefit – levelling up and reducing disparity by rebalancing the UK economy is good for the overall UK economy.



## 2.69. *The visitor economy*

- 2.70. Support for this case comes from VisitKent, the official Destination Management Organisation for Kent and Medway under the umbrella of Visit England. VisitKent are the recognised authority on Kent's visitor economy and have identified the following challenges through their monitoring of the market.
- 2.71. The visitor economy in the south east relies on a significant portion of visitors from abroad, and within that many come from western Europe. In particular, given the proximity with France and the low journey times, as covered in section 2.35, attractions and businesses relied upon ease of access for international visitors.
- 2.72. According to the Cambridge Model Economic Impact of Tourism Study commissioned by the organisation VisitKent, in 2019 tourism was worth £4.1bn to the economy in Kent, with the sector accounting for 11% of all employment in the county. International visitors stayed 6.5m nights in the county contributing £340m to the local economy.
- 2.73. International visitors in Kent are reduced from 2019 levels. The most recent figures show that international visits to the county still have some way to recover with spend down by 20.3% to £271m. When compared to the wider South East region over the same period of time, where spend from international visitors is down by just 11%, and factor in findings from the Kent Perception Study that shows the appetite amongst international visitors is very strong, it's clear that Kent's recovery in the county from the pandemic has been impacted upon by wider factors including the loss of infrastructure such as the international rail connection.
- 2.74. A lack of international stopping services makes ease of access difficult. Renowned attractions such as Canterbury Cathedral, a UNESCO world heritage site, the Kent heritage coast, and the most internationally recognised emergent vineyards in the UK were all within easy reach of the Kent international station stops.
- 2.75. A 2022 study looking at previous visits to Kent showed that 22% of French visitors travelled to the county by train. While Eurostar provided a direct link for European visitors, it also provided a connection service for long-haul visitors travelling through Europe. The same study shows that 13% of all US visitors to the county would visit as part of a wider itinerary including other European destinations. This suggests that the loss of the international rail link will create a barrier for the county when targeting visitors from US and other key markets, particularly when considering the opportunities missed for Kent to benefit from global business and leisure events in Europe such as the 2024 Olympics in Paris.

2.76. There are jobs supported by the international visitor economy in Kent. The business survey conducted collected information including the type of sector that businesses operated in. The results showed that amongst the five most represented industry sectors, Accommodation and Food as well as Arts, Entertainment, Recreation and Other Services were represented by 93 businesses. This frequency of representation reflects those types of businesses operating in and benefiting from the visitor economy.

2.77. In the context of a national agenda to level up the UK, allowing international rail connections to be limited to a London-centric operation risks leaving London with an unfair and unnecessary advantage. The gap between London and Kent in terms of economic benefits from international visitors would grow, not shrink.

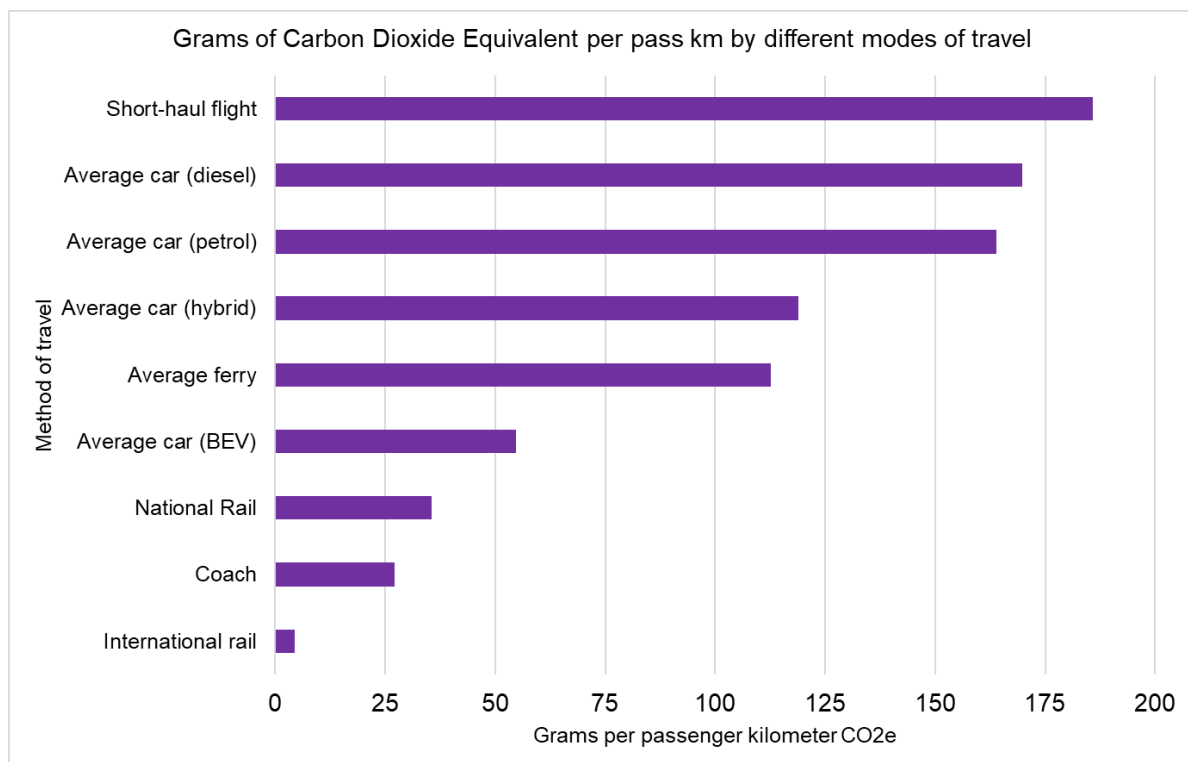
**2.78. *The environmental impact***

2.79. The problem created by a loss of stopping international rail services is that the options and choices for international journeys are reduced and the lost services represent the most environmentally friendly option that exists. The international rail link from London to the continent is fully electrified and furthermore, the nature of the track design and electrical feed (overhead wires, straight tracks enabling high speed operations), lack of stop-start speed profiles associated with braking and acceleration for junctions and frequent station stops, creates a very efficient operation.

2.80. International rail is more efficient in terms of carbon emissions by a large amount over the next most efficient mode of Coach, which could be used by travellers using the Le Shuttle services. Furthermore, as Figure 2 shows, international rail is almost 35 times less emitting of carbon dioxide than short haul flights which are another likely alternative for international travellers that may be pushed to Gatwick.

2.81. Given the long term target to net zero 2050 and the interim targets established by the UK carbon budgets, the lack of stopping international rail services in Kent leaves travellers with more carbon-intensive choices. Unavoidable use of these remaining choices will make reducing national emissions at the rate needed more challenging unless in quick time motoring, ferries, and aviation can decarbonise down to the very low emissions levels of international rail.

**Figure 2 - Carbon Dioxide Emissions from different forms of transport for international travel**



## 2.82. *Unexploited infrastructure delivering poor value for money*

2.83. A significant problem created by the lack of stopping services in Kent is that the infrastructure investment made by the government is not yielding the intended benefits for the public interest.

2.84. The investment made by the public sector is substantial and is in contrast to aviation, the main other form of international travel. In the aviation sector, airports have been largely privately funded and have relatively strong competition amongst operators. The main role of the public sector has become focused on investment to support sustainable surface access.

2.85. The National Audit Office and the Department for Transport have both reported on the outturn capital cost and total cost to the tax payer of the High Speed 1 link. The DfT's estimate from its First Interim Evaluation of HS1, published in 2015) built on a 2012 reported estimate by the National Audit Office. The DfT estimate included costs of connected works such as the remodelling of King's Cross St Pancras International Underground station.

2.86. Including costs associated with ongoing liabilities for the state concerning project debt interest and repayments, and netting off the concession sale receipts, it estimated a total cost of £8.84bn.

