

## **'New' London Plan – Draft for Public Consultation**

### **Network Rail Response – February 2018**

#### **Introduction**

Network Rail welcomes the draft publication of the London Plan and the opportunity to provide comments for the final publication. Transport, and the railway in particular, is key to the development of London over the next 20-25 years and is crucial to London's economic prosperity, enabling economic growth, jobs and housing.

Above all, the key challenge for the railway serving London is capacity and this is expected to be an increasing challenge over the next few decades. At present, there is major investment in schemes such as the Thameslink programme and redevelopment of London Bridge station, but completion of such projects is only the start of a continued long term investment rail capacity that is needed to meet London's needs. Rail capacity is critical, not only increasing sustainable transport and the delivery of new housing and commercial developments within London, but also the ability to increase the accessibility of London to wider south east region and the rest of the country, to service the capital's employment needs and generate long term growth. The Draft for Public Consultation is a comprehensive and well developed document, focussing on the key priorities in the capital over the coming years. This response will raise a number of points for inclusion in the final document and will also comment specifically on the content of the document itself.

Network Rail values our close relationship with the Mayor, Transport for London and the London Boroughs, both in delivering rail schemes within London and in developing future projects, such as Crossrail 2, to meet the capital's needs.

#### **The railway in London**

The railway is a critical part of how London functions as a city. Every weekday, more than half of the people arriving in central London in rush hour have travelled by train. In the busiest hour of the day, 650,000 commuters arrive in central London by train, the equivalent of a rail carriage filled with 90 commuters every second. By the end of each day, rail has brought 1 million people into the capital.

In recent years, rail passenger numbers have been growing by 6% a year. Although the rate of growth has reduced in the last year, if such growth levels resumed, it could result in a doubling of passenger numbers during the next 25 years. Meeting such growth would be a challenge. Already, at the busiest times, some parts of the network have no space to run more trains, trains are often overcrowded and many stations built in the Victorian era are simply not designed for the sheer numbers of people travelling today. Continued investment in London's rail infrastructure is critical for the capital's success in meeting the growing demand for travel. The map shown

in the Appendix illustrates the impact of growth in rail travel to 2026 on the capacity of the rail network in London.

Investment in rail in London is also critical in realising the 'Good Growth' and the broader objectives of the plan, such as housing, the economy and the environment. Rail helps build London's homes, businesses and shops, with about 40% of construction materials arriving by freight trains. Greater rail accessibility reduces the need to travel by car both within the capital and car journeys from outside London, thereby reducing congestion and pollution. It also enables greater accessibility for housing and commercial developments to be realised, including opportunities for intensification in and around stations, and opens up a valuable labour market from outside the capital and provides access to London's major airports.

The document should make it clear that investment in transport infrastructure is inextricably linked to unlocking new growth opportunities in London, and clear links should be made in the document between the Transport section (Chapter 10) and the preceding chapters, as transport infrastructure is fundamental to the success of the New Plan. It is considered that this is currently missing from the draft Plan.

### **Network Rail and London**

Working together as one railway and with Transport for London, we are making a significant investment in London's railways for the city and for the benefit of the whole country. London passengers have already seen major upgrades of stations, better facilities, more and longer trains to increase capacity, as well as accessibility improvements at a number of stations. The transformation of Kings Cross Station and the surrounding area is an example of how rail drives new opportunities and growth.

In the next 18 months we will complete more than £10 billion of mega projects for London which will bring about the total transformation of rail services. This includes projects like the £800m Waterloo upgrade, the £7bn Thameslink Programme and Crossrail, which Network Rail is playing a major role in delivering. They will create major new connections, allow new services with longer trains, reduce crowding and improve reliability. These mega projects are amongst some of the largest, most complex and challenging in the world. By 2019 there will be a 30% increase in capacity into London at peak times, roughly 90,000 extra passengers in the peak hour as new fleets of trains are introduced on new and upgraded infrastructure. There will be more frequent rail services on 16 lines into central London.

