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11 June 2007

Highways Agency
FREEPOST CL4055
Chelmsford
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Dear Sirs

Consultations on M11 Junctions 6 to 8 and Stansted Generation 2 Airport Access from M11 and A120

Despite our serious reservations about the way in which the above consultations (and the concurrent BAA surface access consultation) are being handled and our misgivings about the lack of key information we will not delay our response any further and therefore attach same.

However, we wish to make clear that, were it not for the fact that our financial resources are so stretched at this time as a result of our involvement in the present G1 Public Inquiry, we would have had no hesitation in mounting a legal challenge to this consultation, such is our conviction (supported by advice from Counsel) that the basis for the above consultations – and the related BAA surface access consultation – is fundamentally flawed and unfair.

For the record, we would point out that we have still not received a substantive response from the Secretary of State for Transport to our letter of 7 May 2007 or from the Chief Executive of the Highways Agency to whom it was copied.

Yours faithfully

for Stop Stansted Expansion

Stansted Generation 2

Highways Agency Consultations on M11 Junctions 6 to 8 and Airport Access from M11 and A120

Response by
Stop Stansted Expansion

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INTRODUCTION

1. Stop Stansted Expansion ('SSE') welcomes the opportunity to respond to the Highways Agency ('HA') on these two important consultations ('the HA Consultations') which deal with proposals to widen the M11 between junctions 6 and 8 and for accessing Stansted Airport from the M11.
2. SSE was formed in August 2002 and now has some 6,500 members 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 regulation as it applies throughout the UK.
3. The HA Consultations are being conducted in conjunction with BAA's Stansted Generation 2 Surface Access Consultation and relate to the surface access implications of BAA's proposed second runway at Stansted Airport.
4. BAA's proposal that there should be a second runway is in itself unacceptable to us as such a development would be unsustainable. This response to your consultations in no way implies any change to our position.
5. On 7 May 2007 we wrote to the Rt Hon Douglas Alexander, MP, Secretary of State for Transport, to complain about fundamental deficiencies in the three consultations and to seek his assurance that, insofar as it was within his remit to do so, the shortcomings would be remedied and that he would initiate a full and fair consultation. A copy of this letter was sent to the Chief Executive of the HA. We have still not received a substantive response to this letter despite a reminder sent on 25 May 2007.
6. Although a considerable amount of additional information was provided to us by BAA on 24 May 2007, many fundamental questions remain unanswered. As a result we remain of the view that three consultations are unfair in their present form. Indeed, in this response, we feel insufficiently informed to be able to comment on the majority of proposals and so our prime focus is on the structure of the HA Consultations and their inadequacies.
7. Finally, in this introductory section, we would point out that the particular difficulties with the three consultations may have an adverse effect both on the quality and number of responses that are submitted. A large number of local Parish Councils, individuals and other organisations rely upon SSE to provide a digest and advice on BAA and DfT consultations and we normally make such information and advice available at least a month before the closing date for the relevant consultation. On this occasion we have obviously not been able to do so because there have been so many outstanding issues where we have been awaiting information and clarification.

INADEQUACY OF THE HA CONSULTATIONS

8. Both of your consultations refer to Government policy contained in the 2003 Air Transport White Paper but fail to refer to other relevant government policies. Of particular significance are the policies to:
 - Reduce the need to travel, especially by car" [Transport White Paper, 1998]
 - Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development [PPS1, 2005]
 - Reduce carbon dioxide emissions to combat climate change [Energy White Paper, 2003 and subsequent and emerging policy].

It is not apparent that proper consideration has been given to these policies and failure to mention them gives those consulted an unbalanced view of government policies.

