



[www.stopstanstedexpansion.com](http://www.stopstanstedexpansion.com)  
email: [info@stopstanstedexpansion.com](mailto:info@stopstanstedexpansion.com)

P.O. Box 311  
Takeley  
Bishops Stortford  
Herts. CM22 6PY  
Tel: 01279 870558  
Fax: 01279 870786

26 June 2008

The Secretary of State for Transport  
c/o TWA Orders Unit  
Department for Transport  
9th Floor, Southside  
105 Victoria Street  
London SW1E 6DT

*by post and email*

Dear Secretary of State

### **Transport and Works Act 1992 – Stansted Rail Improvement Order**

#### **Introduction**

1. Stop Stansted Expansion ('SSE') represents some 7,000 members and supporters including 140 parish and town councils, residents' groups, national and local environmental groups and other organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable.
2. The surface access impacts of Stansted Airport are one of our major areas of concern because of ever-increasing road traffic congestion on arterial and local roads around Stansted Airport and increasing passenger congestion on train services, particularly to and from London. The growth of Stansted Airport over the past ten years has not been supported by adequate investment in rail infrastructure, BAA having focused on the cheaper (and more profitable) alternative of encouraging airport passengers to travel to and from the airport by road.
3. In May 2003 BAA signed a Section 106 agreement with Uttlesford District Council which committed it to entering into an agreement with the Strategic Rail Authority to fund platform lengthening on the West Anglia route and the acquisition of additional trains as a condition of its planning permission to expand the capacity of the airport to 25 mppa.<sup>1</sup> That commitment was contingent upon the construction of certain new terminal facilities at the airport. However, BAA advised the 2007 Stansted Public Inquiry that the obligations relating to the funding of these rail service improvements would not be triggered because it no longer intended to proceed with the new terminal facilities defined in the agreement.
4. The most recent patronage evidence shows that the need has already been established for a second rail tunnel and fourth platform at Stansted Airport but the TWA application has been presented as an integral part of BAA's planning application for a second runway at Stansted ('the G2 application') which would only be implemented if permission for G2 were granted.

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<sup>1</sup> Section 106 agreement between Uttlesford District Council, Essex County Council and Stansted Airport Limited, May 2003. Part 5 of the fourth schedule sets out the obligations entered into by STAL with UDC relating to rail infrastructure and train capacity. The full S106 agreement can be viewed on UDC website at: <http://www.uttlesford.gov.uk/stansted+airport/planning+issues/engrossment.pdf>.

Patron: Terry Waite CBE

*Stop Stansted Expansion is a working group of the North West Essex and East Herts Preservation Association*

We object to this conditionality because we consider that the works described in the Stansted TWA application should be taken forward as soon as possible, regardless of the outcome of BAA's G2 application. Moreover, we are concerned to note that there appears to be some confusion over the timing, with an assumption of twelve-car trains by 2015 in one of the BAA planning documents<sup>2</sup> but an assumption in another of the BAA planning documents<sup>3</sup> that the proposed rail improvements would not become operational until December 2017. We consider that 2015 should be the very latest operational date and would hope to see an earlier operational date.

5. The works should of course be fully funded by BAA. Government policy on this matter is clearly stated in the December 2003 'Future of Air Transport' White Paper (the 'ATWP'):

*'The airport operator will be expected to contribute to the costs of rail and road improvements to the extent that these are required to cater for airport-related traffic. Their contribution is likely to be substantial, in particular for provision of increased rail capacity.'*<sup>4</sup>

The 'beneficiary pays' approach is confirmed in the 2007 'Delivering a Sustainable Railway' White Paper<sup>5</sup> and so the responsibility for funding the works described in the TWA application should not be a matter of contention.

### **BAA's presentation of its case for the works**

6. The following extracts from Appendix B of the Stansted TWA Application summarise BAA's reasons for bringing forward these proposals.

*'The provision of a second rail tunnel and a fourth platform at Stansted Airport is necessary to provide for growth in airport and regional rail services and is therefore being brought forward as part of the G2 project.'* (para 1.13)

*'The proposed works would allow Stansted Express services to increase from 8 car to 12 car capacity. In addition, after 2020 two extra trains will be required in the peak hours.'* (para 2.22)

*'The Air Transport White Paper identified the requirement to ensure easy and reliable access for airport passengers that minimises the 'environmental, congestion and other local impacts.' Furthermore it stated that "increasing the proportion of passengers who get to airports by public transport can help reduce road congestion and air pollution.'* (para 3.7)

*'Irrespective of the final schemes designed to achieve the targeted delivery of longer term capacity and service improvements on the West Anglia Main Line, the two capacity constraints on the branch line serving Stansted Airport would need to be addressed as no additional or longer trains can [be] accommodated without additional infrastructure. BAA is proposing that a second tunnel and a fourth platform, with associated track and signalling works, are constructed to remove these constraints... In addition to the removal of the capacity constraints, the additional tunnel and platform would provide both operating and timetable flexibility for both airport and regional services.'* (para 3.25)

*'Evidence in the G2 Transport Assessment shows that service enhancements may only be required by as late as 2020. However, it is likely that the Department for Transport Regional Rail strategy will require delivery of the tunnel in 2017. This ES has, therefore, assessed the tunnel opening in 2017 which is the most likely assumed date.'* (para 4.21)

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<sup>2</sup> BAA G2 Transport Assessment (ES14, App 1) para 6.5.3.