### **Supporting housing and economic growth in London**

Network Rail is working hard to release as much land for housing as we can, supporting the aims of Policy GG4 of the Plan. Such land includes sites adjacent to railway line, stations or depots. Across the country, we will deliver land for 12,000 new homes by 2020 with about 5,000 of those being within London, and we will continue to deliver significant further land for housing after this date and for the

duration of the Plan period. We are also working with the London Boroughs to play our part in areas identified as driving socio-economic growth across the city. The land-release programme is central to Network Rail's objectives to help respond to the nation's housing shortage. The delivery of these sites on railway land is far from easy, and in order to realise the full development potential, Network Rail requires the assistance and support of the Mayor and London Boroughs.

Many sites have difficult constraints and abnormal costs that are associated with developing on railway land or on/over railway assets, and it is, therefore, requested that the new Plan acknowledges both the potential that these sites can bring, but also the costs associated with delivering them. It is also requested that a flexible approach is adopted when considering the development of railway land and assets to recognise the constraints they possess. Policies should better reflect this and include appropriate flexibility of requirements such as Affordable Housing or other planning obligations.

It is therefore considered that the supporting text to Policy H5 (Delivering Affordable Housing) and paragraph 4.6.5 should specifically make reference to the need to adopt a flexible approach to affordable housing requirements on/over railway land given the abnormal costs associated with developing on railway land and infrastructure.

Network Rail would welcome a discussion on the potential strategic opportunities with you throughout the preparation of the new London Plan and is willing to assist with the provision of relevant evidence. In particular, Network Rail can provide you with additional information and detail of major strategic development opportunities such as Euston Station, Clapham Junction Station, Victoria Station and East Croydon Station and also evidence which supports development in strategic growth areas.

In addition to land, railway stations can be key anchors for the next generation of housing developments, growth and regeneration. There is an opportunity for this new Plan to better reflect the opportunities for development around rail stations and transport hubs, which act as gateways to the city, through measures to encourage investment in stations providing both stations capacity as well as new residential and commercial developments.

## **Crossrail 2**

The draft Plan makes strong reference to Crossrail 2 and the potential for it to be delivered and be operational by 2033. Crossrail 2 is key to providing the extra rail capacity London requires. Network Rail supports this and is working as part of the integrated team supporting the development of the scheme. However, given the Plan's reliance on Crossrail 2 for a number of other outcomes, it should be emphasised that the scheme is yet to be funded. It is therefore requested that the Plan should be clear on how it would be impacted, and how growth would be delivered, in the event that Crossrail 2 does not happen, particularly given that transport investment and improvement will still be essential in order to support and deliver good growth.

The case for Crossrail 2 is powerful and there is an opportunity to strengthen further the benefits that can be achieved from delivery of this scheme. Compared to today, Crossrail 2 will create space for an additional 270,000 people to travel into Central London stations across south-west London, Surrey and Hampshire together with services into Liverpool Street from the West Anglia Main Line. Such investment increases the capital's rail capacity by an additional 10 per cent.

The programme has benefits beyond transport for the whole country. It will support up to 200,000 new jobs across London and the South East and up to 60,000 supply chain jobs across the whole country, as well as generate the requirement for thousands of apprenticeships. It also has the potential to unlock up to 200,000 new homes across London and the South East.

### **How can the plan be enhanced?**

There are a number of areas where it is necessary to make important changes to the Plan in order for its spatial strategy to be effective and deliverable, owing to the critical link with transport (rail) infrastructure.

1. Give greater prominence to investment in schemes benefitting both London and other parts of the country, including the Brighton Main Line, South West Main Line and HS2.

The document gives recognition for the need for collaboration with the wider South East in policy SD2 and on pages 57-65. This is supported but could be strengthened. For the wider South East, investment in capacity on corridors such as the Brighton Main Line have a large direct and indirect benefit for the capital providing mutual benefit for the region. This would support in enabling the creating of 6.9 million jobs by 2041.

