



Conservative Transport Group

A Special Interest Group of the Conservative Party

Conservative Transport Group

Response to the Government's Consultation on High Speed Rail

To:

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Introduction

The Conservative Transport Group (CTG) is a group of Conservative Party members who seek to promote discussion between the Conservative Party Transport spokespeople (whether as Ministers or Shadows) and members of the Party. The CTG's past and present position is that it fully supports investment in the UK's transport infrastructure where this can encourage sustainable mobility, through, for example, encouraging modal shift from road and air to rail, and assisting the decarbonisation of the UK's transport network. This response represents the views of the elected Committee members of the Conservative Transport Group. We should point out that although we are mostly in favour of high-speed rail as the means of relieving rail capacity to meet future demand, not all of us support the planned destruction of the countryside in the manner being proposed by HS2 Ltd.

Transport also has a key role to play in improving the UK's economic competitiveness, particularly in the regions, and encouraging sustainable economic growth whilst minimising environmental impacts.

It is important to be very clear that these objectives require a co-ordinated policy landscape and appraisal methodology, which allows proper assessment of proposals on a network-wide, intermodal basis. This does not yet exist and it is therefore impossible to properly evaluate the current proposals for HS2.

However, even without a clear policy context, it is clear that, in broadly adopting the Labour Government's proposals for HS2, the Coalition has accepted a fundamentally flawed scheme that is the result of a similarly flawed brief.

HS2 Ltd. were simply tasked with the design, in isolation, of a high speed railway from London to Birmingham, with a pre-conceived notion of a Heathrow Interchange some 12km from the airport at Old Oak Common in west London. In contrast, Conservative rail policy prior to the election made clear the party's determination to properly connect Heathrow, high speed rail and the existing classic rail network at a multimodal interchange located close to the airport on both the Great Western Main Line and the through high speed line.

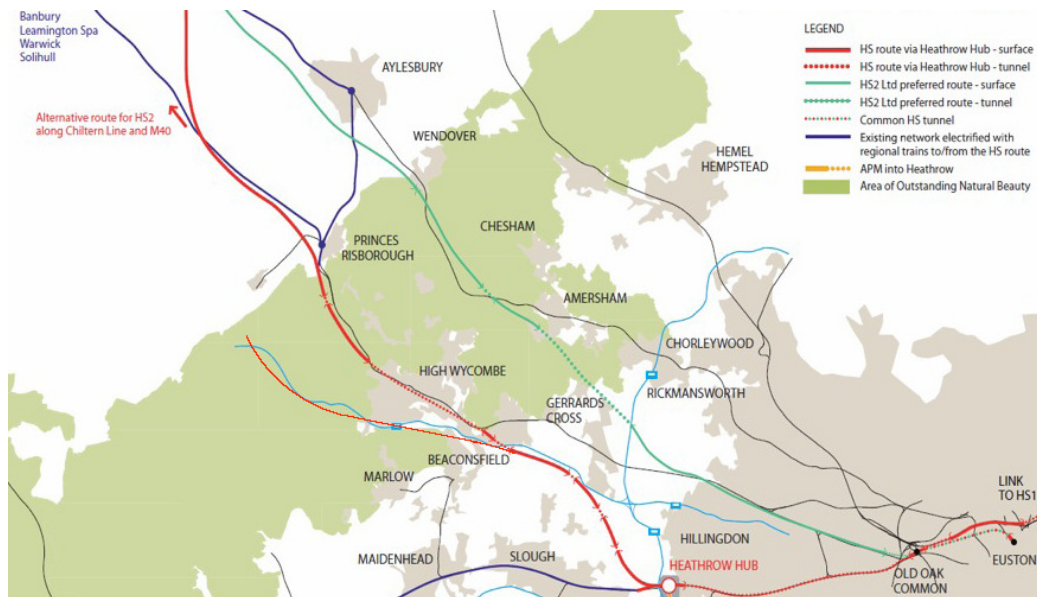
The real benefit of Heathrow is that it could become a major rail interchange with Javelin type services from Kent to Heathrow and on to Oxford, Reading and Basingstoke. These would supplement the existing Great Western Main Line from Wales and the South West which could also call at Heathrow,

strengthening its multimodal interchange role. With that level of interchange in place, the number of people who would use Heathrow for high-speed services greatly increases.