- 2.87. Assuming that these outturn costs are reflective of 2007 prices (the year of completion of the HS1 link), allowing for inflation over the 17 years since, and allowing for some likely reduction in the debt and interest balance over that time, we estimate that the total cost inflated to 2024 prices is around £13bn. Despite £13bn of investment in infrastructure, the link remains with substantial capacity due to a lack of international service operators and reduced high speed rail domestic services following the Covid pandemic. An investment of £13bn has yielded an international rail link with a single service access point currently available at London St Pancras International station.
- 2.88. Concerning infrastructure investment specifically for accessing services in Kent, the Ashford International station platforms and associated overbridge, departure lounge and long stay car parking were constructed from 1994 to 1996 at a cost of around £30 million. Inflated to current day, the cost is circa £80m. Ebbsfleet International station was built following the announced award in 2005 of the London 2012 Olympics and Paralympics Games. The station opened in 2008 for a widely reported cost of £100m. In current prices, this would be around £150m.
- 2.89. The original construction phase through Ashford was through the centre of the town having considerable impact on residents and businesses, but with this disruption being justified on the basis of having international travel available from the town centre and Ashford International Station. The legacy of the High Speed 1 construction still remains in Ashford with some town centre brownfield sites still to be redeveloped over 25 years later.
- 2.90. In 2019, an upgrade to the power and signalling systems on the domestic rail network spur off of the High Speed 1 rail link and through Ashford International station was also completed, to a cost of £8.5m. The upgrade was funded to ensure that international rail services operating on the more modern European Train Control System (ECTS) and Speed control by beacons (KVB) signalling could continue to stop at Ashford International. Ebbsfleet International station had been unaffected as it was built on the High Speed 1 rail link which was built to international rail standards. In current prices this would be around £10.5m.
- 2.91. In total, an investment of c. £0.25bn has been spent by the government to enable international rail services that can serve Kent. Furthermore, although the government sold the infrastructure as a concession, currently held by High Speed 1 Ltd until 2040, the government now reimburses the infrastructure owner for the maintenance and safe provision of the stations, track and other infrastructure. Hence the government is paying further annually, even if indirectly, for the management of infrastructure that is not being used in Kent.
- 2.92. It is acknowledged that some benefits from domestic rail access continue to be gained at Ashford and Ebbsfleet stations and these have been important for

improving connectivity and opportunity associated with access to London's labour market and services, and in enabling more people and businesses to choose to locate or visit Kent. Nonetheless the full benefit of the infrastructure is not being realised, with international departure lounges sat idle, and platforms sat vacant. Each day that passes, Kent and the wider UK economy forgoes another day of benefit that could have been made from the billions of pounds of investment.

2.93. Having a sustained, high quality and high speed rail service for 24 years at stations serving large towns and major regeneration and housing areas followed by potentially no services ever again would be unthinkable within England on the typical domestic rail network. Imagine if towns like Watford and Northampton lost their West Coast rail services to Birmingham because the rail operator did not want to stop trains at those stations, forcing residents to have to travel to London before they could reach rail services destined for Birmingham. The state would act and ensure that franchised or concession contracts to use the line and run services secure service provision for stations on the route.

2.94. Yet the comparable situation of locations in Kent losing access to international rail services after 24 sustained years of operation is occurring with no mitigating action by the government and through its rail authorities and regulator, despite clear public concern and economic damage and long term risks evidenced in this case.

2.95. ***When track or train defects occur, there is a lack of resilience for international rail passengers***

2.96. December 2023 demonstrated the lack of resilience to the country from reliance on a single outbound and arrival terminal for international rail journeys. In December 2023 the tunnel under the Thames for international and domestic high speed services suffered flooding due to a burst water pipe. The incident, on the 30<sup>th</sup> December coincided with a period of high use as passengers sought to make international journeys to see family and friends over the new year period.

2.97. The media reported that over 30,000 passengers were left unable to travel on Eurostar, having to divert to alternative routes or cancel their journey entirely. London St Pancras International was overwhelmed with queuing and confused passengers.

2.98. The resilience, much needed on that day, was one of the arguments made for the £8.5 million investment in Ashford International Station to resolve the signalling issues with the new Eurostar fleet. Due to Ashford International Station providing the only route to take trains off the HS1 tracks through the Ashford Spurs into an International Station, maintaining it as a boarding and

alighting point means it provides a location for unscheduled services to be moved off the international rail line creating further disruption to other international services.

**2.99. *What about Stratford International station's example of no stopping services?***

- 2.100. It is acknowledged that the precedent of Stratford International receiving no international stopping services and lack of government action to rectify this, may be held as an indicator that the current approach to Kent stations is ordinary and fair.
- 2.101. Such an argument would overlook three fundamental differences between the Stratford and Kent situations. Firstly, Stratford International is built close to London St Pancras International, and embedded into the integrated Transport for London network. This means the disadvantages to London's passenger market from no international rail services stopping in Stratford are relatively low.
- 2.102. Secondly, whilst the international station at Stratford was constructed on the same basis as Ebbsfleet International – specifically for the delivery of the London 2012 Olympic and Paralympic Games and its legacy, the reliance on international rail services is lower at Stratford. It was the site of the Olympic park, within the TfL fare zone 2/3 in the Capital, and so saw investment in new transport connections and development with a wide range of uses, from Westfield to the London Stadium for West Ham FC, to an office quarter hosting the FCA and TfL. In comparison the locations in Kent have a higher reliance on the international stations as part of their competitive advantage. This relates to the third and final point as follows.
- 2.103. The third key difference is that the international stations in Kent had had sustained international services – of up to 24 continuous years in the case of Ashford. The impact on Kent is therefore felt harder due to the reliance and competitive advantage that developed. Losing the services has been disruptive and undermined demonstrable value that otherwise was accruing from the investment in international stations. In contrast, Stratford International's benefits realisation have been far less reliant on international stopping services, owing to the significant impact of legacy land use development in the Stratford area and its associated connectivity with London and the wider region.

#### 2.104. **Summary**

2.105. Whilst the problem identified may have unique features owing to its international element, fundamentally the impacts are no different and the public interest case no different from if a comparable problem arose on the domestic rail network. The solutions that this problem may need may not be substantially different from those required to fix a hypothetical equivalent situation on the domestic network given that in either situation the fundamental aim is to ensure a private company operating on UK public infrastructure deliver a level of service that is in the public interest.

2.106. As the exploration of the problem of non-stopping services has demonstrated, the range of impacts are not exclusively international – they have a clear domestic impact and therefore they support the arguments made that it is in the public interest to address this problem and conversely against the public interest to allow the ease of international rail access and travel costs to worsen.

#### 2.107. **Challenges and opportunities - What are the opportunities?**

2.108. ***The infrastructure is ready to go, to coincide with the 30<sup>th</sup> anniversary of the Channel Tunnel and commencement of Eurostar services from Kent***

2.109. The past investment by the government of over £240m to enable international rail services to stop in Kent means that an operator could begin resumption of services within months. The benefits can therefore be quickly realised and at almost zero risk and uncertainty – a distinctly different situation compared to many other transport business case and investment decisions the government typically considers.

2.110. The 24 years of successful past operations prove that there is a market and economic case, which is further emphasised by both the arguments in this case and the array of stakeholders that support it. In short, resume international rail services stopping in Kent and people will use them. This would deliver immediate benefits to those passengers, and the activities that are dependent on their travel, be it business operations, trade and investment through access to markets, or visitor attractions and the accommodation and services industry those enable.

2.111. In May 2024 it is the 30<sup>th</sup> anniversary of the opening of the Channel Tunnel. The link has been transformative for the UK and demonstrated the power of high speed rail. It would be a missed opportunity and an indication of an adverse approach to trade and travel if after 30 years of the delivery of one of the most ambitious construction projects ever, the range of services available for UK residents and businesses had declined.

2.112. The opportunity is clear – government can make a clear commitment and take action to ensure that the next 30 years of the Channel Tunnel and its international passenger rail services are more successful than the previous 30 years. The international rail services from Kent to Europe are not isolated to a continuance of the close neighbourly relationship between the UK and France. They are about demonstrating that opportunity and international travel is a feature that as many people should be able to benefit from as easily as possible. This should be part of the UK government's approach to a global Britain which is good for trade, good for investment, and good for the quality of life and opportunity enjoyed by citizens of the UK.

**2.113. *Resuming services from Kent stations can improve resilience of this vital international connection***

2.114. December 2023 demonstrated the lack of resilience to the country from reliance on a single outbound and arrival terminal for international rail journeys. Had the stations in Kent been open, rail services may have been able to continue to provide the vital connection to Europe.

