

# **CHILTERN COUNTRYSIDE GROUP**

**'Preserving the peace of the Chilterns'**

[www.chilterncountrysidegroup.org](http://www.chilterncountrysidegroup.org)



## **SUBMISSION FROM CHILTERN COUNTRYSIDE GROUP**

**This document is submitted on behalf of the Chiltern Countryside Group to the  
All Party Parliamentary Group for High Speed Rail's  
Inquiry into High Speed Rail**

**Written and researched by the Steering Group March 2012**

**The Chiltern Countryside Group supporters are people who value  
the special character of the Chilterns and its Area of Outstanding Natural Beauty  
and seek for this to be preserved for the benefit of all.**

**The Steering Group comprises aviation, transport and noise consultants, commercial pilots and  
professionals in finance, technology, media, healthcare & education.**

**Written response from the Chiltern Countryside Group to  
the All Party Parliamentary Group for High Speed Rail's  
Inquiry into High Speed Rail March 2012.**

The Chiltern Countryside Group is pleased to submit this written response to the above Inquiry.

The Chiltern Countryside Group (CCG) was established in 2008 at the time of the National Air Traffic Service's Terminal Control North Public Consultation as a natural evolution of local groups and individuals with the same aim of preserving the character and peace of the Chilterns and its Area of Outstanding Natural Beauty (AONB). Following this Consultation, the whole SE airspace is now being reviewed and the Civil Aviation Authority are presently holding an Environmental Consultation on the use of the UK's airspace (ends April 2012).

Our submission is not confined to the locality of the Chilterns. The CCG and its supporters are not against the principle of high speed rail. Whilst the Chilterns and its AONB would be heavily impacted by the current HS2 proposals, we recognise that the concept of a High Speed Rail provision for the UK is of great national importance. It is therefore imperative that the right and wisest decision is made and we welcome this opportunity for our elected representatives to become better informed on key issues.

The Group's considered view is that the current proposals for HS2 from the Department of Transport (DfT) are not in the nation's best interests and should be withdrawn. We give some of our reasons in answer to the specific questions posed in this Inquiry. CCG's fuller responses are contained in the Appendices A and B, respectively the Group's submissions to the DfT's Public Consultation 'High Speed Rail: Investing in Britain's Future' July 2011 and to the Transport Select Committee's Inquiry into the Strategic Case for High Speed Rail May 2011.

## **SUMMARY OF CHILTERN COUNTRYSIDE GROUP'S RESPONSES TO QUESTIONS**

### **Q1: How do you view the current capacity situation on Britain's railways?**

#### **1. Summary:**

- i. The CCG finds the current level of forecasting and assessment inadequate, incomplete and therefore insufficiently robust in informing Government decisions.
- ii. We find capacity issues identified by the DfT insufficient in their consideration of changes in modern working practices and in the impact of recession on the UK's economy.
- iii. We find a narrow approach to resolving any capacity issues at peak travelling times and that the DfT's London-centred modelling and funding restricts other options which potentially provide capacity resolution together with better benefits for more people nationwide.

### **Q2: What capacity do you believe Britain's railways will require in future?**

#### **2. Summary:**

- i. The CCG does not find the information available from the DfT adequate for purpose, and neither does the Public Accounts Committee (report 2010). The DfT comments on the lack of information gathered by the railways on how passengers use their services. (March 2012)
- ii. The CCG recommends that a properly designed transport model appropriate to major infrastructure planning with a full hierarchy of journey choices, and with sufficient modelling zones, be used to explore and then plan capacity and destination needs.

### **Q3: What is the best way of providing capacity and future-proofing Britain's rail network?**

#### **3. Summary:**

- i. The CCG believes Government is missing an opportunity to establish a properly planned and budgeted National Transport Strategy covering all transport modes. This is the best way to 'future-proof Britain's rail network'.
- ii. The current 'piecemeal' approach to transport, which is not exclusive to rail, does not foster a whole nation integrated approach, which will truly meet the needs of regional and international travel in the 21stC and beyond.
- iii. The CCG finds a lack of willingness amongst Government at the highest level to devise and implement what should be a key policy.
- iv. This stance runs the highest risk of Britain's rail network following the French model of unaffordable commitment to a dedicated High Speed Rail project (TGV/HS2) whilst the remaining network which serves the majority of the population continues to struggle with under-investment. There are alternatives which Government ignores at its – and the taxpayers' – cost.

