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Recorded delivery

The Rt Hon Douglas Alexander MP
Secretary of State for Transport
Great Minster House
76 Marsham Street
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**BAA surface access consultation for a two-runway airport at Stansted and related
Highways Agency ('HA') consultations**

1. We write to complain about six fundamental deficiencies (summarised in paragraph 6 below) in the three consultations currently underway relating to surface access strategy for a proposed second runway at Stansted Airport ("Stansted Generation 2"). For the avoidance of doubt, the consultations we refer to are:

- 'Stansted Generation 2: Surface Access Consultation' (led by BAA);
- 'M11: Junctions 6 to 8 Improvements' (led by the Highways Agency ("the HA"));
- 'Stansted Generation 2: Airport Access from M11 and A120' (led by the HA);

together, "the DfT/BAA Consultations".

2. It is clear that the DfT/BAA Consultations are a collaborative enterprise between the DfT and BAA (which is a Public Authority for the purposes of these consultations) and so we have written in similar terms today to Stephen Nelson, Chief Executive of BAA Ltd.

3. The DfT/BAA Consultations commenced on 27 February 2007 since which time we have been examining the information in detail and also examining a wide range of other relevant documentation in the hope of gaining a clearer understanding of what is proposed.

4. On 18 April 2007 Network Rail published a consultative Rail Utilisation Strategy ("RUS") for Greater Anglia, covering the West Anglia line. This consultation has a closing date of 13 July 2007. We note that this has not been endorsed by the Secretary of State or BAA and it is being conducted as a separate consultation. It does however have an important bearing upon the DfT/BAA Consultations.

5. We have made considerable efforts to obtain a clearer understanding of the DfT/BAA consultations including requests for additional information. Generally the Highways Agency and Network Rail have sought to be helpful in this regard but the same cannot be said of BAA who have advised us that "it is not appropriate to provide further details at this consultation stage" (in relation to predicted future volumes of airport-related road traffic).

6. The DfT/BAA Consultations have a closing date of 5 June 2007 and we are now firmly of the view that these consultations, taken together, are unfair in their present form and that it is wholly unreasonable to expect consultees to provide informed responses by 5 June 2007. The main deficiencies in the DfT/BAA Consultations are as follows:

- 6.1 It is not possible for consultees to reach an informed view on the appropriate modal split between road and rail for the Stansted Generation 2 surface access strategy when no proper information on the rail infrastructure proposals has been provided. We are told that this information will be available "later this year" but in the meantime we do not know what rail service options might be possible for different rail investment options. We consider it vital to look at road and rail options together, in the same consultation or at least at the same time, so that an informed view can be reached on the appropriate balance to be struck between the two.
- 6.2 The BAA Consultation appears to be based on a predetermined view that the modal split between road and rail should be much the same as today i.e. between 71% and 72% of Stansted air passengers travelling to/from the airport by road. Quite apart from this emphasis on road transport being at odds with stated Government policy (even allowing for increased bus and coach travel) and with previous indications given by the DfT (both of which points we comment further upon below) we consider this to be procedurally unfair. There should be consultation on alternative surface access options capable of achieving a higher modal share for rail, for example, options capable of achieving (say) 35%, 40%, 45% and 50% rail modal share.
- 6.3 The DfT/BAA Consultations are in effect 'single-option' consultations with no opportunity for consultees to compare costs, benefits and environmental impacts for different options. This, and the absence of clear and adequate information, is in our view contrary to stated Government procedure for appraisal and evaluation of projects and also contrary to the Cabinet Office Code of Practice on Consultation. (We comment further on both these points below.)
- 6.4 The absence of any firm information with regard to rail infrastructure is in stark contrast to the detailed road design schemes provided in the two HA Consultations and the two roads schemes are being presented before there has been proper consideration of alternative rail options, raising concerns that:
- the road schemes may be over-designed resulting in their environmental impacts being more severe than is necessary and creating the risk of excessive road capacity being provided at too early a stage in the project rather than phased to meet traffic volumes as the need arises over the period to 2030;
 - if excessive road expansion plans become firmly entrenched and alternative rail options are discounted at this stage, the opportunity to adopt a more sustainable surface access strategy for the Stansted Generation 2 project could be lost. In effect, the failure to give proper consideration to rail options at this stage would result in the emphasis upon road access becoming a self-fulfilling surface access strategy for the Stansted Generation 2 project.
- 6.5 No information has been provided on the predicted absolute volumes of road traffic to/from Stansted Airport. We are only provided with mode share percentages not actual volumes and our request for projected actual volumes of road traffic has been denied by BAA. Insofar as the Stansted Generation 2 project would result in a trebling of airport passenger numbers we estimate it would generate volumes of traffic higher than those generated by Heathrow today. Clearly this raises concern about the scale of impacts both on the local environment and the local community. We consider it unreasonable that consultees have not been provided with the information necessary to understand the nature and scale of the impacts.
- 6.6 The HA Consultation on 'Stansted Generation 2: Airport Access from M11 and A120' provides no proper explanation as to why all other options (except the minor variants on the option presented) were discounted at Stage 1 of the assessment process. No information has been provided on the costs, benefits and impacts of alternatives.