2.115. Ebbsfleet International and Ashford International's direct rail connections via the domestic non-high speed rail network would have allowed thousands of passengers to travel to Kent to begin their Eurostar journey. The resilience of the network would be substantially improved, and when disruptions solely affecting Eurostar arise, the high speed domestic services would provide an additional route to Kent stations. Furthermore, greater resilience would support a growing railway and the increased pressures it would bear were further operators to run services, making frequencies more intensive and driving higher passenger use.

2.116. This resilience could also aid circumstances at the London terminal, reducing the pressure and burden on a station which also needs to cater for tens of thousands of passengers using other rail services for destinations across England.

**2.117. *There is no obvious risk to international rail operations from the UK if Kent stations are served***

2.118. The opportunity is clear – given that for 24 years international rail services have served Kent stations, with £240m of infrastructure investment to make that possible, the opportunity is to secure a resumption of stopping services at potentially little or nil cost. There is ready to go infrastructure that is capacious and modern, easing the ability for any adaptations necessary to enable stopping services to continue following changes to international border controls and checks.



- 2.119. The international rail route has demonstrated over a long term period that it can sustain a profitable operation of services by private sector operators. Furthermore, the international rail link remains profitable - despite the temporary downturn of patronage due to the Covid-19 pandemic, use of the line has rapidly bounced back and the current services run by Eurostar are on course for pre-pandemic levels of patronage with its latest 2023 accounts recording earnings before interest, taxes, depreciation and amortisation of €332m (c. £285m), with debts paid down by €127m (c. £108m).
- 2.120. If left to the commercial decision making of the current incumbent monopoly of Eurostar, there may not be any return of stopping services. Alternative approaches that could be pursued to secure stopping of services within the current monopoly do not appear to pose an obvious threat to the viability of operations overall. The public interest case for Kent and the region could be served without risking loss of the benefits arising to the public and nation currently obtained through the more limited service operations solely to and from London St Pancras International.
- 2.121. The risks identified by Eurostar concerning French Border authority resourcing are acknowledged by this case and it is concurred that there should be no risk introduced to the efficient and effective operation of the London St Pancras International rail terminal in order to enable operation of Kent stations by redistributing border resources (human or equipment).
- 2.122. The Border resource risk is, however, entirely solvable – the UK government has a long history of working bilaterally with the French government to organise and fund border resourcing. The level of resources required will be relatively low and would therefore represent a relatively low cost were it to be passed onto the UK state by the French authorities. It could also be recovered by the state through options around usage fees concerning passengers or operators.
- 2.123. ***There is ready to go investment in Kent to exploit the international connectivity***
- 2.124. District authorities in Kent have been working hard to support and co-ordinate new investment into their areas. In Ashford this has generated ambitious large-scale proposals for a substantial redevelopment of former rail lands on the doorstep of the international station.
- 2.125. The Ashford International Studios project has already been recognised by the government as a major opportunity with a strong business case to support achieving levelling up. Consequently, the project has designated funding from the Levelling Up Fund of £14.77m, helping to establish a film and tv studios facility, anchor a digital industry hub in Kent, and deliver wider mixed uses of commercial, education and residential. This development alone could see up to

1,725 direct jobs and 775 indirect jobs alongside a £88 million GVA contribution to the local economy each year.

- 2.126. The opportunity is inherent in the plan's name – Ashford International Studios. The success of the venture will be made far more likely if rail services to major global cities across Europe, such as Paris, Brussels, Lille, Amsterdam and other destinations operators have considered such as locations in Germany, Spain and Switzerland.
- 2.127. There are further investment plans by global brands already in situ or considering establishing in Ashford. Companies like Givaudan, a global leader in flavour and fragrance manufacturing, or Brompton Bikes who revolutionised cycling around the world with the portable foldable bike.
- 2.128. Ashford International Station also supports and serves the South of Ashford Garden Community – recognised and supported by the Department for Levelling Up, Housing and Communities, and due to deliver 7,250 homes, 5,000 jobs, 5 Primary Schools and 1 Secondary School, and community facilities, parks and open spaces. In addition, Otterpool Park Garden Town, part of the governments Garden Communities programme, that is just 8 minutes by train from Ashford International Station is a new proposed Garden Town for up to 10,000 new homes and 9,000 jobs in Kent. These developments create significant opportunities for the growth in demand for international travel from Ashford International Station.
- 2.129. Ebbsfleet International station sits in the heart of one of the country's most substantial new garden settlement projects. Designated a garden city, on the doorstep of the station will be a significant new commercial centre for Kent, known as Ebbsfleet Central. Ebbsfleet Central will be the dynamic commercial centre for the garden city, comprised of mixed use residential and commercial opportunities spanning up to 485,000m<sup>2</sup>.
- 2.130. Current car parking around the station will be relocated and the area transformed with modern new offices, city living apartments and places for people to enjoy arts and culture alongside fitness and wellbeing, all on the doorsteps of high-quality and sustainable neighbourhoods hosting 15,000 homes, complimenting the existing towns of Dartford and Gravesend.
- 2.131. International rail connections from Ebbsfleet will support the garden city in the attraction of tenants to the commercial uses and provide the opportunity to maximise the benefits from the government's own £300m investment into the garden city project.

**2.132. *There is a visitor economy ready to seize the opportunity of better access for European visitors***

- 2.133. VisitKent monitoring of the Kent visitor market demonstrates that one in five visitors to Kent in 2022 were foreign, totalling 0.9 million people. Given 2022 experienced some of the residual effects of the pandemic on behaviours and travel restrictions, the number in 2023 we can expect to be higher. Just for 2022, these international visitors that stayed overnight were responsible for generating £271m in the Kent economy, whilst more still will have been spent by day visitors which who make up the majority of economic value at £2bn.
- 2.134. The opportunity of the international rail services, such as with Ashford International located in the centre of town close to accommodation, attractions and integrated into the county's rail and bus networks, is that day trips are viable for visitors. Indeed, Canterbury, Ashford and Thanet recorded the three highest volumes of overseas visitors in 2022, reflecting the opportunity that Ashford International and its fast rail links to Canterbury City (a 14 minute journey) and Thanet (a 40 minute journey) has for supporting growth in this important industry.
- 2.135. The international stations therefore provide the opportunity to maximise the visitor economy and, having had 24 years of rail service operations up to 2020, attractions and businesses are well geared to servicing the demand from international visitors. Part of the pledge and offer from the supporters of this case is that we will work closely together, and with venue and transport operators to ensure our collective resources market and attract visitors, raising awareness of the international rail connectivity following the prolonged period of non-stopping services.
- 2.136. The Kent Sustainable Tourism Action Plan sets out a roadmap for reducing the impact that tourism has on our local environment and our communities. One of the three key priorities of this action plan is to shift visitors to low carbon travel options when travelling to and around the destination, and as such, one of the key actions is to encourage inbound visitors to reduce flights.
- 2.137. A 2022 report by Booking.com showed that 71% of travellers confirmed that sustainable travel is important to them, as more and more visitors choose travel providers and destinations that are able to offer lower carbon, nature friendly experiences. The return of the international rail services to stopping in Kent would not remove barrier for the county to achieve its sustainability goals, whilst also addressing the choices for sustainable travel that visitors want to make.

**2.138. *The UK's credentials in decarbonising travel, already world leading, can be further boosted by a resumption of stopping international services in Kent***

2.139. Securing a resumption of international rail services at Kent station stops would provide a clear signal that the government recognises the exceptional carbon efficiency of international rail over all other modes of travel and thereby providing the conditions for its utilisation by the maximum number of users.

