

Rt Hon Chris Grayling M.P.
Secretary of State for Transport,
c/o Transport and Works Act Orders Unit,
General Counsel's Office,
Department for Transport Zone 1/18,
Great Minster House,
33 Horseferry Road,
London,
SW1P 4DR
transportandworksact@dft.gsi.gov.uk

Dr Eric Crouch

30th May 2018

065/11015

Re: Rother Valley Railway (Bodiam to Robertsbridge Junction) Order

Dear Mr Grayling

I am writing to express my opposition to the proposed Transport and Works Act Order (TWAO) to construct a new railway between Robertsbridge and Bodiam. I have reviewed and carefully considered the information presented in the TWAO order and the original planning application RR/2014/1608/P. There are a number of reasons why I feel that the proposed new railway should not go ahead. I do not feel that the reports commissioned by Rother Valley Railway (RVR) during the initial planning application have been thoroughly scrutinised and, in nearly all cases, the information contained within them is now out of date or insufficient. Overall, I feel that the benefits to the area have been overstated and the negative impacts understated by RVR. I don't feel that the information provided by RVR goes any way towards justifying the proposed compulsory purchase of land. I have outlined my three key concerns in more detail under the following headings.

Level Crossings

To most people living and working in the area, the very idea that a level crossing could be built over the A21 is absurd. RVR have commissioned a number of reports as part of the planning process. The initial reports were based on a 51s closure time. As part of the review process, it was decided that this may not be a realistic figure so a request was made to recalculate this based on a maximum time of 112s. An initial economic study, revised in March 2014, used traffic data from back in 2012, and an hourly rate of people's time from 2010, adjusted using an estimate to 2015 values. Crucially, this report was based on just 8 closures (4 trains) per day, fewer than are currently being operated at KESR. This report found the cost to the economy to be around £9,200 per year, just for the A21 crossing. Later reports have proposed up to 14 closures per day, representing a significant moving of the goal-posts, but the economic impact has not been revised accordingly. Since this report was published, Highways England have installed automatic traffic counters on the A21 near to the proposed crossing site so current quarter-hourly data are freely available. Highways England are

concerned about disruption to the road network and have imposed a condition to the planning that the crossing must not be used during 7-9AM and 5-7PM on weekdays; this does go some way to managing queue lengths.

Based on the calculations used in the RVR reports, I would agree that it is likely that Southbound traffic would be queuing back to the Robertsbridge roundabout whenever the queue length exceeds 24 vehicles. Based on a 112s closure, this equates to a traffic flow rate of 13 vehicles per minute or 196 vehicles per quarter hour. A quick examination of the Highways England data from the Southbound traffic counter (TMU Site 5869) shows that these levels frequently occur outside of the restricted weekday peak times. Even taking into account the restrictions, there would have been potential for gridlock back to the roundabout on the majority of days since January 2017 if the crossing were closed during the busiest part of the day when the crossing could be used.

A lot has changed on the roads since these initial studies were compiled. £70million has been spent on improving the A21, traffic densities and flow patterns have changed, peak-time restrictions have been imposed, and better data are available. These changes, combined with changes in the proposed operation of the railway (crossing times and number of closures) render the conclusions of all published reports to date largely irrelevant.

Of the many aspects to this proposed new railway, the A21 crossing probably directly affects the largest number of people. I would like to see an updated and properly scrutinised study of the economic effects of the proposed level crossings using up-to-date high-quality data considered against realistic and un-movable closure times and number of daily closures.

I am also concerned about the effect the three proposed level crossings would have on emergency service response times. It is quite feasible that should an emergency vehicle need to reach the area where myself and my wife live and work, and our children go to school, that it would need to travel along the A21 or Junction Road, both of which will have new level crossings.

Round-trip Journey Times

One of the stated benefits of the proposed scheme is that the connection of the tourist line to the main line at Robertsbridge will encourage more people to travel by train, particularly from South East London, therefore reducing the amount of cars on the road. At the same time, they want to bring in tens of thousands of extra visitors per year. I can see that it would be advantageous for someone without a car to be able to reach the attraction by train but I feel that the majority of visitors will still arrive by car. This is likely to cause considerable problems in Robertsbridge as no additional parking has been included in the plans. The

journey times from South East London by train also make this a fairly unrealistic prospect for a family with small children.

By way of an example, a family of two adults and two children travelling to / from Croydon and taking in Bodiam Castle and Tenterden would be facing a round-trip time of over 12 hours. The National Rail fare is likely to be over £70; added to the current KESR ticket price of £38, which would presumably increase, and the National Trust entry fee for the castle of £22.50 would make over £130 for the day out, not including refreshments. It would be far more feasible to visit one of the nearer attractions such as the Bluebell railway at East Grinstead or the Spa Valley railway at Tunbridge Wells.

I really think that the proposed visitor numbers, and in particular those arriving by car, should be looked at more carefully as these have a large influence on both the supposed benefits and likely disruption.

Project finance / business plan

Although the TWAO application does include a statement on funding for the construction phase, there are no details given on the financing of the day-to-day running of the line. Previous TWAO applications for other tourist railways have included a business plan outlining how the railway will cover its operating expenses. I would be greatly concerned if the line could only survive financially by regular donations from a small number of benefactors. If this were the case, it should not be considered a robust enough venture to justify the proposed compulsory purchase of land and destruction of habitat. The consequences of the line failing financially in future years should also be considered as several of the proposed changes would not easily be reversed.

Yours Sincerely

Dr Eric Crouch

