

**Doc. No. SSE/37
Case Ref. 2032278**

Appeal by BAA Ltd and Stansted Airport Ltd following the refusal by Uttlesford District Council of planning application UTT/0717/06/FUL

Surface Access

Position Statement on behalf of Stop Stansted Expansion

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1 INTRODUCTION

- 1.1 The poor handling of this topic by BAA has put other parties, particularly those with limited resources, at a disadvantage. No sooner had we completed our evidence than another tome of re-worked information appeared. The Environmental Assessment was produced in April 2006, an Addendum in April 2007 and the Addendum Update on 31 July 2007. Yet we are still not satisfied that what has been provided gives the information required for an informed decision.

2 PREPARATION OF PROOFS OF EVIDENCE

- 2.1.1 Unless we receive alternative guidance from the Inspector, it is our intention to submit revised proofs and summary proofs, based on SSE/13, SSE/14 and SSE/15 submitted 30 April 2007. It is our intention to number these, for example, as SSE/13.1/a.
- 2.1.2 Our revised proofs will incorporate comments on the two documents produced by BAA on 31 July 2007 (the Further Update and the Response to Joint Position Statement) and will also reflect recent discussions with BAA.
- 2.1.3 We await guidance from the Inspector on the dates for submission of proofs and rebuttal proofs and, in due course, without-prejudice proposals for conditions.
- 2.1.4 To some extent, the final content of our proofs will depend on the meeting to be held on 3 September, on the availability of our witnesses (Ken McDonald will not be available from 1 to 14 September and Reg Harman will not be available from 7 to 14 September), and the responses from BAA to questions raised and requests made, particularly at a meeting on 9 August between SSE's three Surface Access witnesses and Julia Gregory of BAA and Ian Forshew from Halcrow.

3 COMMON GROUND

- 3.1.1 At the meeting on 9 August, we reviewed BAA/21, the draft BAA/UDC Statement of Common Ground, version 1, April 2007. We accepted or had no comment on the following points as drafted:

1.1.4; 1.1.5; 1.1.6; 1.2.1;
2.1.4; 2.8.3; 2.9.2;
3.1.2; 3.1.2; 3.1.3; 3.2.2; 3.2.3 items 2, 7, 9 and 14.

4 OUTSTANDING ISSUES

4.1 General

- 4.1.1 Most of the points made in our April 2007 proofs are still valid. We believe there are fundamental flaws in the forecasting assumptions that underpin surface access projections and, as a result, the consequences for road and rail, especially on the key transport corridor between Stansted and London, have been understated. Where problems have been identified, there is no guarantee that these will be satisfactorily overcome in time to avoid disruption. This poses potentially serious

consequences for travel within a corridor which has considerable importance for the national economy and where substantial growth in housing and in (non-airport) employment is planned. In reviewing BAA's projections it is important to remember its track record of under-assessment and the consequent under-provision of infrastructure to support surface access to the airport, both here at Stansted and elsewhere.

- 4.1.2 It would be wrong to ignore the cumulative effect of all the comments raised in our proofs, but we cite below some of the major issues.

4.2 Fundamental flaws in underlying forecasting assumptions

- 4.2.1 Historically, BAA surface access modelling studies have consistently underestimated the impacts. This has been seen at Heathrow and at Stansted.
- 4.2.2 We are not competent to comment specifically on the complex computer modelling suites used to project surface access needs, but we have serious concerns regarding data and assumptions that have been used in those models. Our concern has been heightened by the wide variation in results that were published in the Transport Assessment and later in the Update without a clear explanation why those changes have occurred.
- 4.2.3 We have been unable to find a statement of confidence levels for any of the models. Given that there are several models working in sequence, we would expect the confidence level of the end product to be compounded. For example, an end product that came from three models in sequence, each with a 90% confidence level, would have a confidence level of $90\% \times 90\% \times 90\% = 73\%$; for three stages each at 80% the confidence level of the outcome would be 51%. Any sensitivity test should be based on a review of the worst outcome. We have not seen any evidence of this approach which we understand to be normal practice.
- 4.2.4 We have identified a number of specific areas where reliance has been placed on assumptions that cannot by any means be regarded as robust. We highlight several particular issues:
- The Transport Assessment focuses on the difference between a kind of 'worst case' theoretical scenario of 25mppa and a best case ('enhanced') 35mppa scenario. It therefore never compares like with like and does not give the full impact against real current levels of activity.
 - BAA projects that the proportion of transfer passengers will decline relative to 2004 in the 25mppa scenario but grow very considerably in the 35mppa scenario. The forecast of 17% transfer passengers out of 35mppa goes against the trend of decline in recent years, with 2006 being below 11%. If transfer levels with 35 mppa were the same as today, then the surface access demand would be nearly 8% higher than BAA's forecasts.
 - BAA's forecast of UK origins and destinations assumes a significant change of pattern, contrary to recent trends. In particular, the numbers of passengers travelling to and from London is forecast to grow more slowly than those from other areas, thereby limiting the forecast pressure on the already strained London – Stansted transport corridor. The forecast decline in London's share of Stansted passenger origins and destinations is counter to recent trends and particularly counter-intuitive given BAA's argument that Stansted's growth will

be fuelled by overspill from other London airports. The arguments put by Stan Maiden at the Inquiry in support of his forecasts in this area were unconvincing. Further weight has been added to our argument by the 2005 CAA passenger survey, released since his forecasts were prepared - this shows a further increase in the London share of passenger O/Ds, not a decrease.