Importantly, this previous Conservative Party policy recognised the need for seamless, direct interchange between modes to achieve modal shift from road to rail, and from air to rail. It also provided much wider benefits to, for example, the South and South West of England and South Wales as highlighted in the previous paragraph.

By taking the high-speed line through Heathrow, the Conservative's pre-election proposal followed the proven examples of successful European air/rail interchanges. It also provided the opportunity for the high speed line to connect to the GWML, allowing through running and bringing early benefits to the South and South West regions, and south Wales, and for HS2 to be routed through the narrowest part of the Chilterns AONB, rather than the route through the widest part adopted by HS2 Ltd (**see Chart 1 over**)

Chart 1 – HS2 via Heathrow Hub station (red line) avoids the widest part of the Chilterns Area of Outstanding natural Beauty (AONB)



In seeking to respond to the revised brief provided by the Coalition Government in 2010, requiring HS2 to connect with Heathrow and HS1, HS2 Ltd. simply retrofitted a branch line and single track connection, respectively, to an otherwise unchanged alignment.

This merely exacerbates the flaws in a proposal that does not deliver the results we desire. Heathrow, one of the world's busiest airports and vital to the UK, and the UK's future surface links to Europe, deserves and demands a co-ordinated approach that draws on European experience but which delivers a solution that meets the UK's specific transport requirements for the new economy.

This provides the context for our following responses to the consultation's specific questions.

1. This question is about the strategy and wider context (Chapter 1 of the main consultation document): Do you agree that there is a strong case for enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades?

It is important to enthusiastically support effective enhancement of transport infrastructure as a catalyst for increasing economic activity - with the important caveat that this is planned on an integrated, intermodal basis and that it achieves the optimum balance between cost, benefits and

environmental impact in a way that has democratic legitimacy and which can be “sold” to the electorate.

The demand for rail transport is rapidly growing and parts of the rail network are already severely congested. The Rail Utilisation Strategies being carried out by Network Rail suggest that new capacity is urgently required to prevent congestion and overcrowding which, unless remedied, will damage the economic opportunities for our cities and limit the competitiveness of UK industry.

However, in the debate surrounding HS2 and alternatives such as Rail Package 2, it is not clear whether a better co-ordinated and more strategic approach to transport planning might deliver at least some increase in capacity with existing infrastructure. The current state of the public finances, and the findings of the recent McNulty review, suggest that careful analysis is required before committing to a project costing at least £32bn, and which will require political consensus to be maintained for an unprecedented period if the ultimate claimed benefits are to be delivered.

Taking a current example, Virgin took the commercial decision to operate relatively short, fixed formation trains with a significant proportion of first class seating on the WCML. This has become the norm, as this approach is seen as reducing operational costs and dwell times at termini.

However, it is not clear if this approach has been compared with an alternative of, say, longer trains with more flexible capacity which, by allowing capacity to be better matched to demand, might avoid the need for at least some infrastructure enhancements. Certainly British Rail operated very long portion workings on the WCML in contrast to the current 9 coach Pendolino fleet.

Virgin also sees commercial benefits in operating very high frequency services, which contributes to the demand for additional infrastructure. However, whilst this, in theory, provides the attraction of a regular “turn up and go” service, in practice the fares policy effectively demands advance booking, with severe financial penalties applied to late or flexible bookings, or those passengers found on the wrong train.

It is therefore important that fares policy should also be considered as an integral part of considering the rail network’s future capacity.