7. The information that has recently become available in the RUS creates considerable uncertainty that even the current rail modal share could be maintained. This again highlights the importance of seeing a proper assessment and explanation of the rail options. The experience of the local community around Stansted is that past promises of improved rail infrastructure have so often not materialised. We are mindful that in 2002, in seeking planning approval to expand Stansted to 25mppa, BAA provided strong indications that improvements to rail infrastructure would accompany the growth of Stansted to 25mppa but none have since materialised. And going back further in history, to 1981, when BAA (then the British Airports Authority) sought planning permission for expansion to 15mppa it said:

"BAA and British Rail are at present considering how this service can be provided. BR's plans envisage a direct service running largely on new tracks between the airport and London's St Pancras Station." ['More facts about developing Stansted', British Airports Authority, May 1981]

8. Instead, airport rail services have continued to be squeezed onto the existing track and we have considerable doubts that this can continue to be a viable solution for meeting the needs of the Stansted Generation 2 project. This is one of the main reasons why we attach such importance to having a fair consultation at this stage with transparent disclosure of the options and an assessment of their relative costs, benefits and environmental impacts.

9. In the consultation that preceded the 2003 Air Transport White Paper ('ATWP') the estimated costs of the surface access infrastructure for a second Stansted runway were put at £69m for roads and £785m for rail. This created a reasonable expectation that greater emphasis would be placed upon rail investment than on road investment in the future surface access strategy for a two-runway Stansted Airport. We can provide other examples of statements from the DfT and Government in recent years reinforcing the view that greater emphasis would be placed upon rail in the future surface access strategy for Stansted.

10. The ATWP itself states:

"We support development ... of a wide-spaced second runway at Stansted, with strict environmental controls." [Para 11.11]

"...a balanced approach is required which ... seeks to reduce and minimise the impacts of airports on those who live nearby, and on the natural environment" [Executive Summary, pages 9-10]

"Local controls should operate ... to manage the environmental impact of aviation and airport development so that ... surface access to airports is designed to help limit local environmental impacts." [Para 3.6]

11. The 1998 Transport White Paper, 'A New Deal for Transport: Better for Everyone', also reinforces the expectation that road traffic growth would be reduced and minimised as part of any surface access strategy for a two-runway Stansted Airport.

"There is now a consensus for radical change in transport policy." [Foreword]

"The New Deal for transport therefore sets the framework to ... reduce road traffic growth;" [Chapter 2, page 20] and it calls for

"...challenging short and long term targets for increasing the proportion of journeys to the airport made by public transport" [Chapter 3, page 72]

12. Even leaving aside the policy context and the substance of the proposals set down in the DfT/BAA Consultations, we consider that these consultations are procedurally unfair and inconsistent with:

- the procedures for appraisal and evaluation of projects as set down generally in the Green Book and more specifically, for transport projects, in the 'New Approach to

Transport Appraisal' ("NATA"). The latter emphasises the need for integrated policy appraisal ("IPA") and the importance of effective consultation, for example:

"To be effective, transport appraisal must deal consistently with competing proposals, be even-handed across modes and take account of a wide range of effects" [Tag Unit 1.1, para 1.2.2]

"The decisions made as part of the delivery need to be based on a full range of options and a comprehensive analysis of the impacts using a consistent approach" [Tag Unit 1.1, para 1.2.3]

"Local people, businesses, environmental interests, transport users and operators will need to be involved in the study process. Wide participation and consultation will be a key factor in gaining public support and acceptability for options put forward in the studies. A strategy for involving these groups will need to be established early on in the study process." [Tag Unit 2.1, para 1.5.1]

- the Cabinet Office Code of Practice on Consultation, for example:

"Consult widely throughout the process ..." [Criterion 1]

"Be clear about what your proposals are, who may be affected..." [Criterion 2]

"Ensure that your consultation is clear, concise and widely accessible."

[Criterion 3]

13. For all of the reasons set out above we seek your written assurance within fourteen days that you will agree (to the extent that it is within your remit to do so) to:

- Remedy the shortcomings identified in paragraph 6 above, including the provision of the requested information as soon as possible;
- Initiate a full and fair consultation where it will be possible for consultees to:
 - (a) consider the rail options and road options side by side;
 - (b) compare costs, benefits and impacts for a range of road and rail options; and
 - (c) reach an informed view on the appropriate balance to be struck between road and rail modal shares;
- Ensure that future consultation relating to the surface access strategy for the Stansted Generation 2 project is carried out in accordance with the procedures and guidance set down in the Green Book and NATA and conforms with the Cabinet Office Code of Practice on Consultation;
- Take no decisions on Stansted Generation 2 surface access strategy or on the related Highways Agency road schemes until such time as fair consultations have been properly carried out.

This letter has been copied to the Chief Executive of the Highways Agency.

Yours sincerely

Brian Ross
for Stop Stansted Expansion