### **Q4: What will the effects of providing extra capacity be, beyond addressing journey supply? What would be risked by failing to provide that capacity?**

#### **4. Summary:**

- i. Unless the need for additional capacity and where, when and how this should be provided has been demonstrated from a properly researched evidence base, any benefits or negative effects are suspect.
- ii. Without this, there is high risk of the effect being under-use and waste of taxpayers' money in some parts of the infrastructure, and under-investment in areas where the potential benefits could be greatest.
- iii. Extra capacity alone will not necessarily attract more travellers; it is only a small part of the whole picture which consumers interplay in selecting preferences. Choosing not to travel at all may well be an option consumers increasingly select.
- iv. The greatest risk is not in 'failing to provide that capacity' but in failing to provide the right kind of capacity for optimum national connectivity within a budget which the nation and its taxpayers can accommodate.
- v. CCG accepts that high speed rail may be one of many ways forward, but does not accept that HS2 as currently proposed is the right, or only way in which to achieve this vision.

## **Q1: How do you view the current capacity situation on Britain's railways?**

1. The Public Accounts Committee describes the DfT's knowledge of how many people use which parts of the rail network and when as 'inadequate, sketchy and so gives a poor basis for decision-making'. (ref: *Public Accounts Committee Conclusion 3 Increasing Passenger Rail Capacity 9.11.10*) The CCG agrees with this statement.
2. In March 2012, the DfT stated: 'Compared with other service providers/retailers, train operators currently collect very little information about how their customers use their services'. (ref pt 89, <http://www.dft.gov.uk/consultations/dft-2012-09/>)
3. Thus, the DfT's assumptions for future demand are not robust; they are based upon economic growth not the current precarious international economy.
  - i. They do not take into account increased use of on-going emerging state of art communication technology which will continue to reduce the need for face to face interaction and consequent travel.
  - ii. They do not take into account the increased opportunities which businesses embrace and encourage for their workers to operate from home, with the many financial, time and social benefits this brings.
  - iii. They do not take into account present and future increases in rail ticket costs, above the RPI, poorer or no wage increases, loss of tax and welfare benefits, increases in cost of living and fall in personal disposable income, all of which will prompt travellers, especially families & lower wage-earners, to choose the cheapest travel option. The mode change on which the DfT bases its figures for HS2, for example, is unlikely to happen, and for the first leg, with no London-Birmingham flights, there will no move from aviation.
4. Therefore, the figures and advice given by the DfT cannot be relied upon to properly inform serious long-term decisions which require significant Government and taxpayers' funding, such as the current HS2 project.
5. How then are we – and our elected representatives in Parliament – to judge current capacity?
  - i. The public will do so by their own travelling experiences, which will inevitably be limited to a narrow number of routes often used at similar times of day. For commuters in peak hours therefore, capacity will be a completely different issue to those who use the same services outside those hours.
  - ii. Parliament would do well to become more widely informed by taking note of the many contributions to, for example, the HS2 debate, by leading economists & academics, organisations without vested interests and the business sector.
  - iii. Parliament's own scrutiny body, the Transport Select Committee conducted a robust Inquiry into High Speed Rail (nb not HS2) in 2011 and issued their findings from this prior to the Secretary of State for Transport's decision on HS2. Key recommendations from this Inquiry were ignored by the SofS and the DfT in the decision to proceed with HS2.
  - iv. This action therefore raises serious questions, to which the electorate has the right to have answers – who is Government relying on for advice and what, or who, is influencing their decision-making process.
6. The CCG does not accept that the major rail routes between the UK's key cities are at full capacity during the whole of the working day (6.00am-9.00pm). Recent DfT analysis confirms this.
7. We do accept that at peak hours, (7.30-9.00 am and 4.30-6.30pm) and for certain timetabled trains, there are some rail routes where capacity is a challenge to be resolved, primarily as these routes approach London. But CCG does not support the premise that building a new expensive railway to be used by a minority of high-earning individuals is the most satisfactory way to do this.
8. Capacity on the West Coast Main Line (WCML) has been stated as a prime driver in the promotion of a high speed rail network. However this is already being addressed; by December 2012, new Pendolino vehicles and trains will be in service on the WCML increasing capacity by 106 new carriages. By 2019, there will be some 2,700 new carriages across the rail network. (ref. *Transport Minister, Theresa Villiers. Rail Express July 2011*)