Without considering these strategic issues, (which go to the heart of the fundamental question as to what sort of railway the UK wants and can afford, and the financial objectives which the industry is set), there is a risk that short term commercial decisions by TOC’s lead to Government funding of capital enhancements - the tail wagging the dog.

High speed rail may well be the optimum choice for developing any new capacity, that is shown, after consideration of all factors, to be essential. However, there must be concern at the capacity that is claimed to be required and which forms the basis for HS2’s business case. Whilst we accept that modelling and appraisal is a blunt instrument, to be considered alongside wider political and strategic objectives, we nevertheless find the capacity assumptions underpinning HS2’s business case to be remarkable.

Network Rail’s New Lines Programme showed that the station groups, (i.e.; the wider urban area rail catchments) of Manchester, Birmingham, Leeds and Liverpool - the principal traffic generators on HS2’s proposed network in phases 1 and 2 - currently generate a total of ca. 7m passenger journeys per annum to and from London.

However, assuming an average of 12tph (18tph at peaks) in each direction, (24tph total), throughout a 19 hour operating day, (5am - midnight), with 1100 seats/train, HS2 provides ca. 0.5m seats per day - equivalent to 183m over the course of a year - an increase of more than 2000% over current demand in corridors likely to be served by HS2.

European experience certainly shows that high speed rail, where properly designed, has the potential to convert many car and air business journeys to rail. However, HS2 as currently proposed is forecast to generate very little modal shift from road, nor would the limited number of remaining UK domestic flights provide very significant additional traffic, even assuming their complete withdrawal.

It is therefore difficult to understand, at this admittedly simplistic level, how HS2 expect to utilise this vastly increased capacity in order to justify a return on the very substantial capital investment required. Our fear is that, like the initial forecasts for the Channel Tunnel Rail Link, HS2's demand modelling is over-optimistic, with the inevitable result that there is a call on the public purse to ultimately subsidise operations.

In addition, the building of a high speed railway from London to Birmingham would undoubtedly free up many train paths on the West Coast Main Line. These paths can be used very effectively to improve the competitiveness of the towns along the route that are currently held back by a lack of regular services as a result of the TOCs desire to offer faster services over longer distances by omitting intermediate stops. The paper by Jonathan Tyler for Greengauge 21 "Capturing the benefits of HS2 on existing lines" shows how the services to towns on the west coast main line could be enhanced by HS2.

However, such services, which by their nature are likely to principally generate commuter and short distance journeys, are very likely to require subsidy. This returns us to the need for a coherent, co-ordinated transport policy, which can take a network-wide approach to capacity, fares and investment.

It is also not clear how this additional capacity on the classic network, released by HS2, might be controlled. There appears to be no consideration in HS2 Ltd's or Government's analysis of the potential for open access operators to provide competing, albeit slower, inter-city services, which might be expected to abstract less time-sensitive passengers from HS2. This could potentially have serious consequences for HS2's already ambitious demand and revenue forecasts.

It is vital to support new capacity for additional rail capacity, which it would be shortsighted to design as anything other than a European compatible high-speed railway. However, we are concerned that the Governments current proposals fail to adopt an integrated and coherent approach to transport planning, or a strategy that is politically deliverable.

It is essential that HS2 is instead planned as part of a much wider transport network strategy, with a view to ultimately developing an affordable, co-ordinated high speed and classic rail network for the UK. Fares on the new high-speed services should be competitively set to encourage use of the high-speed trains. This should aim to provide additional capacity and better intermodal connectivity as a means of stimulating economic development whilst reducing transport's environmental impacts. This strategy should be broadly defined (taking a very short time so as to prevent delaying the building of HS2) before deciding the plans for construction of the first stage.

HS2 is also claimed to have the potential to narrow the division of wealth between the north and south of the UK but it is fair to say many remain unclear about the evidence for such claims.

Whilst narrowing regional disparities is a commendable and welcome objective for Government, we do not believe that history demonstrates the clear and direct relationship between journey time and regional economic competitiveness and performance that is claimed. It can be strongly argued that the relative weaknesses of many of the UK's regions are more structural and complex, and require a wider consideration of fiscal, education and spatial planning strategies.