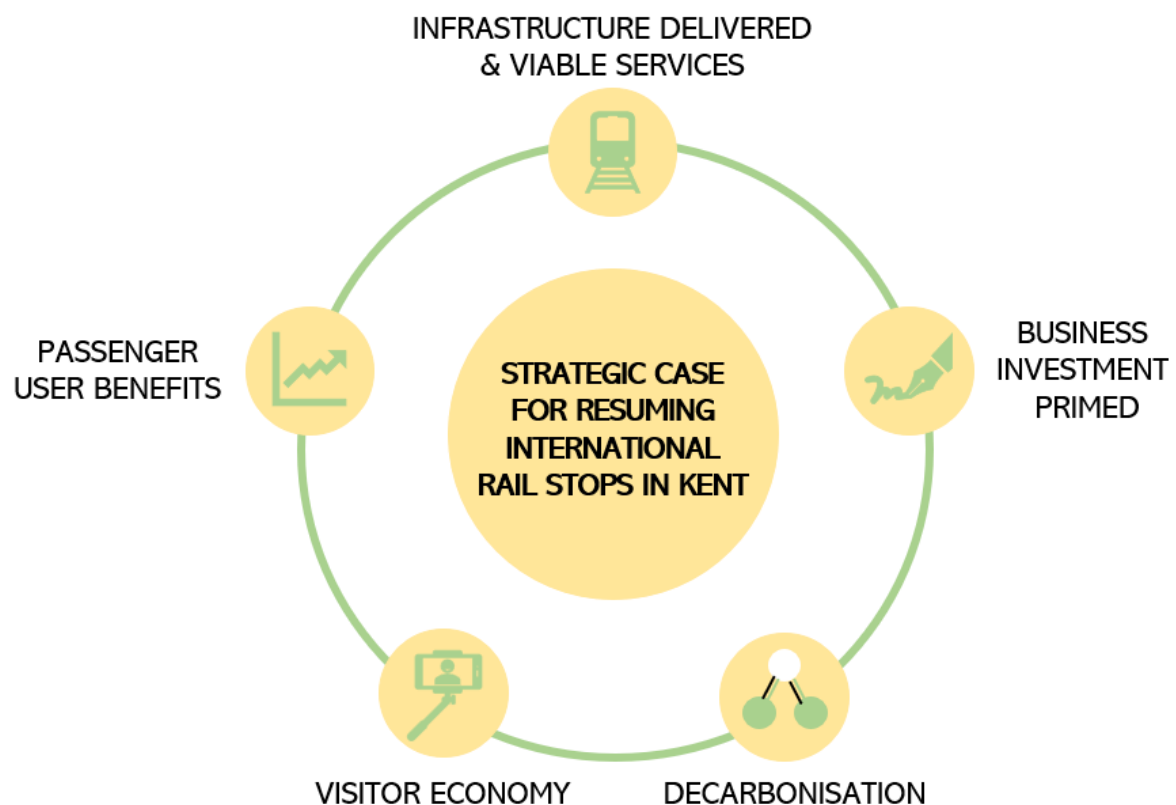
2.140. Providing choice is at the heart of the government's Decarbonising Transport plan and provides a valuable addition to the region's transport mix in the context of the wider transport network changes that may take place. For example, the delivery of the Lower Thames Crossing, easing the routing of road transport between the region and the Port of Dover, as well as the proposed new northern runway at Gatwick increase options for travel that are less carbon efficient.

2.141. In principle, the benefits of these strategic changes to the network are acknowledged and welcomed by the supporters of this case. The opportunity exists, however, to take an approach to ensure that the least carbon emitting form of transport for international travel is as widely available as possible, especially given that the infrastructure to enable this is already in place.

## 2.142. Summary – rationale to act – the case for change

2.143. The range of impacts and opportunities associated with addressing non-stopping international rail services in Kent has been described and shown to be wide ranging. The crux of why action should be taken is summarised in Figure 3, and covers five themes concerning infrastructure and services, business investment, passenger benefits, the visitor economy, and decarbonising transport.

**Figure 3 - Summary of the case for acting**



## **2.144. Strategic objectives and critical success factors**

### **2.145. Strategic objectives**

2.146. The problem articulated in section 2 and its solution, in its most basic form was termed in a binary way – specifically that there are currently no stopping international services at Kent stations and therefore the solution is to change this so that services do stop in Kent.

2.147. The outcome of services stopping at stations would be a positive economic change compared to the current situation, delivering more resilience and sustainability to international travel. Such an outcome leaves room, however, for a wide range of possibilities – for example it could mean one train every Monday stops at each station and that is all. Clearly, this would not address the challenges and deliver the opportunities that have been set out.

2.148. In this section, we have therefore articulated the outcome of stopping international services in Kent in more considered strategic SMART objectives. If those strategic SMART objectives can be achieved wholly or in part then it is more likely that the majority of the benefits across the wide range of themes that have been summarised in Figure 3 can be delivered in the public interest.

2.149. The strategic SMART objectives are as follows.

2.150. Objective A: Both Ebbsfleet International and Ashford International should receive international stopping services throughout a typical week.

2.151. Objective B: Services from each Kent International station should enable return business and leisure journeys to be made outbound and inbound by UK based and non-UK based passengers within a single day.

2.152. Objective C: The international stations should be capable of operating so that there is efficient and fast processing of passengers on arrival and departure, compliant with international border controls, and avoiding disruptions to domestic rail passengers.

### **2.153. Critical success factors**

2.154. We recognise the essential role that Critical Success Factors play in enabling government to understand and ensure its decisions deliver the right outcomes given the options available to it. Established in the Green Book, the success factors have been articulated for this public interest case, as set out in Table 1.

**Table 1 - Critical success factors**

<b>Critical success factor</b>	<b>Description</b>	<b>Rationale</b>
1. Strategic fit: The proposal must deliver on the government and local government's needs concerning the benefits that arise from international travel.	The CSF1 is designed to ensure that the policy alignment and opportunities set out in the strategic part of this case are maintained through any action taken in the public interest.	This public interest case does not make definitive proposals or set out full detailed solutions to government as it is not possible within the limits of the commercial and regulatory arrangements that local government is sighted on in respect of the international rail link and services. CSF1 is therefore designed to maintain the aims of the case and stakeholder needs through any remaining options development by government.
2. Value for money: The proposal must deliver "low value" for money (defined by DfT where the benefits ratio to the costs exceeds 1:1) or higher.	The CSF2 is designed to ensure that the options pursued will yield net benefit to the economy.	A low value for money threshold has been set as the delivery risks are exceptionally low for achieving the outcomes sought. The case concerns, fundamentally, reinstatement of proven rail service operations over a 24 year period in a market and industry that can be set up to reduce financial costs to the state / taxpayer. Therefore, a low value for money threshold is proposed as this would be likely to be achieved with high certainty and low risk, meaning net economic benefit to the UK could be obtained.
3. Supplier capacity and capability: The proposal must be deliverable by the infrastructure operator and service operator.	The CSF3 is designed to ensure that the proposed option is operable by the private sector companies involved in the management of the international rail assets needed.	There is widespread acknowledgement of the changing nature of border controls that will impact international travel. This CSF is proposed, despite infrastructure and service operators demonstrably providing stopping services in Kent for 24 years prior to 2020, owing to the potential remaining infrastructure necessary to adapt to Entry Exit System operations. The CSF is expected to be achievable if the right options and actions are taken.
4. Affordability: the proposal must be affordable for the	CSF4 is designed to ensure the proposed options / actions that are	Affordability is necessary, firstly to ensure that the options and actions taken do not lead to adverse financial consequences for the UK government. Note that this is

government, infrastructure and service operators.	taken are affordable within the constraints of the government's spending plans and the commercial arrangements of private sector operators of infrastructure and services.	considered near nil risk owing to the infrastructure investment necessary having already been undertaken and what may remain being likely no higher than single figure millions, if that. Therefore, entirely within the envelope of existing government spending. Secondly, for the private sector operators of infrastructure and services, the options must be affordable such that they do not risk pushing the companies to become loss-making and risk of bankruptcy causing a suspension of their operations and a complete loss of international rail services. This is also considered near nil risk owing to the high speed rail link being in-effect still publicly owned despite operated under a concession, and the only current service operator being state-owned.
5. Achievability: the proposal must be achievable within the powers and laws the UK government operates within and reasonable relative to any reliance the UK government may need to place on other actors outside its jurisdiction (e.g. the French authorities)	CSF5 is established to ensure that the potential action options can reasonably be delivered by the UK government. It is designed to prevent actions or options being selected that are untried/ untested and have no comparable examples in past experience that demonstrate they could be achieved.	It is possible that the options or actions necessary to guarantee stopping of international rail services in Kent may require action by the UK government. For example, this could include working bilaterally with the French government and its authorities to secure necessary border control resources for Kent stations. The CSF sets an achievability test based on what is considered reasonable and has been successfully achieved in the past. In the instance of the example of border force resources, this CSF would look to the experience of the Government in signing treaties and / or providing funding to support border control activity by the French authorities. For example, associated with irregular (or so called "illegal") immigration.



