

OUR REF: LDF 0932B
ASK FOR: Bernadette Mc Guigan
DATE: 4th September 2013
YOUR REF:

Valentina Licata
Office of Rail Regulation
1 Kemble Street
London
WC2B 4AN

David L Phillips
Head of Planning and Environmental Policy

By e-mail

Dear Ms Licata,

Re: Office of Rail Regulation PR13 Draft Determination - Consultation Response

Please note that this is an officer response on behalf of Wealden District Council to the ORR PR13 Draft Determination.

Wealden District Council would strongly urge that the Office of Rail Regulation press Network Rail to give further consideration to the electrification of the Uckfield Line during CP5, to ensure that an efficient and effective service is available to the residents of Wealden in the near future.

Future Growth within Wealden District

Wealden District is currently poorly served by rail services – with the Uckfield Line being the principal rail service within the District. The District has a high level of out commuting – particularly to London, and has the highest level of proposed housing growth of all the East Sussex Districts.

The Wealden Local Plan Core Strategy (incorporating part of the South Downs National Park) was adopted in February 2013, and provides for 9,414 new homes within the District in 6 key locations up until 2027. Up to 1000 homes have been allocated on a mixed use site in Uckfield just to the south of the railway station. In addition, a further 1,300 dwellings have been allocated in Hailsham – located 11 miles to the south east of Uckfield. Together with a further 1,700 dwellings currently under construction in the Hailsham area, these developments will bring considerable numbers of potential new rail users to the Uckfield line in the future, further attracted by the new 139-space car park at Uckfield station opening next Spring. The electrification of the Uckfield line with improved and faster services would have a significant impact on the sustainable development of the District, and would support modal shift to reduce our carbon footprint.

Through various responses to Route Utilisation Strategies, Wealden have repeatedly supported the platform lengthening and electrification of the Uckfield Line, to enable increased capacity and improved rail passenger services to the residents of Wealden.



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The PR13 Draft Determination

The Draft Determination sets out the Office of Rail Regulations package of decisions on the outputs it considers Network Rail should deliver in Control Period 5 (CP5) which runs from 1 April 2014 until 31 March 2019.

The intention to lengthen platforms on the Uckfield line appears to be fully supported in Chapter 9 (paragraph 9.95) however the electrification of the line is not mentioned in the proposals. Whilst platform lengthening might allow longer 10 car diesel operation, it does not provide the benefits that electrification would bring to passengers in relation to service improvements, additional capacity and reductions in journey time, in the short and longer term. Continuing with the platform lengthening proposals will offer some improvements to rail services, however Electrification during CP5 will offer more benefits to existing and future rail passengers as well as 'future proofing' the principal rail link within the District.

In this respect, Wealden District Council and the Wealden Strategic Partnership fully support the response by Railfuture campaign group (attached for your convenience) in relation to the Uckfield Line, particularly given the uncertainty of sourcing compatible diesel rolling stock.

Yours faithfully

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ENC – Railfuture response

CC – Cllr Bob Standley – Leader Wealden District Council
CC – Nigel Hannam – Director of Environment and Community Services
CC – Railfuture
CC – Tessa Sweet-Escott – East Sussex County Council

Ch.9 Enhancements expenditure: Sussex Route – extra capacity into London Bridge from Wealden line

A scheme consistently carried through from the Sussex and London & South East Route Utilisation Strategies, the Initial Industry Plan, the High-Level Output Specification, the Strategic Business Plan, and most recently the Draft Determination on the SBP for Control Period 5, 2014-19, is the conditional output of train lengthening on Uckfield line services to deliver the requirement for extra peak capacity into London Bridge, especially from East Croydon. Thus far the conventional approach adopted has been to plan for longer platforms to be built at eight Uckfield line stations in order to accommodate longer, diesel, trains of the type operated on the route for the past several years.

There is however considerable uncertainty about any operator's ability to source additional compatible diesel passenger trains within the forthcoming Control Period, a condition recognised in the above documents at various stages of the PR13 process. Attempting to release passenger rolling stock of the same type from the only other line on which it operates, East Coastway/Marshlink services between Ashford International and Brighton, by reconfiguring those services would almost certainly be neither sufficient nor free of public and political controversy.

That sourcing uncertainty contrasts with the continuing supply of new dual-voltage [both as supplied and conversion-capable] electric passenger rolling stock and of a type widespread across the current South Central franchise area, most recently at the end of July through a further order with a growth option. The latter part of CP5 will then witness the arrival of the new Thameslink fleet. It is clear that approaching the end of CP5, when the Uckfield line train lengthening output must have been delivered, there will have been both a significant injection of additional electric rolling stock to the new Combined Thameslink franchise area and an as yet unknown cascade of passenger rolling stock around and beyond that franchise.

An alternative approach to delivering the Uckfield line train lengthening output by 2018-19 therefore appears to merit proper consideration before the draft Delivery Plan is published this December and finalised before next April.

By way of introduction, para. 9.80 of the Draft Determination sets the context: "Electrifying the railway will bring many benefits for both passengers and freight users, most notably the ability to run more frequent trains with shorter journey times and less environmental impact, such as noise and diesel fumes." Mention should also be made of the benefits for passengers of a more reliable service with more punctual journeys, and of the operational efficiencies accruing to the operator of a more homogenous fleet of rolling stock and the lower running costs of electric units. Mention must be made too of the particular importance to local stakeholders of the environmental benefits of eliminating the noxious emissions of diesel fumes from local areas of sensitive and protected landscape such as the High Weald Area of Outstanding Natural Beauty [AONB] and the Ashdown Forest. The various benefits of removing diesel trains from the new London Bridge station should also not be over-looked.

An operational limitation of the diesel units is their lack of inter-unit corridor connections which combined with their mixed 4- and 2-car formations necessitates full platform lengthening to avoid passengers being marooned in a unit stopped beyond a platform. With their inter-unit corridor connections this, together with the use of Selective Door Opening, need not be an issue for the use of electric rolling stock.

The proposition is therefore that the ORR should require Network Rail to give urgent, active and serious consideration to electrifying the 25 route miles of the Uckfield branch line within CP5 as the preferred, higher-value means to deliver the train lengthening output, re-examining the need for and extent of any associated platform lengthening. It is noted that a 'Significant interface' already identified in the Initial Industry Plan [Definition of proposed CP5 enhancements] stated "The scheme should make passive provision for future electrification of the route served by 12-car x 20m vehicles." For these purposes the particular electrification technology to be deployed is immaterial. Network Rail's apparent preference for 25kV overhead rather than third-rail power is understood and should present no operational issues in a south-east network already used to dual-voltage operations on HS1, Thameslink, the West London Line and the west end of the North London Line.

A direct consequence of electrifying the Uckfield branch line would be the release for cascade of around 30 modern diesel passenger carriages. One beneficiary must be the increasingly crowded East Coastway/Marshlink services mentioned above, to improve passengers' journey experience with more seats and accommodate rising demand.

In putting forward this proposition note is taken of the late-June announcement of funding for the infill electrification of the Gospel Oak-Barking Line, and the early-August announcement of the probable electrification of the Windermere branch line. It is a proposition which can confidently be expected to command widespread support across a range of stakeholders as supporting the delivery of their economic and environmental as well as transport policy objectives.