Nevertheless, transport is of course a vital component. We suggest that, rather than high speed rail being considered as a panacea in isolation; the other transport issues described above deserve consideration as part of a co-ordinated strategy. These might include inter-regional connectivity, rather than simply focusing on access to London alone, an intermodal approach to local transport networks, (where Switzerland and Germany demonstrate the transformational potential of regional public transport) and improving access from the UK regions to global markets through connectivity to Heathrow. The latter consistently features as one of the most important regional economic benefits in studies and surveys.

2. This question is about the case for high-speed rail (Chapter 2 of the main consultation document): Do you agree that a national high-speed rail network from London to Birmingham, Leeds and Manchester (the Y network) would provide the best value for money solution

As noted earlier, in the absence of clear policy objectives and appraisal methodology, and with an emphasis on a point-to-point high-speed railway rather than a transport network, it is impossible to determine whether the consultation proposals provide the best value for money solution.

The Government's assessment of alternatives to HS2 has recently been revised and suggests that enhancing existing infrastructure demonstrates a less favourable business case.

It is clear and understandable that the experience of the WCML upgrade has left its scars on DfT, and that constructing an entirely new railway might be greatly preferred in terms of minimizing cost, risk and disruption and providing greater cost and programme certainty.

However, this assessment appears not to recognise the potential levers and influence that Government can exert, for example on fares, fleet and capacity planning and service frequency, particularly with the opportunity of a new WCML franchise. Whilst we understand the desirability of reducing DfT micromanagement over franchises, the particular interdependencies of the rail network do suggest the need for a controlling mind in strategic planning. We also suggest that the findings of the McNulty review into the costs of the UK railway require careful consideration before rushing ahead with the UK's single greatest financial commitment for a generation on a new high speed railway that could potentially have significant adverse financial impacts on the existing network.

In considering value for money, there is a fear that HS2 Ltd's cost estimates may well be understated. For example, we understand that no account has been taken of the need to improve road access to Old Oak Common, and better integrate the proposed interchange into London's transport network, or to provide the additional local transport improvements which the Mayor suggests are essential to provide passenger dispersal at Euston as displayed in Boris Johnson's letter last week to Jerry Marshall, Chairman of the Aghast Federation on June 20th.

The 'Y' route appears to be a political compromise to deliver the economic benefits of high-speed rail to both sides of the Pennines at the same time. However, the number of cities that aspire to direct high speed service to London times the current service frequency significantly exceeds the number of paths available on a single two track line. In addition, the service pattern assumed in preparing the business case does not provide any Heathrow trains.

We therefore question whether the approach suggested by CPRE has been properly evaluated, that of strategic additional capacity inserted into the existing rail network at critical capacity pinch points, and/or to rationalise journey times - perhaps with the opportunity also to consider a nationally integrated, regular interval timetable to maximise the attractiveness of rail by simplifying connections.

Certainly that is the approach taken by the Swiss, where the principal aim of the new Bern-Olten high-speed railway was to provide good connections at each hub. This seems to us to be a far more appropriate strategy for the UK, and its dense inter-urban rail network, than simply seeking to travel as fast as possible over a London-centric HS2, with little consideration for those making journeys that extend beyond the high speed line or involve trips between city pairs not served by HS2.

There must be through trains from Northern cities to London from the start of high speed operation and when HS2 is extended north from Birmingham there should also be through High Speed travel between the Midlands and Northern cities as well as to and from London. The commercial development of our cities is held back by poor road and rail connections cross country as opposed to those to and from London.

3. This question is about how to deliver the Government's proposed network (Chapter 3 of the main consultation document): Do you agree with the Government's proposals for the phased roll-out of a national high speed rail network, and for links to Heathrow Airport and the High Speed 1 line to the Channel Tunnel?