Directly, the Brighton Main Line upgrade project would provide a substantial expansion of East Croydon station allowing more services and improved performance through this major interchange. Indirectly, the removal of bottlenecks along the entire route benefits suburban London metro services and supports the London economy by increasing the accessibility of labour across Surrey and Sussex. Similarly, the South West Main Line Upgrade programme is a series of projects which, in part, provides congestion relief at key stations that are overcrowded today at Waterloo, Clapham Junction, Wimbledon and Woking. Greater prominence of these schemes and their contribution to the development of London over the next 20 years should be given in the document. Further infrastructure will be needed to support the ability to unlock additional capacity created by Crossrail 2.

HS2, the north – south high speed rail project better connecting London to the north is also likely to provide significant benefits for London. The plan makes reference to the benefits of the development of the Old Oak Common area on page 47, but the importance of this scheme could be greater, including economic benefits to London

of greater connectivity to other major cities and the comprehensive development of Euston Station and the surrounding areas.

Victoria Station sits within the Victoria Opportunity Area, so it is appreciated that the Plan already recognises the needs and opportunities in the area. Victoria has most of the key elements in its favour in terms of what is required to bring forward a significant station enhancement: Major renewals required, property opportunities, supportive stakeholders, congestion relief requirements, other major infrastructure projects and status as a key part of London and the south east's travel infrastructure.

It is requested that the new Plan acknowledges this potential for comprehensive redevelopment and includes planning policies for the station and its surroundings, to enable and support the development of this gateway station and interchange.

Table 10.1 on pages 407-410 should clearly be amended to include these key Network Rail schemes. Further information and evidence can be provided on these and other schemes that should be properly acknowledged in the Plan.

## 2. Highlight and support the need for digital railway technology

For London in particular, investment in transport technology is important and there is an opportunity for the Plan to highlight and support this. Network Rail is currently developing digital railway technology which will allow trains to run closer together and more reliably, freeing up more capacity from our existing rail infrastructure. The successful development of such technology will enable increased capacity minimising the need for very expensive infrastructure.

## 3. Intensification of Development

Network Rail welcomes the Mayor's intent to meet as much of the city's growth demands within London through higher density developments which are situated in highly accessible locations, well served by existing or planned transport interchanges (Policy GG2).

All stations within London provide an opportunity for sustainable development, including (but not limited to) residential intensification, providing Londoner's with a clear opportunity to live close to public transport nodes. Whilst all stations provide this opportunity there are clearly a number where significant development can take place, creating both the homes that are needed whilst providing the significant funding required to contribute to the expansion of the rail network that is central to the continuing success of the capital as a world city. Such priority locations in London are clearly Euston, Waterloo, Clapham Junction, Victoria, Paddington and East Croydon where there now exists an opportunity for major high density development and significant and substantial station capacity improvements.

It is clear, therefore, that policies in relation to the delivery of housing, creation of employment, unlocking the potential of public land, and the optimisation of strategic

development opportunities at key transport nodes will be vital to London's growth and the success of a new London Plan. Network Rail would welcome further engagement with you in order to inform the new Plan on these matters.

#### 4. Funding of Infrastructure

The financing of railway infrastructure is vital and whilst Network Rail is funded to provide all the necessary maintenance and improvements to its infrastructure, it is not funded to carry out certain enhancements and developments over and above what is required for the safe and efficient operation of the railway. It is, therefore, necessary to seek alternative funding sources and we are calling on the Mayor and London Boroughs to invest revenue from the planning system (as well as other sources) to improve London's railway. In this context, we would very much welcome the commitment in the new London Plan to support the Mayor's transport priorities and seek third party funding contributions to the railway.

The intensification of development around stations must fund both mitigation and enhancement of the stations and supporting infrastructure. Without this, the rail infrastructure will be unable to support any growth, and both the deliverability and effectiveness of the Plan would be impacted. This could have significant implications for successful good growth within Opportunity Areas and strategic growth areas.

