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14th February, 2010

Reference: EG3/14022010/RH

The Secretary of State for Transport,
c/o The Transport and Works Act Orders Unit,
Department for Transport,
Zone 1/31,
Great Minster House,
76 Marsham Road,
London, SW1P 4DR

Dear Secretary of State,

Re: Objection to Evergreen 3 – Chiltern Railways (Bicester to Oxford) improvements application

On Monday 11th January, 2010, I received access to the 1,000 page Environmental Statement prepared by ERM on behalf of Chiltern Railways for the planned Evergreen 3 project to develop rail links between Oxford and London. The project is a welcome initiative given public policy concerns for sustainable developmental pathways in the UK. However, I must raise two principal objections to the material made available to me which question whether the proposal is adequate for purpose and in the public interest. First, the demand assessment for this service is mired in ambiguity and offers a compelling lack of detail to provide any decision-maker with confidence in the plans proposed. Second, there is potentially a health and safety hazard issue related to moving to high-speed twin-tracks in the Wolvercote section in Oxford based on local knowledge of serious structural damage caused when part of the Wolvercot Tunnel section was previously twinned-track.

First, the stated aims of the Transport and Works Act application indicate that the "Evergreen 3 project will, over time, earn sufficient net revenue to pay for its construction, and can thus be delivered as a private sector project". Within Chiltern Railways' current licence to 2022, this assumes there will be sufficient new and switching passenger demand for the rail service, which can generate in the order of £18 million profit per year. There is no evidence presented to support this position. In fact, I understand that another (and unmentioned) consultancy report for Great Western Railways¹ recommended the closure of the Oxford - Bicester Line with the Strategic Railway Authority proposing reducing Oxford-Bicester trains due to "low usage".

Low usage of the route naturally focuses attention on the question of demand from existing or latent road or rail users for the London rail link, which would compete directly with Great Western's current service. Modelling transport preferences by the quality, price, time and reliability of a new service is a standard approach in such cases, which is referred to in Annex C of the December 2009 Environmental Statement Volume 4, p.174 of 714, referring to a Halcrow Fox study. However, no details are provided from the study. Without these data on demand forecasting of the quantity and likely returns per passenger, given existing transport alternatives, how can Chiltern substantiate their confident return on investment statement? Great Western's existing Oxford-Paddington rail link business model is also likely to respond to their effective monopoly on the London service. Any

¹ Greater Western Franchise Outline Business Case Report (Jacobs Consultancy)

rudimentary Environmental Impact Assessment considers such alternatives, though I could not find any assessment in the available documentation.

The magic number of 66 minutes journey time by EverGreen 3 is also worthy of reflection. Chiltern have reputedly conceded to the fact they cannot run trains around almost perpendicular bends, such as over the Oxford canal bridge, at over 60 mph. In addition, they have agreed to reduce residents' complaints of high speed trains suggesting the rather precise figure of 66 minutes may increase. Currently, Great Western runs a 50 minute single-trip journey time to Paddington. If EverGreen 3 edges up to 70 minutes or more how will this effect passenger demand and revenue for a service that may be almost twice the return journey time of its competitor? Standard economic theory and almost all published peer-reviewed articles would suggest business model problems. For residents' bearing the risk of another transport white elephant, these concerns are large, credible and immediate. Government may well like to push responsibility, returns and risk to the private sector, but recent experience has left the public badly bruised and government desperate to regain credibility and authority in regulating markets more equitably and effectively.

Second, in private conversations with Oxford City Councillor, John Goddard, who has lived in Upper Wolvercote for several decades, he has related how the railway line previously had a twin-track line but was changed to a single track line partly due to residential and commercial property structural damage caused by low speed (compared to the proposed 100 mph) trains on the heavy clay/mud geo-morphological beds underlying the area. Again, the Environmental Impact Statement and Chiltern Railways do not adequately address this issue. As a parent of a child in Wolvercote Primary School, which is adjacent to the track, I have understandable concerns that this potentially serious health and safety issue is not adequately understood nor any measures discussed to mitigate the risks to an acceptable level. Another primary school, SS Philipp and James, also lies adjacent to the proposed track development off Aristotle Lane in Jericho. By way of this letter, the Minister is now aware of these issues and hopefully will act in a suitably responsible manner.

Finally, the project also plays to the revival of the former Oxford-Cambridge rail link closed in 1967. However, my understanding is that planning permission for a larger rowing lake has been granted at Willington near Bedford, which will supply gravel for the Olympic Games in 2012. For some commentators this has reduced the likelihood of this cross-country linkage materialising. As with other unsubstantiated and speculative statements in the planning application the proposal dilutes the fundamental argument that rail transport has an increasing role in a sustainable transport policy for the UK. Building and exploiting existing infrastructure has a clear role to play in this process. Unfortunately, as presented, Evergreen 3 reflects an imperfect and speculative vision that is not adequate for purpose. As such, I recommend the Secretary to reject the proposal until sufficient, credible and satisfactory evidence is provided to support the claims made.

Yours sincerely,

Robert A. Hope and family