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2020-11-01

Dear Sir/Madam,

## **Ely Area Capacity Enhancement**

Railfuture is Britain's leading, longest-established, national independent voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities.

We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in transport and development planning.

We welcome this latest exercise by Network Rail in examining the problem of network congestion in the Ely Area, and this particular opportunity to commence our engagement in the associated sequence of public consultations. We take careful note that this first consultation, about the challenge of increasing capacity, is currently due to be followed by a second round in early-2021 which will focus on potential options for the area called Ely South, by a third round in mid-2021 on options in the rest of the Ely area, and by a final round in late-2022 on preferred options without the EACE programme. We see this therefore as an initial opportunity to set out our thoughts on what we hope to emerge from this necessarily extended exercise, and to share our vision and aspiration for this area which is so crucial to the operation of the railway and the communities which it serves not only in East Anglia but also far beyond.

### **4. How do you feel about our proposals to increase the capacity for passenger and freight rail services through the Ely area?**

**Undecided.**

**Reason:** while clearly we strongly support and shall continue to advocate the general principle of 'increasing the capacity for passenger and freight rail services through the Ely area' (our emphasis) we are at this stage undecided about your proposals for two reasons. One is that there is here only one proposal, and which at this early stage can only be expressed in general and probably unexceptional terms – "to upgrade the railway to allow more trains to run" – although six of what will be a wide variety of challenges in achieving that, "to increase capacity of the railway", have been identified specifically. The second is because we are concerned at the lack of clarity and consistency in some of the messages and images which do not yet give us the necessary confidence that a sufficiently strategic, 'fish-eye lens' approach is being applied with due rigour and thoroughness to this matter.

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We take particular note of the response to this question: “What happened to the Ely north junction scheme?”

The Ely North junction scheme was a proposal to improve the track layout of the main rail junction to the north of Ely station, however, this work was put on hold following the Hendy review in 2016.

This has given us the opportunity to review the wider capacity constraints around Ely which also need to be considered in order to meet the aspirations to run more rail services.” (our emphasis).”

The two diagrams used illustrate subtly but vitally importantly different areas, the phrases ‘through Ely’ and ‘through the Ely area’ appear to be used as if they are inter-changeable while we submit that they most certainly are not, and while there is reference to Ely being at the convergence of five railway lines the scope of the EACE programme is elsewhere, in FAQs, described as only covering three; Ely-Norwich and Ely-Ipswich are conspicuous by their absence, a very significant blind-spot.

All that said we stand four-square behind the general aim which is consistently expressed throughout, namely “to improve connectivity and reliability for passenger services and meet the demand for more rail freight between the Port of Felixstowe, the West Midlands and the North to support sustainable, long-term economic growth.”

## 5. How do you feel about our public consultation proposals?

**Strongly support.**

**Reason:** we accept that the whole Ely Area demands forensic examination of all its constituent parts and that the second and third consultations will focus on Ely South and the rest of the Ely Area respectively. The fourth and final round will then however be fundamentally crucial in drawing the disparate threads together into a holistic package which convinces stakeholders that, on the basis that ‘the total is greater than the sum of the parts’, the options are not divisible into discrete interventions, for example just for Ely North or just for Ely South, but represent a coherent, integrated and unified programme.

## 6. How do you feel about the factors that we propose to use to help inform identification of the preferred options?

**Undecided.**

**Reason:** the six challenges identified could be characterised as just fixing today’s railway. While some increased capacity would undoubtedly result, the proposal expressed simply, and in our submission inhibitingly, as just “to upgrade the railway to allow more trains to run” (our emphasis) suggests a disconcerting lack of a properly comprehensive analysis and differentiation of the contrasting needs of the different train types presenting themselves to the Ely Area. While all passenger services call at Ely station because of its pivotal role in the passenger rail network, the exact opposite applies to freight services for which Ely station is nothing but an unavoidable and unwanted impedance to their progress. What we strongly advise that points to is the very clear need for a more strategic approach to encompass the additional challenge of addressing those needs specifically, and not generically on the basis that merely ‘allowing more trains to run’ will necessarily optimise outcomes for all operators. While grade separation is a valuable engineering intervention to address conflicting moves, as at Werrington for example, the demands of the particular situation in the Ely Area require, as a ‘factor to help inform identification of the preferred options’, examination of the benefits – direct and consequential – of traffic separation. Network Rail’s *Anglia Route Study* in March 2016 made clear reference to this in Chapter 5, page 67 and Appendix B, page 103.