The Plan should also specifically acknowledge the vital role played by Network Rail in increasing the capacity of London's railway and, particularly, re-developing many of its major stations to meet the needs of a growing population. Network Rail recommends that a specific commitment to support the comprehensive redevelopment of London's stations be included in the new London Plan, as well as an acknowledgement that financial support through the planning charges regime and commercial development is required to facilitate these station improvements.

#### 5. Highlight the impact of not investing in national rail infrastructure

In section 2.1, the plan very clearly identifies a number of opportunity areas, where the driver for growth in these areas is future transport links such as Crossrail 2 and the Bakerloo line extension. As there remains uncertainty over the funding of such schemes, it is important to emphasise in the Plan the impact of a lack of delivery of rail enhancements and acknowledge that there are opportunities to comprehensively redevelop these stations and areas without such large transport schemes such as Crossrail 2.

The possible impacts include:

- The railway might act as a brake on economic prosperity rather than the stimulus and enabler of growth and prosperity in London.
- Performance is very likely to deteriorate as more passengers and more freight traffic are squeezed on to the existing infrastructure and services that run on it.

- Crowding will become more acute and more widespread, and the timetable may become inoperable in places as stations become overcrowded and the times train stop at stations become unmanageable.
- Safety risk could increase as stations become more overcrowded, with more frequent station closures required to deal with this risk.

The Plan should, therefore, include additional provision in Section 2.1, which outlines the opportunity to develop these areas in the event that the major infrastructure schemes do not come forward.

#### 6. Highlight the opportunities that can be realised from investment in London's rail stations and major terminals

A number of stations within London need congestion relief schemes, with a number being seriously overcrowded following significant passenger growth. Many of the highest priority stations in the country for capacity interventions are in London, some examples of these include Waterloo, Clapham Junction, Wimbledon, Seven Sisters, Stratford, Lewisham and Peckham Rye, as well as a number of terminal stations such as Liverpool Street and Victoria. In these stations, capacity issues include congestion on platforms, insufficient space for ticket gating and congested concourse space and walkways. Network Rail has reported on these priority stations in our advice to Government (Initial Industry Advice) during 2016.

Policy GG2 (page 15) suggests prioritisation of commercial and residential development around tube and rail stations. It is important that the Plan reflects the need to enhance such stations as demand grows but also for the opportunities that can be realised from railway station developments, for example, the development of transport hubs for cycling and bus interchange.

#### 7. Retain land for depots and rail freight

In order to support growth in the use of rail for passenger and freight transport, the Plan should propose the retention and greater provision of rolling stock depots and, in particular, freight yard and terminal facilities.

Increased rail freight access to and through London is an economic and environmental opportunity that should be identified in the Plan. Nationally, rail freight takes 7.6 million heavy goods vehicle (HGV) journeys off the road each year. It also plays a vital role in supporting the construction industry for building London's homes, businesses, with circa 40% of the Capital's construction materials arriving by train. However, rail freight cannot achieve its full potential without changes to land use planning policy to protect existing rail freight sites and their associated facilities, and promote the construction of new ones. In recent years there have been similar notable frustrations with the development of new rail freight terminals across London, largely due to planning difficulties involved in such schemes. Equally, pressure for realisation of new housing has, in many cases, seen new residential development permitted in very close proximity to existing and future rail freight sites leading to

environmental restrictions on the latter that subsequently serve to undermine the continued operational and economic viability of such facilities.

In addition to terminal developments linked to serving the construction sector, the emergence of an express freight and urban logistics rail freight offer promises to be an exciting new market for rail, supporting the delivery of parcels and retail goods directly into city centres. In London, this traffic could be based both around enhanced traditional rail freight sites as well as exploiting latent out of hours capacity of major stations. A sector that would directly support urban load consolidation and sustainable last-mile delivery as proposed in Policy T7 of the Plan.

