



www.stopstanstedexpansion.com
info@stopstanstedexpansion.com

PO Box 311
Takeley
Bishops Stortford
Herts CM22 6PY
Tel: 01279 870558
Fax: 01279 870786

12 July 2007

BAA Stansted
FREEPOST CL4055
Chelmsford
Essex
CM1 3BR

Dear Sirs

Stansted Generation 2 Rail Schemes Consultation

We enclose our response to your consultation document, which we have reviewed alongside Mott MacDonald's High Level Option Assessment (HLOA) published in February 2007.

You will note that we have serious concerns about the adequacy and fairness of this consultation, especially as it follows on from the similarly flawed BAA Surface Access February 2007 Consultation

Our comments are also relevant to the consultation on Rail Utilisation Strategy (RUS) for Greater Anglia that is being undertaken at this time. We have therefore provided Network Rail with a copy of our response.

Yours faithfully

for Stop Stansted Expansion

cc:

Alastair McDermid Esq
Director, Stansted Generation 2
BAA Ltd
Buckingham Gate
Gatwick Airport
West Sussex RH6 0NT

Greater Anglia RUS Consultation Response
National RUS Consultation Manager
Network Rail
8th Floor
40 Melton Street
London NW1 2EE

Stansted Generation 2 Rail Schemes Consultation

Response by
Stop Stansted Expansion

12 July 2007



www.stopstanstedexpansion.com
info@stopstanstedexpansion.com

PO Box 311
Takeley
Bishop's Stortford
Herts, CM22 6PY
Tel: 01279 870558

Introduction

1. Stop Stansted Expansion ('SSE') welcomes the opportunity to respond to this important consultation ('the Rail Schemes Consultation' or 'this Consultation') regarding one element of the surface access implications of your proposed second runway at Stansted Airport.
2. SSE was formed in August 2002 and now has some 6,500 supporters including over 100 local parish councils, residents' groups and other organisations. Whilst our primary focus relates to Stansted Airport, SSE is also concerned with the broader implications of airport expansion as it applies throughout the UK.
3. Your proposal for a second runway is in itself unacceptable to us as we made clear in our letter of 31 January 2006 in response to your December 2005 consultation on the siting of a proposed second runway. This response to your Rail Schemes Consultation in no way implies any change to that position.
4. As you are aware we had serious misgivings about the Stansted Generation 2 Surface Access February 2007 Consultation and the related Highways Agency consultations that preceded this Consultation. Those concerns were expressed in our response dated 11 June 2007.
5. We wish to register our concern that this latest consultation is also fundamentally flawed. The only published analysis of options from which your preferred choice has been selected appears in Mott MacDonald's High Level Option Assessment ("HLOA"). This document does not appear on your website, its content has not been incorporated in either this consultation document or the previous one on surface access and it appears to be available only on request. The great majority of likely respondents have therefore not been provided with essential information needed to answer your questionnaire. In addition the HLOA has been carried out without any consultation on the options to be considered or on the methodology for assessing options. And even the HLOA leaves it unclear how BAA's forecasts of passengers using the Airport translate into increased capacity requirements for rail.
6. This consultation exercise is also taking place at the wrong time. It follows detailed consultation on highways schemes, even though highways improvements are meant to be the 'residual' element of the surface access strategy. It is running in parallel with Network Rail's consultation on the Route Utilisation Strategy for Greater Anglia ("RUS") which proposes different improvement schemes for the West Anglia line and may therefore reach different conclusions. And it precedes publication of the Government's High Level Output Specification for the railway which may indicate whether any of the improvements canvassed either in this consultation or the RUS have any prospect of receiving Government funding before 2015.

High Level Option Assessment

7. To put our response on your own consultation into context, we start by commenting on the HLOA. This has, in our view, a number of serious shortcomings which have fed through to, and therefore vitiate, your own consultations on surface access. Our main criticisms are as follows.