## 2.155. **Conclusion**

- 2.156. The strategic arguments are clear and evidenced based on the impact of 24 years of sustained international rail services. With clear arguments making the public interest case, the objectives lay the pathway to what action needs to be taken and what the outcomes actions need to deliver. The key action needs to be intervention by the government to ensure public assets deliver the full benefits of the investment. Only intervention can guarantee that both stations in Kent benefit again from their international status and become successes again as part of an outlook of a global Britain.
- 2.157. Supplementing the strategic arguments are the quantifiable impacts to the Kent and national economy. These are set out in the next section of the case.

### **3. Economic case**

- 3.1. The purpose of the economic analysis in this section is to clearly establish the public interest justification for government acting on the current non-stopping of services in Kent. The case knowingly avoids attempting to establish a value for money case given that there is no specific cost / investment called for within this public interest case. The costs associated with any intervention would need to be appraised against their benefits should the government determine any specific actions it is willing and able to take in the public interest.
- 3.2. Despite the limitations of this economic case relative to a typical transport investment scheme business case, it nonetheless provides a purpose to demonstrate how impactful the current arrangement of non-stopping services is in a range of ways, aligned with the themes in the strategic case.
- 3.3. The scale of the economic disbenefits (and conversely the potential benefits that could arise from resumption of stopping international rail services in Kent) provide a clear onus on government to fully consider the public interest case and explore actions to take in response.
- 3.4. If the economic case presented here is not considered sufficient by government to provide such an onus, then the partnership requests that government demonstrate its own cost benefit analysis. That analysis should include detailing the justification for not acting to secure the benefits that should accrue from high value public sector rail assets, given the regulatory controls the government ultimately has over those.

#### **3.5. Scope of the economic case**

- 3.6. The scope of the economic case concerns only the Kent international stations and the access those provide to travellers for arriving from and departing to European destinations served by current international rail services provided by Eurostar.
- 3.7. Associated with transport user benefits and costs, within scope of the assessment is the potential passenger demand that would benefit from stopping international rail services in Kent. Differing levels of passenger demand affect the scale of benefits. The assessment has considered scales of demand based on derived estimates from published statements by the current operator Eurostar since 2009.

### **3.8. Scope exclusions of the economic case**

- 3.9. Other international stations that have no stopping services – for example Stratford International station.
- 3.10. The range of potential European destinations that could be connected to Kent and that could influence the market has not been assessed. The economic case has focused, where necessary, on the route to Paris to provide an indication of the scale of potential quantifiable benefits. Other destinations would of course be possible and were operated prior to 2020 from Kent stations. Getlink, owner of the Channel Tunnel also has an ambition for a range of further European destinations to be reached by services running through the tunnel. Ultimately, the range of destinations on offer in Europe will depend on the decisions by the rail companies.
- 3.11. The case has not considered the range of train service frequencies that could operate to and from Kent stations and their impact of passenger demand. Also out of scope is the timing of those services across a weekday and weekend. In general, the assumption is that a train service comparable to past volumes from c. 2015 is assumed to operate to provide a similar scale of benefits as Kent and the wider economy received previously. This is out of scope as the focus of this case is a resumption of any international rail services stopping at Kent in the first instance. It is acknowledged that the ultimate volume of services would be dependent on market appetite.
- 3.12. Investment and operational costs have not been considered in this economic case as it is not concerned with appraising the value for money case of a specific infrastructure, policy or regulatory intervention. No benefit cost ratio is estimated. The case is instead focused on the user (dis)benefits and costs and wider economic benefits of convenient international rail connectivity associated with services from Kent international stations.
- 3.13. Revenue impacts have not been considered in this case. This includes potential revenue impacts arising to international operators from serving passenger markets via Kent stations, relative to any impact on passengers arising from demand elasticities associated with international rail journey times. Also excluded are revenue impacts arising to the government associated with changes in use of domestic rail services concerning changes in rail journey patterns between St Pancras International as the current location to access international rail services, and Kent Ashford and Ebbsfleet International stations as alternatives, all accessible via the domestic National Rail network.

### **3.14. Overview of the approach to appraisal**

- 3.15. In this section we will describe the way in which we have established evidence to quantify the benefits of services returning. This will cover the petition,

business survey, carry forward of the Ashford International Signalling Spurs business case methodology, evidence sources for both our quantitative and qualitative assertions. We will also explain why modelling has not been used – namely that as an international market our strategic county model (and indeed national transport models) is not capable of simulating how access times to international rail within the UK may impact two-way international traffic levels, or business investment levels and locational decisions.

- 3.16. We will set out how we have dealt with uncertainty – namely by presenting ranged estimates, acknowledging that there has been a variable picture of demand over time at the Kent stations.

### **3.17. Appraisal horizon and price base / inflation / discounting**

- 3.18. Costs and benefits are reported in a 2024 price base. A 2010 DfT TAG compliant price base has not been reported in this work as the study does not concern a specific intervention and therefore represent a full investment decision case needing comparison with other public sector investment decisions. If specific investment decisions are determined in the future, then a fuller business case will need to be developed including use of 2010 price base.
- 3.19. The value of time growth index has been applied to transport user benefits, and the discount rate also applied to convert future year estimates to current year prices, both taken from DfT TAG Data book sheet 'Annual Parameters' version dated November 2023. The GDP deflator has been used to adjust Carbon Dioxide equivalent emissions costs based on the 2020 price values published by government in Annex 1 of Policy Paper Valuation of greenhouse gas emissions: for policy appraisal and evaluation.
- 3.20. Given that the case does not concern a specific investment decision regarding infrastructure assets over their whole life, the appraisal horizon used has instead focused on the remaining time in which the existing HS1 concession has to run – which is to 2040. In 2040, the state will receive back the infrastructure and full control over its use.
- 3.21. Until 2040, it is possible (but not definite) that intervention could require modification of the concession. This has therefore been used as a guide to the horizon in which benefits could accrue longer term. Ultimately though, it should be recognised that the benefits should realistically be expected to be sustained well beyond 2040 as the partnership considers that the life of the international station assets and the potential for continuous operation of stopping services could last for many decades to come.

### **3.22. Demand scenarios**

- 3.23. The volume of potential passengers that would use international rail services from Kent stations is an important consideration in estimating the benefit of services. Of course, if no passengers used international rail services then there would be no benefit from stopping services and no wider benefits to the economy to be gained owing to the secondary (and onwards) impacts of the activity arising from the travel (e.g. visiting attractions, undertaking business etc).
- 3.24. To estimate reasonable demand scenarios, past indicators of demand at Kent stations have been considered. Due to there having been long term sustained stopping of services prior to 2020 and relatedly former investment decisions associated with Kent international stations, there is intelligence in the published domain about the scale of patronage.
- 3.25. Demand using Kent stations changed over time. Eurostar Ltd has previously stated that:
- 3.25.1. Around 2009, the share of demand on services arising from Kent stations, across all stations operated was c. 7%. Published Getlink and Eurostar records indicate that total demand on services in that year was c. 9 million passengers.
  - 3.25.2. By 2019, the same statistic had changed to c. 3% and total demand in that year was c. 11 million passengers, although it is recognised that the regular service provision for Kent Stations was reduced at this time due to the challenges around access of the new train fleet at Ashford International Station, which will have reduced these figures.
- 3.26. Using these reported figures gives a range as follows for total potential Kent international station demand, where 2009 is taken as the upper end of the range, and 2019 taken as the lower end of the range.
- 3.26.1. Lower range: 330,000 passengers per annum.
  - 3.26.2. Upper range: 630,000 passengers per annum.
- 3.27. In addition to this range, an investment decision concerning Ashford International station in 2015, known as the Ashford Spurs project, reported in its published business case Eurostar Ltd a Eurostar station usage figure. The quoted figure is an estimate 195,000 passengers a year. This order of magnitude fits with where the combined likely level of demand in Kent was between the 2009 and 2019 estimates and hence provides assurance that the range used is accurate.
- 3.28. Although the scenarios used are a robust range for the purpose of this case, it is important to recognise that demand will be a function of the following factors and could therefore potentially be higher or lower than the range considered.