9. Rail must be a fundamental element of coping with the surface access demands that would be created by an expanded airport, and indeed by other projected expansion in the M11 corridor, especially if there is to be a real effort to reduce road traffic, yet BAA did not launch a rail consultation until the formal closing date for these three consultations had passed.
10. The absence of comprehensive rail proposals (particularly in the light of Network Rail's April 2007 Rail Utilisation Strategy) made it impossible for us and others consulted to reach an informed view either on the appropriate balance of airport-related surface access traffic between rail, bus/coach and private car/taxi or on the relevance of your road proposals.
11. We consider it wholly inappropriate that consultations on the details of proposed new road infrastructure projects should precede any consultation on investment in rail infrastructure. A more appropriate sequence of consultations on surface access to Stansted Airport, and indeed generally along the M11 corridor, would be:
 - first, rail – the options for maximising access by rail, the respective benefits and costs (economic and environmental) for each option, and what results can be expected;
 - second, coach and bus – the options for encouraging non-rail traffic away from private car and taxi and onto bus and coach, the respective benefits and costs, and what results can be expected;
 - third, road infrastructure – the options and their respective costs and benefits for handling the residual road traffic.
12. Your consultations seem to leap straight to the third step, to be followed by BAA's second runway planning application and your publication of draft Orders under the Highways Act. By that time, there is a real danger that the conclusions of the third step will be so entrenched as to make the first step almost redundant.
13. Furthermore, these consultations are presented only as single option 'consultations', without anything other than a passing reference to alternatives that you have considered and dismissed.
14. It is essential for a proper understanding of your proposals that those consulted are provided with clear information on other options, including 'Do-Minimum' and any potential or committed investment by the DfT/Network Rail or BAA in rail infrastructure.

RELIABILITY OF BAA FORECASTS THAT UNDERPIN THE CONSULTATIONS

15. BAA has consistently underestimated surface access infrastructure needs. We quote from Essex County Council's Local Transport Plan 2006-2011 which, in anticipation of the 2006 planning application from BAA to increase use of the single runway, states:

“Serious concerns remain that there will be a repeat of the previous three phases of growth at Stansted which have each been based on forecasts and planning assumptions that later transpired to be so different in reality that the transport impacts were seriously misunderstood and not properly planned for.”

16. In response to BAA's 2006 planning application for full use of the single runway, we were highly critical of BAA's forecasts, especially of passengers' UK origins and destinations. These assumed a massive change from past trends, a change that understated the pressure that would be felt in the Stansted – London transport corridor. Our review of background papers to your consultations, including "Stansted Generation 2 – Airport Access Roads – Traffic and Economics Report, November 2006", has failed to reveal what passenger origins assumptions have been incorporated into your thinking.
17. The HA consultations are heavily reliant on BAA's forecasts and in particular are limited to an overall maximum of 76 million passenger movements per annum in 2030. However, a second runway would increase Stansted's capacity to around 90mppa.
18. Even at 76mppa, Stansted would handle more passengers than Heathrow today. Not only has Heathrow the benefit of both rail and underground connections but, as an international hub, more than one-third of its passengers never leave the airport, simply transferring from one plane to another. Even so, Heathrow struggles to cope with the surface access needs of around 44million of its 67mppa passengers.
19. It appears that the scale of the surface access challenge that a second Stansted runway would create has not been recognised. At 68mppa (BAA's latest forecast), and assuming a continuation of today's proportion of transfer passengers, Stansted's surface access demand would be over 55million, whilst at 90mppa this would rise to around 75 million, each far more than Heathrow today.
20. Given the long lead times for delivery of road and rail infrastructure, such eventual demand must be planned for today. It cannot be left to be tackled piecemeal.