9. Whilst the introduction of one additional WCML inter-city train to accommodate early evening off-peak demand on Fridays is welcomed, CCG question why this is limited when removing restrictions would immediately provide potential for increased capacity.
10. As long ago as 2009, Sir Richard Branson, chairman of the Virgin Group, called for Government to give the 'private sector more freedom to innovate' and that if they did, 'further up-grade of the London-Glasgow WCML could reduce journey times sharply (London-Birmingham reduced by 22 mins) and be self-funding'. (ref <http://www.ft.com/> 20.9.09) HS2 will cost the public £17bn for the London-Birmingham phase 1 and reduce the journey time by 30 minutes. Without doubt, a pretty expensive 8 minutes.
11. On WCML local services, there are frequently gaps of 20 mins between local trains with some peak services of only 4 carriages. There is opportunity here to increase local capacity needed at peak times relatively inexpensively, without great disruption to existing traffic, by increasing numbers of carriages & by signalling improvements so that more trains can run, without compromising safety.
12. Similarly, the Chiltern Line between West Midlands, Oxfordshire, Bucks and London now operates a faster, more frequent service with a completely new line to Oxford due in 2013. As these services will be accessible to travellers in the Chilterns who currently use WCML, capacity there will be released by people's choice of line, particularly if there is some other incentive such as frequency, end terminal, cost and parking at station of origin.
13. The East Coast Main Line (ECML) has a new high speed service running between Edinburgh-King's Cross in 4 hours; Leeds to London under 2 hrs and Newcastle-London just over 2.5 hrs. All provide further capacity, whilst reduced journey times on existing track frees up space, without compromising safety, for additional inter-city connectivity.
14. UK cities are already mostly well connected by rail links unlike many in Europe. However connectivity in some areas is more of an issue than capacity. People in the North certainly feel they need better connectivity. Researching options which connect Liverpool, Manchester, Bradford, Leeds and York with higher speed rail are worthwhile. These are close major cities which are currently poorly connected by rail & have relatively few rail trips between them – indicators of higher potential benefits.
15. East-West connectivity is very restricted and increases pressure on North-South road & rail routes particularly in the approach to London. For example, Northern Home Counties travellers to the NE currently have to go South into London and out again, or drive, clogging roads, to access the London-NE rail network. This creates unnecessary demand on the local railways serving London's termini and on the first or final leg of a long-distance route as it leaves or approaches London.
16. An artificial picture of capacity demand is thus created by not providing adequate, accessible cross-country rail options which actually deliver travellers between a choice of major destinations or interchanges. The current London-centred model encourages travel into/out of London when often it is only an interchange, not an ultimate destination. If this model was removed so that travellers could choose an option which did not require a London interchange, journey times could be reduced and certainly, capacity increased for those with a London final destination.
17. A proper transport model which models changes to people's origin-destination pattern could identify much better transport investment opportunities so as to offer a step-change in transport provision and provide considerably better economic regeneration benefits. These should be carried out. The CCG's statements relating to the proposals & the HS2 public consultation documents are based upon figures released by the DfT. However we make the following observation.
18. The Secretary of State for Transport & the DfT have refused to supply passenger figures requested by non-commercial organisations with a relevant interest, citing need to protect commercial interests. These figures must be released to interested bodies bidding for rail route franchises as they come for renewal; it is unacceptable that information on issues surrounding capacity is restricted to primarily organisations with vested interests. The public cannot, and should not, be asked to accept that such information is only supplied as, and how, those organisations with vested interests choose, or be excluded from this information by Government, when it has been given to other third parties.