<sup>3</sup> BAA G2 Stansted Rail Improvement Order ES, Vol 1, Table 14.1.

<sup>4</sup> 'The Future of Air Transport', DfT, Dec 2003, 'Taking Forward Development at Stansted', highlighted box on p.118.

<sup>5</sup> 'Delivering a Sustainable Railway', DfT, July 2007, para 8.11.

## The capacity and operating constraints

7. The tunnel leading into Stansted Airport has only a single track which limits the frequency of service to a maximum of twelve trains per hour – six in each direction. The current hourly pattern is four Stansted Express ('STEX') trains to/from London Liverpool Street, one train to/from Stratford and one train to/from Cambridge and Birmingham. Although the two main platforms at the airport station are long enough for twelve-car trains, at some times during the day the STEX has to share a platform with the Stratford train, which departs shortly afterwards. This limits the length of STEX trains to eight cars.
8. The airport station layout also means that if a STEX train were to fail in the station, there would be nowhere to remove it to and all the services would have to make use of the remaining long platform which may not be physically possible. The bay platform used by the northbound service is much shorter.
9. For these reasons an additional platform and tunnel would not only allow more frequent services to be operated but would also ensure that twelve-car trains could serve the airport without excessive vulnerability to disruptions in service.

## The demand for rail services

10. The 2007 'Delivering a Sustainable Railway' White Paper makes clear that on congested commuter routes there will not be sufficient capacity to provide dedicated airport rail services and airport services will need to carry part of the commuter demand.<sup>6</sup> STEX services currently stop at Bishop's Stortford and/or Harlow throughout the day. In the morning peak STEX services make additional stops closer into London and a few STEX services provide stops at Stansted Mountfitchet throughout the day. There is little prospect of this service pattern changing in the near future and BAA has modelled future demand and capacity on this basis. Therefore, in looking at the need to run additional and/or longer trains, account needs to be taken of demand growth along the whole of the route and the capacity of the infrastructure to accommodate more and/or longer trains.
11. The most recent performance and patronage data is contained in the December 2007 RUS for Greater Anglia.<sup>7</sup> This shows the West Anglia route running at full capacity (in terms of train frequencies) for much of the day with a high degree of performance risk because:
  - the route has only two tracks with few passing places;
  - all the junctions are flat rather than grade separated; and
  - there is a mixture of services and stopping patterns.In addition, between London and Cambridge only four stations (Tottenham Hale, Harlow Town, Bishop's Stortford and Audley End) can accommodate twelve-car trains. All the other stations would require platform lengthening to accommodate trains of more than eight cars.
12. The RUS notes that:

*'The West Anglia route carries around 28,000 passengers a day into London during the morning peak. This is 40 percent more than it carried in 1995.'*

and

*'Passenger numbers have climbed rapidly again since 2003. This growth seems to have accelerated over the last year, when passenger numbers increased by more than 8 percent.'*<sup>8</sup>
13. The RUS includes a 'standing allowance' on all West Anglia services for calculating passengers in excess of capacity ('PIXC'). Why it should have done so is not clear since

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<sup>6</sup> 'Delivering a Sustainable Railway', DfT, July 2007, para 8.9.

<sup>7</sup> 'Greater Anglia Route Utilisation Strategy', Network Rail, Dec 2007.

<sup>8</sup> 'Greater Anglia Route Utilisation Strategy', Network Rail, Dec 2007, para 3.3.13.

Government policy generally is that no passenger should require to stand for more than 20 minutes. Outer commuter services from Cambridge are the most crowded of any in the RUS area.<sup>9</sup> Passengers have to stand from as far out as Bishop's Stortford and standing continues to Liverpool Street, a trip of about 50 minutes. On Cambridge services PIXC capacity limits (which all include a standing allowance on West Anglia) are exceeded from as far out as Harlow Town and some passengers are unable to board at Broxbourne.<sup>10</sup> In addition, two of the five key route sections on which the highest levels of delay occur in the RUS area are Liverpool Street to Broxbourne and Broxbourne to Cambridge.<sup>11</sup>

### Conclusions on demand and capacity and the works proposed

14. The clear conclusion to be drawn from the above is that more capacity is needed on the route now, at a time when Stansted is handling around 23m passengers. More capacity will unquestionably be needed long before BAA contemplates a second tunnel and fourth platform being built (2017). Regardless of G2, if the G1 application for 35mppa is allowed, the impact of Stansted Airport upon rail demand – and upon the highways network – is likely to be at least 50% greater in 2017 than it is today.

