

Transport and Works Act 1992 - Stansted Rail Improvement Order  
(in conjunction with the application by BAA for a second runway)

# Outline Statement of Case

**Stop Stansted Expansion**  
**13 October 2008**



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## 1. INTRODUCTION

### 1.1 Stop Stansted Expansion ('SSE')

1.1.1 SSE was established in 2002 as a working group of the North West Essex and East Herts Preservation Association ('NWEHPA') in response to Department for Transport ('DfT') proposals for major expansion of UK airports, particularly in the south east. NWEHPA was itself founded in 1965 in response to a similar expansion threat. SSE currently has some 7,500 members and supporters including 140 parish and town councils, local residents' groups across Essex, Herts and Suffolk, national and local environmental groups and other organisations. We have no political affiliations.

### 1.2 Context

1.2.1 In March 2008 BAA Ltd and Stansted Airport Ltd (hereinafter referred to as 'BAA') submitted a series of planning applications to Uttlesford District Council ('UDC') for a second runway at Stansted Airport. At the same time, BAA submitted an application under the Transport and Works Act 1992 ('the TWA') for rail improvements associated with the G2 project and the Highways Agency ('HA') submitted proposals for airport access associated with BAA's proposals. BAA refers to all these proposals as the G2 project. This outline statement of our case relates to the TWA application.

### 1.3 Summary of our position

1.3.1 Our position, in short, is that the G2 project is self-evidently unsustainable in the context of seeking to safeguard both the local and the global environment for future generations. 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, for BAA, more profitable) alternative of encouraging airport passengers to travel to and from the airport by road.

1.3.2 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.<sup>1</sup> 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.

1.3.3 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 BAA planning document<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, whether or not G2 is approved.

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<sup>1</sup> See, for example, *'Concise Statement of the Aims of the Proposals'*, BAA. March 2008, para 5.

<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, para 2.42.

- 1.3.4 The works should of course be fully funded by BAA in accordance with Government policy<sup>4</sup> and as accepted by BAA.<sup>5</sup>

## 2. MAIN ELEMENTS OF THE SSE CASE

### 2.1 The capacity and operating constraints

- 2.1.1 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.
- 2.1.2 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.
- 2.1.3 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.

### 2.2 The demand for rail services

- 2.2.1 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.
- 2.2.2 The most recent performance and patronage data is contained in the December 2007 Route Utilisation Strategy ('RUS') for Greater Anglia.<sup>6</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.
- 2.2.3 In addition, between London and Cambridge only four stations, namely Tottenham Hale, Harlow Town, Bishop's Stortford and Audley End can accommodate twelve-car trains. All other stations would require platform lengthening to accommodate trains of more than eight cars.
- 2.2.4 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

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<sup>4</sup> 'The Future of Air Transport' White Paper, DfT, Dec 2003, p118: 'Taking Forward Development at Stansted' and 'Delivering a Sustainable Railway' White Paper, DfT, July 2007, para 8.11.

<sup>5</sup> 'The costs of these works are to be funded entirely by BAA. No public contribution is required.', 'Funding Statement', BAA, March 2008, p1, para 5.

<sup>6</sup> 'Greater Anglia RUS', Network Rail, Dec 2007.

*'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>7</sup>

2.2.5 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 Government policy generally is that no passenger should need to stand for more than 20 minutes. Moreover, in evidence presented to the G1 inquiry, DfT made it clear that STEX services should be planned on the basis of one seat per passenger.<sup>8</sup> 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>

## 2.3 The balance between demand and capacity

2.3.1 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 per annum. More capacity will unquestionably be needed long before BAA contemplates a second tunnel and fourth platform being built (2017). Regardless of G2, now that the G1 application for 35mppa has been allowed, the impact of Stansted Airport upon rail demand – and upon the highways network – is likely to be 50% greater in 2017 than it is today.

2.3.2 BAA has responded to a question from SSE to the effect that it expects the additional platform to be in place by 2015 and the second tunnel to be in service in the period 2015-19. This distinction is not apparent from the TWA application which links all the proposed works to permission being granted for G2. It adds weight to SSE's contention that the TWA application should be considered on its merits and implemented if approved irrespective of any decision on Airport expansion.

2.3.3 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.

2.3.4 Previous analysis (for the G1 application) suggested 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.<sup>12</sup> 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

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<sup>7</sup> 'Greater Anglia RUS', Network Rail, Dec 2007, para 3.3.13.

