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To whom it may concern,

Response to Brentwood Local Plan consultation

Thank you for the opportunity to comment on Brentwood Borough Council's Local Plan consultation document.

Background

c2c is the operator of the Department for Transport's Essex Thameside franchise. c2c is owned by Trenitalia UK, the British arm of leading Italian train operator Trenitalia SpA. Trenitalia is in turn part of Ferrovie dello Stato Italiane Group (FS Group), one of the world's largest transport and infrastructure companies.

c2c holds a 15-year franchise for the Essex Thameside operation, which runs until November 2029. The length of this contract means we have an ongoing interest in the medium- to long-term growth and development of Thurrock borough and the wider south Essex and east London region.

The only c2c station in Brentwood borough is West Horndon.

Consultation Response

c2c strongly supports the importance of continued economic growth and the provision of more homes, both in Brentwood borough and the wider region. The combination of comparatively low housing costs, easy access to and from central London, and the most punctual commuter service in the South East are important factors that underpin this growth.

To deliver this economic growth and the proposed housebuilding programme, maintaining and improving the transport infrastructure is absolutely essential and must be treated as such by the Council. Supporting the railway infrastructure in particular is vital, given the unique economic and environmental benefits it provides that cannot be delivered by investment in roads. For example, only the railway provides a realistic link to central London and Canary Wharf for regular commuters, who then spend their salaries locally, bringing economic growth. The railway also provides the most environmentally-friendly form of transport for longer journeys, which will be vital for protecting local air quality.

Route Capacity

c2c's current franchise includes increased capacity delivered in stages as demand increases. To date this has been achieved through:

- Reconfiguring a proportion of our existing rolling stock to increase onboard capacity in 2015

Trenitalia c2c Limited is part of the FS Group



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- Implementing a new timetable which significantly increased the number of peak services from most stations in the borough in 2015
- Expanding c2c's train fleet with the addition of 24 new carriages in 2016

The final contractualised increase in capacity is scheduled for December 2021, with the addition of 60 new Bombardier Aventura carriages. This will provide a net 20% increase in seats across the c2c fleet. This capacity increase has been accelerated from its original scheduled date of 2022-2024 in recognition of the scale of growth that has already been delivered on the Essex Thameside franchise. However there are no further increases in capacity included in our franchise agreement with the Department for Transport.

Given the latest projected housing numbers reported by each local authority in the region, our latest analysis forecasts that our contractualised route capacity, including the additional rolling stock scheduled for 2021, will be exhausted by 2025.

This means the projected scale of housebuilding included in Brentwood's Local Plan, and in the other equivalent documents from local authorities in the region, is at risk.

The route capacity is set to be exhausted because:

- At peak times we are currently operating at the maximum capacity for the signalling system of 20 trains per hour. That means we cannot increase the frequency of service
- Our options for further increasing capacity by adding rolling stock and lengthening trains are limited. Many peak services are already operating at the maximum length of 12-carriages. Additional 12-car trains could also create problems at London stations and thereby increase delays route wide
- The replacement of the current signalling system is expensive and has been deferred to 2040. This will result in an ongoing decline in the reliability of the signalling infrastructure until that point

Network Rail is undertaking a route study to evaluate our forecasts, and the potential solutions, which is due to report in late 2019.

One potential solution is ETCS Level 2, which is train-based signalling technology that would replace the current traffic light signals. c2c's owning group, Trenitalia UK is currently developing an Outline Business Case for the Department for Transport for an investment in ETCS Level 2.

Installing this system on the core section of the current c2c route, between Fenchurch Street and Upminster, would unlock the possibility for a new higher-frequency timetable that can be operated while maintaining current punctuality levels. Combined with an estimated 12 additional units, ETCS has the potential to provide 24 trains per hour in the peak from December 2024, with the potential for up to 28 trains per hour beyond the end of the current c2c franchise. This would provide sufficient additional capacity across the route.

A funding strategy is currently being developed to gain support from the Department for Transport. If the Outline Business Case demonstrates a positive BCR for this scheme, it is essential that Brentwood Borough Council supports its development to mitigate the existing risk to the proposed targets in its Local Plan. The capital costs would require contributions from developers and others who benefit through appropriate mechanisms.

For example, we are aware that the Association of South Essex Local Authorities are undertaking a joint approach to strategic planning, which we welcome, and are considering an application to central government for a Growth Deal. We urge Brentwood Borough Council to support the inclusion

of our scheme in this strategy, and identify funding sources across the region that can be used to contribute to the capital and net operating costs of the proposal.

Station enhancements

We strongly welcome the Plan's recognition that the projected growth in passengers at West Horndon will require significant improvements to the existing station, and the positive engagement we have had from the council's officers on this issue to date.

In particular, the London-bound platform is not currently accessible, and this will require a bridge and lifts to ensure it is suitable for all proposed new residents. The station building itself is also of limited capacity, with only a short gateline. This will require significant investment to ensure it can handle the future anticipated number of passengers. Finally, the car park is also limited in capacity and will require expansion.

The importance placed on providing effective public transport links from the Dunton Hills Garden Village to West Horndon station in the draft Plan is also welcomed.

In addition, we are aware that Thurrock Council is considering significant development to the south of the railway line. There is currently no access to the station from the south, so such development there would also mean significant investment is required. We recommend a joint approach between c2c, Brentwood, Thurrock and the relevant developers would be the most effective way forward to ensure a suitable station is constructed that delivers value for money for all parties. We are committed to playing a full role in this process in the future.

I hope this response has been useful, and please do not hesitate to get in contact if you would like to discuss any of these issues in more detail.

With best wishes,



Chris Atkinson

Head of Communications, Trenitalia c2c