COMMENTS ON ROAD STRATEGY

21. We are opposed to any expansion of the road network that is necessitated by a second runway at Stansted Airport. The additional noise, pollution and increased carbon dioxide emissions – from road vehicles as well as aircraft – is unacceptable. Increased congestion on strategic and regional roads will combine with increased traffic and noise at all times of the day and night on local lanes and village streets, further degrading the quality of life for those who live on and use the routes favoured by airport passengers and airport employees.
22. It is too early to judge what upgrades would be appropriate for strategic routes. On the one hand, BAA has a track record of under-forecasting demand, whilst on the other we are not convinced that sufficient focus has been given to minimising car use and maximising access by public transport, especially rail.
23. The HA M11 Airport Access Consultation only invites comments on variations on a single 'spaghetti junction' option. There is no proper opportunity to consider the pros and cons of alternatives. We are firmly opposed to the spaghetti junction option because of the visual impact this would have upon the local landscape and its noise and pollution impact upon local communities. Those consulted should have been given the opportunity to comment on wider alternatives for and also on the likely consequences for local roads.
24. We are concerned that inadequate consideration has been given to the possible impact on country lanes and village streets that have already seen significant increases in through traffic, frequently speeding, in recent years. Minor roads, for example between the Harlow area and the airport, are now regular 'rat runs' for airport-related traffic – in

the case of the Harlow area in order to avoid the M11. Given that Harlow is expected to be a major source for additional airport employees, solutions would need to be developed to provide for improved public transport access to the Airport from Harlow, failing which a roads solution will be needed. We see no evidence that this is being considered.

CONCLUSIONS

25. The HA Consultations refer to Government policy contained in the 2003 Air Transport White Paper, but fail to refer to other relevant Government policies which call for increased use of public transport, reduced use of cars and the need to reduce CO2 emissions to combat climate change. It is not apparent that any consideration has been given to these policies and failure to mention them gives those consulted an unbalanced view of Government policies.
26. The HA Consultations in conjunction with the BAA surface access consultation fail to give adequate information to allow those consulted to make informed comments on the appropriateness of the modal split between rail, road and coach or on the choice of solutions.
27. Airport-related surface access demand forecasts appear to be understated and the proposed provision of overall extra capacity (road plus rail) is therefore assumed to fall short of the eventual need.
28. We are opposed to any expansion of the road network that is necessitated by growth in aviation. Growth in aviation and the road network are both unsustainable and the environmental and social costs are unacceptable.
29. We end our response by repeating the final request in our letter of May 7 2007 that you take no decisions on Stansted Generation 2 surface access strategy or on the related Highways Agency road schemes until such time as full and fair consultations have been properly carried out.

RESPONSES BY SSE TO QUESTIONNAIRES

Airport Access from M11 and A120

Q2 Do you agree or disagree with the principle that road access to the airport will need to be improved if it is extended?

We believe that far more could be done to substantially increase rail mode share and public transport mode share for passenger and employee access to Stansted Airport. This would at the very least influence the timing if not the eventual need for improved access by road. There is inadequate information on alternatives to respond in any more detail than that.

Q3 How do you feel about the proposed scheme to improve road access from the M11 and A120, as described in the leaflet?

Wholly opposed.

Q4 Please give any reasons for your answers to Q2 and Q3.

See our accompanying letter.

Q8 Please make any other comments you wish about the proposal, discounted options, or your own suggested alternatives.

We consider it wholly unfair that there was no consultation and no proper information provided on the discounted alternatives. See our accompanying letter.

M11 Junctions 6 to 8 Improvements

Q2 Do you agree or disagree with the principle that the capacity of this stretch of the M11 will need to be increased in order to cope with future regional and airport traffic growth?

We believe that far more could be done to substantially increase rail mode share and public transport mode share for passenger and employee access to Stansted Airport. This would at the very least influence the timing of the need to widen the M11. There is inadequate information on alternatives to respond in any more detail than that.

Q3 How do you feel about the proposed scheme to widen the M11, as described in the leaflet?

It is likely to be premature but, as to the detail, there is inadequate information on alternatives to respond to this question.

Q4 Please give any reasons for your answers to Q2 and Q3.

See our accompanying letter.

Q8 Please make any other comments you wish about the proposal, discounted options, or your own suggested alternatives.

We consider it wholly unfair that there was no consultation and no proper information provided on the discounted alternatives. See our accompanying letter.