We strongly applaud the decision of the Secretary of State, Phillip Hammond, in requiring that Heathrow airport is linked to the high-speed rail network and to insist that a direct connection is made from HS1 to HS2 for through trains from the Midlands and the North to cities on the European continent. These links are both vital for trade and economic growth and we question whether HS2 Ltd's work can deliver the full potential economic growth by not making any provision for either 'of these international gateway links in their original report published in March 2010.

The question of how Heathrow is linked into the high speed rail network is one that needs considerably more research and more independent discussion than has so far been achieved. Currently, and certainly for the foreseeable future, Heathrow is the UK's main hub airport and is the only UK airport with direct flights to most of the world's most important business destinations. This has very important job creation implications for areas seeking inward investment from India and China.

If Heathrow, with its constraints on runway capacity, is to maintain its present status as an internationally competitive hub, and the main UK international business airport, then it needs to be developed to increase its passenger handling efficiency, improve the passenger experience and provide better surface access. It is also essential to recognise that, despite Government's stated aim of making Heathrow better, not bigger, significant growth is forecast as airlines introduce larger aircraft to reduce costs, improve yields and maximise use of Heathrow's scarce capacity.

Firstly, there needs to be optimum connectivity between the terminals, with the opportunity taken to co-ordinate airport and rail planning to maximise the efficiency of both modes. For example, by locating new terminal facilities and other landside activities (for example, car parking and a bus/coach interchange), outside the current congested airport, this could provide more space within the airport for more efficient and resilient aircraft operations and more pier served stands, whilst avoiding the complexity and likely high cost of finding space for an HS2 interchange within the airport itself.

Secondly Heathrow needs full connectivity along all axes, with direct rail services to all the main sources of its passengers starting points and their destinations as well as the most popular residential areas for those who work at the airport. In planning this connectivity, it is important to learn from European experience that improved rail access fundamentally changes an airport's catchment. This is especially relevant to Heathrow, where the lack of any direct rail access from, say Bristol or Birmingham, results in passengers being forced to interline through European hub airports, with adverse implications for journey time and flexibility – as well as UK regional competitiveness.

We do not believe that the spur or loop which HS2 Ltd. propose to retrofit, at some later date, to connect HS2 and Heathrow, provides the connectivity that the UK requires. European experience is again clear, that, to be successful, major airports require an "on-airport" interchange located directly on the through high speed line. Only in this way can the necessary high frequency rail services be provided in order to generate modal shift.

HS2 Ltd's proposals also condemn Heathrow to what the Secretary of State himself acknowledges as an unattractive and uncompetitive remote interchange at Old Oak Common in west London for many years after the first phase of HS2 opens. In that time, we believe that there is a real risk that Heathrow's airlines will look elsewhere for growth and investment, with very severe consequences for the UK's competitiveness and connectivity.

Certainly, even if Heathrow were able to maintain its pre-eminence with a remote interchange, whilst becoming increasingly disadvantaged as other airports continue to improve their surface access and expand their catchments, it is hard to see how airport users might be expected to meet the Government's expectation of a significant financial contribution to the extremely high cost of a spur or loop.

A spur or loop would require a frequent train service in order to make rail an attractive modal choice and justify any financial contribution from airlines. However, even with just two trains per hour in each direction, (the minimum that might be expected to provide a reasonable service frequency to UK regional cities, with full length train sets splitting at Birmingham to as HS2 Ltd. propose), that would provide a total of almost 4,500 seats per hour - equivalent to ten A380's travelling between Heathrow and a few regional cities each and every hour. We simply do not believe that a credible business case exists for such a proposal. In addition, each Heathrow service would take at least one valuable train path on HS2 that would otherwise be used by services to London or Europe.