15. In referring to the anticipated growth in the size of the UK's airports (and seaports), the 2007 'Delivering a Sustainable Railway' White Paper<sup>12</sup> states [our emphasis]:

*'The challenge is to accommodate these movements of people and goods as efficiently as possible and **in an environmentally sustainable manner**'*  
(para 8.4)

*'This is a **particular challenge in the South East**. The concentration of major international airports and deep-sea ports generates **rail demand that has to be accommodated alongside the already crowded commuter flows into London.**'* (para 8.5)

*'As the number of people using airports increases, so does **the challenge of providing efficient and environmentally friendly connections**, particularly between the major airports and the cities they serve.'* (para 8.7)

*'It is the Government's view that **any proposals for new airport capacity must provide surface access options that minimise environmental, congestion and local impacts.**'* (para 8.8)

16. In order to provide more capacity, the Government's and BAA's strategy is, in the first instance, to run longer trains. To enable this to happen, new trains have to be ordered, either to run on the route or to replace rolling stock elsewhere which could be cascaded on to the route (the more likely option in the short term). Although the Government has announced its wish for new trains to be ordered both for the route and for another route to facilitate a cascade, no orders for new trains have yet been placed. The Government also intends that all station platforms on the route should be lengthened to take twelve-car trains and that, subsequently, parts of the route should have two additional tracks reinstated to allow more frequent services to be run. Network Rail has been asked to study and report on this strategy. Meanwhile the feasibility and timing of such improvements are uncertain.

17. It is currently possible to run twelve-car trains from Liverpool Street to Cambridge provided that they stop only at those stations which have long enough platforms. However, to do so in a way which reduced overcrowding would require a more frequent service to Cambridge. This would entail a significant recast of the timetable because much of the capacity on the route is provided by the four eight-car STEX trains per hour. There is no capacity on the route to increase the frequency of Cambridge services unless the frequency of STEX services during the peaks was correspondingly reduced. Previous analysis (for the G1 application) suggested

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<sup>9</sup> Ibid, para 3.3.15.

<sup>10</sup> Ibid, para 3.3.19.

<sup>11</sup> Ibid, para 3.8.7.

<sup>12</sup> 'Delivering a Sustainable Railway', DfT, July 2007.

that running longer trains to Cambridge, even at their current frequencies, would be a sub optimal solution providing too much capacity north of the airport and not enough further south. A better way of meeting demand would be to retain the existing service pattern but run twelve-car trains to the airport. However, as currently configured, the airport station cannot accept twelve-car trains while the current timetable is being operated. Thus, the proposed fourth platform is needed.

18. Rail's market share of Stansted Airport passenger demand declined from 28.8% in 2004 to 23.3% in 2006<sup>13</sup> (latest data available) and the actual number of passengers carried by rail has also declined over this period (from 5.27m in 2004 to 4.96m in 2006). We believe there are four reasons for this:

- a massive increase in coach services to central London;
- the frequency of service to the airport (especially from the north) is too low to appeal to air passengers with a flight to catch;
- overcrowding on the STEX service such that air passengers who have experienced problems in the past (or have heard of the overcrowding problems) may be deterred from using the service;
- the first services from the north arrive too late and the last depart too early to cater for significant elements of airport passenger demand.

19. Options for regaining rail market share, in line with Government policy and BAA's own surface access strategy include:

- more aggressive pricing to London, to recapture market share lost to the coach. This may not be attractive to the train operator if trains are already close to capacity and no capacity increase is immediately forthcoming. Moreover, National Express, the train operator, is also the dominant coach operator;
- penetrating markets where rail has a low market share. Two obvious possibilities spring to mind. First, a more frequent service to Stratford would provide an increased range of public transport links (including Eurostar) while also improving the opportunities for airport employees from East London to travel by train; second, a more frequent northbound service might be more attractive to air passengers. More frequent services to the airport can only be accommodated if a second tunnel is built;
- splitting the trains at Cambridge or Ely would also enable a wider range of destinations (such as Ipswich and Norwich) to offer a direct service to/from the airport, again, reinforcing its dependability in the eyes of air passengers.

20. In conclusion, there is already a need for more frequent airport rail services and longer trains and so a second airport tunnel and a fourth platform should not be contingent upon the G2 project. The Stansted TWA application should be taken forward as soon as possible, and fully funded by BAA, regardless of the G2 application for a second runway or the timing of capacity improvements elsewhere on the West Anglia route.

21. Further consideration should be given to the arrangements proposed for managing the Stansted TWA works because the current plan assumes the availability of an enlarged airport site for the disposal of spoil and the availability of the G2 access and internal circulation roads.

Yours sincerely



Peter Sanders  
Chairman

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<sup>13</sup> CAA Annual Passenger Survey Reports (2004-2006), Table 9.