The Plan should also propose measures to increase freight capacity on orbital routes across the capital, such routes being critical to Channel Tunnel traffic growth and traffics to/from those ports and manufacturing facilities located along the Essex Thameside corridor. Equally, the completion of infill schemes to enable more electrically-hauled rail freight to operate in London should be promoted. Such schemes are identified in Network Rail's Freight Network Study, published in 2017.

## 8. Green Designations

Network Rail acknowledges the need for Green Infrastructure and the need to protect green and open space within London. However, significant Network Rail owned land has been identified as 'green allocations' within the London Plan and within Borough Plans without any regard to the nature of the land. Network Rail land is often operational in nature, which means that it can be cleared at any time if required for operational railway purposes, it is not accessible to the public due to possible safety risks and it has not been properly assessed to understand the ecology and biodiversity quality of the land.

Network Rail should, therefore, be part of discussions at both the Mayor and Borough levels on the assessment of Green Infrastructure and green and open space. It is particularly important in the context of railway land as it is considered that there are significant opportunities in providing better quality and publicly accessible open space within railway corridors if a proper strategy is put in place. Currently there is over-reliance on out-dated assessments and incomplete information.

## 9. Devolution

The draft Plan makes reference to fiscal devolution and greater powers for the Mayor in section 11.1. Network Rail does not have a view on devolution, as this is a political decision, but welcomes any benefit to the delivery of transport scheme from changes to the structure of funding.

In terms of rail, Network Rail has a good record of working effectively with TfL and its rail operator and works effectively with any specifier/franchisee/concessionaire. If the devolution of service specification from the Department for Transport to Transport for London was to occur, Network Rail's assumption is that our role would remain



unchanged. It should be noted that capacity and journey time issues for rail services within London are, in the main, due to the underlying infrastructure constraints, not governance arrangements.

#### 10. Report the economic value of investment in rail projects

The Plan should also report the economic value of delivering rail enhancement schemes. Some of Network Rail's major projects will return £4 of economic benefit for every £1 invested and better rail connectivity can unlock housing supply and take people off the roads. This rail investment helps drive London and the South East's economy, with about £4.3 billion spent annually with businesses and creating about 70,000 jobs.

### **Specific comments on the document**

The items below highlight some specific issues to be address in the document:

2.1, pages 28-56 – Growth Corridors and Opportunity Areas – The opportunities for new homes and jobs in each of these areas should also give recognition to the need for capacity enhancement of existing rail services in addition to the new schemes being highlighted. For example on page 55, the development opportunity in the Croydon/Suttons areas resulting from extensions to Tram services would also be enhanced by the Brighton Main Line programme and redevelopment of East Croydon Station.

2.1.17, pages 35-36 – Network Rail supports the Opportunity Area at New Cross/Lewisham/Catford. However, this paragraph should acknowledge the constraints and issues faced at Lewisham Railway Station and the interchange. Significant pressure is being placed on the station from surrounding development, making it one of the most congested stations in the country. This paragraph needs to both acknowledge the needs of the station, but also promote both mitigation and enhancement directly from nearby developments and users of the station.

2.1.26, page 39 - Clapham Junction OA - there a significant opportunity at Clapham Junction for oversite development. Crossrail 2 will, of course, improve the interchange opportunities but is not a prerequisite for the development to happen. TfL and Network Rail (along with our development partner Innova) are working together to provide technical assurance of any oversite development and Crossrail 2.

The wording of the Clapham Junction OA should be amended to the following:

#### ***Clapham Junction OA [paragraph 2.1.26]***

*Clapham Junction is Europe's busiest rail interchange station, and a designated Major town centre serving key commuter routes from West London and Southern England, and is identified as one of London's four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger*

numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers public transport experience.