Feedback is invited on nine specific factors in deciding on preferred options as design / development work is progressed, but is not limited to them alone. We comment on just the first four:

~ “does the option deliver the required capacity and meet stakeholder aspirations?” The railway through Ely has been established for about 175 years and it’s about 30 years since it was last substantially altered. Notwithstanding the current state of uncertainty about short and even medium-term prospects there are underlying policy imperatives demanding that a long view forward be taken – with rail transport infrastructure in particular to support and to enable those policies to be fully realised. Some examples: population change and the inexorable rise in the demand for additional homes, the unique role of Cambridge and its sub-region in the national economy as a rare goose laying many golden eggs, and the environmental imperative to minimise the footprint of human activity and for rail in particular to up its game in actively driving modal shift for both the passenger and freight markets.

~ “is the option consistent with railway and wider social, environmental and economic policy?” We advocate a higher ambition than being merely ‘consistent’ with such policy. The EACE programme should explicitly see itself as an exemplar of how rail can drive forward those policies. Beyond accommodating currently-anticipated demand, it should establish the basis to enable additional longer-term future demand to be invited onto the network and absorbed.

~ “the impacts on communities and passengers.” We simply note the conspicuous absence of reference to freight users.

~ “environmental and sustainability impacts.” The language of ‘impacts’ suggests an approach confined to mitigation. It is disappointing that there is no discernible reference to Network Rail’s emerging work on decarbonisation as a change-maker and its likely application to the F2N route in particular. The *Traction Decarbonisation Network Strategy* Interim Programme Business Case dated 31 July 2020 and the *Environmental Sustainability Strategy* launched just days after this consultation began, with ‘A low-emission railway’ as the first of four priorities, each need to be fully reflected in future rounds of consultation.

## **7. Do you have any further comments or other ideas for the Ely area capacity enhancement programme?**

### **Strategic scope**

It is often said that Ely sits at a critical point in what’s known as the F2N route. We are clear: that is the abbreviation for the Far East to Northern Powerhouse route [and not excluding the Midlands and Scotland]. That is the true significance of the EACE programme. It never was just a local programme and is not just a regional programme either. Even for passenger services it is of national significance, and for freight services it is of international significance.

### **Geographic Scope**

We have already noted the inconsistency of two diagrams, with one appearing to exclude Ely Dock Junction and the Bury route from scope, and the omission of reference to the two of the five routes radiating from Ely which face eastwards, one of which (Ipswich) has long been a core part of East West Rail! The line from Ely Dock Junction towards Soham and Bury St. Edmunds and on to Ipswich is a single track section of route which restricts the potential to increase the number of trains operating along it. The Greater Anglia franchise includes a commitment to increase the Ipswich to Peterborough service to hourly from its current alternate hour pattern. The public purse, through a combination of leasing charges and foregone passenger revenue that an hourly service would generate, is paying for the

acquisition of two class 755 bi-mode trains which were ordered under the Greater Anglia franchise settlement but which appear to be underutilised as long as the present pattern continues. We trust that Network Rail will address this issue as part of their programme of intended works and that the omission of any reference to this service was only oversight.

This lack of line capacity will also hamper the freight market. The public purse has again made a recent investment in improving infrastructure on the Felixstowe branch by lengthening the passing loops at Trimley. This investment was designed to increase the number of freight trains able to operate out of the port from around 32 per day to 45 daily. Only 4 of these 13 additional paths have been found to be available however, until capacity at Haughley junction and in the Ely area (among others) is improved.

While we have little doubt that the proposed works will add capacity to the Ely area, it is important that this is not seen as the limit of the ambition for the freight market. Further works to the Felixstowe branch will increase capacity still further and we are concerned that excluding the Soham line from the current round of works will merely 'shift the problem along the pipe'. At least the new Soham station includes design provision for track re-doubling. In this context the Anglia Route Study reference, on page 67, bears repeating: "Single track sections between Ely and Soham (F2NCO1, F2NCO2) The single-track section between Ely and Soham is a capacity constraint for any increase in either freight or passenger services via this corridor. The Ely to Soham doubling project was developed in CP4 and early CP5. The information arising from consultation with local stakeholders and survey work have identified that the complexity of the project is greater than originally thought and therefore the cost estimate has increased significantly. As a result, the decision was taken not to progress with the design and construction phase of Ely to Soham within CP5. The single track remains a constraint and additional capacity will be required between Ely and Soham to support the 2043 level of service, particularly if the aspirations for a new station at Soham are progressed." The final sentence in particular is especially noteworthy and reflected in Table 7.10 of Appendix B, page 103.

Forthcoming consultations will need to demonstrate how this is to be allowed for in future as this line will eventually carry five trains per hour in each direction (see table below).