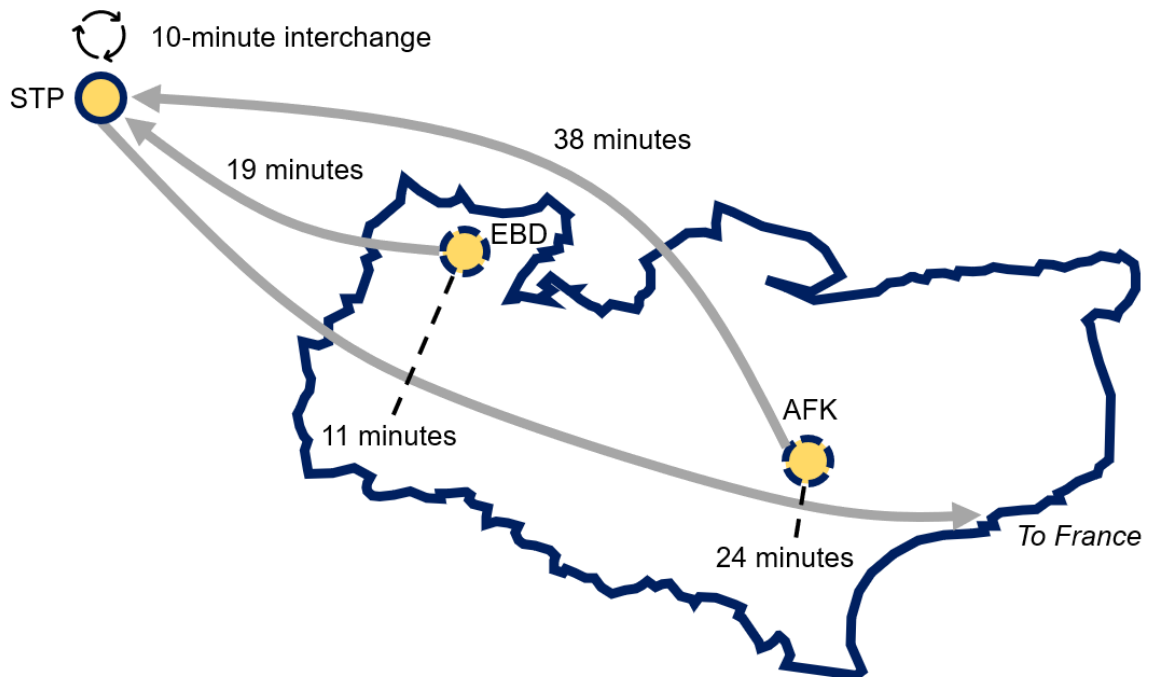
The range used should not be considered as the limits of possible demand levels due to potential variation in:

- 3.28.1. Train service frequency.
- 3.28.2. Destinations served across Europe.
- 3.28.3. Journey time between destinations.
- 3.28.4. Timing of trains for departure and return journeys throughout the day across the whole week.
- 3.28.5. The time taken for processing at luggage and border check points on departure.
- 3.28.6. The cost of fares for journeys.
- 3.28.7. The quality of the journey and the services available relative to the alternatives.
- 3.28.8. How services are marketed by any operator and those businesses or organisations that benefit from the access and connectivity from international rail services.
- 3.28.9. Businesses and passengers changing preferences concerning taking sustainable transport.
- 3.28.10. The behaviour change characteristics of the target passenger market, affecting the extent and rapidity with which it may respond to a return of services to Kent.

### **3.29. Transport User Benefits**

- 3.30. The transport user benefits of re-instatement of stopping services in Kent have been estimated by summing the clock-time cost of the following stages of each stage of travel. This consists of the rail journey time to London St Pancras International station from either Ebbsfleet International and Ashford International; the interchange time to transfer from the domestic high speed rail services to the international rail services at London St Pancras International; and the journey time of travelling back out of London on international stopping services back past the Kent international stations where services could otherwise have been boarded. These journey stages and their times are shown in Figure 4.

**Figure 4 - Journey stages and their time associated with international rail travel from Kent via London**



3.31. It is important to note that once a passenger is at the international departure terminal in London St Pancras International, the processing time for border and security checks, and the loading time is assumed to be no different from Kent International stations. This is considered to be a conservative assumption. Firstly, dwell times at Kent stations for train services are far shorter than at London St Pancras International. This means boarding time is significantly shorter at Kent stations and hence the time spent accessing and then departing services from Kent is shorter.

3.32. There is also more space on average per passenger at Kent international stations – their departure lounge size relative to London St Pancras International terminal is similar, especially Ashford International. Given the lower demand at Kent stations relative to London St Pancras International, there therefore tends to be easier queue management. Processing times for passengers were, historically when the service operated, shorter.

3.33. Monetising the journey time savings that would occur under the different demand scenarios is also based upon distinguishing the passenger journey purpose. DfT TAG requires different values of time be used based on whether the journey is in working time or non-working time with the latter split between commuting and 'other' e.g. leisure.

3.34. The assumptions made for this case are as follows:

- 3.34.1. No journeys are assumed to be for commuting purposes.
- 3.34.2. 70% of journeys are assumed to be for 'other' purposes (primarily like leisure and tourism).
- 3.34.3. 30% of journeys are assumed to be for work purposes.

3.35. The 2015 SELEP Ashford Spurs business case used a journey purpose split of 60% leisure and 40% business. The journey purpose split has been modified for this latest assessment as the changes in the nature of remote working may have resulted in a slight rebalancing of journeys by purpose. The extent of the change is limited to the assumptions used though due to Eurostar itself having reported that business travel recovery and managed business travel accounts had seen a strong recovery following the pandemic.<sup>4</sup>

3.36. Furthermore, stopping at Kent stations incurs a journey time cost to passengers bound to and from London and European destinations. Based on reported 2023 demand, and that not all services would stop at Ashford and Ebbsfleet International stations, based on benchmarking with former Eurostar timetables, a total of 3 million Eurostar passengers a year are assumed to incur a 4 minute journey time delay. This assumption of 4 minutes is also consistent with the 2015 SELEP Ashford Spurs business case. The journey time delay penalty is built into the results presented i.e. they are net of the journey time impact on non-Kent bound passengers.

3.37. The results of the assessment of transport user benefits are shown in Table 2.

**Table 2 - Transport User Benefits**

	Lower range demand scenario (330k pax pa.) £m 2024 prices	Higher range demand scenario (630k pax pa.) £m 2024 prices
Leisure trips	0.29	1.38
Business trips	0.8	3.80
2024 year total	1.09	5.19
Discounted total for appraisal horizon to 2040	16.00	76.10

3.38. The results in Table 2 demonstrate that the loss of international rail stopping services is generating millions of pounds of economic disbenefit a year, even at the low demand scenario. Resuming stopping of services in Kent could therefore deliver significant economic benefits which would support Kent's economy, the prosperity and quality of life of businesses, residents and visitors,

<sup>4</sup> See [https://mediacentre.eurostar.com/mc\\_view?language=uk-en&article\\_id=ka43z0000004S1bAAE](https://mediacentre.eurostar.com/mc_view?language=uk-en&article_id=ka43z0000004S1bAAE)



and also help return Kent to being an attractive location for investment in given the international connectivity for prospective users.

### **3.39. Carbon Impacts**

- 3.40. International rail is proven to be the least carbon intensive form of mass transport available. At just 4 grams of carbon dioxide equivalent emissions per passenger kilometre travelled, it far outstrips any alternative. Furthermore, with the prospect for further greening of the energy mix used to provide the electricity that powers all parts of the international rail system, there is a prospect for these levels of emissions falling further in coming years.
- 3.41. The benefit of international rail therefore cannot be overlooked in the context of the substantial challenge of achieving the UK's nationally determined contribution towards the Paris Climate Agreement, known more widely as the net zero 2050 target and the interim targets to 2050 established by the UK's carbon budgets.
- 3.42. The level of emissions in the current baseline of non-stopping services in Kent have been considered. This has been performed by assuming some of the demand that has demonstrably used the Kent International stations in the past over the period of 2009 to 2019 instead travel via either air or road using the Channel crossing services. The assumption used was that c. 40% of demand has switched to non-international rail modes, based on the volume of travel no longer using international rail stated in response to the business survey.
- 3.43. Specifically, 25% to air and 15% to road (the latter reflecting the region's proximity to Europe and the range of Channel crossing points for roll-on roll-off traffic). This means the remaining 60% is assumed to either have switched to travelling from London St Pancras International or are not travelling at all. In either case, it means the baseline emissions would be broadly unchanged in the event of Kent stations opening, and therefore this proportion of demand is out of scope.
- 3.44. The emissions associated with the ferry or Le Shuttle leg of road-based journeys were not in scope, as no suitable emissions factors are established by government.
- 3.45. For air emissions, the focus is on only the flight emissions. Emissions concerning surface access to airports are excluded from scope as they are the minority of the journey's emissions.
- 3.46. The assessment considered the journey lengths to Paris from the relevant departure points in the UK. Air journeys were estimated at c. 350 kms in length, and road journeys at c. 375 kms in length.