8. The HLOA has been carried out without any consultation on the options to be considered or on the methodology for assessing options. Even now, those being consulted on the rail strategy are not even being made aware of the existence of the HLOA. It was only because SSE pressed for more information that we were eventually provided with a copy of this document.
9. Section 1.2 includes among the objectives of the access strategy 'to reduce the number of motorized journeys, especially by car'. We support this objective, although it is difficult to see, in the terms in which you have expressed it, how this is compatible with building a second runway at Stansted. After all, far greater air travel will mean far greater surface access trips in total, and some 70% of these are by road at present. Nevertheless, accepting it at face value, we would have expected to see the HLOA paying particular attention to areas of the market where rail has a low market share since the objective will only be achieved if that market share is greatly increased. However, the HLOA concentrates very largely on the Stansted to London market and even here asserts rather feebly that because rail already has an 80% share of the market, any improvement will be difficult to achieve. As a result the HLOA projects rail's market share of airport passengers in 2030 at around 29% - virtually unchanged from today. We think this is a wholly inadequate aspiration and clearly fails to meet the key objective of reducing motorized journeys.
10. Of the 29% rail journeys, most (25% of all journeys) are forecast as being to/from London. As a result the only other current rail service dealt with in the HLOA is the hourly operation of short diesel trains between the Airport, Cambridge and the Midlands. Given that BAA, in the G1 forecasts at least, claims that the fastest growing Airport passenger markets will be from East Anglia and the East Midlands, surely services northbound from the Airport demand substantial expansion.
11. Even for the Stansted – London market it is likely that the rail demand has been seriously underestimated, particularly if that demand were to be stimulated by positive initiatives to encourage a modal shift away from road use. The HLOA simply relies on BAA's passenger forecasts including those for origins, destinations and transfers. As our evidence to the G1 public inquiry shows, these appear to be based on unrealistic and unsubstantiated assumptions whose main effect is to minimize forecast growth in the London area market. We are not alone in our scepticism since we note that DfT have provided a higher (+7% in 2021) forecast for the RUS and this may be an underestimate.
12. The starting point for the HLOA appears to be based on train passenger loading data gathered from surveys based on the pre-December 2005 timetable. The changes which took place then will have had a considerable impact on load factors for both Airport and non-Airport services. There has been ample time to carry out fresh passenger counts based on the current timetable but, if such data exists, it does not appear to have been published. So the baseline data must be suspect.
13. All the modelling appears to have been based on the present timetable. As BAA's evidence (Volume 11 of the G1 Environmental Statement) to the G1 public inquiry shows, the current timetable brings about a serious misallocation of train capacity in the commuter peaks, with serious overcrowding projected on non-Airport services while the Airport services have seats to spare. This arises mainly from the insistence on running a Stansted Express service every 15 minutes throughout the day, which eats into the remaining track capacity available for other services. If making best use of existing train capacity is an objective, alternative timetables which achieved a better match of resources to demand should have been modelled.