## Service Scope

One of Railfuture's greatest concerns, and this applies to network investment generally, is the restrictive RNEP process which pays too much attention to present day business cases and too little to future-proofing the network. There is a tendency to assume that additional capacity will never be required if it depends on projects elsewhere on the network which are yet to be committed, even if Network Rail's own Market and Route Studies have assumed future growth. An example relevant to Ely is the recent publication by Network Rail with MDS Transmodal (*Routeing of rail freight forecasts August 2020*) suggesting that by 2043/44 some 80-100 freight trains per day could be moving through the Ely Area between Felixstowe and Peterborough (two per hour in each direction). Even this report ignores the government's legal requirement to decarbonise the economy by 2050 which would see yet more freight switched to rail.

Another example is the aspirations of local and regional statutory bodies for the development of local services. The *Cambridgeshire and Peterborough Combined Authority* is committed to a half-hourly service between Cambridge and Wisbech as well as a service between Ely and Cambridge via Soham and Newmarket. The *East West Rail Consortium* together with the Sub-National Transport Boards of *England's Economic Heartland* and *Transport East* are calling for East-West Rail services to extend to Ipswich and Norwich at least hourly. The following table indicates the number of train path requirements in the base year together with a 'do minimum' and 'plan for growth' targets for the Ely area.

### Ely Area Capacity Enhancement

Service (all off peak single direction)	Base	Minimum	Plan for
London-Kings Lynn	1	2	2
Birmingham-Stansted	1	1	2
Norwich-Stansted	1	1	1
Ely-Norwich (EMT)	1	1	1
Ely-Nottingham (EMT)	1	1	1
Ipswich-Peterborough	0.5	1	1
Freight Felixstowe-Midlands/North *	1	2	3
Norwich-Oxford	0	1	1
Wisbech-Cambridge	0	1	2
Ely-Cambridge (via Soham & Newmarket)	0	1	1
<b>Totals (* assuming a freight path = 2)</b>	<b>7.5</b>	<b>14</b>	<b>18</b>

\* NB due to their length (broadly the equivalent of three 12-car passenger trains) and comparatively poor acceleration from standing we are assuming that freight trains take twice as long as passenger trains to clear junctions etc. unless the Ely Area proposals allow for freight to pass through the area at line speed. The above *does not include aggregate traffic or movements generated by Potters at Ely*. As noted above, the *Anglia Route Study* (Network Rail 2016) envisaged a separate avoiding line for freight – the traffic separation principle referred to previously – possibly to the south and west of Ely, with grade separation to avoid the conflicts arising from the, preferably uninterrupted, freight traffic flow on the south-east : north-west axis crossing the invariably stopping / reversing passenger services. In this context the *Anglia Route Study* reference, on page 67, bears repeating: “Ely area (GECO2, GECO5, WACO6, F2NCO1, F2NCO2) The speed differential of a mix of both passenger and freight in the Ely area would require interventions, such as three to four-tracking between Ely Station and Ely North Jn or grade separation at both Ely Dock Jn and Ely North Jn, to remove the constraints of crossing moves, platform usage and line utilisation in the Ely area. An alternative option has also been assessed which considers the installation of a new railway link on the west side of Ely (an avoiding line). This would remove the interaction between freight and passenger services in the Ely area and therefore reduce the required infrastructure work at junctions, level crossings and platforms.” The latter half of that final sentence in particular is especially noteworthy and reflected in Table 7.12 of Appendix B, page 103.

Network Rail will need to demonstrate that their proposals are adequate to provide for the scenario set out in the above table.

## Engineering Scope

Railfuture are assuming that the purpose of this and forthcoming consultations is to fulfil the requirements of any subsequent application for a *Transport & Works Act Order* or a *Development Consent Order* by Network Rail since any widening of the track bed or diversion of line(s) will require works to be undertaken beyond the current network boundary. The recent publication by Network Rail of their *Traction Decarbonisation Network Strategy* makes it pretty clear that future electrification will be prioritised around the nation’s major freight flows and that this makes electrification of the lines to Felixstowe and Peterborough inevitable. Furthermore, we expect this to follow within a decade of the Ely junction works.

While not necessarily expecting electrification of these lines to be part of the EACE programme we trust that the opportunity will be taken to ensure that any land required for future electrification infrastructure will be incorporated within a TWA or DCO application. We must observe however that, in a similar way that “An alternative option ... which considers the installation of a new railway link on the west side of Ely (an avoiding line) ... would ... reduce the



required infrastructure work at junctions, level crossings and platforms” (*Anglia Route Study*, pages 67 and 103 op. cit.) the different performance characteristics of diesel and electric-hauled freight trains may generate consequential benefits from a single combination of “a new and electrified railway link on the west side of Ely (an avoiding line)” which should be fully evaluated as an additional factor to help identification of preferred options.

We look forward to contributing to the next rounds of a maturing consultation embracing bold ambition and steady progress towards providing a fit-for-the-future railway for the Ely Area.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS  
Railfuture  
Director for Infrastructure & Networks