A comprehensive approach to the rail network station improvements along with the proposal for a Crossrail 2 station this represents presents a unique opportunity to make more efficient use of land above and surrounding the station for residential and commercial development, including new retail and offices as part of the designated Major town centre. The station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers. The Planning Framework will need to fully explore and evaluate options to comprehensively deliver a reconfigured station alongside over-station development that reflects the role of Clapham Junction as a strategic transport interchange and growth corridor. for comprehensive over station development, which would be reliant on a reconfiguration of the station layout. This will include the consideration of complex technical issues related to the operation of the railway and the integration with other transport infrastructure and services, including Crossrail 2. Careful consideration will need to be given to the urban design and place-making of the development and its integration into the existing streets and functions surrounding the station. It will be important to consider integration of any development with surrounding residential areas, and the Housing Zone.

3.62-3.63, page 119 – It should be clearly stated in the Plan that both the Mayor and London Boroughs need to seek the advice of, and work closely with, Network Rail when creating their Infrastructure Assessments and Infrastructure Delivery Plans. This is fundamental to capturing the needs of the network and infrastructure.

Policies E4 and E5 – It is requested that acknowledgement is made of the differences between Network Rail operational land, and land adjacent to the operational railway, and general employment land. The nature of the railway means that there are a number of factors such as type of use, type of operations and nature/characteristics of site, which can often mean that an employment designation is not suitable. It is, therefore, requested that flexibility is included in these policies to allow for a change of use should the current use impact on the safe and efficient operation of the railway.

Chapter 10 Transport – There is a distinct lack of reference in the whole document to Network Rail and specifically in Chapter 10. As mentioned above, Network Rail schemes need to be properly referenced within table 10.1, and Part D of Policy T3 needs to include delivery of upgrades to railway lines, station infrastructure and capacity. Currently the policies and supporting text within this section do not provide sufficient acknowledgement of the railway and rail infrastructure, nor do they go far enough in promoting both mitigation and enhancement improvements to the network. It is also requested that more reference is made to specific links between housing delivery and transport infrastructure and how this is related to the delivery of housing targets. This is currently severely lacking in the draft Plan.

Table 10.1, page 409 – There is a severe lack of information on Network Rail projects on this list. Specific reference should be made to development at stations, including the comprehensive development at stations, which include essential infrastructure investment and development, both of which are key to unlocking growth potential and effective delivery of the Plan. Network Rail requests further discussions with you on populating this table.

Table 10.1, page 409 – It is suggested that the ‘Heathrow Airport Southern Access’ schemes should be reclassified from a medium to high cost scheme.

Table 10.1, page 409 – The proposed scheme ‘Devolved suburban rail services to enable London suburban metro’ does not refer to any infrastructure interventions that point to a high cost scheme. It would be helpful if this was more clearly described.

Policy T7, page 430 – Freight and servicing: It would be helpful if there is reference here to include the potential for rail freight to support the capital’s needs (as noted in point 4 above).