3.47. With baseline emissions established, the emissions from International Rail were estimated based on the rail journey route length of 343 km.

3.48. For the forecast of savings overtime, a horizon to 2040 was used as this is the date of the end of the current HS1 concession and hence when the asset returns to full public ownership and management, or a new concession let. Modes of transport were assumed to become less emitting of carbon dioxide over time – a 50% reduction in international rail assumed, a 30% reduction in air emissions and a 53% reduction in road emissions, all by 2040. The BEIS prescribed central series value of carbon was used, adjusted to 2024 prices using the GDP deflator index from DfT TAG (Nov 2023).

3.49. The difference in emissions between baseline and resumption of international rail services from Kent stations is shown in Table 3. They demonstrate that if past demand is realised at Kent stations following a resumption of international rail services there could be worthwhile carbon emission savings to be gained. The cost of these could be as high as £46.5m to 2040. The emissions reductions would be a meaningful step towards increasing choice so that passengers can choose their travel to be more sustainable and less damaging to the fight to limit global warming.

**Table 3 - Carbon Dioxide equivalent emissions savings estimated from the resumption of stopping international rail services in Kent**

Demand scenario	2024 carbon savings in tonnes CO2e	Savings over time to 2040 in tonnes CO2e	Monetised value of carbon savings in £ms
2009 demand	16,065	220,705	74.8
2019 demand	8,135	112,042	38.0

### 3.50. Cost of living and trading impacts

3.51. The cash cost to residents, visitors and business of Kent cannot be overlooked as it is substantial and will be having a material impact on day to day decisions affecting Kent and so the country's prosperity.

3.52. The cost impact arises from the substantial additional cost of accessing international rail services from London St Pancras International due to the need for many to use rail network to travel into the capital to do so.

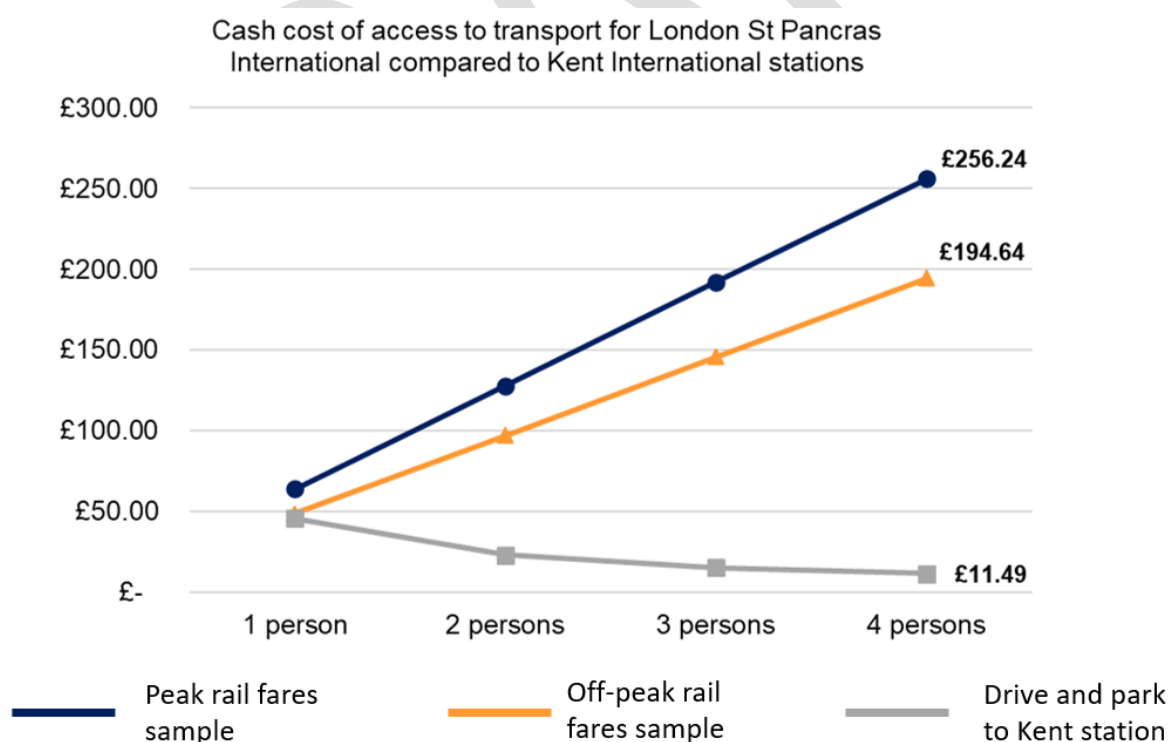
3.53. Fare prices range across Kent, the wider south east region and also across times of day. A scale of the additional cost to passengers that bear that cost, or which otherwise deters the journey, can nonetheless be estimated by using some conservative assumptions on a sample of journeys and fares. A selection of origins in the region have been considered across off peak and peak.

3.54. The analysis shows that for a single traveller, off peak rail travel (especially if advanced fares are secured), can yield a similar cost to fuel and parking costs from Kent International stations. The cost difference based on peak fares is notable though, at a difference of c.£20.

3.55. The most significant cost difference arises once more than one person travels – a group of two, three or more people. As soon as the journey entails an additional adult, costs of accessing international rail services from London St Pancras International can double unless the travellers have purchased concessionary rail cards. For a family the costs can also be substantial especially if peak travel is required given any concessionary fare costs are ruled out from eligible at those times.

3.56. The comparison with travel costs from Kent International stations shows that the more people travel – the more substantial the decline in costs per head – see Figure 5. Whilst currently journeys to London can see a broad average of around £50 per head, which for a group of four can mean total costs of around £200 or more, the comparable cost per head for travel access from Kent International stations can be around £11 per head.

**Figure 5 - Comparison of travel access costs to international rail services with and without Kent international station services**



NOTE: No travel cards applied. Sample of origins from across south east region. Costs similar for Stratford Int

3.57. These differences are very large and, in the context of international rail fares themselves, can mean travellers via London St Pancras International paying as much for their domestic rail journey as for a far longer journey internationally. In comparison, the cost of transport to access international services from Kent stations can be marginal – representing less than a fifth of the total cost.

3.58. These cash impacts are being borne by residents and businesses across Kent and south east and are eating into incomes and profits. They also impact journeys from the continent to Kent – such as visitors and tourists who must now spend larger amounts on rail journey costs to and from Kent, which risks becoming a sustained long term deterrent to growth in the Kent visitor economy on which many jobs rely.

3.59. Lastly it is important to recognise that in the past the real terms increase in the cost of rail travel has outpaced the real terms increase in the cost of fuel and parking costs. Assuming the real terms cost of rail grows by 1% per annum compared to 0.5% per annum for fuel and car parking costs, then the cash difference for a group of four people could increase to nearly £300.

3.60. The cost of access benefits of Kent International stations could therefore grow in the future and hence it must be in the public interest to provide residents and businesses access to these, enabling more money to be kept in incomes and profits for investment in more productive activities for the economy.

### **3.61. Wider Economic Impacts**

3.62. The findings of a business survey indicate that c.30,000 jobs exist at businesses that expressed concern about the impact of a lack of international rail on their own prospects and those of other businesses more widely. It is not proposed here that these jobs are all at threat from a lack of international rail services and the impact on business trade and investment. It is the case though that for businesses to express such clear concerns about the current situation, there must be a degree of direct impact on their productivity and, ultimately, profitability.