14. Moreover, the reliability of the timetable with longer trains carrying more passengers resulting in increased station dwell times should also have been assessed. Apart from noting that level crossings will have to stay closed to road traffic for longer, this assessment seems not to have been undertaken.
15. Much of the BAA approach appears to reflect the principle that there should be 'no overall adverse effect' on other West Anglia services and so the proposals are geared towards shoe-horning in sufficient capacity to deal with forecast growth levels of Airport generated rail traffic. Since these are based on simply maintaining the present rail/road modal shares, any target to reduce the road share would significantly increase rail numbers. So the capacity need is almost certainly understated. Even the forecast rail traffic flows will result in excess pressure on some peak services; any addition would have grave consequences.
16. But even if BAA's forecasts were a correct and suitable target, 'no adverse effect' implies that everything is well at present and will continue to remain so. The quality of the current service is unsatisfactory (as shown for example by recent Passenger Focus national surveys of passenger satisfaction). The Draft RSS for the East of England projects substantial employment and population growth along the corridor but this will be constrained unless much higher levels of sustainable travel are available. So this means that the quality of all West Anglia services needs to be upgraded in terms of train capacity, passenger comfort and reliability. High capacity rolling stock for commuters would not represent an improvement in quality compared with the present. Better quality will involve more trains rather than more standing or tighter seat pitches for commuters.
17. It is clear that under any scenario more track capacity is needed on the West Anglia route to provide opportunities to separate the different types of traffic using it and to operate a more frequent service. Given the long lead times required to deliver rail infrastructure enhancements, this should be treated as an early priority rather than, as the HLOA appears to, as a last resort.
18. The ATWP noted that expanding Stansted Airport would lead to peak capacity problems at Liverpool Street and Tottenham Hale. We take this to refer to the adequacy of the passenger circulation areas to handle greater numbers of passengers and not just the physical constraints on running more frequent or longer trains. The HLOA takes no account of this and even excludes the implementation of Crossrail from its assumptions although this provides the only realistic opportunity currently planned for relieving pressure on Liverpool Street Station.
19. The HLOA contains brief analysis of several imaginative ideas for increasing rail capacity but they are swiftly rejected. The reasons for dismissal appear to be heavily influenced by financial considerations as seen from a BAA perspective, rather than a wider strategic approach to long term sustainable transport planning for the region. Rather than being hidden away in the HLOA, we feel that more open consideration as part of this consultation should be given to these ideas, particularly those that offer an alternative rail link from London - extension of the rail line from Chingford or the Central Line from Epping.
20. Finally, the HLOA dismisses without any analysis three options which might relieve pressure on the West Anglia route and create a greater market share for rail.

21. Firstly it rules out the use of alternative London termini. Kings Cross is dismissed on the grounds that 'there are no spare platforms'. While this is true at the moment, Thameslink 2000 will create the opportunity to remove all suburban services (out as far as Peterborough and Kings Lynn) from the main line terminal and the spare capacity thus created would be an ideal destination for Stansted Express services with greatly improved interchange opportunities, particularly with other heavy rail services.
22. Secondly, reinstatement of the former line from Braintree westwards is dismissed on the grounds that it would not provide sufficient daily passenger capacity to London. This comment may be true since it is a single track route but it is also irrelevant since it should be seen as complementary to other capacity enhancements and not a substitute for them. A substantial part of the track bed is still in situ, albeit now serving as the Fitch Way bridleway. Reinstatement would provide an outer orbital public transport link across Essex and create the opportunity to turn the Airport station into a through station (as suggested for another option in the HLOA). This would allow a 'horseshoe' Liverpool Street – Stansted – Liverpool Street service to be run using both the West Anglia and Great Eastern main lines, greatly improving operational flexibility particularly in dealing with planned or unplanned disruption on the West Anglia line. BAA stresses in its evidence to the G1 public inquiry that East Anglia will be the fastest growing market served by the Airport so it is surprising that this option was dismissed without any analysis.
23. Thirdly, doubling the frequency of the northbound service from the Airport to half hourly could provide more attractive and direct connections to the main population centres in Norfolk and Suffolk, particularly if the trains were operated as six car formations. They could serve a mix of destinations by being split at some point on their journey, at Cambridge or Ely for example, to avoid creating congestion on the Airport – Cambridge route section.
24. With so many options omitted from the Consultation, rejected at the HLOA stage, some without any analysis, it is impossible to conclude that the optimum rail strategy should be based only on train lengthening and capacity enhancements on the West Anglia line.

Shortcomings of the Rail Schemes Consultation

24. It follows therefore that we do not accept that the HLOA and your present consultation have correctly identified the best mix of schemes to achieve BAA's own objective to reduce motorized journeys, which requires an enhanced rail modal share to be achieved.
25. However, even if it were accepted that the main thrust of improvements should still be train lengthening and track capacity enhancements on the West Anglia route, the proposals in the consultation document are clearly inadequate. The reasons are as follows.
26. No timescales are given for implementing any of the proposals, how progress in implementation might compare with forecasts of increased passenger demand from the Airport and other sources, what the long term impact would be on commuter services (the issue of most concern to regular users of the line) and what limits should be placed on passenger throughput at the Airport until those schemes have been completed.
27. No assessment has been given of what impact the proposed enhancements will have on service frequencies or journey times for all the services using the route.
28. Since the strategy relies on running longer trains in the first instance, it falls down at the first hurdle. It relies first of all upon additional rolling stock having been provided to run longer trains as part of the G1 surface access strategy. Additional rolling stock is not