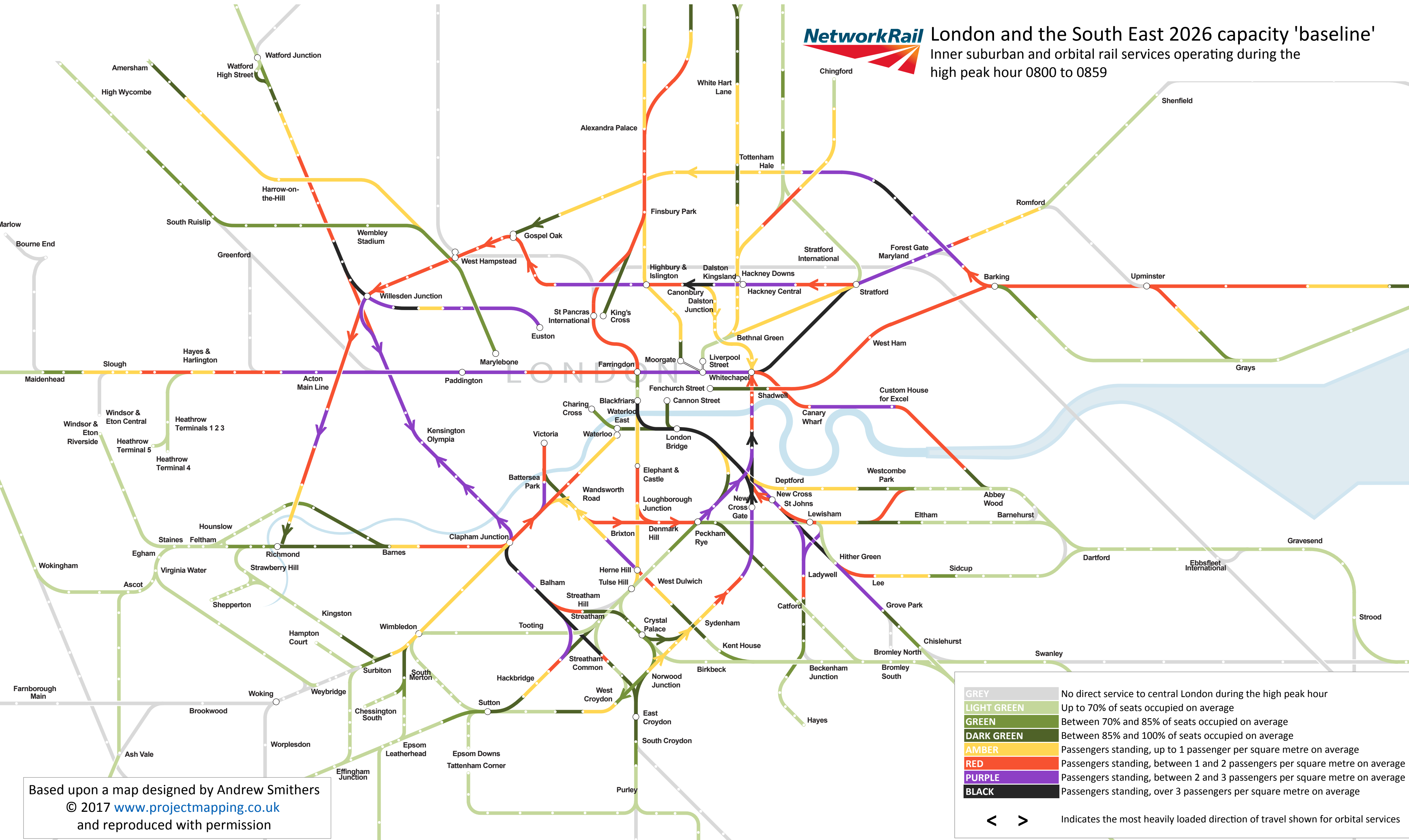
Policy T9, page 436 – The wording of the policy should be amended to include Network Rail in the process of ‘identifying a package of their strategically-important transport infrastructure’, as Network Rail possess vital information and data that will help inform this process.

11.1, page 446 – It should be noted that transport schemes in London are also delivered through nationally sourced rail enhancement funding. There is also an opportunity to make greater use of the Mayoral Community Infrastructure Levy (MCIL) to secure funding for schemes as was achieved for the Elizabeth Line. The opportunity to obtain funding also from developer contributions could be recommended here.



# London and the South East 2026 capacity 'baseline'

Inner suburban and orbital rail services operating during the high peak hour 0800 to 0859



GREY	No direct service to central London during the high peak hour
LIGHT GREEN	Up to 70% of seats occupied on average
GREEN	Between 70% and 85% of seats occupied on average
DARK GREEN	Between 85% and 100% of seats occupied on average
AMBER	Passengers standing, up to 1 passenger per square metre on average
RED	Passengers standing, between 1 and 2 passengers per square metre on average
PURPLE	Passengers standing, between 2 and 3 passengers per square metre on average
BLACK	Passengers standing, over 3 passengers per square metre on average

< > Indicates the most heavily loaded direction of travel shown for orbital services

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