## **Q2: What capacity do you believe Britain's railways will require in future?**

1. In 2010, the Public Accounts Committee recommended that the DfT conducted a fundamental review of the railway industry structure as it: 'provides little external challenge to its vested interest in its own growth' ... 'to ensure value for money...restrain[ing] the tendency to seek solutions through growth'. (*ref. Public Accounts Committee Conclusion 6 Increasing Passenger Rail Capacity 9.10.10*). As such action is essential to the prosperity and economic stability not just of the rail network, but for the UK, it is of extreme concern that this recommendation is being ignored in Government decisions.
2. This question is also discussed in the Group's response to Q1. We make further points below on appropriate forecast modelling.
3. For a public transport scheme (of say £50m minimum), and certainly for a major infrastructure project such as HS2, DfT modelling guidance require the transport model to have a full hierarchy of choices: trip frequency, mode choice, time period choice, destination choice and route choice, interconnected so that one choice correctly influences the others. The model used by HS2Ltd when planning demand/capacity for HS2 had route choice alone. They had other models which did not cover the missing choices, did not cover the same area and were totally disconnected. Thus the model used had vastly insufficient zones (with about 250 zones and should have had several 1000) so has not been able to provide accurate forecasts. (*ref. 3.1.3. CCG submission TSC Inquiry into High Speed Rail May 2011*)
4. The elasticities used by HS2 Ltd to determine additional travel generated by HS2 were calibrated on relatively small changes to the train speed and service pattern and are designed to be applied to small rail schemes, new stations etc. Such simple elasticities are inadequate for a system the size of HS2. They are well outside their calibrated range and as would be expected therefore, give numbers well beyond expectations in reality. (*ref ibid 3.1.4*)
5. Again using HS2 as our example, the model forecasting of future levels of travel used very high growth assumptions which are unlikely to be achieved. These are much higher than would normally be used for rail schemes. CCG accept that rail travel has grown at a higher rate since privatisation. But this will not continue at the same trajectory; the latest statistics show travel generally is declining, as people find other, more financially and time-saving ways to communicate and conduct business.
6. The CCG does not accept the assertion by the DfT in their March 2012 Consultation (*pt 101*) that: 'There is every reason to believe demand will continue to increase as our population and our economy grow'. This is based on the false premises that our economy is growing, which it is not, and that an increased population will choose to travel more, and when they do, it will be by train. None of these claims are supported by rigorous statistical evidence.
7. Government recognises society is changing in response to emerging communication technology and changing work patterns. It is 'developing policy to promote alternatives to travel – making greater use of Information and Communication Technologies and flexible working patterns to reduce or remove the need to travel – and will be working with businesses to encourage them to consider different working patterns'. (*ref. DfT March 2012 Rail Fares & Ticketing Consultation*). This is to be commended. Demand is therefore more likely to fall, or least, stabilise.
8. The DfT points out: 'Despite the busy peaks, once overall usage across the day is considered Britain has the lowest average volume of passengers per train of any major European railway. (*ibid. pt. 93*) So it is not total capacity which needs to be addressed, but peak capacity.
9. The Secretary of State recently announced proposals to change ticket costs, with possible increases to peak and 'shoulder' fares in a bid to resolve peak capacity & dissuade travellers away from peak hours. Whilst the CCG welcomes initiatives, we believe penalising the commuter, many of whom have no, or little, choice over their travel times, runs a serious risk of causing more unemployment, as static wages fail to keep pace with rising travel costs, reduction of personal disposable income, as more will be spent on essential travel and fall-off in overall demand as people seek other ways to more efficiently & economically work. The only beneficiary from increasing fares, already the highest in Europe, is highly likely to be the rail industry itself. This is a high risk initiative carrying great potential to impact negatively on Government's efforts to re-invigorate the nation's economy.