currently available and is not likely to become available either through new build or cascade during the currency of the 'one' franchise. It would of course be open to BAA to procure and fund additional rolling stock itself, as it has done with the Heathrow Express. But BAA has made it clear in its evidence to the G1 public inquiry that it regards this as the responsibility of the DfT and/or the franchisee. So we cannot be confident that this first precondition of the rail access strategy will be satisfied.

29. Running longer trains would require increased berthing facilities and probably enhanced power supplies. The location, cost and possible impact on local communities is not identified.
30. Two of the busiest stations on the route are Cheshunt and Broxbourne. The route section between the two stations is also one of the most vulnerable and congested because Southbury loop services and Hertford East services both have to be fitted on to a two track railway at this point. It is therefore frankly absurd that your consultation document should propose no track capacity enhancement on this route section and no lengthening of platforms at either Broxbourne or Cheshunt. Broxbourne in particular is an essential interchange point between services along the Lea Valley, including bus and car feeder services. If there has to be an order of priority, platform lengthening at these stations should clearly take precedence over lightly used stations such as Angel Road.
31. Although recognised in both the HLOA and the RUS as needing attention, your consultation document makes no reference to Seven Sisters which Stansted Express services call at when diverted from the main line. Passenger circulation areas, platforms and interchange facilities with the Underground need to be enhanced as part of any proposal to run longer trains.
32. No explanation is given as to why you propose to lengthen 8 coach platforms to 12 coaches between Tottenham Hale and Waltham Cross but at none of the stations north of there apart from Stansted Mountfitchet and the Airport itself.

Relationship with the RUS

33. These criticisms should of themselves be sufficient for you to acknowledge that the proposals are fundamentally flawed and should be withdrawn from consultation. However, an even stronger reason for doing so concerns the relationship – or lack of it – with the RUS. Option 12 in the RUS contemplates two possible capacity enhancements, both more extensive than your proposals. The first involves three tracking from Coppermill Junction to Cheshunt, with the removal of all level crossings and further north an extra track between Broxbourne and Broxbourne junction. It would also involve the use of bidirectional signalling so that the extra track could be used to create capacity for the peak flow in either direction. Your proposals, though similar to, fall well short of the first RUS option – for example, no replacement of level crossings by bridges even though this would benefit road users and pedestrians from the point of view of both traffic circulation and safety.
34. A second, clearly much more flexible, variant of RUS option 12 would involve four tracking throughout as far as Broxbourne Junction and lengthening of all platforms on the route to 12 coaches. Your proposals would positively preclude investment in the second variant of option 12. Yet this second RUS option has the highest benefit to cost ratio – 4.2 as compared with a maximum of 2.7 for the best of the HLOA options (it is not clear whether this is the same as your current proposal) or 2.3 for the first variant of option 12 in the RUS. The second RUS option also performs well in the event that BAA has underestimated Stansted Airport rail passenger demand.

Conclusion.

35. None of the proposals put forward either by BAA or in the RUS comes with any assurances about timing or funding. The position may become clearer when the results of Network Rail's RUS consultation are known, and the quinquennial review of its pricing has been completed. Until then, we suggest that BAA cancels the whole of its surface access consultation exercise. When we know what rail enhancements can realistically be expected we shall have a better understanding of what opportunities there are for modal shift and whether any Airport expansion beyond the current limit can be regarded as sustainable.

Questionnaire Responses

1. Strongly agree that more capacity is needed on the West Anglia line. No further growth at the Airport should be permitted in advance of such capacity improvements.
2. Both
3. The Stansted Express should not become a service dedicated for Airport passengers unless and until additional trains have been provided for regional passengers.
4. Strongly agree.
5. Strongly agree.
6. Strongly disagree. A four track railway should be provided from Coppermill junction to Broxbourne junction.
7. Same answer as for 6 above.