Heathrow should be a station stop and primary interchange on the through HS2 line, not Old Oak Common which has incurred strong criticism from the Mayor of London and the London Chamber of Commerce. Heathrow is a destination that attracts people, and indeed is already the UK's single largest traffic generator. Old Oak Common is not, and is unlikely to be sufficiently attractive to commercial development to justify the very high infrastructure costs of construction over the high

speed and classic rail stations, and Crossrail depot, that occupy the majority of the site, and the additional road access that HS2 Ltd. suggest is likely to be required to serve the station, (and which would also be essential for any commercial development).

We therefore suggest that the Conservative's proposals, set out in the Party's policy review prior to the general election, remain the optimum solution for the UK. Only an HS2 alignment via a Heathrow International interchange, located on the Great Western Main Line as close as possible to the airport, and providing direct connections between high speed rail, classic rail, Crossrail, the motorway network and Heathrow, can provide the connectivity that the UK requires.

Even if this results in non-airport passengers incurring a 3-minute journey time penalty, as HS2 Ltd. suggest, we believe this is outweighed by the wider benefits. We also believe that it is no more expensive, and may be cheaper, than HS2 Ltd's proposals for a main line and spur, whilst providing world-class access to Heathrow in the first phase of HS2.

We do not believe the current proposals provide a satisfactory solution, and also suggest that the current consultation is flawed in leaving any detail of a Heathrow connection to a later date. In pursuing this approach, there is a grave danger that plans for a first phase of HS2 will proceed only to find that the flaws in the proposal for a spur or loop will become increasingly apparent, but too late to change fundamental decisions on HS2. Such a development would create huge political problems.

We similarly urge Government to revisit the proposals for a link between HS1 and HS2. Posterity will not thank us if we plan this vital link on the basis of a single track, slow speed branch line threading its way through central London.

Certainly an improved pedestrian link will be required between Euston and St Pancras as well as through services from Midlands and Northern cities to Europe via HS1 and the channel tunnel.

4. This question is about the specification for the line between London and the West Midlands (Chapter 4 of the main consultation document): Do you agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process HS2 Ltd undertook?

The short answer is NO. Whilst HS2 Ltd appear to be open and transparent in their reasoning they have relied too much on their computer analyses over their knowledge of what the customers of HS2 trains want. Economic analyses can never be perfect, (as illustrated by the NAO's examination of HS1 forecasts). They are a tool to use to aid good management and strategic planning, not an alternative to good management. Exacerbating the problem is the fact that much of the material presented as supporting the case is, at best confusing and contradictory, and in some cases entirely wrong.

For example, the decision to effectively ignore Heathrow is based on HS2 Ltd's assumption that improving surface access to the UK's only hub airport would have no effect on demand. That flawed assumption, together with the original mistaken belief that a route via the airport incurred a 9-minute journey time penalty, (and not just 3 minutes or less as later realised) appears to have influenced fundamental decisions on HS2's route selection process.

In view of the Coalition Government's requirement that HS2 is properly connected to Heathrow, the route selection process requires a fundamental reassessment, not the simple bolting on of substandard connections to Heathrow and HS1 that has been the case.

HS2 Ltd's emphasis on journey time savings as the primary influence on route selection also led to the decision on the shortest distance route between London and Birmingham, taking the line through the widest part of the Chilterns AONB.

The severe environmental impact of the route is exacerbated by HS2 Ltd's decision to adopt a design speed of 400kph, requiring a virtually straight alignment that carves through the landscape. It is difficult to imagine a more environmentally - and politically - destructive alignment for such a railway than that selected through the tranquil Misbourne Valley.

(The design speed adopted also has severe implications for energy consumption, with very high speeds requiring disproportionately greater energy use which appears difficult to reconcile with the UK's commitment to very ambitious carbon reduction targets).

We believe that Switzerland and Germany provide relevant models for a UK high-speed rail network, in providing appropriate - not necessarily the fastest - journey times, (the "commercial vitesse") within the context of a fully co-ordinated and integrated network.