- In forecasting airport-related road traffic, BAA has assumed levels of vehicle occupancy whose basis is not clearly established. In consequence its forecasts could substantially understate the number of additional vehicle movements. We have requested an explanation of BAA's calculation and reserve further comment until this is received.
- BAA has adjusted its latest (Update) forecasts for the number of passengers using bus and coach transport to reflect a recent increase in coach patronage and reduction in rail patronage. These, however, have been caused by short term factors that are unlikely to hold over the long term, with the result that forecast rail passengers may be under-stated.

4.2.5 Each of these factors has a significant and distorting effect on the Transport Assessment, all leaning in the same direction and combining to present a substantial understatement of the pressures on the weakest links – the rail and road access to London.

4.3 Failure to achieve a meaningful modal shift to public transport

- 4.3.1 It is not sufficient for BAA to claim that the impact of its proposal will be only a minor worsening of what is projected to happen because of a general growth in road transport. There should be a demonstration that BAA's proposal will contribute to the Government's transport policy objective of reducing the need to travel, especially by car. Rail's modal share of passengers travelling to and from the airport has been declining and this application has no ambition to reverse this.
- 4.3.2 It seems highly likely that BAA's proposal will result in increased carbon dioxide emissions from surface access, especially if there is no significant shift from private car to public transport, and this would be incompatible with Government policy on climate change.
- 4.3.3 It is not surprising that BAA is seeking to resist any policies that might discourage driving to, or parking at, the airport. Investment in rail facilities would be expensive, whilst revenue from car parking is a critical element of Stansted's business model.

4.4 Inadequate information to form a judgment on the consequences

- 4.4.1 Consistent with the rest of BAA's evidence, its surface access Transport Assessment focuses on one proposed slice of development, from 25mppa to 35mppa. It fails to look at the cumulative effect of past and future development, fails to correct past under-investment in surface access infrastructure, especially rail, and fails to provide for BAA's long term aspirations. The application is for removal of the passenger cap and while BAA has offered a 35mppa cap this is clearly seen by BAA as only a temporary restraint. The Inquiry has heard evidence that a single runway is capable of handling up to 50mppa by 2030.

- 4.4.2 Such a total throughput would create surface access demand greater than Heathrow today (where far more passengers transfer planes and never leave the airport). The scale of surface access challenge facing Stansted can be illustrated by the fact that Heathrow is served from central London by a dedicated fast rail service (Heathrow Express), a stopping rail service (Heathrow Connect) and the frequent London Underground (Piccadilly Line) service. In contrast, Stansted has only one rail connection which is shared with local commuters. Given the protracted timescale for developing rail (or road) infrastructure, it is necessary to look at the longer term.
- 4.4.3 There is no detailed projection either beyond 35mppa or beyond 2014, so there is inadequate information to judge the longer term adequacy of mitigation proposals.
- 4.4.4 Given that both road and rail services on the London to Stansted corridor and in the vicinity of the airport are already close to capacity, the development should be allowed to proceed only if there are firm guarantees that the necessary infrastructure will be in place to meet increased demand as it arises. Given the history of under-assessment and under-investment and the doubt over key data assumptions, those guarantees should be guided by the precautionary principle so as to minimise the risks of road or rail disruption.
- 4.4.5 We consider that too much reliance has been placed on BAA's flawed projections. Reactions to the Transport Assessment by Uttlesford District Council, Essex and Hertfordshire County Councils and the Highways Agency were made without a critical review of the underlying assumptions that led to the forecasts that were fed into BAA's transport models. The significance of those underlying assumptions (which were not always readily visible) became apparent to SSE only after considerable in-depth investigation.
- 4.4.6 We suspect that BAA's willingness (in the Update) to test its results against alternative forecasts by SH&E is indicative of how benignly SH&E's forecasts were regarded. On the other hand, BAA has refused to test on the basis of assumptions promulgated by SSE or Stansted Airlines Consultative Committee.
- 4.4.7 Information that has been provided about the current rail situation is piecemeal, inconsistent and often outdated. It gives an incomplete and unsound assessment of present loadings and service reliability against which to judge future projections.
- 4.4.8 Despite inadequate information and understated forecasts, the Transport Assessment still points to problems ahead and inadequate mitigation.

4.5 Inadequate rail provision

- 4.5.1 BAA's forecasts of airport rail traffic remain at a level where capacity on the Stansted Express service remains sufficient in almost all scenarios. Indeed the most recent forecasts in the Update are lower than previous rail forecasts (largely because of short term factors commented on above). Capacity problems are identified as affecting the Cambridge trains, i.e. the non-airport services, which BAA argue, erroneously, have nothing to do with the airport service. Stansted Express services operate as an integral part of the West Anglia corridor services and their timetabling requirements take precedence, severely constraining the capacity left to operate other services.
- 4.5.2 The Greater Anglia Route Utilisation Strategy (RUS) identified the severe pressures on the line now and also the more serious problems that it is likely to

face because of the housing and employment growth along the line; problems that it sees compounded by the operation of the Stansted Airport trains. The two Stansted peak airport traffic forecasts in the RUS are much higher than those presented by BAA, even in the original Transport Assessment; the RUS also sees airport rail traffic continuing to grow after 2016 (the RUS main forecast year) whereas the BAA rail forecasts are for 2014 only.