<sup>8</sup> Letter to Essex CC from Mr S. Baker, Divisional Manager, National Projects, DfT Rail, 23 April 2007.

<sup>9</sup> 'Greater Anglia RUS', Network Rail, Dec 2007, para 3.3.15.

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

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

<sup>12</sup> 'Greater Anglia RUS – Draft for Consultation', Network Rail, 2007, Assessment of Option 8, p109.

cannot accept twelve-car trains while the current timetable is being operated. Thus, the proposed fourth platform is needed.

## **2.4 Timing of delivery of increased capacity**

- 2.4.1 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 by National Express East Anglia (NXEA), the train operator. The most recent reports in the technical press indicate that while NXEA published an invitation to tender in June 2008, approval to place an order will be required from DfT as a franchise variation and such approval is likely to take many months.
- 2.4.2 However, an order for new trains has been placed by another franchisee (London Midland) which would allow class 321's to be cascaded to another route in 2009. These trains are compatible with the infrastructure on the West Anglia route and such a cascade forms part of the Government's rolling stock plan. So the availability of additional rolling stock to operate longer trains on the West Anglia route may arise in the near future, but they could not serve the Airport without completion of the works proposed in this order.
- 2.4.3 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 but no deadline for its report has been published. Meanwhile therefore the feasibility and timing of such improvements are uncertain.

## **2.5 Service frequencies**

- 2.5.1 Rail's market share of Stansted Airport passenger demand declined from 28.8% in 2004 to 23.3% in 2006 (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.<sup>13</sup> We believe there are four main reasons for this:
- a massive increase in coach services to central London;
  - the frequency of service to the airport from anywhere other than Liverpool Street 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.
- 2.5.2 In order to enable rail to regain or improve market share, the capacity for more frequent services to the airport needs to be provided. This can only be achieved by provision of a second airport tunnel and additional platform capacity.

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

### **3. ADMINISTRATIVE MATTERS**

#### **3.1 Procedure for handling the TWA application**

- 3.1.1 We would welcome amalgamation of the three main elements of the G2 applications, namely the main set of applications and the HA (roads) and BAA (rail) elements. To date, the three processes have been running side-by-side but not always with a consistent approach.

#### **3.2 Witnesses**

- 3.2.1 We expect our main witness to be John Rhodes, an independent public transport consultant, specialising mainly in strategies, organisational structures and regulatory aspects of railways, a Fellow of the Chartered Institute of Logistics and Transport and a member of SSE. We expect presentation of his case to take around half a day.
- 3.2.2 We have received responses from BAA to a series of questions, but many of the answers received are unsatisfactory or incomplete. If and when full and satisfactory responses are received we will consider the need for additional witnesses.
- 3.2.3 If BAA is seeking to rely upon any detailed analysis produced by external consultants or other parties, such as the DfT, we would expect either BAA's witnesses to be able to deal fully with such evidence themselves or to make provision for the cross-examination by SSE of the relevant external parties involved so that the evidence can be properly tested.
- 3.2.4 We would expect Network Rail and National Express East Anglia to give evidence to the Inquiry since they will be responsible for operating any enhanced service.

#### **3.3 Cross-examination**

- 3.3.1 The extent of our cross-examination will depend upon three principal factors, namely, (a) the extent to which BAA is prepared to provide requested additional information and clarification of issues before the start of the Inquiry; (b) the extent to which additional information is forthcoming from Network Rail and the DfT; and (c) the extent to which matters have been dealt with by other parties in cross-examination which precedes ours. At this stage we are unable to provide an estimate of the time we will require for cross-examination.

#### **3.4 Core documents**

- 3.4.1 We will provide a list of documents which we would wish to have included in the Inquiry 'Core Documents' library in due course. For practical reasons, we assume that a single Inquiry library will be shared by all three elements of the G2 proposal, namely the BAA, HA (roads) and BAA (rail) elements and that the starting point will be the G1 list of Core Documents. Also for practical reasons (avoiding duplication) it would seem sensible for SSE to wait and see which further documents are listed by BAA and the local authorities before providing our list.

#### **3.5 Additional representations**

- 3.5.1 We reserve the right to add to or amend this outline statement following consideration of further submissions by the Applicant and to address any other relevant material that may emerge. We note in particular that we have only just received (9 October) the Secretary of State's decision letter and Inspector's report in respect of the G1 Inquiry and clearly have not yet had an opportunity to study these documents in any detail.