3.63. Overtime this could have an impact on the ability of these businesses to employ further employees or retain and reward those that they currently have. We do not have a means to estimate the extent of that impact, but it is valuable to couch this economic harm in the context of what the employment of the c.30,000 employees at the concerned businesses mean to the economy as a whole.

3.64. Using the Gross Value Added per head of population statistics reported by the Office of National Statistics (ONS), we estimate that the Gross Value Added of the c. 30,000 employees is c.£750m per annum. This is based on the 2021 (the latest reported) figure for Gross Value Added from the ONS estimates derived

by balancing the income and production approaches to measuring GVA. These were published in April 2023. They demonstrate that the GVA per head of population in Kent was £25,260.

### 3.65. Other Qualitative Impacts

3.66. The respondents to the public petition and business survey provide testimonial of the impact of the lack of international rail services. These testimonials provide a clear and powerful articulation of the day to day disadvantages that have been created affecting the quality of life and ease of trading as a business in Kent and the wider region.

3.67. Some select testimonials that indicate the range of impacts are as follows:

3.67.1. *"It's ridiculous that we live so close to France but have to travel 2 hours to London to board the Eurostar."*

3.67.2. *"Going to King's Cross St Pancras takes you away from the direction of travel. It puts extra time on your journey, not to mention the additional burden of fares into London on top of your Eurostar ticket. Previously it was so much easier and more convenient to travel from a Kent station. You didn't have to haul your luggage through connecting trains on the underground and overground."*

3.67.3. *"I'm local to Ebbsfleet and after having spent a fortune to create an international rail line and station, it's absolutely absurd to not be able to use this mid way stop from London to Europe!!"*

3.67.4. *"As a second home owner in France, the reinstatement of Eurostat at Ashford would allow me to reach my home without a polluting 1000 mile return journey by car."*

3.67.5. *"Make it easy for me to travel on business without wasting time having to go to London to get the train."*

3.67.6. *"To have a unused international station, then having to travel to London to pick up Eurostar then pass through Ashford without stopping is absurd."*

## 4. Conclusions and recommendations

- 4.1. The strategic and economic cases have demonstrated that there is a compelling public interest argument to overcome the lack of international rail services stopping in Kent.
- 4.2. From a pure public investment perspective, the value of the taxpayer's investment into international rail infrastructure is not being fully accrued, and this is then compounded by the day to day costs now experienced by residents, businesses and visitors to Kent and the wider region – indicated by the transport user benefits estimated of between c. £1.1m to £5.2m a year along with cash costs from fares for additional journeys of a group of four which could be as much as £256 just to reach London St Pancras International for international rail services.
- 4.3. The environmental impact is also clear – without Kent international stations receiving stopping services, journeys that need to be made will likely use alternative travel options that are far more emitting of Carbon Dioxide equivalent emissions. The cost of this alone, over the next 16 years, to the end of the current High Speed 1 rail link concession at which point the day to day management returns to the government, could be at least c. £23m and potentially as high as c. £46m if the higher range of demand realises itself.
- 4.4. Ultimately these disbenefits are all indicators of the backwards slide in the quality and availability of transport. Whilst international rail connectivity may appear a peripheral and low importance issue on a national landscape, for the county of Kent and the wider south east region it is of very high importance. The strength of this importance is borne out by the c. 50,000 signatures to a public petition and hundreds of Kent businesses that represent around c. 30,000 all calling for a reinstatement of international stopping services and setting out testimony to the impacts the current situation is having. These are further to the chorus of stakeholders that have signed their support for the call for intervention recommended in this case.
- 4.5. This is unsurprising given there had been international rail services operating over a sustained period of 24 years and given the close proximity to France for the county and region. People's lives and business investment decisions and operational strategies had been predicated on the international connectivity. Loss of the services is therefore impactful for the local and regional economy and a major blow to the long-term economic prospects of a county.
- 4.6. The local authorities are acting, continuing efforts that have gone back decades of ensuring that this vital asset is kept. That was demonstrated by the Ashford Spurs project and is being further demonstrated by this very case – the local authorities are calling on action from the government on behalf of their residents, businesses, and vital visitor economy. This case is designed to

provide a launch pad for government having confidence that there is good evidence for acting in the public interest to secure a return of stopping international rail services at Kent stations.

- 4.7. The position of the government to date, that it is an open-access railway and down to private rail operators to determine the level of service received by prospective passengers is understood, however this approach is clearly not in the public interest given the evidence in this case. We note that this position was common place for the domestic rail network and other parts of the transport mix, such as bus services. There has been, however, a consistent move towards intervention and action in these markets as failures are occurring<sup>5</sup> as markets struggle to act in the public interest due to their overriding commercial focus on meeting shareholder demands.
- 4.8. We also advocate that this is similar to the position on regional airports where government intervention has been forthcoming to sustain or reopen regional airports for improved economic impacts. For example, the £9.2m of investment in regional airports as part of building back better and greener from the Covid pandemic to the investment in Newquay Airport to make it fit for international travel for the G7 summit held in 2021. These all demonstrate where government has been willing to invest in regional access points for international travel, on a by-exception basis due to an overriding public interest.
- 4.9. The government should use powers available to it to ensure the public interest is served by international rail services. For these services to operate and serve shareholder interests, they are reliant on provision of public infrastructure. There appears scope for the government to apply its control of public infrastructure to secure outcomes from private commercial operations in the public interest.
- 4.10. To do that the local authorities that have prepared this public interest case along with all the supporters of it (reflected on the cover letter accompanying this case), are calling for government to act on the following recommendations.

**Recommendation 1:** Government should commit to intervening to secure a return of services from December 2025.

**Recommendation 2:** Government should establish a working group immediately to develop the public interest case with local partners and determine the powers it can use ensure a return of services.

**Recommendation 3:** Kent stations should be invested in so that they are maintained to a functional standard and ready to go for the new Entry Exit System and a return of international rail services.

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<sup>5</sup> For example - nationalisation of domestic rail operators, supported bus services and associated funding support via local transport authorities for that.

## Appendix A – Assumptions and their provenance

Assumption	Source
Value(s) of time: <ul style="list-style-type: none"> <li>- 2010 Working Rail (Market Price), converted to 2024 price</li> <li>- 2010 Non-working Other (Market Price), converted to 2024 price</li> </ul>	TAG Databook November 2023; Table A 1.3.1 plus application of TAG Databook sheet 'Annual Parameters'.
Value of time growth rate	TAG Databook November 2023 sheet 'Annual Parameters'.
Discount Factor: 3.5%	TAG Databook November 2023 Table A 1.1.1.
Demand reassignment post cessation of Kent international rail services: <ul style="list-style-type: none"> <li>- Assumed 25% rerouted to air travel</li> <li>- Assumed 15% rerouted to road travel</li> <li>- Assumed remaining proportion either not travelling or travelling via London.</li> </ul>	Professional judgement. No measurement of reassignment is undertaken by the government, the Council, or shared through collected passenger survey data that international terminals or operators may be undertaking.
Carbon emissions per passenger km for Air, Road, and International Rail 2023 Air: 186 g/pax km 2023: Road (Diesel Car): 170 g/pax km 2023: International Rail: 4 g/pax km Conversion to 2040 values: Air: 30% reduction on 2023 Road: 53% reduction on 2023 International Rail: 50% reduction on 2023	2023 units taken from BEIS GHG Factors for Company Reporting, v1.1, 2023, Condensed Set. Future year units derived based on professional judgement given UK Transport Sector and Energy Generation Carbon Pathways (with reference to Decarbonising Transport and 6 <sup>th</sup> Carbon Budget).
International rail market split 30% business, 70% leisure	Professional judgement reflecting post-COVID market changes conveyed anecdotally by Eurostar, coupled with SELEP Ashford Spurs Business Case assumed split of 67% business, 33% leisure.
Appraisal horizon: 2040	Based on current duration of the HS1 concession, post which the circumstances for government action on the matter significantly change owing to the release of the commercial limitations / constraints of the existing concession agreement.
Future demand growth: no growth is assumed beyond the two demand scenarios used for appraisal.	Professional judgement. No attempt has been made to consider the effect of population change etc, as there is no pre-existing dataset indicating a clear link between population and international rail use.



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