- 4.5.3 The RUS identifies a number of projects which might offer a solution, but only the most expensive – quadrupling along the Lea Valley – offers really effective reduction of capacity pressures, thereby enabling the service to meet the growing demand forecasts. The identified BAA solution, expansion of Cambridge trains to 12 coaches, would only work effectively in practice if the main stations were all of sufficient platform length. This would require lengthening at Broxbourne and Cheshunt, both important for their own traffic and as interchange points; but both would be very expensive. None of the RUS projects are yet committed, and the recent rail White Paper does not identify any new investment on the West Anglia route before 2014, which implies that even the lengthening of platforms to enable longer Stansted Express trains to operate will not attract Government funding.
- 4.5.4 While BAA's forecasts indicate much higher growth in passenger origins from East Anglia, the East Midlands and further afield, very little growth is indicated for the northbound rail service from Stansted Airport. No suggestions are made for upgrading this service, for example to provide more frequent direct links to Norwich or Ipswich or existing destinations via Peterborough.

4.6 Inadequate road provision

- 4.6.1 BAA assumes that extra road traffic will be nearly all outside peak hours because additional ATMs can only be accommodated during off-peak hours. However, BAA also argues that there will be an acute shortage of capacity in the South East by 2014, so it must be reasonable to assume that airlines will increase load factors or use larger aircraft at the times when passengers wish to travel.
- 4.6.2 BAA consistently claims that the impact of increased road traffic from passengers and airport workers will be small compared with what is there already and compared with other causes, but its application should be resisted if it has the potential to lay 'the last straw'.
- 4.6.3 BAA's forecasts focus on the 35 mppa enhanced scenario, in which improved public transport reduces demand for road travel. If the proposed public transport facilities are not created, then the road traffic figures would be higher than the preferred ones.
- 4.6.4 The Transport Assessment identifies a number of places where capacity will be exceeded or close to exceedance by 2014, including M11 junction 8, two roundabouts on the A120 west of the airport and the B1383 through Stansted Mountfitchet. However, the only proposed road improvements appear to be those that have already been implemented in accordance with conditions attached to the 2003 permission to grow to 25mppa.
- 4.6.5 No consideration is given to local roads. Many country lanes and village streets have become increasingly affected by airport-related traffic – for more than 20 hours a day - over the past ten years and these are now threatened with worse to come - more traffic, more noise and pollution and more fly-parking. Road conditions in Bishops Stortford are also very difficult at times and becoming worse.

5 THE WAY FORWARD

5.1 Rail baseline

- 5.1.1 Rail services should be resurveyed to provide a thorough and reliable assessment of present loadings and service reliability for both airport and other services. Without a reliable benchmark, projections of future performance have little meaning.

5.2 Modelling

- 5.2.1 Unless the modelling process is established on a much more transparent basis, using credible assumptions, we have no sound forecasts on which to make judgements. Models should be re-run with realistic figures for transfer passengers, origins and destinations and vehicle occupancy.

- 5.2.2 BAA has claimed that its 15% sensitivity test has effectively satisfied that need. We disagree for the following reasons:

- Any test should be applied to a sound base, not to achieve that base.
- Evidence submitted at the Inquiry by York Aviation on behalf of the Stansted ACC projected a continuing decline in the number of transfer passengers at Stansted, both in numerical and percentage terms.
- The 15% test fails to examine the effects if what we regard as a sound base actually turns out to be an understatement.
- The 15% test is applied selectively – only to passengers, not employees; and only to the “enhanced” 35mppa case.
- A selective test is no substitute for modelling.

5.3 Possible conditions

- 5.3.1 It is too early to consider what specific conditions might achieve adequate mitigation as we do not yet have a plausible forecast of the scale of the surface access problem that needs mitigating. Indeed, the inadequacy of the Surface Access element of the Environmental Assessment contributes to the grounds for refusal.

- 5.3.2 However, should the Inspector be minded to recommend approval, then we consider that any conditions should, in line with paras 4.89-4.90 of the Guidance on Transport Assessment, issued by DfT and DCLG in March 2007, at least seek to achieve the following objectives in respect of surface access:

- achieve a significant switch in airport access from car to public transport, especially rail;
- ensure that neither regular commuters nor airport users of the West Anglia Main Line are disadvantaged by further airport growth;

- ensure that neither regular road users, nor airport road users nor local residents are disadvantaged by further airport growth;
 - ensure that such expansion of rail or road infrastructure as is necessary is in place in good time before it is required.
- 5.3.3 We will propose without-prejudice conditions when required to do so by the Inspector. We envisage that this will not be before all parties have given evidence and been cross-examined.