### **Q3: What is the best way of providing capacity and future-proofing Britain's rail network?**

1. CCG makes the following recommendations for this question to be answered with the hope of any accuracy:
  - i. Firstly, the Government should establish a proper strategically planned and realistically budgeted National Transport Strategy, incorporating all transport modes.
  - ii. Secondly, then a proper transport model of the country with a full interconnected choice hierarchy for rail with sufficient spatial detail can be commissioned.
  - iii. From this, where and when capacity is needed, or not, can be accurately identified and decisions then made on where the nation's limited funds are best deployed.
2. Currently, plans are being designed, seemingly, without robust scientific evidence of need or potential uptake to support them. It is therefore not surprising for example, that HS1 is not achieving its load targets for economic viability. The car park at Ebbsfleet is practically empty. Meanwhile, Kent commuters are suffering a poorer local service than pre-HS1 & paying higher fares to use it.
3. The CCG's responses to Q1,2 are relevant here.
4. Serious examination and analysis of the UK's rail freight traffic and where changes/improvements could be made in both provision and use to release additional track for passenger traffic should be commissioned urgently. CCG does not accept that current provision for freight is used to greatest advantage, for example when passenger traffic on the WCML is at its lowest during off-peak day, all night and weekends, freight could utilise this space. Whilst the improvements recently made to the Southampton freight depot's rail connectivity are welcomed, the Group believes that present rail freight infrastructure nationally has scope for further improvements.
5. The DfT is promoting alternatives to travel (*ref <http://www.dft.gov.uk/publications/alternatives-to-travel-next-steps>*) & identifies more flexible ticketing options as an important way to encourage employers and employees to adopt more flexible working patterns.
6. The same Public Accounts Committee made suggestions to 'reduce the inefficiencies of overcrowding in peak hours and underused rolling stock at other times' (*ref Q1.1 PAC pt2*). This included smart ticketing and other demand management techniques. We support these initiatives. CCG does not support spending billions on a project still years away from operational to resolve capacity issues now. There are better, more cost-effective and flexible ways to do so.
7. Further, extra capacity can be provided now:
  - i. by investment in improving current rail infrastructure and connectivity nationally, such as the Northern Hub;
  - ii. by improving antiquated signalling so that more trains can be run without compromising safety or speed;
  - iii. by upgrading bottlenecks on existing trackways, particularly where the faster inter-city and slower local trains compromise each other;
  - iv. by running longer trains with smaller first-class provision, especially at peak demand;
  - v. by running more trains to popular destinations at peak hours;
  - vi. by providing incentives to stagger journey times without necessarily financially penalising the daily commuter for example, wider variety of season tickets; limit on number of peak journeys but unlimited number of off-peak; choice of daily use ie Mon-Thurs, or Tues-Fri.
  - vii. Thinking creatively about how people travel and how requirements are changing could bring many ways to reduce demand and release pressure on peak travel, which is the only real issue for capacity needs.

**Q4: What will the effects of providing extra capacity be, beyond addressing journey supply? What would be risked by failing to provide that capacity?**

1. There could be many effects to providing extra capacity, dependent upon whether there was proven need, and then up take, of that provision. Extra capacity may for some peak hour travel make the journey more comfortable, but not necessarily more affordable – a prime driver in uptake. Additional choices of timetabled trains will not generate greater productivity, indeed it may foster the reverse. Additional capacity for freight rail transport may release pressure on key road arteries and reduce carbon. But, unless we know where, when and how any extra capacity is required from a properly researched evidence base, benefits for any additional provision are suspect, for if it remains unused, then financially, the taxpayer's money will have been wasted.
2. Extra capacity is unlikely to generate mode choice from short haul UK or international aviation unless greater national connectivity is provided, which may not necessarily be London-centred.
3. Before commitment is made to invest large sums of money to providing increased capacity (as for example in the £17-32bn required for HS2), proper analysis using appropriate transport modelling should be made. Such modelling will provide answers, without the physical or financial commitment, to where additional capacity is actually needed, where better connectivity would be productive and economically viable, and where extra provision would be wasted.
4. Extra capacity will not necessarily attract more travellers; it will certainly not affect mode choice unless other factors, such as door to door accessibility, cost, availability when needed and so on, are also positive. The public will not choose to travel by train just because they can have a seat; for some, this may affect station or train choice but it is only a small part of the whole picture which consumers interplay in selecting preferences.
5. The risk of failing to provide that capacity is that travellers will choose other options, which may include not to travel at all. This, in our crowded island, where we are all rightly challenged to reduce our carbon footprint, may well be the best option.
6. The greatest risk is not in 'failing to provide that capacity' but in failing to provide the right kind of capacity for optimum national connectivity within a budget which the nation and its taxpayers can accommodate. CCG does not accept that HS2 as currently proposed is the way to achieve this vision.