Chart 2

Experience, both from Europe and HS1, also demonstrates the benefits of a high speed rail alignment following motorway corridors as closely as possible, minimising environmental impacts, particularly through sensitive areas, even if this requires some compromise on perceived journey time benefits. **(See Chart 2 right where HS1 parallel's the M20 in Kent)**



It is of concern that HS2 Ltd. appear not to have considered any such compromise in order to minimise environmental impacts by design, rather than, as now occurring, by retrofitting deeper cuttings and proposing green tunnels (with consequent financial implications). Such proposals do nothing to make a flawed route choice more acceptable.

European models also suggest that there is a fundamental flaw in the proposal that Birmingham, (like Heathrow), should be designed as a terminus, when other European countries have realised, through experience, their operational disadvantages, and are committing very significant investment to converting or replacing these with through stations, (for example, Florence, Stuttgart and Barcelona).

It is also unsatisfactory to further fragment rail services across various stations. Birmingham for example would have 3 major stations, making local interchanging unattractive and time consuming. The aim should be to co-locate high speed, regional and local rail services with tram/bus networks to maximise the attractiveness of public transport. We believe the decision to invest in New Street in preference to Arup's Grand Central station proposal for Birmingham will come to be seen as a missed opportunity, and it is essential that HS2 does not make similar fundamental mistakes.

It is also not satisfactory that high speed trains terminate in Birmingham and we strongly consider that trains from the high speed route should continue on to Wolverhampton and Shrewsbury or to Walsall, and possibly onwards to Stoke on Trent (if Stoke is not to be served by London to Manchester trains).

HS2 Ltd also propose a parkway station for Birmingham, but the economic assessment tools can be shown to distort the results in favour of parkway stations because they can determine the high construction costs of city center stations more accurately than the costs of expanding the road network to provide access for parkway stations.

It seems frankly perverse to recognise the benefits of an airport interchange at Birmingham, located on the through high speed line, whilst condemning Heathrow to a branch line connection.

5. This question is about the route for the line between London and the West Midlands (Chapter 5 and Annex B of the main consultation document): Do you agree that the Government's proposed route, including the approach proposed for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands?

The answer is No. Quite simply the high level of political opposition to the route is so extensive as to require an independent examination, external to HS2 Ltd, of the route.. HS2 Ltd appears to have been too obsessed with speed and Benefit to Cost ratios to take into account the political impact and acceptability of potential routes.

Our view is that a more southerly route via a station at Heathrow airport, as we have indicated in earlier paragraphs is a far better choice.

In addition the decision to locate the Birmingham city centre high-speed station some 10 minutes walk away from New Street loses almost half the benefits in time saving for onward rail journeys to the greater West Midlands. At a cost of £10 billion for the line, this waste in potential time savings is very expensive.

6. This question is about the Appraisal of Sustainability (Chapter 5 of the main consultation document): Do you wish to comment on the Appraisal of Sustainability of the Government's proposed route between London and the West Midlands that has been published to inform this consultation?

For such a major transport project, HS2 should show a much greener benefit by making a significant reduction in CO2 emissions. If necessary, ultimate high speed along parts of the route should be sacrificed in favour of a route that creates less environmental and amenity damage.

Safety of trains and their passengers at these high speeds has to be a high priority.

Without a detailed environmental appraisal, and a monetised assessment of the environmental impacts, similar to that carried out for Heathrow's proposed third runway, it is impossible to determine whether the Appraisal of Sustainability provides a proper assessment.

We are also concerned that the risks of poor quality management of the project are adequately assessed and that measures are taken to prevent costs from seriously over-running the budget as a result of the HS2 programme attracting bidders who are not sufficiently qualified or resourced to undertake such a large project.

We are pleased that the Minister has recently confirmed that "No decision has been taken about the right route. All we have is a preferred option. It is entirely appropriate for MPs. Including members of the Government, to take part in the debate about what final route should be chosen and make representations on behalf of constituents." (The Minister of State, Mrs. Theresa Villiers), Westminster Hall debate, High Speed Rail 13th July 2011.

ENDS

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